

2025-26 CWSRF IUP Public Comments

No.	Date of Comment	Commenter	Summary of Comments	SWRCB Staff Response to Comments	Comment Submitted by:
1	6/27/2025	City of Wheatland and Olivehurst Public Utility District (OPUD)	<p>The City of Wheatland and OPUD are requesting the State Water Board to allocate the full \$75 million in grant funding to support their regional wastewater consolidation project. This project will connect Wheatland’s aging and failing wastewater treatment facility to OPUD’s system, eliminating environmental risks to the Bear River and surrounding groundwater, and offering financial and operational benefits to both disadvantaged communities. The project is shovel-ready, has secured over \$80 million in local funding commitments, and aligns with the State Board’s priority to support regionalization among disadvantaged communities.</p>	<p>Staff appreciate the comment. Under the current proposal, OPUD is eligible for up to \$75 million in grant funding, subject to grant availability.</p>	<p>Lisa McIntosh Mary Jane Griego</p>
2	6/30/2025	California Association of Sanitation Agencies (CASA) WateReuse CA (WRCA)	<p>CASA and WRCA strongly support the adoption of Loan Scenario E, which includes a \$50 million loan for the Town of Windsor’s biosolids project. They also advocate for maintaining and enhancing Clean Water program funding priorities in light of ongoing PFAS concerns and limited resources.</p> <p>Loan Scenario: Support Scenario E Emerging Contaminants Funding: Support retaining future EC funding within the Clean Water SRF; encourage development of a Clean Water-specific EC program if new federal funds become available Water Recycling Funding Program (WRFP):</p> <ul style="list-style-type: none">• Support maintaining the \$15 million grant cap to maximize broad distribution• Support restoring funding to projects previously affected by state budget changes• Support establishing a large project funding track to accommodate high-cost projects within limited funding constraints	<p>Staff appreciate the comment. After further evaluation, DFA has decided to propose Scenario E to the Board to allow funding for the Town of Windsor project.</p>	<p>Jared Voskuhl and Brenley McKenna</p>
3	6/30/2025	California Stormwater Quality Association	<p>CASQA supports the \$20 million in PF allocated to stormwater projects and urges continued and increased investment in future years. They emphasize the growing demand for stormwater infrastructure funding. CASQA also highlights that the current CWSRF application is not well-suited for stormwater projects, creating barriers to access.</p> <p>CASQA requests the following:</p> <ul style="list-style-type: none">• FY 2026–27 IUP: Adapt the CWSRF application process to better support stormwater projects, including stormwater-specific instructions, technical assistance, and a Call for Stormwater Projects.• Long-Term Improvements: Develop a dedicated stormwater application and scoring framework.• Future Funding Increases: Increase PF funding and raise the per-project cap as demand grows, consistent with State water supply and climate resilience goals.	<p>Staff appreciate the comment. Staff will review the application process to improve guidance for applicants submitting stormwater project funding requests. Proposition 4 stormwater appropriations are expected to be administered through a separate solicitation process, which will open up more opportunities to tailor to stormwater projects.</p> <p>Staff will continue to evaluate the per-project limit for principal forgiveness to align with the State’s water supply and climate resilience goals, as well as based on funding availability.</p>	<p>Karen Cowan</p>
4	6/30/2025	City of San Diego	<p>The City requests increasing the estimated CWSRF loan funding for the Chollas Green Infrastructure and Storm Drain Improvements project (Project No. 8654-110) from \$4 million to \$32 million—a \$28 million increase. To offset this change without impacting the overall IUP funding balance, the City requests reducing the Los Peñasquitos Lagoon Restoration Phase I project (Project No. 8504-110) loan allocation from \$50 million to \$22 million—a \$28 million decrease. The City emphasizes that it does not seek to alter the \$5 million in estimated principal forgiveness currently allocated to each project.</p>	<p>Thank you for your comment. DFA has updated the Fundable List to reflect the requested changes.</p>	<p>Sumer Hasenin</p>

