



ALLIANCE *for the*
GREAT LAKES

February 22, 2021

The Honorable Peter A. DeFazio
Chairman, Committee on Transportation and
Infrastructure
U.S. House of Representatives
Washington, DC 20515

The Honorable Grace F. Napolitano
Chairwoman, Water Resources and
Environment Subcommittee
U.S. House of Representatives
Washington, DC 20515

The Honorable Sam Graves
U.S. House of Representatives
Washington, DC 20515

The Honorable David Rouzer
U.S. House of Representatives
Washington, DC 20515

Dear Chairman DeFazio, Subcommittee Chairwoman Napolitano, Congressman Graves and
Congressman Rouzer:

The Alliance for the Great Lakes (“the Alliance”) appreciates the opportunity to express its support for robust increases in funding for critical Clean Water State Revolving fund and funding for other wastewater and stormwater infrastructure programs.

As the largest and oldest citizens' environmental organization dedicated to the protection of North America's Great Lakes, the Alliance commends the committee's bipartisan recognition of the importance of increased funding for our nation's wastewater and stormwater infrastructure.

The entire nation, and the Great Lakes region in particular, are facing a water infrastructure crisis. Aging water infrastructure and decades of declining federal investment have resulted in the inability of our current infrastructure to meet the needs of the people and the goals of the Clean Water Act. This situation has been aggravated by the challenges of a changing climate and the adverse effects of the COVID-19 pandemic on the water sector, which in turn, has led to losses in ratepayer revenue nationwide and severely and disproportionately impacted low income households and communities of color. Expectedly, planned investments in infrastructure upgrades and maintenance are no longer

being prioritized by many utilities. Without federal funding to make up the difference, these utilities may end up raising rates, worsening existing affordability challenges. Addressing these issues will require considerable financial resources; in the Great Lakes region alone, at least \$80 billion is needed over the next 20 years to improve, upgrade, and repair failing wastewater and stormwater systems.

Furthermore, over 70 percent of the United States' combined sewers which collect both sewage and stormwater runoff, are in the Great Lakes region. Every year, billions of gallons of raw or poorly treated sewage are dumped into the Great Lakes due to combined sewer overflows during heavy rain events. This causes many beach advisories and beach closures and puts public health at risk. Failing infrastructure is also a major contributor to the occurrence of sewage backups in homes and flooding of neighborhoods, creating serious economic and health consequences for families.

Increasing investment in our water infrastructure would not only protect public health but also allow for necessary infrastructure upgrades to improve the resiliency of our communities, reduce maintenance and operational costs, and create good paying local jobs during this economic crisis. In developing the legislation to establish and authorize infrastructure funding programs, the As a member of the Clean Water for All Coalition, the Alliance echoes its requests in our own and urges the Committee to make the following investments in our nation's clean water systems:

- \$10 billion per year for the Clean Water State Revolving Fund (CWSRF).
- \$400 million per year for the Sewer Overflow and Stormwater Reuse Municipal Grants Program.
- \$200 million per year for grants to publicly owned treatment works to implement a pretreatment standard or effluent limitation for per- or polyfluoroalkyl (PFAS) developed by the EPA.
- \$50 million per year for a new Low-Income Decentralized Wastewater Grant Program.
- \$20 million per year for a new Clean Water Infrastructure Resiliency and Sustainability Program, which would help increase the resilience of publicly owned treatment works to natural disasters and climate change.
- \$10 million per year for a new Small Publicly Owned Treatment Works Water and Energy Efficiency Grant Program.
- \$5 million per year for the Water Infrastructure Workforce Development Program.
- \$50 million per year for technical support to help utilities in rural, small, tribal, and economically disadvantaged communities access available federal infrastructure funding.

Additionally, we recommend that the legislation developed by the Committee go beyond funding alone to incorporate necessary policy reforms to the CWSRF and other key infrastructure programs. The Alliance recommends that the legislation:

- Require states to provide at least 20 percent of the annual Clean Water State Revolving Fund capitalization grant to disadvantaged communities in the form of grants rather than loans (“additional subsidization”), and raise the current cap on additional subsidization beyond the current 30 percent maximum.
- Direct states to provide at least 20 percent of the annual CWSRF capitalization grant to projects that incorporate green infrastructure and other nature-based solutions that provide social, economic, and environmental benefits to communities.
- Require and fund a study analyzing the historical distribution of federal funds to low income, rural, and minority communities, as well as communities of indigenous peoples, under Clean Water Act infrastructure programs.
- Adopt measures designed to ensure that infrastructure investments are affordable, including incentives for states and wastewater utilities to adopt low-income customer assistance programs, equitable rate structures, and strategies that reduce system-wide costs.
- Incentivize inclusive workforce development and procurement through requirements for apprenticeships; inclusion of local disadvantaged workers; and preferences for minority-owned, women-owned, and disadvantaged firms.
- Clarify that PFAS dischargers are subject to limits under the Clean Water Act and set a two-year deadline for a drinking water standard that is protective of vulnerable populations.

Lastly, we strongly urge the Committee to reject any legislative proposals to roll back clean water laws, such as provisions weakening pollution discharge permit requirements for wastewater treatment plants.

We applaud the Committee’s leadership on this critical legislation and reiterate our support for the increased funding of wastewater and stormwater infrastructure to improve water quality and protect public health.

Thank you for your consideration. We look forward to working with you to bring this legislation to fruition.

Sincerely,

A handwritten signature in black ink that reads "Molly M. Flanagan". The signature is written in a cursive, flowing style with a large, sweeping underline under the name.

Molly M. Flanagan
Chief Operating Officer and Vice President, Programs