U.S. Environmental Protection Agency, Region 9 Drinking Water Tribal Set-Aside (DWTSA) Lead Service Line Replacement (LSLR) Program Guidelines and Procedures for Applying for Assistance

EPA Region 9 is pleased to issue these guidelines and procedures for applying for assistance from the *Drinking Water Tribal Set-Aside (DWTSA)*¹ *Lead Service Line Replacement (LSLR) Funding.* This program provides funding for the investigation and replacement of lead service lines (LSLs) for federally recognized Tribes within EPA Region 9 under Bipartisan Infrastructure Law (BIL) programs. These guidelines and procedures will be utilized to award BIL funding through 2026. Funds are awarded through direct grants to tribes or interagency agreements with the Indian Health Service (IHS). To provide more flexibility and reduce administrative requirements, EPA Region 9 also plans to offer the option of utilizing in-kind assistance through an EPA-directed contractor to support eligible activities.

President Biden signed the Bipartisan Infrastructure Law (BIL) on November 15, 2021, which included over \$50 billion to strengthen the nation's drinking water and wastewater systems. The BIL includes more than \$868 million to address tribal drinking water and wastewater infrastructure needs over fiscal years 2022-2026. ² These guidelines will be utilized to consider project awards utilizing new BIL funding programs for LSLR projects.

In fiscal year 2022, Region 9 received \$18.9M to support eligible projects under the DWTSA-LSLR Program. Region 9 anticipates receiving funding through fiscal year 2026.

This assistance will be awarded under Section 300j-12 of the Safe Drinking Water Act, 42 U.S.C. §1452. The Catalog of Federal Domestic Assistance Number is 66.468.

¹ The <u>Drinking Water Tribal Set-Aside (DWTSA) Program</u> is also referred to as the Drinking Water Infrastructure Grant—Tribal Set-Aside (DWIG-TSA) Program.

² Implementation of the Tribal Water Infrastructure Appropriations in the Bipartisan Infrastructure Law Memo, p. 3.

Proposed Project Award Timeline:

Below is an outline of EPA's anticipated funding timeline from receipt of project application to award date. Specific timing will be dependent upon when EPA receives the project proposal, and when the Tribe responds to EPA comments. Applications are accepted on a rolling basis.

Proposals submitted to EPA must include the DWTSA LSLR Project Proposal Form, tribal government endorsement, and a cost estimate. A planning document is also required for construction projects. Proposals will be accepted throughout the year and will be evaluated when they are received. Delays in EPA award processing may occur for proposal received in July through September and will affect the timelines below.

Please email one electronic copy of the proposal and any documentation to Karly Ho, ho.karly@epa.gov.

<u>Electronic files exceeding 10MB must be separated into emails not exceeding 10MB each</u>. If you have difficulty submitting electronic documentation, contact Karly Ho.

Table 1: Proposed Project Award Timeline

Table 1. 110posed 110ject Award Timenne				
Proposal Su	bmission Steps			
Estimated timeframe	EPA Actions			
Step 1:				
Tribe Submits Proposal				
2 months	EPA will review applications for completeness and notify each applicant with requests for additional information.			
St	ep 2:			
Tribe Responds to EPA Comments				
1 month	EPA reviews final submissions and notifies applicants of the funding decision, along with guidance letters for projects to be funded throughout the program.			
Step 3:				
Tribe submits final documents for Grant, Interagency Agreement, or In-Kind Services				
3 months	EPA processes and awards funds for projects.			

The steps above refer to Section III of this guidance: Proposal Submission Process. EPA actions and estimated timeframes occur after each step is completed.

Based on the actions and estimated timeframes above, it may take approximately 6 months after the initial project proposal is submitted to EPA to receive funding.

