

September 30, 2020

Colorado Department of Public Health & Environment
Water Quality Control Division
4300 Cherry Creek Drive South
WQCD-B2
Denver, Colorado 80246

Via electronic mail: cdphe.wqcc@state.co.us

RE: CLEAN WATER AND DRINKING WATER STATE REVOLVING FUNDS

Dear Water Quality Control Division, Water Resources and Power Development Authority, and Division of Local Government:

WaterNow Alliance and Colorado WaterWise appreciate the opportunity to provide comments on the draft Intended Use Plans (IUPs) for the Clean Water and Drinking Water State Revolving Funds. WaterNow is a nonprofit network of [600+ local water leaders](#) in 39 states—including 120 members in Colorado—advancing sustainable, affordable, and climate resilient water strategies in their communities. We have reviewed the draft IUPs and are encouraged that the plans identify several Green Project Reserve eligible projects and allocates funding for sustainable, green stormwater infrastructure projects. Colorado WaterWise (CWW) is a nonprofit membership organization representing the [Colorado water conservation community](#). CWW addresses the state's water challenges by improving water efficiency through diverse community connections, innovative solutions and valuable member resources.

Water use efficiency and conservation, and other onsite installations and technologies distributed widely across a community such as green stormwater infrastructure, watershed restoration, lead line replacements and more, supplement, extend and serve the same functions as more conventional, centralized water supply infrastructure. These [distributed approaches](#) are the exact types of projects meant to receive SRF funding through the [Green Project Reserve](#). Localized solutions are also often less expensive than larger public works projects keeping rates affordable, while building local resilience to disasters and ability to withstand shifts resulting from climate change. Critically, green and distributed strategies provide lasting economic benefits, including near-term permanent local green jobs and local economic development. Distributed water management strategies also go a long way to address water equity issues around access to clean water and more affordable rates, and provide other [co-benefits](#) including improved [public health](#), energy efficiency, improved air quality, reduced greenhouse gases, increased open space, increased property values and reduced crime.

As an important step in funding these localized, sustainable water solutions through the SRF, we value that the Water Pollution Control IUP prioritizes green project reserve eligible projects by allocating up to 40 points in the prioritization scoring for projects with at least 20% green components. And we appreciate that green projects are also encouraged by Colorado's commitment to reduce loan interest rates for projects with eligible green costs.

These elements could be even further strengthened. ***We recommend that the Water Pollution Control IUP expressly identify the broad range of categorically eligible green projects***, which include but are not limited to: water conservation incentive programs (e.g., rebates), retrofit of water efficient devices (e.g., plumbing fixtures and appliances), water audits and water conservation plans, retrofit or replacement of landscape irrigation systems with more efficient systems (e.g., moisture and rain sensing controllers), constructed wetlands, sustainable landscaping and site design, street tree/urban forestry, and practices that mimic natural hydrology. In particular, these localized infrastructure investments are most efficiently made in the form of subsidies, financial incentives and rebates for consumers, including private businesses, commercial, industrial and institutional enterprises, residences, and other public entities (such as local parks, schools, transportation agencies, etc.). EPA identifies [these strategies, as well as many others](#), as eligible projects. Encouraging and enabling local water utilities to access SRF funding to scale investments in these vital incentive programs advances the purposes of the Green Project Reserve, and represents investments in strategies that supplement and extend the life of critical built infrastructure. By highlighting the full range of eligible projects in the IUP, Colorado will likely expand the types of green projects receiving SRF funds and, as a result, increase water use efficiency and integrated water management statewide.

We acknowledge that the Green Project Reserve is not required for the Drinking Water SRF. Colorado is, however, committed to [“\[r\]educe overall future water needs through cost-effective water efficiency measures.”](#) among other conservation goals. Providing SRF support for local drinking water agencies’ water use efficiency and conservation programs is crucial to meeting this commitment. ***Thus, we recommend that the Drinking Water IUP include a Green Project Reserve element consistent with the Water Pollution Control IUP that expressly identifies the broad range of categorically eligible green projects.***

Localized water infrastructure has enormous potential to not only sustainably manage our water resources now and for future generations, but to also foster long-lasting economic recovery for Colorado communities facing critical needs for jobs and renewal. We appreciate your consideration of our recommendations and look forward to working with you to transform the nation’s water infrastructure to secure our water future. Please feel free to contact me by email at cak@waternow.org or by phone at 415-813-8044 if you have any questions.

Sincerely,



Caroline Koch
Water Policy Director
WaterNow Alliance



Lyndsey Lucia
Co-Chair
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