



February 18, 2022

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Advisory Subcommittee only

Paige Lieberman
Designated Federal Officer, EPA

Michael S. Regan, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Regan:

On behalf of the Local Government Advisory Committee (LGAC), I thank you for the opportunity to provide recommendations to the EPA on issues impacting the public health and environment of communities across the country. The 2021 LGAC class represents one of the most diverse advisory committees in EPA's history. The 35-member committee includes 17 women, 16 people of color, and representation from 30 different states, Tribal nations, and U.S. territories.

EPA asked the LGAC to advise on its implementation of the Bipartisan Infrastructure Law (BIL) to ensure that it tackles the climate crisis; prioritizes equity, environmental justice, and the lived experience of those most impacted by water pollution; and strengthens the capacity of local governments to address ongoing environmental protections. More than an investment in infrastructure, the BIL is an opportunity to invest in communities and position them for a more successful and sustainable future. The BIL provides an opportunity to apply our collective knowledge of how policy can exacerbate or alleviate the impacts of climate change. As leaders of a diverse cross-section of local and state governments, we believe it is important that BIL funding both reaches communities quickly and is distributed in an inclusive, thoughtful manner that makes a transformative, equitable, and enduring difference in people's daily lives.

The LGAC received informative briefings from EPA staff who are working to implement the BIL. The LGAC appreciated receiving this information and insight as we sought to formulate responsive, meaningful, and timely recommendations.

This letter summarizes the recommendations that we believe will help achieve the goals of the BIL at the local level. While the recommendations focus on guidance documents that EPA is issuing in the next few weeks, our intent is that the recommendations also apply to future funding decisions and guidance. Additionally, we propose initial recommendations for technical assistance related to the BIL. We look forward to continuing this conversation over the next several years as the BIL programs grow.

A few of the top messages we want to emphasize include:

- Develop standards and internal policies to hold EPA, state and local agencies, and grantees accountable to the equity and environmental justice goals EPA has set.
- Issue guidance that amplifies and encourages the use of screening tools that demonstrate how projects take environmental justice and equity into account. Use these tools and community input to make data-driven decisions about funding disadvantaged communities.
- Add flexibility to the list of allowable costs for any funding, so that communities can fund what they need to meet the goals of the BIL, including workforce development, community outreach, and management of regional partnerships.
- Think innovatively when developing technical assistance programming, including embedding resources in local government offices to support the large task of identifying and applying for funding.
- Issue guidance that encourages projects to consider climate change, such as building carbon negative infrastructure, and prioritizing a fix-it-first or nature-based approach to infrastructure.
- Support innovation and emerging technologies – especially those that promote efficiency, look at environmental issues from a systemic perspective, and help facilities adapt to changing needs.

Thank you for the opportunity to provide this input. We look forward to discussing these recommendations with you and your team.

Sincerely,

A handwritten signature in black ink, reading "Leirion Gaylor Baird". The signature is written in a cursive, flowing style.

Leirion Gaylor Baird, LGAC Chair

Local Government Advisory Committee

Recommendations on Implementation of Bipartisan Infrastructure Law

February 18, 2022

Following the passage of the historic Bipartisan Infrastructure Law (BIL), the EPA will be making significant investments in the health, equity, and resilience of American communities. With unprecedented funding to support our national infrastructure, EPA will strive to improve people's health and safety, create good-paying jobs, and increase climate resilience throughout the country.

Knowing that much of this work will take place at the local government level, the EPA asked the LGAC for input on the following questions:

- As EPA implements the BIL, how can we do so in a way that tackles the climate crisis?
- How can EPA, state and local governments prioritize equity, environmental justice, and the lived experience of those most impacted by pollution in the implementation of the BIL?
- Are there tools, resources, or technical assistance that EPA can provide to help local governments access BIL funding to upgrade their water and wastewater infrastructure?

The members of the Local Government Advisory Committee (LGAC) and its Small Communities Advisory Subcommittee (SCAS) have prepared the following responsive recommendations. They are organized into four categories: integrating equity and environmental justice, providing flexibility and assistance, promoting climate-resilient projects, and promoting innovation and efficiency of water resources.

