MILWAUKEE WATER COMMONS

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Subcommittee on Water Resources and the Environment
Water Quality Protection and Job Creation Act of 2021

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Milwaukee Water Commons is a cross-city network that fosters connection, collaboration and broad community leadership on behalf of our common waters. We promote stewardship of, equitable access to and shared decision-making for our common waters. We advocate on environmental justice, climate justice, economic justice and social justice locally in Milwaukee, in Wisconsin and the Great Lakes region, and nationally. Milwaukee Water Commons works under four organizing frameworks: collective impact, the commons, environmental justice, and community engagement. We believe environmental work -- and, more broadly, work to support healthy communities -- has the greatest impact when it adopts an intersectional approach. By that we mean that we must inclusively consider the connections between social and environmental systems, recognizing that vulnerability is often experienced as multiple compounding challenges that cannot be separated. To arrive at justice these challenges must be addressed simultaneously.

Water Infrastructure is an Environmental Justice Issue

"Milwaukee" is a settler variation of the Anishinaabemowin word minowaki, which means "good land." The city of Milwaukee sits at the confluence of the Milwaukee, Menomonee, and Kinnickinnic rivers and along the shores of Lake Michigan. Water is foundational to the city, and the lives of the many people who have lived here have been rooted in water. Indeed, Milwaukee is globally recognized as a water-centric city.

Milwaukee also has the unwanted reputation of being America's most segregated city, and one of the worst places to live as an African American. In Milwaukee we suffer from compounding systemic disparities in incarceration, educational attainment, income and employment, public health, access to transportation, and access to a healthy environment. Segregation is a prominent part of Milwaukee's history and, through systemic marginalization, segregation actively produces barriers that prevent vulnerable communities from fully accessing and enjoying the opportunities Milwaukee has to offer, including in relation to its waters and its water sector.

The US water Alliance defines vulnerable communities as communities that face, “historical and/or contemporary barriers to economic and social opportunities and a healthy environment, with some key factors being income, race or ethnicity, age, language ability, and geographic location. Vulnerable communities may include low-income persons, certain communities of color, immigrants, seniors, children, persons with disabilities, persons living in public housing, and currently or formerly incarcerated persons.

Often it is Milwaukee’s vulnerable communities that bear the brunt of environmental risks through no fault of their own. Rather, these risks are rooted in compounding systemic disparities that have marginalized these communities from the benefits of a healthy environment. Environmental Justice is an outcome, where a healthy environment and wellness are respected as a human right for all people and future generations regardless of identity. Ethical issues of justice arise when people, communities, or regions are subject to greater environmental degradation, excluded from a healthy environment, or disconnected from the process of shaping their environment. Environmental justice links environmental sustainability with social justice, to ensure that no population, community, or individual is subjected to bear a disproportionate burden of environmental risks. Milwaukee Water Commons describes environmental justice as having two parts: (1) creating access to the benefits of the environment and (2) overcoming the risks associated with an unhealthy environment.

People value water infrastructure when they don’t have to think about water infrastructure. But for many Milwaukeeans, water infrastructure comes to their attention when it poses risks to their health and environment. For example, despite historical efforts to manage stormwater, many Milwaukeeans associate major storm events with basement backups and combined sewage overflows that dump wastewater into Lake Michigan. Due to Milwaukee’s extreme segregation, and a legacy of negative water experiences connected to drinking water, storm water, waste water, and public water spaces it is not uncommon for residents in this “water-centric city” to have a negative relationship or no relationship with Milwaukee’s three rivers or Lake Michigan.

Milwaukee Water Commons offers the following written testimony to the House Transportation and Infrastructure Subcommittee on Water Resources and Environment to bring an environmental justice lens to the water infrastructure funding decisions being considered for in relation to the Water Quality Protection and Job Creation Act of 2021. These comments are deeply rooted in our experience in Milwaukee over the past nine years working closely with community-based organizations representing vulnerable communities as well as with institutions and organizations focused on workforce development, other environmental and equity advocates, local water utilities, and state and local policymakers and community leaders.

