

June 15, 2016 (6/21/16) Board Meeting--Item 3
Drink Water Revolving Fund (DWSRF)
Deadline: 6/16/16 by 12:00 noon

Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
Transmitted via email only



Re: Comment Letter – June 21, 2016 Board Meeting – 2016 Drinking Water SRF Ir

Dear Ms. Townsend:

The Central Valley Salinity Coalition and the CV-SALTS Initiative appreciate the opportunity to comment on the Intended Use Plan (IUP) for the Drinking Water State Revolving Fund (DWSRF). CV-SALTS is a stakeholder led group that is developing the Salt and Nutrient Management Plan for the Central Valley Region. This group is made up of permitted dischargers, regulators, federal and state partners, as well as communities, environmental justice advocates, and others.

The Central Valley Salinity Coalition is supporting projects that address nitrate. In these discussions, it became clear that many significantly impacted disadvantaged communities that need access to DWSRF and Bond funding for addressing drinking water contaminants such as arsenic, chromium and nitrate may slightly exceed the 3,300 connection or 10,000 population limit. We urge the State Board to amend the IUP to delegate to the deputy director the flexibility to interpret these limits when applying the IUP including the award of principal forgiveness to ensure there is no delay in funding these critical projects. This is even more important where the population or connections include State prison facilities which should not be included in the totals. These facilities are noted as disadvantaged community places and they burden their region's water supplies and they discharge nitrates to groundwater.

Significant efforts are ongoing in the State merger smaller water suppliers into larger more capable suppliers to achieve economies of scale and more reliably provide safe water. We urge the Board to use the opportunity to document the existing practice of using the smallest community being merged and when assessing eligibility. This practice prevents two newly merged DAC entities with a population over 10,000 from being ineligible for grants and loan forgiveness.

We appreciate your consideration of this request in helping reduce the adverse water quality and economic impact of salt and nitrate in the Central Valley.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel B. Cozad".

Daniel B. Cozad
Executive Director
Central Valley Salinity Coalition, CV-SALT