Integrating Equity and Environmental Justice

The Justice 40 program commits to delivering 40 percent of the overall benefits of federal climate and infrastructure investments to disadvantaged communities. The LGAC applauds EPA's efforts to integrate this and similar efforts into its work. To make these efforts meaningful, the EPA needs to set standards to hold itself, state and local agencies, and grantees accountable to the ambitious equity goals it has set.

When it comes to recognizing how infrastructure and environmental actions can bolster or inhibit equity, there are varying levels of understanding and familiarity. Part of EPA's role in making Justice 40 successful will be to provide training and education on both the history and ongoing legacy of environmental justice. The LGAC recommends that this happens early and often, as EPA interacts with state, local, tribal, and territorial government partners. EPA should also provide training for its own employees.

We also recommend that EPA guidance requires, incentivizes, or at least encourages the use of screening tools that demonstrate how projects take environmental justice and equity into account. Both Environmental Justice (EJ) Screen and the Climate and Environmental Justice Screening Tool (CEJST) look at factors such as environmental indicators and demographics to help governments make data-driven decisions about investing in communities that have historically experienced environmental injustices.

While the data that these tools provide is valuable, it is also important to recognize the knowledge and expertise of local leaders, who can provide additional information about community needs. Establishing partnerships with community leaders will improve decision making; it will also serve to ensure EPA

programs are meeting the needs of disadvantaged communities and providing opportunities for them to access funding and relevant technical support.

Beyond deploying these tools and establishing partnerships, the LGAC recommends that EPA develop a framework for ensuring the BIL addresses historical environmental injustices and prevents new environmental injustices in a tangible way. Elements of a framework could include creating internal policies for using the tools to identify disadvantaged communities, embedding metrics that ensure program and funding decisions incorporate both the data gleaned and community input, and setting metrics for state, local, tribal, and territorial partners and grantees to ensure they achieve the equity goals they've set.

The LGAC looks forward to working with EPA to further develop this work.

Affordability

Historically, when local governments seek federal funding for new projects or capital investments, they rely on local user fees or rates to fund the long-term maintenance of those investments. The LGAC is concerned that long-term maintenance of projects initially funded through BIL won't be supported. We encourage EPA to ensure that funding recipients have planned for long-term funding to support the maintenance of new projects in a way that preserves low-rate bases for users and ratepayers and avoids leaving residents with the burden of unmaintained infrastructure. Other solutions include encouraging utilities to set up nonprofits or provide flexible rates.

Technical Assistance

A major component of integrating equity is the provision of technical assistance to communities. There is broad consensus among the LGAC members that many governments and community organizations – particularly those that are underserved – simply lack the time and expertise to access new federal funding and implement highly complex projects. The fact that much of the funding is moving through the State Revolving Funds (SRFs) presents a further barrier. Even for larger cities with more staff, the SRFs are typically managed through a finance department, rather than a water or public works department that would be more knowledgeable about the projects needed in a particular community.

At a minimum, EPA should consider providing targeted outreach to local governments, including templates to simplify the application process, and opportunities for communities to work with experts via a hotline, webinars, peer-to-peer platforms, or one-on-one meetings. A broad effort at this level enhances the likelihood that BIL funding achieves its goal of supporting disadvantaged communities.

We understand that EPA already provides a range of technical assistance but want to acknowledge that many governments may not be aware of these resources. As part of issuing guidance for BIL funding, the LGAC recommends including information about available assistance and how interested parties can access it. The simple act of including this information up front with the guidance will help ensure it reaches the intended audience.

Other helpful actions include providing a point of contact in an EPA regional office and hosting regionally based events for governments to access technical assistance and share best practices. However, to truly promote equity, the EPA needs to be present in communities, working with the teams to understand the barriers they face and navigate solutions. Unfortunately, many federal funding programs have grown so

complex that large cities pay consultants to find and apply for grants on their behalf. Even if a small community had a staff member with the technical capacity to complete an application, they often choose not to because they know what their competition is. The result is a deepening of inequity.

The LGAC recommends embedding dedicated EPA staff members or other resources in local government offices or having them shared by a small number of regional offices. These individuals would be responsible for finding funding opportunities that meet the needs of a community, assisting in the completion of the applications, and setting up a plan for managing the life of the project. While they would be funded by EPA, they would also become a part of the local government team.

