



Division of Environmental and Financial Assistance Response to Public Comments

June 30, 2016

On May 25, 2016, Ohio EPA announced the beginning of a public comment period regarding the DRAFT 2017 Drinking Water Assistance Fund (DWAF) Program Management Plan. The comment period ended on June 27, 2016 with two public meetings. This document summarizes the comments and questions received in writing prior to June 27th, and during the public hearings.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format.

Project Specific Comments

As part of the DRAFT Plan, Ohio EPA includes a list of projects that are eligible for financial assistance during the 2017 program year. The listed projects are scored using several criteria. The final scores determine the potential for additional financial assistance in the form of principal forgiveness and/or a subsidized interest rate.

The Villages of Georgetown and Addyston submitted written comments regarding their respective project scoring. Also, the City of St. Mary's submitted written comments regarding their population estimates and how that relates to a lower interest rate.

Ohio EPA responded directly to those communities regarding their project specific issues.

U.S. EPA Program Comments

Comment 1: In order to attract larger systems into the program, the State should set a goal of marketing the fund to large systems as well as small systems.

Response: The goals stated in the DRAFT Plan are primarily programmatic. While we intend to continue to promote the program to both small distressed

communities and large ones as well, the marketing aspect of the program is not discussed in detail within the Plan itself because the approach frequently changes.

Comment 2: The State should make its intentions clear as to whether it intends to provide additional subsidies beyond the 20% that is required.

Response: The language used in the DRAFT Plan mirror the over-arching federal laws that dictates what we “must” provide and what we “may” provide in principal forgiveness. Currently, the total requests for principal forgiveness far exceed the minimum 20% required by law. How much of the additional 30% we will make available depends on project specific criteria.

Comment 3: Leveraging – What range of leveraging does the state think may be needed and when would this need to occur?

Response: We aren’t sure yet. For this DRAFT Plan, Ohio EPA has removed the maximum loan amount that can be requested. Based on financial modeling, we could theoretically fund all of the requests (est. \$360 million). The only limiting factor would be the amount of funds available during loan award. If more funds are needed, then we will initiate issuance of additional notes or bonds to cover the loans.

Comment 5: Does the state want to reserve the authority to transfer funds between SRFs in the future?

Response: We still reserve the authority to transfer funds between SRFs. Because Ohio EPA believes that the probability for actually invoking this authority is extremely low, we simplified the language in this DRAFT Plan.

Comment 6: How will you accommodate project applications that come in after the application deadline for lead issues?

Response: There is no application deadline for lead-related projects. Ohio EPA will accept nominations for planning loans throughout the year to conduct corrosion control studies and to map the location of lead service lines. We will also accept nominations for construction loans throughout the year to implement the recommendations of a corrosion control study or to replace lead service lines.

Comment 7: Is the additional subsidy for back-up power and asset management open to all applicants or just disadvantaged communities?

Response: All applicants.

Other U.S. EPA Comments

U.S. EPA made several general/administrative/grammar-like comments. Also, several requests for additional information and project updates were also included. Ohio EPA has addressed the grammar/typo comments, and we will follow-up with additional information in the near future for project updates.

End of Response to Comments