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5	6/30/2025	Community Water Center Leadership Counsel for Justice & Accountability Central California Environmental Justice Network Clean Water Action	Community Water Center and partners submitted eight recommendations to improve access to CWSRF funding for small, rural, and disadvantaged communities: 1.Support Higher Grant/PF Limits: Commend the increase in PF for small communities and urge clear communication of these changes. 2.Øse Full 4% Admin Allowance for Technical Assistance (TA): Recommend allocating the full federal admin set-aside to support TA, especially for septic-to-sewer projects. 3.Ødedicate 10% of Prop 4 Funds to TA: Support using Prop 4 for TA and urge prioritization of rural and disadvantaged communities. 4.Øorecast 3–5 Years of Funding: Recommend multi-year funding projections to aid long-term planning and transparency. 5.Ømprove and Report Performance Metrics: Urge faster disbursement (100% in 60 days) and annual public reporting on all metrics. 6.Øreate TA Tracking Platform: Request a public dashboard to track wastewater TA deployment and progress. 7.Øund Laterals and Septic Decommissioning: Ensure these private property costs are fully covered for SCWW projects. 8.Ørioritize Districts in Receivership: Recommend targeted support for districts under receivership due to urgent public health risks. These changes aim to ensure equitable access and improve outcomes for the communities most in need.	Thank you for your comment. The SRF Admin Allowance is necessary to fund DFA staff to support program administration and provide funding to applicants. Currently, 10% of Prop 4 for wastewater is already proposed to be dedicated to TA. Staff will evaluate your recommendation on a 3–5 year funding forecast, performance metrics, and tracking platform as part of our ongoing efforts to improve program transparency. Laterals are already eligible to the extent allowed by the funding source. Districts in receivership likely fall into the "compliance" category currently being prioritized for funding. Staff will reach out to clarify if there are concerns with specific projects.	Erick Orellana Nataly Escobedo Garcia Nayamin Martinez Jennifer Clary
6	6/30/2025	Eastern Municipal Water District	EMWD supports Cut-Off Score Scenario D, as it includes their projects and strikes a practical balance between funding needs and project readiness. EMWD also supports the proposed grant funding requirements for large-scale water recycling or reuse projects, especially the definition of large-scale as delivering at least 10,000 AFY of recycled water, and the flexibility for phased construction. These provisions help maximize both cost-effectiveness and funding opportunities.	Staff appreciate the comment.	Matthew Bates
7	6/30/2025	Sacramento Area Sewer District (SacSewer)	SacSewer supports the following: <ul style="list-style-type: none">Restoring the WRFPP construction grant cap to \$15 million, andImplementing the large-scale water recycling provisions established under Proposition 4 (2024).	Staff appreciate the comment.	Christoph Dobson
8	6/30/2025	San Francisco Public Utilities Commission	SFPUC supports the 2025-26 CWSRF IUP, particularly its emphasis on funding predictability and sustainable capacity. They endorse the continued use of project scoring and funding cutoffs, which help applicants better plan and assess eligibility. SFPUC also supports restoring the WRFPP construction grant cap to \$15 million and allowing additional WRFPP funding for previously approved projects that had reductions. Additionally, SFPUC requests correction of a scoring error for their Lower Alemany Area Stormwater Improvement Project, which they assert should have a total priority score of 15 instead of 13.	Thank you for you comment. After further evaluating, staff concur with the scoring change and has reflected this in the IUP.	Ronald Flynn
9	6/30/2025	[LATE] Self-Help Enterprises	“Small Disadvantaged Community” refers to two conditions but only lists one bullet point. The second bullet point should likely be “A sewer rate of more than four percent (4%) of the community’s MHI”. Support increasing project maximums and perconnection maximums. In Table 8, make sure how much funding is remaining vs. allotted to projects Provide a timeline of when 2024 GGRF and Prop 4 funding may be available through TA providers. Support DACs not being required to comply with federal environmental crosscutters. Establish an Emergency Wastewater Grant program.	Thank you for your comments. The 2nd bullet for "Small Disadvantaged Community" has been removed to streamline determination as it historically hasn't been in use. Timing of funding availability is subject to State budget. Staff are actively monitoring budget updates and will communicate with stakeholders when there's more information. Setting up an Emergency Wastewater Grant program requires specific eligible funding to be available, with reduced requirements to expedite funding. As an alternative, requests for emergency funding can be made from the Cleanup and Abatement Account: https://www.waterboards.ca.gov/water_issues/programs/grants_loans/cleanup_and_abatement.html .	Thomas Collishaw
10	[Late]	Metropolitan Water District of Southern California & Los Angeles County Sanitation Districts	Consider increasing grant maximum to \$30 million per phase for large-scale projects. Add large-scale projects to the Fundable List. Clarify the costs allowed under the Large-Scale Construction Grants category includes planning and design.	Thank you for your comments. Large-scale projects with a complete application are shown on the Fundable List. Our staff will reach out to provide more assistance on your project specifically.	Deven Upadhayay Robert C. Ferrante