Providing Flexibility and Assistance

One perennial concern for local governments is finding funding that matches the specific needs associated with a project. To the extent possible, LGAC recommends adding flexibility to the list of allowable costs for each funding stream of the BIL. This will position communities to develop holistic projects that not only develop infrastructure, but also address the secondary and tertiary aspects of a project that are crucial to its long-term sustainability. The Brownfields Multipurpose Grant is one successful model, as funding can be applied for the full lifecycle of a project – including project proposal, preliminary design, land acquisition, permitting, and construction.

Allowing Flexible Funding

Flexibility is especially needed for “soft infrastructure.” One example is workforce development. The technology in the water industry is rapidly changing, and the influx of funding provided by the BIL will likely accelerate this trend. At the same time, the water workforce is aging. If the BIL is going to have a transformative, once-in-a-generation impact, a new generation of workers must be trained. EPA should support training as either an allowable cost for BIL funding or another accessible funding stream. Moreover, EPA should support training that focuses on securing good-paying jobs for local residents. Training for all ages is needed, and should start as young as high school, to create a pathway from school to career. This kind of investment will support not only the water systems, but also the economic vitality of the communities they serve.

Another important component of implementing the BIL is community engagement. The projects funded by the BIL will require short-term disruptions, such as tearing up streets and temporarily shutting off water, to achieve important long-term gains. Explaining the value of these actions will require people on the ground using smart messaging to communicate directly with customers. There is deep distrust in many communities – especially communities of color – about the safety of drinking water. This investment is a much-needed opportunity to educate and build trust. The LGAC recommends making community engagement an allowable cost under BIL funding, or another accessible funding stream.

Deferring to Local Governments

Many local government leaders are concerned that a potential reluctance by some agencies to reimagine new ways of doing business will create complexity in fully implementing the Administration’s goals of addressing climate change and environmental justice. This is especially true for the water funding. Since the Law requires use of the State Revolving Fund (SRF) programs, states must serve as an intermediary between EPA and local governments. Local governments know which infrastructure

projects will have the most meaningful, equitable impacts in their communities. The LGAC recommends encouraging states to conduct proactive public engagement with their communities in a meaningful way prior to soliciting project ideas from local governments, as well as to offer technical assistance to create project proposals. Ideally, local communities would have a thorough understanding of the process for deciding which projects are eligible to be funded by SRF. Special attention should be given to reaching small communities. The LGAC's Small Communities Advisory Subcommittee will provide additional recommendations, but at this point the LGAC and SCAS recommend working with local municipal leagues and associations of counties to reach these communities. While the LGAC does not want to add to the administrative burden of these processes, the EPA could operationalize community engagement by asking states to demonstrate how they engaged municipalities in a meaningful way as part of their required annual Intended Use Plan (IUP) or other similar process.

Another concern is that states may choose not to utilize the entirety of BIL funding available to them, as they have for other federally funded programs in recent years. The LGAC recommends that EPA take steps to discourage this. For example, the EPA could require additional administrative processes if a state wants to return funding. Or, if a state fails to spend their money by a certain date, EPA could consider ways to redistribute the money directly to municipalities, local departments, agencies, or public water supply systems in that state. At the same time, the LGAC recommends that EPA provide outreach directly to local communities regarding opportunities to access funding – either by educating them on the SRF and related processes, or highlighting options like the National Estuary Preserves program, which allow local governments to receive money directly from EPA.

Aligning Funding Priorities

The BIL takes a progressive step forward by making 49 percent of funds eligible for grants or forgivable loans. To take another step in this direction, the LGAC recommends two actions. First, EPA should align its eligible project criteria with the priorities of the BIL (e.g., lead, PFAS, climate resilience, equity, legacy pollution, drought, and flood mitigation), and consider modifying the required annual IUP and similar processes so that states, Tribal nations, and territories demonstrate how they supported these efforts. Second, EPA should encourage states, Tribal nations, and territories to align their own State Revolving Fund (SRF) statutes, regulations, or programs with the BIL's provisions for grants and forgivable loans. For example, some state SRF programs prohibit certain communities from accessing grants or loan forgiveness. Therefore, these communities will be eligible only for low-interest loans, despite having significant water infrastructure needs, particularly in vulnerable and historically marginalized neighborhoods. These kind of state rules may unintentionally block communities from accessing BIL funds, as they often don't have the financial capacity to take on loans. This is particularly important where, because of the BIL, state match is not required or is reduced.

