



June 21, 2019

Arielle Gerstein
Water Infrastructure Division
Office of Wastewater Management
4201-T
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Subject: Docket No. EPA-HQ-OW-2016-0178

Dear Ms. Gerstein:

Thank you for the opportunity to provide comments on the proposed Letter of Interest and Application for "SWIFIA," which was established by America's Water Infrastructure Act of 2018 to streamline access to financing through the Water Infrastructure Finance and Innovation Act (WIFIA) program for the State Revolving Funds (SRFs).

The Council of Infrastructure Financing Authorities (CIFA) is a national not-for-profit organization that represents state agencies that implement the Clean Water and Drinking Water State Revolving Funds, the nation's premier programs for providing low-cost financing of water infrastructure that protects public health and the environment.

CIFA has three recommendations.

First, the annual appropriation for SWIFIA should be allocated on a pro rata basis to all SRF applicants. The allocation process should include provisions to ensure timely expenditure of funds.

Second, all SRFs that meet the eligibility requirements for the capitalization grant should be automatically eligible for a SWIFIA loan and all agencies who participate in administering the SRFs should be allowed to apply for SWIFIA financing. Allowing all SRFs to apply would eliminate the need for a Letter of Interest.

Third, SRFs already provide the U.S. Environmental Protection Agency (EPA) with much of the data and documentation required by the proposed SWIFIA Application, including the Intended Use Plan, Grant Agreement, Annual Report, Clean Water Benefits Report (CBR), Project Benefits Report (PBR), and reporting in the National Information Management Systems (NIMS).

Because EPA already has access to this information, the SWIFIA Application should be streamlined to consist of:

- Basic program and contact information,
- A description of how the SRF plans to use SWIFIA financing,
- The amount of the loan that is being requested, and
- Financial information, including the credit rating.

SWIFIA has the potential to increase and accelerate investment in water infrastructure that protects public health and the environment. Developing an application process that recognizes the unique, three-decade state-federal partnership of SRFs is critical to the success of SWIFIA.

Thank you again for your partnership and collaboration in developing an efficient and effective program for SRFs to access financing from WIFIA.

Sincerely,



Jeff Freeman
Executive Director, Minnesota Public Facilities Authority
CIFA President

CIFA Board of Directors, Officers:

Jeff Freeman, Minnesota Public Facilities Authority, President
Kim Colson, North Carolina Department of Environmental Quality, Treasurer
Jim McGoff, Indiana Financing Authority, Secretary
Mark Bennett, Arkansas Natural Resources Commission, Past President

CIFA Board of Directors:

EPA Region 1: Nate Keenan, Massachusetts Clean Water Trust
EPA Region 2: David Zimmer, New Jersey Infrastructure Bank
EPA Region 3: Brion Johnson, PENNVEST
EPA Region 4: Angela Knecht, Florida Department of Environmental Protection
EPA Region 5: Scott Campbell, Ohio Water Development Authority
EPA Region 6: Jeff Walker, Texas Water Development Board
EPA Region 7: William Carr, Kansas Department of Health and the Environment
EPA Region 8: Mike Perkovich, South Dakota Dept. of Environment & Natural Resources
EPA Region 10: Jeff Nejedly, Washington State Department of Ecology
Anne Burger Entekin, Hilltop Securities

cc: Andrew Sawyers, Office of Wastewater Management
Raffael Stein, Director, Water Infrastructure Division
George Ames, Chief, Clean Water State Revolving Fund Branch
Jorianne Jernberg, WIFIA Program Director