

DWSRF/WPCSRF Responses to Public Comments

The DWSRF program received 49 requests for ARRA funding. A total of 32 communities have been made an offer to receive this funding for their projects. There were 14 communities that were not offered the funding as a result of the project scores using the ranking criteria and funding limits established. The remaining 3 projects were deemed ineligible to receive the funding since the primary purpose of the projects were to improve fire flow capabilities or provide system expansion to accommodate growth, or both. These scopes of work are not eligible to receive funding as required by the base DWSRF program requirements. DWSRF eligibility is a prerequisite requirement to receive ARRA funding.

The WPCSRF program received 40 requests for ARRA funding. A total of 29 communities have been made an offer to receive this funding for their projects. There were 9 communities that were not offered the funding as a result of the project scores using the ranking criteria and funding limits established. The remaining 2 projects were deemed ineligible to receive the funding. One of those projects was primarily for development of unoccupied ground which is ineligible for SRF funding. The other project was for replacement of individual on-site septic and drainfield systems which, although conceivably fundable through an intermediate public entity, are not eligible for a direct loan from the WPCSRF program. Neither of these two projects submitted the required SRF priority survey form.

During the 30 day public comment period, the DWSRF program received written letters of support for ARRA funding of their respective projects from 12 communities or their representatives. The WPCSRF program received numerous phone calls supporting various projects for consideration of ARRA funds.

At the public hearing held on March 20, 2009, 23 people gave oral testimony in support of 32 various drinking water projects and wastewater projects. Of those people who gave testimony, 5 additional comments were received. Two comments were made that suggested projects that would increase the scope of the work as a result of ARRA funding should be given additional consideration and ranked higher. DEQ thought that this was a worthwhile point, however did not believe that the ranking criteria should be changed after the draft criteria had been published unless the change could be evenly applied to all applicants. Since this aspect was not asked for or included in the applicants' Needs Surveys for requesting ARRA funding, it could not be applied fairly to everyone, so it was not implemented.

Another comment encouraged close scrutiny of project approvals to ensure that ARRA funding is available next year. Finally, one comment was given that suggested the SRF program(s) check the history for grant administrators and recognize positive qualifications.

Another comment encouraged DEQ to only consider awarding funds to those projects that were not already in progress in order to clearly create new jobs. DEQ had initially taken this same view point. However, the tight timelines established in the ARRA do not allow enough time for a project to proceed from conception through planning, design, environmental reviews, bidding, etc. Therefore, projects already well into the design process are the most logical ones to meet the required timelines.

There was a comment submitted at the hearing that asked that ARRA funds be allotted based on population. DEQ considered this strategy early on in the development of a funding strategy but felt that with this approach much of the funds would be allotted to only a few projects. Keeping with the intent of the ARRA, DEQ felt that it was most important to fund as many projects as possible, within reason, thus maximizing the creation and retention of jobs across the entire state.