In the sections that follow, we describe the urgent need for federal funding for water infrastructure; trace the history of how water infrastructure has been funded over past decades, and the racial and economic inequities embedded in this history and consequent inequitable burdens placed on vulnerable urban communities in dire need of extensive repair and upgrades to aging wastewater and stormwater management systems to protect their health and their environment. We call for a substantial shift away from funding through loans that would ultimately need to be repaid by residential water ratepayers in these communities towards a return to the levels of federal grant support for water infrastructure provided during the mid-20th century. Federal grant funds should be prioritized for vulnerable communities to redress historic inequities in how the burden of financing water infrastructure has been

distributed. We also point to inequities in the water sector workforce, and suggest concrete ways in which federal leadership can spur local actions to ensure that the living-wage jobs generated by federal investments in water infrastructure are equitably distributed.

Equitable Investment in Water Infrastructure is Urgently Needed

Across the nation there is an urgent need for federal leadership to equitably fund the repair and enhancement of water infrastructure. Our delay in addressing the need to replace aging water infrastructure with more adaptive and resilient water management contributes to ongoing economic and public health crises around our nation. In Wisconsin, the climate crisis has been hard hitting: major storms have washed out bridges cutting off transportation around the Chequamegon Bay, caused floods and basement backups on Milwaukee's northwest side, and all around the state have led to major sewage overflows into the Great Lakes (the source of drinking water for millions of Americans). According to the Governor's Task Force on Climate Change, between the year 2000 and 2020 there were 19 severe storms along with two flood-related and six drought-related disasters resulting in around $100 billion in impacts. Water infrastructure repair and enhancement is getting more expensive by the day, and the cost for communities is immeasurable.

Utilities and institutions in Wisconsin are struggling to adaptively manage water infrastructure in the face of the climate crisis and new emerging contaminants such as PFAS. These challenges require consistent modeling and monitoring of existing infrastructure, transitions to more sustainable green infrastructure, and investments in innovative technologies and training to prepare workers to manage emerging threats to public and environmental health.

Milwaukee's deteriorating grey stormwater and wastewater infrastructure have a direct impact on water quality and community health. For example, it has been verified that infiltration between leaks in these systems results in human sewage entering our river systems at a majority of stormwater outfalls in the Kinnickinnic and Menomonee River Watersheds. These infiltrations along with sewage overflows caused during major rain events, can make days on the river or beach unappealing, and make swimming in Milwaukee's water ways an unheard of extreme. Though Milwaukeeans used to frequently swim in Milwaukee's rivers before the 1930's, due to legacy contamination, swimming in the Milwaukee river was unheard of until Milwaukee Water Commons piloted the Cream City Classic in 2018, an open water swim event that advocates for safe water spaces for all of Milwaukee's residents. Despite generations of investments put into river restoration, with remarkable impact, safely swimming in the Milwaukee River requires at least two full weeks of no precipitation, constant water quality monitoring, and a swimming location near the mouth of the river that is diluted by water from Lake Michigan.

On Milwaukee's south side, a predominately Latinx community, historical decisions to move stormwater out of dense, low-lying neighborhoods have resulted in land cover that is mostly impervious, including large sections of the Kinnickinnic River that flow through underground tunnels or concrete channels. During low flow, the river has almost no current, no habitat for natural ecosystems, and extremely high levels of fecal coliform. During large storms, the river moves faster than whitewater rapids, resulting in multiple drownings and near drownings over the years. Green infrastructure could have profound benefits on neighborhood health, stormwater retention and flooding. Because of the required concrete

removal, however, the re-naturalization of Milwaukee's channelized Kinnickinnic River has a high price tag.

