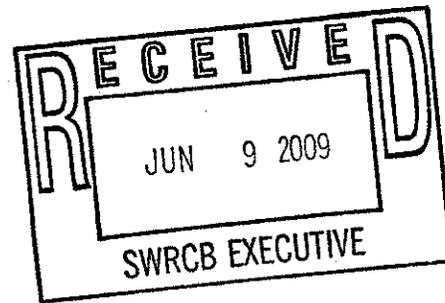




American Rivers
Thriving By Nature

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I St., 24th Floor
Sacramento, CA 95814



RE – ARRA Subsidy

Dear Ms. Townsend,

American Rivers is a national non-profit conservation organization dedicated to protecting and restoring healthy natural rivers for the benefit of people, fish and wildlife. American Rivers has over 65,000 supporters nationwide and has offices around the country, including a regional office in California. We are pleased to submit the following comments in support of the proposed resolution to allocate subsidized funds from the American Recovery and Reinvestment Act (ARRA) to expanded use projects including urban stormwater, as well as several additional recommendations.

In passing the ARRA, Congress provided the United States with a unique opportunity to move towards a new vision for water management by investing in sustainable green infrastructure and water efficiency. Such an investment will stimulate the economy, create good, 'non-offshorable' jobs, and protect communities from the increasingly extreme droughts and floods that will accompany climate change. In this time of economic instability and soaring deficits, it is important that we invest in solutions that do more with less and address a multitude of problems. Green infrastructure has proven to be a cost-effective way to not only reduce stormwater runoff, sewer overflows, and flooding, but also protect our communities from the effects of droughts and help secure our water resources for future generations. The ARRA-mandated 20% set-aside for these types of projects (the "green project reserve") within the Clean Water and Drinking Water State Revolving Funds (SRF) signaled this important shift toward more sustainable approaches.

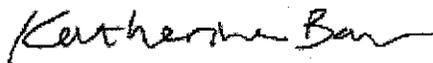
Although green infrastructure and water efficiency projects are both cost-effective and provide multiple benefits, they cannot be paid for by the user fees and other immediate repayment streams that typically fund water infrastructure investments. For this reason, American Rivers advocates providing additional subsidization to these projects. Consequently, we support the State Water Resources Control Board's proposed resolution to spend half of California's remaining subsidy funds on expanded use projects with a priority for urban stormwater. We especially encourage that the state reopen the process to allow for submittal of additional innovative projects. However, we do recommend that the state prioritize green infrastructure or low impact development

approaches over structural approaches. Green infrastructure approaches work to protect, restore and replicate an area's natural hydrology and are effective at reducing pollutants and offsite runoff in addition to being cost-effective. California should provide criteria for the remaining list to prioritize these approaches in addition to readiness to proceed to construction.

Finally, priority for the subsidy should also be given to water efficiency, which is missing from the current proposal. Water efficiency is the proven, most cost-effective, and reliable source of water supply. At a time when population growth as well as climate change stresses our water resources, it is critical that we invest in water efficiency to ensure water security for our communities – human and natural. ARRA prioritizes water efficiency through the green project reserve and, in addition, expands the scope of eligible water efficiency projects to include programs such as rebates for residential utility customers. Given both the change in the scope of eligible activities as part of the ARRA as well as California's serious water supply needs that can be addressed through water efficiency, we strongly recommend that the State Water Resources Control Board reopen the process to allow for submittal of additional water efficiency projects and develop criteria that would prioritize water efficiency projects that secure water supply for California.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Katherine Baer".

Katherine Baer
Senior Director, Clean Water Program