



May 28, 2019

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Transmittal Via E-mail: commentletters@waterboards.ca.gov

**RE: Comment Letter – June 18, 2019 Board Meeting – SFY 2019-20 (FFY 2019)
CWSRF**

Dear Ms. Townsend:

On behalf of the Rural County Representatives of California (RCRC), I respectfully submit comments regarding the Clean Water State Revolving Fund (CWSRF) 2019-20 Intended Use Plan (IUP). RCRC is an association of thirty-six rural California counties, and our Board of Directors is comprised of one locally-elected Supervisor from each of our member counties.

We believe the CWSRF is a cost-effective way of capitalizing local water projects across the state. The CWSRF policy amendments adopted by the State Water Resources Control Board (SWRCB) on November 28, 2018 were an overall improvement that better manage the program. In particular, we appreciate SWRCB automatically including all Small Severely Disadvantaged Community (Small SDAC) and Small Disadvantaged Community (Small DAC) to the Fundable List without regard to priority score. We also view bridge financing as a valuable tool to help communities. And, we likewise appreciate that the definitions of Small DAC and Small SDAC are reasonable and consistent with state law.

In the last five years, voters have made significant investments into California's water supply and infrastructure. Proposition 1, the "Water Quality, Supply, and Infrastructure Improvement Act of 2014" and Proposition 68, the "California Outdoor Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access for All Act of 2018" were \$7.12 billion and \$4 billion general obligation bonds, respectively.

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However, we are extremely concerned with the impacts implementation of the new statewide accounting system, "FI\$Cal," has taken away from financing the CWSRF. As you know, application demand far exceeds available funding. Overall, Small DACs and Small SDACs will see a reduction of hundreds of millions of dollars in spite of recent momentous investments from voters. FI\$Cal implementation has siphoned as much as two-thirds of historic program funding away from needy communities.

We appreciate the wide distribution of funds that "Cut-Off Score – Scenario C" would provide to applicants in the draft IUP and encourage SWRCB's favorable consideration. Scenario C would meet funding targets and include a greater number projects across the state.

Thank you again for the opportunity to provide these comments on the Clean Water State Revolving Fund 2019-20 Intended Use Plan. If you have any questions, please contact me at (916) 447-4806 or mwarmerdam@rcrcnet.org.

Sincerely,

A handwritten signature in purple ink that reads "MaryAnn Warmerdam". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

MARY-ANN WARMERDAM
Senior Legislative Advocate