

**Academy of Natural Sciences of Drexel University · Advocates for Clean & Clear Waterways
Alabama Rivers Alliance · American Rivers · Anthropocene Alliance
Children's Environmental Health Network · Clean Water Action · Community Water Center
Conservative Voters of PA · Earthjustice · Environment America
Environmental League of Massachusetts · For Love of Water (FLOW) · Freshwater Future
Georgia Conservation Voters · GreenLatinos · Healthy Gulf · Illinois Council of Trout Unlimited
Illinois Environmental Council · Junction Coalition · League of Conservation Voters
Maine Conservation Voters · Massachusetts Rivers Alliance · Mississippi River Collaborative
Montana Conservation Voters · National Latino Farmers & Ranchers Trade Association
National Parks Conservation Association · National Wildlife Federation
Natural Resources Defense Council · NC Conservation Network
New York League of Conservation Voters · Ocean River Institute
Ohio Valley Environmental Coalition · Pennsylvania Council of Churches · Sierra Club
Southern Environmental Law Center · Surfrider Foundation · Tennessee Clean Water Network
The Alliance for the Great Lakes · Vermont Conservation Voters
Virginia League of Conservation Voters · Wisconsin Conservation Voters**

June 1, 2021

Dear Committee Chair DeFazio and Subcommittee Chair Napolitano:

The undersigned members of the Clean Water for All Coalition support the proposed substitute amendment to the *Water Quality Protection and Job Creation Act of 2021* (the Act), H.R. 1915, which would authorize much-needed increases in funding to help address our nation's wastewater and stormwater infrastructure challenges.

All people in America should have access to water infrastructure systems that provide safe, clean, and affordable water – systems that protect people's health, sustain thriving ecosystems, withstand the effects of climate change, and support a robust and diverse workforce. However, in many areas, our nation's infrastructure is no longer up to the task of meeting these goals. Pipes, septic tanks, and treatment facilities have exceeded their intended lifespans and are breaking down, with the most severe impacts often falling on low-income communities and communities of color. The American Society of Civil Engineers rated the nation's wastewater infrastructure a D+, and its stormwater infrastructure a D, in its 2021 infrastructure report card. Meanwhile, climate change is adding further stress to these systems.

In 2012, the EPA estimated that we need to invest \$271 billion in maintaining and repairing our wastewater infrastructure over the next twenty years just to meet current environmental and health standards – a figure that is now outdated and is almost certainly an underestimate. Infrastructure costs have continued to rise in recent years as communities have worked to implement important water pollution control projects. Yet according to Congressional Budget Office data, federal funding for water and wastewater utilities has decreased fourfold since 1980, leaving state and local governments to pick up the tab. These costs are becoming increasingly difficult for communities to afford. The passing on of infrastructure repair costs to consumers has created an affordability crisis for many across the country, with wastewater prices more than doubling over the last twenty years.

The Water Quality Protection and Job Creation Act, H.R. 1915, would help meet the pressing need for additional wastewater and stormwater infrastructure investment by significantly increasing authorized federal funding to states and communities through the Clean Water State Revolving Fund (CWSRF). Our organizations support a CWSRF funding level of \$10 billion per year. The Act's proposed authorization of \$8 billion – more than quadrupling current levels – would bring the program much closer to the amount of investment that is truly needed to help communities address their water infrastructure backlog. In the process, it would also create thousands of jobs for America's workers.

We strongly support the steps taken in the substitute amendment to establish a minimum requirement for the use of additional subsidization (i.e., grants and principal forgiveness) within the CWSRF program. Additional subsidization is a critical source of funding for project applicants that cannot afford to take out a normal low-interest loan. Ensuring that all states provide it is an essential step toward improving equity within the CWSRF. However, the proposed minimum of ten percent of the annual capitalization grant is insufficient to meet the needs of the many communities that cannot access traditional CWSRF financing. We urge you to raise this minimum percentage from ten percent to twenty percent and to apply the minimum specifically to disadvantaged communities. Currently, projects serving these communities must compete with other kinds of projects for additional subsidization. Communities struggling with affordability challenges must have dedicated access to additional subsidization in order to ensure that clean, safe water and protection from flooding are enjoyed by all people everywhere, not reserved as privileges for affluent jurisdictions. We also ask that the cap on additional subsidization be raised beyond the current statutory limit to make more funds available for all eligible projects.

Thank you for including the CWSRF Green Project Reserve in the substitute amendment. Green projects improve the resiliency and sustainability of clean water infrastructure while providing multiple benefits to communities. Codifying the Green Project Reserve in statute will guarantee the availability of support for green projects in future years, boosting project applicants' demand for funds. To strengthen the incentives for these beneficial projects even more, we recommend that the Green Project Reserve be increased to twenty percent of the annual capitalization grant.

We support the Act's authorization of \$400 million per year for the Sewer Overflow and Stormwater Reuse Municipal Grants Program, and the addition in the substitute amendment of authorized funding for technical assistance, workforce development, and resiliency efforts. The substitute amendment's requirement for the Environmental Protection Agency to conduct a study of the historical distribution of clean water infrastructure funding to rural, tribal, and disadvantaged communities is also important and will help us to understand and address the inequities in America's infrastructure programs.

As the Act evolves and moves through the legislative process, we encourage the inclusion of other clean water infrastructure funding mechanisms that were included in the Senate's Drinking Water and Wastewater Infrastructure Act of 2021 (DWWIA), S. 914, especially the grant program for individual decentralized wastewater systems for low-income households.

Finally, we appreciate the omission from the substitute amendment of any provisions that would weaken the Clean Water Act, including by extending the permissible duration of water pollution discharge permits to ten years. We strongly oppose the addition of any such provision to H.R. 1915.

This Act, and in particular the proposed substitute amendment, is a vital step toward our shared goal of wastewater and stormwater infrastructure that provides clean water for all. Our organizations thank you for leadership in developing it and strongly support it.

Sincerely,

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