



## San Diego County Water Authority

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May 22, 2017

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

#### MEMBER AGENCIES

Carlsbad  
Municipal Water District  
City of Del Mar  
City of Escondido  
City of National City  
City of Oceanside  
City of Poway  
City of San Diego  
Fallbrook  
Public Utility District  
Helix Water District  
Lakeside Water District  
Olivenhain  
Municipal Water District  
Otay Water District  
Padre Dam  
Municipal Water District  
Camp Pendleton  
Marine Corps Base  
Rainbow  
Municipal Water District  
Ramona  
Municipal Water District  
Rincon del Diablo  
Municipal Water District  
San Dieguito Water District  
Santa Fe Irrigation District  
South Bay Irrigation District  
Vallecitos Water District  
Valley Center  
Municipal Water District  
Vista Irrigation District  
Yuima  
Municipal Water District

#### OTHER REPRESENTATIVE

County of San Diego

**Subject: San Diego County Water Authority Comments on the Draft FY17-18 Clean Water State Revolving Fund (CWSRF) Intended Use Plan (IUP)**

Dear Chair Marcus and Members of the Board,

Thank you for the opportunity to comment on the State of California's Clean Water State Revolving Fund (CWSRF) draft Intended Use Plan (IUP) for fiscal year (FY) 2017-2018. The Water Authority is the wholesale water supplier for the San Diego region, with 24 retail member agencies that provide water to 3.3 million residents in San Diego County. The county is made up of diverse communities that would benefit from financial assistance available through the CWSRF.

The San Diego region currently has fourteen recycled water and potable reuse projects awaiting funding on the CWSRF Project List. Recycled water and potable reuse are essential components of our region's long term water supply reliability and sustainability goals. The next increment of water supply to reduce reliance on imported sources and ensure drought-resilient supplies will come from these projects. For some of our member agencies, CWSRF is a critical source of funding for these projects. We support WaterReuse California's recommendations on the Draft FY 17-18 CWSRF IUP to secure funds for waitlisted recycled water and potable reuse projects. If the CWSRF Program adopts a prioritization process for project funding, we recommend a balanced approach that would allow broad issuance of funding to agencies of various sizes (small, medium and large) while ensuring selection of projects that increase the supply of recycled water in California.

Recently, the State Water Board adopted Resolution No. 2017-0012 on March 7, 2017, outlining a comprehensive response to climate change for all the Water Boards' activities and programs. Resolution No. 2017-0012 directed the State Water Board staff to take several actions that affect the CWSRF program IUP. Specifically:

- By July 1, 2017, include climate change mitigation and adaptation objectives in the IUP.

Jeanine Townsend

May 22, 2017

Page 2

- By July 1, 2017, ensure that applications and environmental reviews for potential projects account for impacts related to climate change, including potential effects of climate change on the viability of funded projects.

We request that any climate change mitigation and adaptation objectives considered for inclusion in the CWSRF IUP FY 17-18 be released for public review and comment. Climate change mitigation and adaptation can be accomplished through reducing energy intensity in the water sector by replacing fossil fuels with renewable energy, improving efficiency and reducing water consumption. However, several San Diego region projects listed as potential applicants for CWSRFs can require greater energy inputs than traditional supply sources. These same projects also provide the highest water supply reliability and reduce the San Diego region's vulnerability to drought and shortages due to climate change.

Finally, the Water Authority would also like to request clarity on the definition of "viability" in the second bullet. It is unclear whether the term refers to the project's ability to mitigate and adapt to climate change or to improve water quality and public health.

Again, we appreciate the opportunity to comment on the Draft FY17-18 CWSRF IUP. Please contact me with any questions at (858)522-6743.

Sincerely,

A handwritten signature in blue ink that reads "Toby Roy". The signature is written in a cursive, flowing style.

Toby Roy  
Water Resources Manager

Sent via email to: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)