



November 26, 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 appreciates recognition by the U.S. Environmental Protection Agency (EPA) of the need for a different approach to WIFIA for SRFs. While most applicants to WIFIA are municipal utilities that are borrowing to finance specific infrastructure projects, SRFs are pooled loan programs that are borrowing to leverage their programs and increase the availability of funding for other borrowers. CIFA also appreciates the hard work and collaboration of the SRF EPA SWIFIA Work Group to build consensus around common-sense streamlining measures that will increase the efficiency and effectiveness of SRFs and WIFIA.

CIFA supports the proposed Letter of Interest and Application for SWIFIA and encourages EPA to continue to explore opportunities to further streamline the programs. Thank you again for your partnership.

Sincerely,

Kim H. Colson, PE
Director, Division of Water Infrastructure
North Carolina Department of Environmental Quality
CIFA President

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