Investments in green infrastructure can yield community benefits that are multidimensional. For example, stormwater trees are a unique infrastructure that can be utilized in smaller green spaces to manage precipitation where it falls over a large area. When strategically planted and maintained, trees can also contribute to other economic and public health priorities. Trees impact respiratory and cardiovascular health, can eliminate urban heat islands, create access to fresh food, create habitat for wildlife, reduce energy costs, and their maintenance can create long term employment opportunities. In addition, tree planting and other green infrastructure implementation can support local environmental priorities while also fostering neighborhood placemaking. These needs and benefits are analyzed and documented in the *Branch Out Milwaukee Master Plan*, which also outlines the steps needed for a broad campaign to equitably replenish Milwaukee's tree canopy, led by Milwaukee Water Commons together with a partnership of 30+ municipal and community organizations. The inequitable distribution of tree canopy in urban areas, and the lack of resources to manage trees and other green infrastructure, is an often-overlooked environmental justice crisis.

Water has a profound potential to connect communities around Milwaukee, and equitable investments in addressing water challenges provide substantial, valuable impacts. We have seen this play out through federal grant programs like the Great Lakes Restoration Initiative which has bipartisan support in communities throughout Wisconsin and the Great Lakes region. In Milwaukee, these funding opportunities don't only produce environmental benefits; when done well they build relationships across communities, benefit public health, and generate employment opportunities.

The story of water infrastructure funding reflects broader patterns of racial and socioeconomic inequity that must be recognized and remedied.

During the mid-20th century, a period of substantial development and expansion of water infrastructure systems in the United States, federal grants provided the major source of funding for water infrastructure. In 1977, federal funding provided 63 percent of funding for water infrastructure; by 2014 this had fallen to nine percent. To the extent that federal taxpayers still pay for wastewater and stormwater infrastructure, a major portion of these funds flow through the Clean Water State Revolving Loan Fund (CWSRF) program created in 1987.

Federal funding for state CWSRFs provides only a very small portion of the investment needed to address the country's water infrastructure needs, however. For example, according to the U.S. Environmental Protection Agency's latest Clean Water Needs Survey, the EPA estimated that Wisconsin needed approximately $316.5 million per year over the next 20 years to meet the state's clean water infrastructure needs, but Congressional appropriations to Wisconsin's CWSRF have averaged around $39.5 million per year during 2013--2020 -- about 12.5 percent of Wisconsin's assessed need. Nevertheless, SRFs are currently one of the primary tools available for financing water infrastructure.

Because the vast majority of these funds are provided to local communities as loans rather than grants, local water ratepayers ultimately bear the burden of repaying these loans. Raising rates to levels required to repay all of the funds necessary to address existing water infrastructure needs would render water rates unaffordable. Reluctant to raise water rates and without other funding options, utilities

instead postpone making urgent water infrastructure repairs and upgrades. As noted above, however, continued failure to repair and enhance failing and outdated water infrastructure strains the public health of our communities as well as the environmental health of our waterways and ultimately leads to compounding problems resulting in even greater expense. This is particularly true for vulnerable communities that typically face the most urgent infrastructure needs but have the least ability to bear their cost. One example is in the Kinnickinnic River Watershed, as referenced earlier, where the removal of concrete, river naturalization, and installation of green infrastructure could benefit public health by reducing the urban heat island effect, preventing neighborhood flooding and flash floods, restoring natural ecosystems, and filtering water where it falls to reduce the loading of bacteria and other contaminants cited in Total Maximum Daily Load requirements of the Wisconsin Department of Natural Resources. Despite the urgent need, and local expertise, to develop these solutions, the cost of concrete removal is so great that it is unrealistic to expect urgent changes or locally funded action to remediate this blatant environmental injustice.