Contents

I. Description of Program	3
II. Eligibility Information	6
III. Proposal Submission Process	8
Step 1: Proposal Submission Information	8
Step 2: Response to EPA Comments and Planning Documents	9
Step 3: Grant Application/Interagency Agreement Process	10
IV. Funding Process	10
IV. Technical Assistance	11
V. Award Administration Information	12
VI. Agency Contacts	13

U.S. Environmental Protection Agency, Region 9 Drinking Water Tribal Set-Aside (DWTSA) Lead Service Line Replacement (LSLR) Program

Guidelines and Procedures for Applying for Assistance

I. Description of Program

DWTSA LSLR Funding

Region 9 expects to receive significant each year from FY22 through FY26 to support eligible projects under the DWTSA-LSLR Program. This funding is for LSLR projects and associated activities directly connected to the identification, planning, design, and replacement of lead service lines.

A service line is defined as the line which connects the water main to the building outlet. This may be owned by the water system, property owner, or both. A "lead service line" under this guidance includes the following:

- A service line made of lead; or
- A galvanized service line, if it ever was or is currently downstream of any lead service line or service line of unknown material.

EPA has also expanded the eligible uses to include the replacement of lead-containing goosenecks, pigtails, and connectors as eligible expenses, whether standalone or connected to a lead service line.

A. Program History

The Bipartisan Infrastructure Law (BIL) was signed on November 15, 2021, which included over \$50 billion to strengthen the nation's drinking water and wastewater systems. The majority of the BIL funding will flow through the Clean Water and Drinking Water State Revolving Funds (SRFs). The BIL specifically provides more than \$868M to address tribal drinking water and wastewater infrastructure needs over fiscal years 2022-2026 through the DWTSA and Clean Water Indian Set-Aside programs (CWISA).

On May 27, 2022, EPA's Office of Water issued the following implementation memo for Tribal Water Infrastructure Appropriations in the BIL:

https://www.epa.gov/infrastructure/investments-tribal-communities. The memo provides guidelines on how the agency will allocate and administer DWTSA and CWISA funds appropriated under the BIL. This document provides guidelines, procedures, and project prioritization, for applying for funding for projects related to LSLRs in Region 9.

B. What types of projects can be funded through this program?

New BIL programs to address LSLRs include additional eligibilities that are more fully

described in EPA's March 2022 BIL Implementation memo.³

Under these new appropriations, projects must be otherwise DWTSA eligible <u>and</u> be a LSLR project or associated activity directly connected to the identification, planning, design, or replacement of lead service lines.

Because completion of a service line inventory is foundational to identifying eligible LSLR projects, we have classified project types as either a service line inventory (SLI) project or an LSLR project.

Service Line Inventory (SLI) Projects – The 2021 Lead and Copper Rule Revisions (LCRR) requires all community and non-transient, non-community water systems to develop a service line inventory and submit it to their primacy agency by October 16, 2024. A proposed SLI project must include investigatory activities that meet the requirements of the Lead and Copper Rule Revisions⁴. The outcome of the projects must include a completed service line inventory consistent with guidance from EPA Region 9 or the respective primacy agency. Service line inventory projects must aim to determine the materials of all applicable service lines to the extent that they are eligible for replacement or are determined to be non-lead (i.e. service line material that is not lead or galvanized requiring replacement). Such activities may include:

- Development or updating of service line inventories, including locating and mapping service lines.
- Methods of investigation to develop inventories could include records review, visual observation, water quality sampling (non-compliance), excavation, vacuum or hydroexcavation, or other emerging technologies.

Lead Service Line Replacement (LSLR) Projects are for planning, design and construction of LSLRs and other service line components eligible under this funding. Planning projects must be completed prior to award of construction funding. The LSLR funded projects must replace the entire LSL, not just a portion, unless a portion has already been replaced. Eligible activities for LSLR Projects may include:

- Planning and design, including environmental review and clearance.
- Complete removal of lead service lines or service lines made of galvanized iron or galvanized steel that are currently or have previously been downstream of lead or unknown components. Removal and replacement must include both the public and privately owned portion.
- Removal and replacement of lead or galvanized goosenecks, pigtails, and connectors.
- Replacement of curb stops, curb stop boxes, and other service line appurtenances that are removed as part of full LSLR.
- Site restoration, including landscaping, sidewalks, driveways, etc. if the removal was necessary to replace the lead service line.
- Permit fees if the fees are normal, required, and specific to the LSLR. It is recommended that communities waive these fees.