Encouraging states, Tribal nations, and territories to align their programs with BIL's list of eligible projects as well as funding mechanisms, will provide maximum flexibility to deploy funds, as well as ensure the equitable distribution of federal dollars.

Distributing Money Efficiently

The most important priority for local governments is the ability to start rebuilding the infrastructure across America as soon as possible. To that end, the LGAC offers several recommendations. First, the EPA should look for ways to streamline administrative processes and incorporate any new requirements into existing processes. The LGAC also recommends digitizing these processes, and working to

coordinate them across the federal government, to minimize the time and burden placed on communities seeking funding. Finally, the EPA should explore financial mechanisms that accelerate the distribution of funding to communities. For example, last November, Morgan Stanley and Enterprise announced an initiative that will advance funding from the United States Department of Housing and Urban Development (HUD), so that communities in need can start building on an accelerated timetable.¹ Allowing BIL funding to be used as part of a public-private partnership – especially where there is an urgent need – could make a big impact.

At the same time, there is a growing trend to support “dig once” policies or best practices, where the construction of all the infrastructure needed in a specific location are coordinated (e.g., replacing lead pipes, adding broadband, upgrading electrical capacity) so that subsequent construction is not needed. One limiting factor to taking this approach is aligning the funding streams. The LGAC recommends allowing flexibility regarding when EPA’s funding is used, so that this is an option for communities that want to take this approach.

Prioritizing Climate-Resilient Projects

Tackling the climate crisis will require governments to rethink and reimagine how infrastructure is planned, delivered, and managed, so that it becomes part of a low-emission and resilient future. Infrastructure is responsible for 79 percent of all greenhouse gas emissions and 88 percent of all adaptation costs. At the same time, the more intense and frequent extreme weather becomes, the more it costs to maintain current infrastructure. In the past 10 years, the U.S. has accrued \$51.2 billion in economic damages due to the increasing frequency and intensity of flooding alone.² The growing costs of failing to adapt our approaches to infrastructure are clear. Climate change is also exacerbating environmental justice, as disadvantaged communities are more likely to suffer from extreme heat and storms.

As EPA implements the BIL, climate change must be a central component of its funding decisions. Therefore, BIL guidance should require, incentivize, or at least encourage carbon negative infrastructure, a reduction in greenhouse gas emissions, support for renewable sources of energy, or the use of nature-based solutions.

EPA should also support infrastructure designed with current and future climate conditions and impacts in mind. The design standards to which most existing infrastructure was built are not resilient to current and future climate projections, especially when it comes to flooding. For example, replacing a bridge or culvert “in kind” will often not improve the resilience of transportation infrastructure. To address this, the LGAC recommends that EPA ask states to demonstrate how projects will address climate change as part of an IUP or similar process.

Providing Targeted Assistance

Local governments are stretched, and in some cases, their knowledge of sustainability is often limited, despite a desire to learn and do more. One approach to overcome this challenge could be to prioritize

¹ <https://www.enterprisecommunity.org/news/enterprise-and-morgan-stanley-launch-disaster-recovery-accelerator-fund>

² Infrastructure for Climate Action. United Nations Environment Program. 2021. <https://www.unep.org/resources/report/infrastructure-climate-action>

any project proposed for funding that includes a climate vulnerability assessment and resiliency plan. However, care should be taken to not add administrative processes that further discourage small and disadvantaged communities from applying. A potential solution is to bring in EPA's technical assistance experts at the project planning phase. The LGAC Air & Climate Workgroup had an opportunity to speak with the State and Local Climate and Energy Program and learn about the range of tools and one-on-one support they offer to local governments. The LGAC recommends exploring ways to offer this technical assistance to all who apply for funding from the start of the application process.

A longer-term solution is to develop training targeted at government employees, especially those from smaller jurisdictions that have limited resources in this area. Creating a path for staff to develop capacity over time – e.g., a Climate or Environmental Justice 101, 201, etc. – would help multi-disciplinary city employees develop the technical capacity needed to make informed decisions in the long run. While there are many ways to provide this training, engaging universities is one way to institutionalize knowledge in each region and provide sustainable, long-term ways to develop the workforce. The LGAC recommends pursuing options to work with universities to develop training and technical assistance opportunities.