The inequities of current water infrastructure funding and financing mechanisms become even more apparent when we look more closely at the history of how water infrastructure has been funded -- and how the costs of funding water infrastructure have been distributed -- over the past century. During the 20th century, small and large cities and towns benefited from extensive federal investments in public water systems. The late 20th century push for disinvestment in urban centers in support of suburban sprawl (later extended to exurban sprawl), and the tendency to construe collectively created problems as the fault of individuals and communities who are, in fact, victims rather than perpetrators of structural problems, are central to understanding the current water infrastructure funding crisis. This scapegoating is a hallmark of how power obscures the structures through which it serves and perpetuates itself, and it is the rhetorical and political lynchpin that hampers broad public understanding of this decades-long crisis.

The fiscal pressures created by deindustrialization, regressive tax policy, and federal disinvestment, risky debt financing, mass incarceration, and drastic cuts to revenue sharing at the state level shifted the financial burden of maintaining aging water systems in major urban centers to the water ratepayers that remained in these centers following the white flight facilitated by systemically racist housing and employment factors. These factors include the racial inequality of labor unions and racially disparate federal financial support for home mortgages and opportunities to move to areas with richer opportunity networks. In short, racial discrimination in hiring practices and housing policies locked Black residents into specific neighborhoods and cities.

At the same time as Black and lower-income residents were left behind in older parts of cities suffering the devastating economic downturn of deindustrialization, city water systems were extended to serve the expanding suburbs and exurbs. Not only was this expansion key to enabling white flight, but it was paid for not only by federal grants for water infrastructure (which remained at high levels through the 70s, 80s, and 90s when these economic and demographic shifts transpired) but also by the urban water ratepayers who were themselves left behind with water systems built several decades earlier and increasingly in need of repair and upgrades. Even as these needs grew more pressing, however, the mechanisms through which water infrastructure is funded and financed also shifted dramatically, from federal grants and state cost-sharing to placing responsibility for maintaining, repairing, and upgrading water infrastructure on each locality's water rate payers. As explained above, even to the extent that

federal funds were still expended towards water infrastructure, this was increasing in the form of loans issued through the state revolving funds and ultimately repaid by local ratepayers.

Thus, urban (largely Black and low-income) water rate payers essentially subsidized white flight during an era of cost-sharing across states and metropolitan regional water systems, and then were subsequently stuck with the bill for upgrading failing, outdated water systems that severely threaten their public and environmental health and economic security. Detroit provides one of the starkest and best-documented examples of this narrative, but it is a story that is replicated in most major American cities, particularly in the post-industrial Midwest.

Although racism may not be the explicitly stated driver of state and municipal policies today, racist inequity is baked into the way the system functions. Without directly recognizing and remedying these lingering legacies, we will continue to see racially and economically disparate outcomes.

Today, it is local ratepayers who, for the most part, bear the burden of financing the assessment, operation, and maintenance of water infrastructure with far fewer state and federal subsidies. This overreliance on ratepayers compounds other existing inequities. The inability of vulnerable communities to pay for much-needed infrastructure maintenance and upgrades means their needs remain unmet, subjecting these already-vulnerable communities to greater risks of water insecurity and related health, social, and economic impacts.

The current approach is also unsustainable for water utilities who are forced to increase water rates to pay for water infrastructure projects. The COVID 19 crisis and its economic fallout have cast a spotlight on the tragic circumstances of households whose water has been shut off due to inability to pay soaring water bills. Water rates may still be manageable for a majority of ratepayers, including in Milwaukee where, thankfully, utility policies do not favor shutting off water to vulnerable households. Under a business-as-usual trajectory, however, water rates are expected to increase sharply throughout the country, driven in large part by the need to maintain and upgrade water infrastructure which has fallen into disrepair.

We rely on water infrastructure -- drinking water, wastewater, and stormwater management systems -- to protect our natural waters and ensure access to clean, safe water for drinking, bathing, and recreation. But the vulnerability of our aging and outdated infrastructure, compounded by additional strains on these systems due to climate change, means that even in water-abundant places like the Great Lakes region, communities face the threat of water insecurity.