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³ Implementation of the Clean Water and Drinking Water State Revolving Fund Provisions of the Bipartisan Infrastructure Law, p.20.

⁴ 40 CFR 141.84(a).

Additional eligible activities for SLI and LSLR projects include:

- Temporary pitcher filters or point-of-use (POU) devices certified by an American National Standards Institute accredited certifier to reduce lead during or for a short time period after a LSLR.
- Technical assistance to small water systems undertaking lead service line inventories or construction projects.
- LSLR consumer education and outreach.

C. What are ways that funding can be awarded?

Funds will be awarded through the following mechanisms:

- Direct grant to the Tribe or a tribal consortium
- Interagency Agreement (IA) with Indian Health Service (IHS)
- EPA-directed Contracted Assistance

Tribes must contact IHS prior to submitting a proposal for an IA.

EPA encourages Tribes to request in-kind assistance to conduct SLI projects and LSLR planning projects where the project has a limited scope. In-kind services cannot be used for construction projects.

D. What <u>cannot</u> be funded through this program?

According to EPA's March 2022 BIL Implementation memo⁵, the following items cannot be funded through this program:

- Corrosion control studies and corrosion control infrastructure;
- Water meters;
- Bottled water; and
- Premise plumbing;

E. Program Link to EPA's Strategic Plan

Projects funded under this program support the strategic measures expressed by Goal 5 (Ensure Clean and Safe Water for All Communities), Objective 5.1 (Ensure Safe Drinking Water and Reliable Water Infrastructure), of the EPA Strategic Plan for 2022-2026 related to the provision of safe drinking water to tribal communities. The program fits within the EPA Strategic Plan and its long-term performance goals: Goal 5.1.2 to reduce the number of community water systems in Indian country still in noncompliance with health-based standards since March 31, 2021, from 110 to 70 and Goal 5.1.5 to provide 2,203 Tribal, small, rural, or underserved communities with technical, managerial, or financial assistance to improve operations of their drinking water or wastewater systems by September 30, 2026. In addition, the program will help to increase the number of American Indian and Alaska Native homes provided access to safe drinking water in coordination with other federal agencies.

⁵ <u>Implementation of the Clean Water and Drinking Water State Revolving Fund Provisions of the Bipartisan Infrastructure Law, p.20.</u>

II. Eligibility Information

The Drinking Water Tribal Set-Aside (DWTSA) Lead Service Line Replacement (LSLR) Funding aims to fund projects that address the investigation and removal of LSLs for federally recognized tribes within EPA Region 9. Projects for this funding need to be otherwise DWTSA eligible and be a LSLR project or associated activity directly connected to the identification, planning, design, or replacement of LSLs.

A. Who is eligible to receive assistance under this program?

Only federally recognized Indian tribes within EPA Region 9 may submit proposals⁶. Funds will be awarded in either grants to tribes, interagency agreements with IHS, or through in-kind EPA-directed assistance. Region 9 covers the States of Arizona, California, Hawaii, and Nevada, the Navajo Nation, and the Pacific Islands of American Samoa, Commonwealth of the Northern Mariana Islands, and Guam.

If a tribe receives a grant, the tribe may issue a contract or subaward using grant funds to carry out the project. In such cases, the tribe must comply with the federal procurement requirements, federal regulations pertaining to subawards, and the EPA Subaward Policy. The tribe is the EPA grant recipient and is ultimately responsible to EPA for proper management of the funds. The plan for the tribe's use of the grant funds must be identified in the grant award document.

