



May 10, 2018

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County of San Diego

The Honorable Felicia Marcus, Chair c/o Jeanine Townsend, Clerk to the Board State Water Resources Control Board, Division of Financial Assistance 1001 I Street, 24th Floor Sacramento, CA 95814

Subject: Comment Letter - June 19, 2018 Board Meeting - FFY 2018 CWSRF IUP

Dear Chair Marcus:

The San Diego County Water Authority (Water Authority) offers the following comments on the draft Clean Water State Revolving Fund Intended Use Plan (CWSRF IUP) for Federal Fiscal Year 2019:

The IUP articulates the Board's interest in establishing a new application prioritization protocol as a result of the significant increase in interest in CWSRF funding in recent years. Since application requests now exceed available funding by a considerable margin, developing a clear system—the 'Fundable List'—for managing the program is a laudable goal. Including application completeness as a Fundable List eligibility criterion makes sense, but a clear timeframe for meeting this milestone should be expressly included in the IUP, to facilitate understanding and collaboration among Board staff and project applicants. The Water Authority recommends that the CWSRF IUP specify that projects whose applications are complete by June 30th of the prior fiscal year be eligible for placement on the program's Fundable List.

In addition to establishing particular minimum requirements for eligibility, the Water Authority supports the Board's need for discretion in developing the Fundable List, so that projects' unique characteristics and scope of impact may be properly considered in the prioritization process. As an example, the Water Authority supports CWSRF funding for the Pure Water San Diego – Phase 1 project, which will significantly reduce our region's reliance on imported water, reduce discharges from the Point Loma Wastewater Treatment Plant ocean outfall, and rely primarily on renewable energy production to power the facility. Pure Water San Diego – Phase 1's application for CWSRF will be complete by June 30, 2018, and so the Water Authority requests that this project be placed on the Fundable List for SFY 2018-19.

Thank you for your time and consideration, and for the opportunity to comment. Should you have questions or need anything further regarding this matter, please contact Toby Roy at (858) 522-6743, or TRoy@sdcwa.org.

Sincerely,

Robert R. Yamada

**Director of Water Resources** 

Sent via Electronic Mail: commentletters@waterboards.ca.gov