While the range of technical assistance desired is large, one area in which the LGAC recommends investing is how to message climate and environmental justice issues to a range of audiences, and on a range of platforms, including social media. In some locations, there is immediate pushback when a project touting these goals is mentioned. Tackling the climate crisis will require local government officials explaining what they're doing and why they're doing it in a way that garners support.

Promoting Sustainable and Nature-Based Approaches

As population growth continues, the demand for drinking water and wastewater services will increase and possibly outpace current supply or capacity to deliver. At the same time, the current systems may be further stressed by climate change causing shifts in precipitation patterns that result in more frequent and intense flood and drought periods.

Local governments who provide critical services must balance the need for building new infrastructure with climate-resilient solutions like infill redevelopment or nature-based approaches. Policies and investments that maximize natural climate solutions will be key to ensuring the provision of essential services like hazard protection, source water protection, water conservation, and wastewater treatment. These types of projects are also resilient to extreme weather events, are affordable, and can reduce future risks associated with pollution or contamination.

One example is managing stormwater runoff by decreasing impervious surfaces and increasing green stormwater solutions, such as rain gardens, conservation landscaping, and swales and bioretention areas. These approaches provide more open spaces to slow down stormwater flow and reduce flooding in urban areas. In coastal, rural or remote areas, wetlands and marshes can be utilized to improve water quality and buffer the impacts of coastal storms, and projects that improve soil health have proven more efficient at improving water quality and reducing carbon. In water scarce regions, agricultural practices that use resources efficiently can have a big impact, like using lakes for irrigation.

When considering more traditional forms of infrastructure, the LGAC recommends including a “Fix it First” prioritization in any guidance – specifically related to water infrastructure.³ This would focus federal funding on repairing and upgrading infrastructure already in place, as well as rightsizing for future infill development and a changing climate. This prioritization also promotes equity. Smart Growth America found that maintenance and repair projects create up to 16 percent more jobs per dollar invested, compared to new construction projects.⁴ Maintenance and repair projects also create jobs faster, since new construction projects must first complete more extensive environmental and design reviews.⁵ However, it is important to recognize the link between infrastructure and environmental justice. Starting in the mid-1900s many interstates and large infrastructure projects were constructed in the middle of African-American communities, which led to increased pollution, disjointed communities, and displaced residents. This fact should be included in the analysis of any future projects – both to mitigate past injustices and to prevent new ones from occurring.

LGAC also recommends that BIL funds reward and incentivize projects that meet climate and equity goals. In Lincoln, Nebraska for example, local funds are used to help offset any incremental cost of sustainable, nature-based, or climate resiliency measures. BIL fund criteria could incentivize new or redevelopment projects that incorporate climate-smart solutions.

Clean Bus Program

A final climate-related recommendation concerns the Clean Bus Program funding in the BIL. This program will benefit communities across the United States, especially those that have been historically underserved. As EPA implements this program, the LGAC recommends using available climate and equity filters to ensure that funding goes to the places with the most need. Even within a community, if an entire fleet can’t be converted, EPA should encourage school districts to prioritize neighborhoods that have more cumulative impacts of pollution, children experiencing more negative health issues, and socially vulnerable areas.

As the technology of buses is upgraded, the goal should be to pursue carbon neutrality by using renewable energy. However, the program should allow communities to determine the best environmental option for their location.

Another forward-thinking approach is to consider compatible technology. As the federal government invests in new buses, it should work with the United States Department of Transportation to promote universal charging infrastructure. If a local government can charge its entire fleet in one place – school buses, trash trucks, bus transit – it will reduce operation and maintenance costs and encourage low-

³ This includes but is not limited to the Small and Disadvantaged Communities Drinking Water Grant Program, the Clean Water State Revolving Fund, the Drinking Water State Revolving Fund, and the Water Infrastructure Finance Innovation Act funds

⁴ Smart Growth America’s analysis of Recovery Act reports found that money spent on highway and bridge repair projects created 16% more jobs per dollar than money spent on new road and bridge construction. See: “Recent Lessons from the Stimulus: Transportation Funding and Job Creation.” Smart Growth America, February 2011, Page 2, smartgrowthamerica.org/wpcontent/uploads/2016/08/lessons-from-the-stimulus.pdf

⁵ “Learning From the 2009 Recovery Act: Lessons and Recommendations for Future Infrastructure Stimulus,” Smart Growth America, April 2020, Pages 4-5, smartgrowthamerica.org/app/uploads/2020/04/SGA-T4A-Lessons-from-the-2009-Stimulus.pdf

carbon fleet expansion. Local communities are more likely to make investments in low-carbon vehicle technology if there is ease and convenience in charging the fleet.