B. Which water systems are eligible to receive assistance?

- 1. Only public water systems that are community water systems or non-profit, non-community water systems are eligible to receive funding.⁷
 - A public water system is defined as an entity that supplies water for human consumption and has at least 15 service connections or regularly serves an average of at least 25 individuals daily at least 60 days out of the year. It may include collection, treatment, storage, and distribution facilities.
 - A public water system is classified either as a community water system or a noncommunity water system. A community water system means a public water system which serves at least 15 service connections used by year-round residents or regularly serves at least 25 year-round residents. A non-community water system means any public water system that is not a community water system.
- 2. The system must serve an Indian tribe. Funding can be provided to improve any eligible public water system, whether it is owned by a tribe, on or off-reservation, or serving tribal communities living on or off-reservation. Since tribes will be applying for funds on behalf of the water system, EPA will assume that the water system serves a tribe, as required by the SDWA, and the requested improvements are a high tribal priority. In cases where commercial entities and/or non-tribal populations receive water from the

⁶ 42 U.S.C. 300j-12(i)(1).

⁷ 42 U.S.C. 300j-12(a)(2).

⁸ 42 U.S.C. 300j-12-(i)(2).

- public water system, EPA may require the tribe to contribute funds to the project proportional to the water demand of the commercial entity and/or non-tribal populations.
- 3. Systems that are in significant noncompliance with any requirement of the National Primary Drinking Water Regulations will not be eligible for funding unless the project which is being funded will ensure compliance. Monitoring and reporting requirements must also be met to maintain compliance with the SDWA.

C. What are the water system capacity requirements?

EPA will evaluate the technical, financial, and managerial capacity of the water systems to maintain and operate new infrastructure and/or oversee a planning and construction project. EPA characterizes the three elements of technical, financial, and managerial capacity to properly run the water system as follows:

- 1. **Technical capacity** refers to the physical infrastructure of the water system (i.e. the capability of the system components to provide water that meets the requirements of the SDWA), and the technical knowledge of the system personnel and their ability to use that knowledge to adequately operate the system.
- 2. **Financial capacity** includes the ability of the system to maintain sufficient revenues to cover operation costs and the effective management of those resources to operate the system.
- 3. **Managerial capacity** includes such things as ownership accountability, the ability of management to adequately staff the system with qualified personnel, an understanding of the regulatory requirements involved in operating a water system, and the ability to interact well with customers and regulators.

Water Systems wishing to receive more information about improving the technical, managerial, and financial capacity of their systems should contact their EPA Direct Implementation Program Manager or Primacy Agency Contact (see Section VI).

D. What are the requirements to receive funding via grants?

Grant administration generally requires more administrative and technical expertise to complete than receiving funding via in-kind services or interagency agreements. Grant applicants are required to complete a project management checklist to demonstrate that they can meet EPA's project management and reporting requirements and effectively oversee the project.

If EPA determines that a utility does not have adequate capacity to complete the service line inventory, service line material investigation, or LSLR, EPA may ask the system to receive assistance via in-kind services in lieu of a grant. If a grant is still the preferred option, EPA may require the system owner to take appropriate steps to ensure that the utility develops the appropriate level of capacity prior to an award. Appropriate steps may include the following:

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⁹ 42 U.S.C. 300j-12(a)(2).

• Providing a commitment from another Tribal department to assist with grant and project management.

Tribes wishing to receive more information about training for grants or other project management skills should contact their EPA Infrastructure Project Officer (see Section VI).

E. Are Matching Funds Required?

Matching funds are not required.

III. Proposal Submission Process

The proposal submission, review and award process is summarized below:

- 1. **Proposal Submission**: Once a Tribe submits a complete proposal, EPA will review the documents and provide and comment or questions to the Tribe.
- 2. **Respond to EPA Comments**: Once all of EPA's comments are addressed, EPA will notify the Tribe of EPA's funding decision and provide application guidance. This may include additional requests for information.
- 3. **Grant Application/Interagency Award Processing**: Once the Tribe submits a complete application and requested information, EPA can make a final award.

Additional Instructions for each step that the Tribe will need to take is detailed below:

Step 1: Proposal Submission Information

The first step is the submittal of the initial project proposal package. Packages will differ depending on whether the project is a SLI project or LSLR project.

