



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON HYDE
Chief Engineer and General Manager

April 22, 2015

Mr. Zaffar Eusuff
California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
Post Office Box 942836
Sacramento, CA 94236

Dear Mr. Eusuff:

Comments on the 2015 IRWM Grant Solicitation Draft Guidelines and PSP

Thank you for the opportunity to provide comments on the Draft Guidelines and PSP for the 2015 IRWM Grant Solicitation. The Santa Clarita Valley Sanitation District (SCVSD) has been involved in the IRWM process for many years, and as such, we offer one comment for your consideration based on our experience with the program.

Currently, page 34 of the 2015 IRWM Grant Solicitation PSP states that "State Revolving Funds (SRF) are considered State funds; therefore, cannot be used as funding match...". On the contrary, we note that page 9 of the Draft Proposition 1 Water Recycling Funding Program Guidelines that were recently released for public review states that "Repayments of CWSRF financing may be used as all or part of the local match." It is true that initially, the SRF funds provided to a local agency are "State funds". However, these funds are actually loans, which are ultimately repaid by user fees; in other words, the loans must be repaid with local funds. For this reason, and to be consistent with another state grant funding program, it seems reasonable to allow SRF funding (i.e. repayments of CWSRF financing) to be considered part of the "local share" when calculating the match provided by the project proponent. Therefore, we request that DWR make that modification to the PSP for the 2015 IRWM Grant Solicitation.

Thank you for your consideration. If you have any questions, please feel free to contact Sharon Green of our staff at sgreen@lacsd.org or (562) 908-4288 x2503.

Very truly yours,

Grace Robinson Hyde

John H. Gullledge
Department Head

Financial Management Department

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