Finally, as EPA awards funding to eligible contractors, they should understand that municipalities often change the independent contractors they use for procuring buses over time and allow flexibility that accommodates this fluctuation.

Promoting Innovation and Efficiency of Water Resources

Americans rely on 22 million miles of underground pipes to deliver safe, reliable drinking water, but that infrastructure is aging. EPA estimates that \$472.6 billion is needed to maintain and improve that infrastructure over the next 20 years, and another \$271 billion is needed for wastewater and stormwater management. The funds provided by the BIL are needed urgently, but it is important to deploy them in ways that allow these resources to continue serving communities in years to come.

Supporting Technology and Adaptability

Given the number of emerging contaminants of concern, as well as the impact climate change is having on sustaining reliable water sources, the water industry will need new and adaptable technology to succeed in the next generation. LGAC recommends supporting emerging technologies – especially those that look at these issues from a systemic perspective and could help facilities adapt to changing needs. This could be accomplished by prioritizing funding for projects that use proven but nascent technology, providing dedicated technical assistance on such alternatives, or by using set-aside funding to support efforts that would bring technologies to scale.

One area ripe with innovation is water reuse. Across the country, reverse osmosis technology is being used to make wastewater effluent and seawater safe to drink. The technology – which forces water through a membrane that captures salts, microbes, and chemicals – could be repurposed to remove PFAS and algal toxins from water supplies. Similarly, LED water disinfection lamps and treatment systems that use electricity instead of potentially harmful chemicals to decontaminate water could provide new approaches for solving water-quality problems. In Orange County, California, communities recycle their wastewater by passing it through a treatment plant and returning it to the local aquifer that sources the area’s drinking water. In Eugene, Oregon, the wastewater treatment plant recovers biogas to power its municipal facilities, and biosolids to use as fertilizer on a nearby poplar plantation.

Harmful algal blooms are also being addressed with innovative approaches such as developing agricultural alternatives that use less nutrients, converting to low-nitrogen septic systems, and reducing nonpoint source pollution from lawns and other livestock farms.

Encourage Regional Approaches

Another way to increase efficiency is to develop partnerships. The LGAC recommends allowing BIL funds to be used to support partnerships that improve efficiency, including consolidation. By pooling utility resources, buying power, and technical expertise, utilities can provide more effective service at a lower cost. One example is the Great Lakes Water Authority (GLWA), which leases regional treatment and transmission assets of the Detroit Water and Sewerage Department to provide services for four million users in the surrounding region. The action has led to a stabilization of service rates, an increase in regulatory compliance requirements, improved financial standing and creditworthiness, and an overall improvement in service for residents.

Like many regional consolidations, the GLWA was established through U.S. federal court mediation as part of the negotiation of the City of Detroit bankruptcy plan. However, EPA could address a myriad of issues by encouraging these kinds of mergers up front, especially when it comes to supporting small and disadvantaged communities.

Another regional solution is using market-based approaches to manage water supply. For example, in the Southwest, states are incentivized to return unused water credits. Under the Colorado River Compact, the seven states in the River's basin are allocated a certain amount of water credits. The more efficiently they can use the water, the more opportunity there is to return the water and benefit financially.

Supporting Data and Public Health

Finally, the LGAC recommends EPA allow BIL funding to support broader public health initiatives. The COVID-19 pandemic has underscored the need for reactive and proactive efforts in this arena. For example, the U.S. Centers for Disease Control and Prevention are developing a nationwide database to track the spread of COVID-19 and other diseases through wastewater epidemiology studies. In North Carolina, Duke University worked with 10 municipalities to collect data and were able to predict the onset of the omicron variant 14 days before case numbers spiked. Many water utilities lack the time, staff, or technical capacity to capture and analyze public health data in a meaningful way. The LGAC recommends allowing BIL funding to support these initiatives.

Another application is to improve understanding and connection in disadvantaged communities. The BIL seeks to make significant, historic investments in disadvantaged communities, and it presents an opportunity to inform future programs and improve the ways all levels of government work in these locations.