All proposals must include: a) the DWTSA LSLR Project Proposal form (DWTSA-LSLR Proposal Form.xlsx) which will be available on our <u>website</u>, b) the tribal government endorsement, and c) cost estimate. LSL replacement project proposals must additionally include a planning document.

- 1. **DWTSA LSLR Project Proposal Form** The Project Proposal Form will be available on our <u>website</u>. There are separate tabs for both Service Line Inventory projects and Lead Service Line Replacement projects. The applicant should complete the appropriate tab based on project type. The form should be filled out as much as possible. A single project may cover multiple public water systems. The form must be signed by a person certifying that the information supplied is accurate.
- 2. **Tribal Government Endorsement** The proposal must be submitted with a tribal resolution or a tribal government endorsement of the proposal (i.e., the tribal leader's signature on the letter transmitting the proposal).
- 3. Cost Estimate Detailed cost estimates will be required for all grants and interagency

agreements. The applicant may be required to provide written documentation to support estimated costs.

For service line inventory and planning project budgeting purposes, project proposals and budgets should identify the entity that will be performing each planning activity. In general, the administrative and technical support costs should be captured in the individual line-item costs for each planning activity.

For service line inventory projects, it is possible that a water system will not know the full scope of work that will need to be done. The cost estimate should only include funding for confirmed elements of the scope of work. EPA will work with the Tribe to apply for supplemental funding once additional elements of the scope of work are known. For example, a water system may need to conduct records review and establish a service line map in order determine the amount of potholing that would be required; funding for potholing could be provided via supplemental funding to the project.

For construction project budgeting purposes, the following allowances for tribal administration, contingencies, engineering, inspection, and other technical support services are based on the following percentages of estimated construction costs.

Tribal administration	5% (interagency agreements)
	Indirect Cost Rate (grants)
Contingencies	10%
Technical support services	15% (interagency agreements, this includes engineering,
	inspection and technical support)

If the costs exceed the above allowances, the applicant must provide written documentation to support the increased costs. This approach is consistent with our December 2013 revised national program guidance. ¹⁰ Only actual costs incurred under the approved budget will be paid.

4. **Planning Document for Construction Projects** – To receive consideration for construction funding, a planning document must be prepared and submitted with the project proposal form. A planning document is eligible for funding prior to construction.

A preliminary Engineering Report may be submitted; at a minimum, the planning document must include: a) a detailed project description; b) timeline for completion; c) a detailed cost estimate; and d) documentation that the required right-of-way permissions have been secured.

EPA may award funds for work to secure rights of way through a planning project, though DWTSA funds cannot be used to purchase real property.

Step 2: Response to EPA Comments and Planning Documents

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¹⁰ U.S. EPA Final Tribal Set-Aside Guidelines (national), p. 11.

Upon initial review of the project proposal, EPA will notify each applicant with requests for additional information. Tribes must submit a response to any EPA requests, which could include: revised planning documents, any additional supporting documentation or endorsement requested by EPA, and if applying for direct grants, a project management checklist.

Step 3: Grant Application/Interagency Agreement Process

After reviewing final project proposal submissions, EPA will notify each applicant of the funding decision.

Tribes with fundable projects that meet the water system capacity requirements and grant administrative requirements, as applicable, will proceed with Step 3, the formal grant application, interagency agreement process, or direct or in-kind EPA assistance. Invitations to apply (or submit a Memorandum of Agreement and Project Summary) is not a guarantee of funding. The workplan and budget and grant application, or Interagency Agreement request must be approved by the EPA Project Officer and Grants Specialist. For grants, the EPA Region 9 Grants Management Officer will make the final award determination. For interagency agreements, the EPA Interagency Agreement Shared Service Center (IASSC) (or just Interagency Agreement Specialist) will make the final award determination.

For projects to be funded by grants, additional guidance will be sent out. These communications will include: 1) the amount of funding available for the project, 2) links to the grant application packet for grant-funded projects, 3) any final comments, and 4) the date by which the completed grant application must be submitted to EPA. For projects funded through a grant, the federal Standard Form 424 (SF-424) grant application, other required forms, as well as a workplan and budget must be submitted via grants.gov.

