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Dear Mr. McCurdy:

Thank you for this opportunity to provide written comment on MA DEP's Proposed Project Selection Criteria Modifications for the Clean Water State Revolving Fund (CWSRF) Loan Program for calendar year 2011 Intended Use Plans. On behalf of Clean Water Action's 50,000 members in Massachusetts; my role as Commissioner on Governor Patrick's Water Infrastructure Finance Commission; and the additional organizations signed on below, please accept these comments and suggested adjustments to MA DEP's Project Selection Criteria.

While we are pleased to see high point scores awarded to projects in the "Energy Efficiency and Renewable Energy" category under EPA's 20% Green Reserve Projects requirements, it is critical not to disadvantage the other three categories of projects under the Green Reserve Project program. These other three categories are:

1. Water-efficiency,
2. Green infrastructure, and
3. Environmentally innovative projects (decentralized wastewater facilities)

We urge MA DEP, in the strongest possible terms, to give the same point advantage to these three categories as it has chosen to give to the Energy Efficiency and Renewable Energy category. As the draft 2011 Project Evaluation Form stands currently, up to a total of 40 points can be given for combined Energy Efficiency and Renewable Energy project components (Items 50 and 51), while only 2 points can

be given for Innovative and Alternative Technology (Item 47.) There is currently no point award indicated for any other Green Project, which includes Water Efficiency and Green Infrastructure components (Item 54).

EPA provides that:

Congress' intent in enacting the Green Project Reserve is to direct State investment practices in the water sector to guide funding toward projects that utilize green or soft-path practices to complement and augment hard or gray infrastructure, adopt practices that reduce the environmental footprint of water and wastewater treatment, collection, and distribution, help utilities adapt to climate change, enhance water and energy conservation, adopt more sustainable solutions to wet weather flows, and promote innovative approaches to water management problems.

We believe that the weighted focus towards only one of the four Green Project Reserve categories will neither effectively lead infrastructure in the Commonwealth toward the above-stated goals, nor most efficiently solve our water needs while preserving our water and energy resources as well as the economies and character of our communities.

Massachusetts has great potential to mirror the administration's assertive energy efficiency and renewable energy progress in these other innovative sectors. Not only do projects that fall into the other three categories help to restore surface and groundwater flows, restore ecological habitats, reduce the effects of climate change, restore natural water cycles, and reduce the use of vast quantities of potable water for non-potable needs, but these projects can also put MA at the forefront of clean-tech development and investment, and create new sectors of skilled green jobs.

We greatly applaud the efforts and outcomes of DEP and EPA's joint *Massachusetts Energy Management Pilot Program for Drinking Water and*

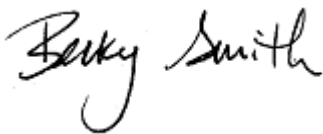
*Waste Water Case Study*, and believe the case study's approach to be a fantastic model for helping communities move towards sustainability and cost savings within their water utilities. We understand that these Energy Efficiency project had some additional subsidization such as principle forgiveness through SRF funds, and also believe that this should be replicated for the remaining three categories of Green Reserve Projects.

We understand that DEP does not regard its role as being prescriptive to communities about which types of technologies they choose in addressing their water and wastewater needs. Nevertheless, the state has established pilot projects and in-the-field demonstration and education through programs such as *Massachusetts Energy Management Pilot Program for Drinking Water and Waste Water Case Study*. It is clear in the draft language which is subject of today's hearing that these Energy Efficiency and Renewable Energy project components will also enjoy very high point scoring capacity for SRF funding. We are simply asking for similar strategies to help drive demand for additional types of forward thinking projects throughout the state across all four categories of Green Reserve Projects.

Finally, when assigning point scores to projects applying both under the Green Project Reserve and otherwise, we encourage more rigorous evaluation of grant and loan applications to establish whether alternatives to big-pipe and big-energy technologies were given full consideration.

Again, thank you for this opportunity to testify and provide comments in regards to these very important funding criteria, which will shape the future of the Commonwealth.

Sincerely,





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