



July 19, 2019

Andrew Sawyers, Director
Office of Wastewater Management
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Andrew:

Thank you for the opportunity to work collaboratively on implementation of the newly authorized program which allows Clean Water and Drinking Water State Revolving Funds (SRFs) to access financing from the Water Infrastructure Finance and Innovation Act (WIFIA), known as SWIFIA.

As a follow up to our official comment letter, the Council of Infrastructure Financing Authorities (CIFA) recommends the following process for allocating funds for SWIFIA on a pro rata basis:

- If total requests for funding are less than the annual appropriation, then all eligible SRF applicants would be awarded full funding of their loan request.
- If total requests for funding exceed the annual appropriation, then each eligible SRF applicant would receive a proportionate amount of the appropriation. For example, if the appropriation is \$5 million for reserves and SRFs, combined, apply for loans requiring \$10 million in reserves, then each SRF applicant would receive 50% of their requested amount, regardless of the amount requested.

Any additional requirements or qualifiers, including minimum funding levels or caps, would needlessly complicate the process.

Developing a clear and transparent process for allocating the annual appropriations is critical to the successful implementation of SWIFIA. CIFA would appreciate the opportunity to review and comment on the proposed allocation process before it is finalized.

Thank you again for your continued commitment to work collaboratively to successfully implement SWIFIA.

Sincerely,

Jeff Freeman
Executive Director, Minnesota Public Facilities Authority
CIFA President

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cc: Raffael Stein, Director, Water Infrastructure Division
Jorianne Jernberg, Program Director, WIFIA Program
Karen Fligger, Senior Project Manager, WIFIA Program
George Ames, Chief, Clean Water State Revolving Fund Branch