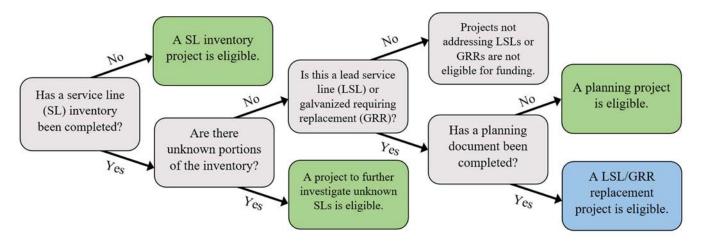
For projects to be funded by interagency agreements, the Memorandum of Agreement and Project Summaries prepared by Indian Health Service must be submitted to EPA.

IV. Funding Process

Region 9 anticipates that there will be sufficient funding to complete service line inventories and lead service line replacement projects for all eligible water systems. Prior to funding a LSLR project, a complete service line inventory for an eligible public water system is required. The water system must also determine the materials of all service lines to the extent that they are eligible for replacement or are considered non-lead (i.e. not lead or a galvanized requiring replacement). The Region may consider simultaneously funding SLI and LSLR projects in certain circumstances where unknown portions where investigation is delayed due to reasons beyond the Tribe or water system's control, or where the water systems have eligible LSLR projects and are on track to complete a full investigation project.

To assist in the scoping of eligible lead service line replacement projects, Region 9 may offer direct or in-kind assistance to complete service line inventories. This may include investigating unknown plumbing materials, providing a template service line inventory form, and providing additional guidance and tools to support the development of funding proposals.

The funding flowchart below outlines the process of determining project eligibility and is intended to streamline funding allocations. Boxes shaded in color represent the types of projects that can be funded through this program, with blue and green used to differentiate SLI and planning projects from LSLR projects.



IV. Technical Assistance

Under EPA Region 9's DWTSA-LSLR Program, EPA plans to provide technical assistance via contractor support and communication guides for water systems.

Currently, EPA can provide contractor support to complete initial service line inventories. Completing an initial SLI will also assist tribes in completing the DWTSA-LSLR Project Proposal Form and is supplemental to any additional assistance for investigative work.

EPA is also planning to develop specific guides and templates for tribes and water systems to use during the SLI and LSLR Process. The proposed templates include:

- Template notice for water systems to distribute to homeowners prior to potholing
- Template notice to homeowners for when a Service Line is identified as being lead, galvanized requiring replacement, or having a lead component.
- Template notice for water systems to distribute to homeowners prior to construction
- Template form to obtain permission from homeowner to replace entire service line & obtain right of way permission
- Factsheet for homeowners after service line replacement (e.g., possible flushing or POU usage)

EPA has additional technical assistance programs available to Tribes that include project development, grant management, general water system troubleshooting, operator training and more. Tribes wishing to receive more information about these opportunities should contact their EPA Infrastructure Project Officer (see Section VI).

V. Award Administration Information

Regulations governing the award and administration of grants can be found at 2 C.F.R. Parts 200 and 1500, and 40 C.F.R. Part 33.

Quarterly Progress Reports are required for all projects. Quarterly reports should describe project activities and provide the EPA Project Officer with information about project development including the status of the timeline and budget for meeting the environmental outputs and outcomes.

Financial Status Reports (FSRs) – For grants, an interim FSR is required annually and a Final FSR must be submitted within 90 days after grants expire.

Terms and Conditions: Examples of Grant Programmatic Conditions and Interagency Agreement Programmatic and Administrative Conditions are available. Sample Grant Administrative Conditions can be found online at https://www.epa.gov/grants/epa-general-terms-and-conditions-effective-october-1-2018

Environmental Reviews conducted by IHS under interagency agreements with EPA: For interagency agreements between EPA and IHS, IHS shall be the lead agency in environmental review.