To address this threat, we need to recalibrate our approach to paying for water infrastructure, to ease the burden currently placed on residential ratepayers and municipal water utilities. Financing and funding wastewater and stormwater management systems must shift from primary reliance on overburdened residential ratepayers to an integrated approach that includes sources of revenues that are more equitable and reliable. As was the case in the mid-20th century, when much of the state's water infrastructure systems were built, federal grants are needed to support these needs. This transition is essential not only to ensure equitable outcomes for vulnerable communities, but also to enable public water systems to become financially, structurally, and operationally resilient, reliable, and sustainable.

Solving the complex, challenging, intrinsically connected problems of inequity, water insecurity, and water infrastructure funding will entail more than throwing more money at the dual problems of deteriorating water infrastructure and water affordability. We also need to critique and reform how we think about water infrastructure and the essential role it plays in supporting our individual and collective public health and wellbeing, social coherence and social stability, and our shared prosperity. How we pay for water infrastructure should be guided by these key principles:

- **Public water systems must be understood as a public good and service that assures safe, clean, and affordable water for all.** Water infrastructure is more than an assemblage of pipes, treatment plants, bioswales, cisterns, and other physical assets. These assets must be understood in terms of the water services they are meant to provide, and the communities of people they are meant to serve.
- **Inequity, infrastructure funding problems, and the threat of water insecurity are intrinsically linked.** The failure to adequately fund water infrastructure as well as the social, health, environmental, and economic inequities experienced by vulnerable communities' stem from the decoupling of water infrastructure and equity values.
- **Public Trust principles provide a framework to reorient our understanding of human-built water systems, and how we should pay for them, by recoupling water infrastructure and equity.** Water is a public commons. Our drinking water, wastewater, and stormwater management systems exist to protect and deliver safe, clean water for hydration, sustenance, bathing, and health -- the same uses that are protected under the deeply rooted principles of Wisconsin common law and the common law of all the States, as well as the common nature of water under the public trust doctrine that underpins our water governance. We should understand that our human-built water infrastructure exists to fulfill the public trust in water by making water available for our needs in our 21st century context -- in other words, a modern-day iteration of the classic, public-trust duty to safely steward waters for the benefit of communities' sustenance, health, and livelihoods.

In line with these principles and the need to recognize and redress the inequities demonstrated by current water infrastructure funding mechanisms, we recommend that federal funding for water infrastructure be dramatically increased to approximate the levels of federal grant funding provided in the mid-20th century and, moreover, that federal funding shift away from the provision of rate-payer reimbursed loans toward greater provision of grants, particularly for vulnerable communities.

Federal Leadership Can Spur Local Partnerships to Address Inequities in the Water Sector Workforce

In 2018 Milwaukee Water Commons began facilitating one of seven Water Equity Task Force groups piloted by the US Water Alliance in cities across the country. In Milwaukee, the Water Equity Task Force is a cross-sector partnership between water utilities, environmental nonprofits and community-based organizations, educational institutions, and workforce development organizations. The Task Force focused on establishing greater access to living wage employment in Milwaukee's water sector, recognizing that even with fewer requirements for advanced degrees and the promise of jobs, Milwaukee's water sector did not represent the diversity of our city despite Milwaukee's employment

disparities. The outcomes of our work lead to the production of two reports: (1) the UWM Center for Economic Development's, *Water Needs Assessment: Pathways to Employment in a Water Centric City*, which assessed the employment in Milwaukee's existing water sector and barriers/pathways to employment for Milwaukee residents and (2) the *Milwaukee Water Equity Roadmap*, which makes recommendations on how stakeholders from around Milwaukee can lean into establishing a more equitable water workforce.

