



PALMDALE WATER DISTRICT

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May 1, 2017

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

RE: COMMENT LETTER – JUNE 20, 2017 BOARD MEETING – FFY 2017 CWSRF IUP

Dear Chair Marcus and Executive Director Howard:

We appreciate the opportunity to comment on the above-referenced Draft CWSRF IUP. We fully understand the difficulty in managing programs when expressed needs are much greater than the available resources. However, there can be at least one major improvement to the Draft CWSRF IUP. Specifically, better adherence to the State Board's Strategic Goal 6 – Enhancing consistency across Water Boards.

The Palmdale Water District (PWD) is a participant in two water recycling projects submitted for funding under the Proposition 1 Water Recycling Program. Both projects have completed applications and reviews are pending. PWD is the sole sponsor of the Palmdale Regional Groundwater Recharge and Recovery Project and is a partner in the Palmdale Recycled Water Authority (PRWA), a JPA along with the City of Palmdale, which is sponsoring the Recycled Water Line Phase 2 Project. The two projects are listed below.

Palmdale Groundwater Recharge and Recovery Project

Project Number 8102-110
Type of Project: Water Recycling
Amount of Recycled Water: 6,500 AF
Total Cost: \$55,000,000
Grant Request: \$15,000,000
CWSRF Loan Request: \$40,000,000

Recycled Water Line Phase 2 Project

Project Number 8125-110
Type of Project: Water Recycling
Amount of Recycled Water: 500 AF
Total Cost: \$7,500,000
Grant Request: \$2,625,000
CWSRF Loan Request: \$4,875,000

The District is concerned that water entities located in Region 6 (Lahontan Regional Water Quality Control Board) appear to be at risk in the future of not receiving grant funding for the water recycling projects. We have reviewed the Draft April 20, 2017 Intended Use Plan and provide a summary table to highlight this concern.

Ms. Jeanine Townsend,
Clerk to the Board
State Water Resources Control Board

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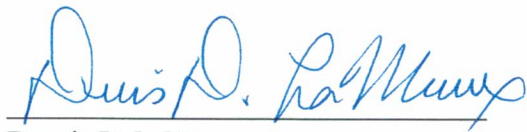
May 1, 2017

Region No.	Number of Projects in Each Region			
	Projects from January 2017 IUP Update	Projects Identified in April 20, 2017 IUP		
		Group 1	Group 2	Group 3
1	1	0	1	3
2	1	0	7	13
3	1	0	2	4
4	4	0	1	7
5	7	0	6	18
6	0	0	0	4
7	0	0	1	2
8	0	0	4	21
<u>9</u>	<u>0</u>	<u>2</u>	<u>1</u>	<u>10</u>
Totals	14	23	82	82

The District requests that an equitable allocation of projects among the Regions be made and that projects located in Region 6 be allocated a fair share of grant funding and a low interest CWSRF loan. In addition, the District anticipates providing similar oral comments at the June 20th State Water Board Meeting in Sacramento.

Thank you again for the opportunity to provide comments. Please feel free to contact us at 661-456-1017 or dlamoreaux@palmdalewater.org if you have any questions.

Very truly yours,



Dennis D. LaMoreaux,
PWD General Manager
PRWA Executive Director



Robert E. Alvarado,
President, PWD Board of Directors

JR/DDD/dd

cc: State Senator Scott Wilk, 21st Senate District
Assemblyman Tom Lackey, 36th Assembly District

Palmdale Water District Directors
Matt Knudson, PWD Assistant General Manager
James Riley, PWD Engineering and Grant Manager

PRWA Directors
James Purtee, City Manager, City of Palmdale
Michael Mischel, PRWA Assistant Executive Director and Director of Public Works, City of Palmdale