Environmental Reviews conducted by EPA under drinking water infrastructure grants awarded directly to Tribes: Generally speaking, drinking water infrastructure grants awarded directly to Tribes are exempt from the procedural requirements of the National Environmental Policy Act (NEPA) based on the doctrine of functional equivalence. However, EPA may conduct an environmental review of a project funded under a drinking water infrastructure grant under the Agency's Voluntary NEPA Policy. EPA makes the decision to invoke the Voluntary NEPA Policy on a case-by-case basis. In cases in which EPA conducts a voluntary NEPA analysis, the NEPA process may include public participation, mitigation measures (e.g. monitoring measures), etc. Any voluntary NEPA review must be conducted prior to award of projects for construction; however, a voluntary NEPA analysis can be funded for a planning project with the preparation of an Environmental Information Document.

Federal Cross-Cutting Authorities: For interagency agreements, IHS shall be the lead agency responsible for complying with the Federal cross-cutting authorities (e.g. the National Historic Preservation Act, the Endangered Species Act, etc.). For grants EPA awards directly to Tribes, the recipient must comply with the applicable Federal cross-cutting authorities before the grant is awarded.

Greening Grants Policy: EPA has implemented Grants Policy Issuance (GPI) 17-01, Sustainability in EPA Assistance Agreements, that encourages voluntary efforts to incorporate sustainability practices into EPA grant funded programs and projects. When grant workplans are developed, EPA Project Officers will work with tribal staff to identify potential ways for the tribe to carry out EPA funded work in an environmentally sustainable way. The Policy includes numerous examples of sustainability practices, including environmentally preferable purchasing, green building, green meetings, and alternatives to travel.

VI. Agency Contacts

For general information about this program, please contact:

Karly Ho
DWTSA-LSLR Coordinator
U.S. Environmental Protection Agency
75 Hawthorne Street (WTR-4)
San Francisco, CA 94105

Phone: 415-972-3458 E-mail: ho.karly@epa.gov

Infrastructure Project Officers

Project Officers work with recipients under the DWTSA-LSLR Program and other tribal infrastructure programs within Region 9. For questions related to the DWTSA-LSLR Funding Program, including the development of eligible project scopes, the award process, and available technical assistance opportunities, please contact your EPA Infrastructure Project Officer. These geographic areas align with the Indian Health Services Districts and Areas:

Adam Ramos, Project Officer Navajo Nation Area	(415) 972-3450
Andrew Sallach, Project Officer Eastern Arizona, Redding Districts	(415) 972-3503
Karly Ho, Project Officer Sacramento District	(415) 972-3458
Madeleine Tango, Project Officer Escondido District	(619) 849-1033
Nancy Sockabasin, Project Officer Tuscon Area	(415) 972-3772
Sarah Mcgillewie, Project Officer Reno, Western Arizona Districts	(213) 244-1859

Direct Implementation (DI) Program Managers

Direct Implementation Program Managers oversee public water systems to ensure compliance with the Safe Drinking Water Act requirements. To discuss specific information about your water system, service line inventory requirements, and assistance with initial service line inventories, please contact your EPA DI program manager.

Karl Banks, Program Manager Nevada, Northeastern California	(415) 972-3557
Joi Chu-Ketterer, Program Manager Sacramento, Owens Valley, Washoe Tribe	(415) 972-3803
Jason Gambatese, Program Manager Ukiah Area, Fresno Area, Palm Springs Area	(415) 972-3571
Karly Ho, Program Manager Las Vegas Area, Northern Colorado River	(415) 972-3458
Andrew Sallach, Program Manager Northwestern California	(415) 972-3503
Jeffrey Tsai, Program Manager CRIT, Hopi, Yavapai	(415) 972-3459
Bayla Fisher, Program Manager White Mountain, Tonto Apache, Phoenix Area	(415) 972-3806
Greg Gholson, Program Manager Yuma Area, San Diego County	(415) 947-4209
Nate Delano, Program Manager San Carlos Apache, Tohono O'odham Nation	(415) 972-3776

For Water Systems regulated by Navajo Nation EPA, please contact: Navajopublicwater.org.