In a 2018 report, *Renewing the Water Workforce*, the Brookings Institute determined that in 2016 around 1.7 million workers in 212 different occupations were directly involved in designing, constructing, operating and governing US water infrastructure. We generally think of the water sector -- including stormwater, wastewater, natural, and drinking water infrastructure -- as a catalyst for supporting our country's water economy, which includes a larger set of industries such as tourism, service, recreation, and fishing. All of these industries rely on benefits from sustainably managed water systems and stewardship of our communities' relationships with water. Notably, the Healing Our Waters Coalition projected that for every dollar spent on Great Lakes restoration there is a three-dollar economic return in the Great Lakes region.

Water jobs are also more likely to be living-wage jobs, relative to the economy as a whole. The Brookings Institute also determined that water occupations around the country pay more on average compared to all national occupations, and also pay up to 50 percent more to workers at the lower 10th-25th percentile of the income scale. Most employment opportunities in Milwaukee's water sector provide living wages and tend to have minimal educational barriers to entry because many incorporate on-the-job trainings. In Milwaukee in 2017, average wages for entry-level positions across the water sector were $22,140 but could range as high as $51,220. Median wages for all occupations averaged at $38,670, but could range as high as $81,700 for specific professions.

Investments in resilient and sustainable water infrastructure also have profound benefits for public and environmental health, in addition to spurring employment opportunities and developing more economically sustainable communities. In particular, the need or skilled maintenance of green infrastructure to address stormwater concerns establishes long-term employment opportunities as a critical component of resilient water management, trades such as green infrastructure construction and maintenance should demand larger wages.

Milwaukee's Water Equity Task Force found that water sector employers around the Greater Milwaukee Area expressed growing concern about the age of the water workforce and looming retirements, technical training needs associated with increasing technology in water-related occupations, and decreases in federal funding for infrastructure. Water sector employers and members of the Milwaukee Water Equity Task Force also expressed concerns about the lack of visibility for water sector employment, and a lack of diversity in water sector professions. These concerns are echoed nationally in the Brookings Institute's 2018 study which found that on average water workers are older than the national median, and that in 2016 nearly 85% of water workers were male and two-thirds were white. In some cases, in Milwaukee and surrounding counties, among professions associated with Milwaukee's Water Sector such as pipelayers, plumbers, pipefitters, and steamfitters, 85-100% dominated by white males.

At the same time, in Milwaukee the unemployment rate for African Americans is more than three times that of white residents. The average household income in Milwaukee was approximately $28,000 for African American residents, $34,000 for Latinx residents, and $53,000 for white residents in 2019. Barriers to employment such as transportation challenges disproportionately impact communities of color, 27 percent of African American household's lack access to a car, compared with 11 percent of white households. In Milwaukee, slightly more than one-fifth of Latinx households are considered "limited English speaking." In 2020, 38 percent of jobs in the city of Milwaukee require at least a high school diploma, 62 percent require some level of training after high school, and 39 percent require an associate degree or higher. Among Milwaukee residents aged 25 or older, 18 percent have less than a high school diploma, but their distribution is not uniform across racial and ethnic groups. In 2015, six percent of the city's white population had less than a high school diploma, as compared to 18 percent of the African American population, 28 percent of the Latinx US-born population, and 55 percent of the Latinx immigrant population. Residents with some level of training after high school comprised 67 percent of the city's white population, 48 percent of the African American population, 42 percent of the Latinx US-born population, and 15 percent of the Latinx immigrant population.

The challenges creating vulnerability in Milwaukee's communities are systemic, and require intention to decipher and dismantle. It is not enough to advertise employment opportunities to a more diverse group of individuals recognizing that communities of color in Milwaukee do not have the same access to education and training, to reliable transportation, and to other services that make these jobs accessible to white residents. Through collaboration, and with time, the Milwaukee Water Equity Task Force was able to build trust and understanding to form recommendations that begin to interrupt these challenges. What we learned is that our approaches need to address compounding, complex problems experienced by vulnerable communities, and they need to be informed and supported by community leadership. Folks living in neighborhoods around Milwaukee understood these challenges before we measured the employment statistics, and it is likely that many solutions to community vulnerability around the country will be found through collaboration between water sector employers and local communities.

