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May 28, 2019

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

Subject: Comment Letter – June 18, 2019 Board Meeting – FFY 2019 CWSRF IUP

Dear Ms. Townsend,

The California Municipal Utilities Association (CMUA), representing 42 public water utilities, appreciates the opportunity provide comments on the 2019-2020 Clean Water State Revolving Fund Intended Use Plan (CWSRF IUP) for the Federal Fiscal year 2019.

The Clean Water State Revolving Fund (CWSRF) is an important tool in promoting the public health of Californians through improving water quality. CMUA member agencies have utilized funding from the CWSRF to improve water quality within their service areas and regionally and hope to continue to do so in the future.

As noted by the Public Policy Institute of California, water reuse/water recycling has incredible potential for use in California's Mediterranean climate.¹ CMUA is concerned the proposed CWSRF IUP's reduction in maximum grant funding/principal forgiveness for Water Recycling Funding Program from \$15,000,000 to \$5,000,000 will discourage water agencies from developing recycled water projects, particularly larger, more complex projects that could provide regional benefits. While CMUA understands Proposition 1 grant funding may be near exhaustion, CMUA believes funds from Proposition 68² should be utilized to maintain the previous maximum level of \$15,000,000³. Maintaining the cap at this level will incentivize water agencies to invest in water recycling while preserving the Division of Financial Assistance's authority to partially fund projects.

CMUA thanks the State Water Resources Control Board and its staff for consideration of these comments. If you have any questions, I can be reached at (916) 326-5806.

Sincerely,

Jonathan Young
Regulatory Advocate
California Municipal Utilities Association

¹ [PPIC Issue Brief: Water Reuse Potential in California](#)

² https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB5

³ [Water Recycling Funding Program Guidelines](#)