Funding to address water infrastructure challenges should hold recipients accountable to forge positive change, and to be intentional about workforce equity and community benefits. It is important that the decision makers leading on infrastructure repair in our communities are considering the impact of their existing workplace policies and practices, and financing community benefits through their procurements with contractors. These elements should not be construed as add-ons to infrastructure financing. Rather, they must be understood as investments in overcoming nationwide segregation and marginalization from wealth building, environmental health, and public health. Urging this approach at a federal level will influence innovation among water sector employers, and change the way that our communities relate with the water sector.

We recommend that legislation to fund water infrastructure investments should require recipients to track and report the impact that this funding is having on vulnerable communities around the nation. This means tracking and reporting on workforce diversity and the diversity of contractors/subcontractors, policies and practices aimed at fostering workforce equity, and how funded programs address environmental injustice. This reporting could be done through the Environmental Protection Agency's Office of Environmental Justice and should show measured contributions to both federal and local plans to address environmental and economic justice concerns. To establish more

institutional accountability and coordination, the Milwaukee Water Equity Roadmap has made specific recommendations regarding the importance of tracking water jobs under a singular employment sector recognized by regional workforce centers. To the extent that tracking employment statistics for water infrastructure investments might aid in developing an understanding of positions that fall within our nation's water sector, and ways to leverage additional programs to increase the economic impact of investing in the growth of this sector, we recommend that the US EPA should work with the Bureau of Labor Statistics to establish specific tracking of America's water sector.

We recommend that guidance on federal infrastructure funding strongly advocate for local cross-sector coalition building, especially with neighborhood organizations, nonprofit organizations, workforce development organizations, and community resource organizations. Overcoming the barriers of segregation to ensure equitable impact of these funds will require intersectional analysis and cross-sector leadership. Further leveraging work happening locally and across sectors to address compounding systemic challenges, will deepen the impact of these funds on our nation's most vulnerable communities.

We also recommend that federal investments in water infrastructure should include procurement preferences for projects with an additional commitment to establishing community benefits agreements. Community benefits models have been piloted with great success by utilities around the country such as in Louisville KY and San Francisco CA. Community benefit agreements deepen relationships between water utilities and the communities they serve, while also bolstering the impact that infrastructure investments have on priorities at a neighborhood level. Community benefits could take the form of investments in wrap around services, working with community resource organizations and workforce development organizations to leverage existing federal, state and local programs to support job seekers that face additional barriers to employment. Other possibilities include support for transitional jobs programs and young/emerging entrepreneurs without the wealth or experience to navigate existing procurement policies or set-aside financing to support the development of community spaces establishing access to a healthy environment and building on the social determinants of health in neighborhoods struggling to overcome legacy pollution.

The examples and recommendations in this report are meant to make a case for the urgent need for federal infrastructure funding, and the key role that infrastructure financing must play in addressing environmental justice concerns around the country. Though many communities, including those in Milwaukee, are increasingly dealing with vulnerability caused by outdated infrastructure, there is a lack of urgency and equity demonstrated by both the insufficient levels of federal funding appropriated and how federal funding has been used to alleviate this vulnerability. Here we offer three key takeaways on how increased federal funding for the Clean Water State Revolving Fund could have an impact on these issues:

1. Funding for water infrastructure must prioritize and greatly increase the amounts of infrastructure funding that is received as grant funding and prioritize water infrastructure grants for vulnerable communities.

2. To stimulate equitable economic impacts from these investments, there is a need for more equitable workforce policies and practices. Improved policies and practices should be encouraged by federal guidelines for tracking workforce diversity, strategies for developing a

more equitable workforce, and how dollars are contributing to alleviating environmental injustice.

3. To spur local collaboration and maximize impacts, federal investments in water infrastructure should be tied to procurement requirements that include community benefits agreements.

Thank you for the opportunity to provide testimony.

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