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July 22, 2021

The Honorable James P. McGovern
Chairman
House Committee on Rules
Washington, D.C.

The Honorable Tom Cole
Ranking Member
House Committee on Rules
Washington, D.C.

Dear Chairman McGovern and Ranking Member Cole:

On behalf of the National Association of Clean Water Agencies (NACWA), which represents over 340 public wastewater and stormwater utilities across the country, I write in strong support of the Napolitano/Gibbs amendment, #62, being offered to the Fiscal Year 2022 (FY22) Interior and Environment Appropriations bill being considered by the House next week. This critical amendment would direct important funding to help local communities prioritize their clean water investments in an affordable manner while providing increased human health and water quality benefits.

At the end of 2018, Congress passed the bipartisan Water Infrastructure Improvement Act (WIIA) (Public Law No: 115-436) which codified EPA's 2012 Integrated Planning (IP) Framework to provide local communities with critical flexibilities in meeting their Clean Water Act (CWA) obligations and ensure residents continue receiving safe, reliable, and affordable clean water services. The IP approach helps local communities sequence and prioritize how they meet their specific clean water obligations and long-term infrastructure needs and better manage costs over time, especially at a time of rapid innovation and changing environmental conditions.

On July 12, 2021, EPA submitted its *Report to Congress on Integrated Plans to Comply with the Water Infrastructure Improvement Act (WIIA) of 2019* to both the Senate Committee on Environment and Public Works (EPW) and the House Committee on Transportation and Infrastructure (T&I). The report, which was required by WIIA, highlights the nationwide progress on IP development and includes a series of case studies examining specific control measures taken, how compliance schedules have been used, and the costs associated for a community to implement an integrated plan.

This Report exemplifies how an IP can present a community with considerable cost-saving opportunities while simultaneously providing significant water quality benefits beyond what a singular improvement project could achieve. But much more is needed, especially from EPA, to continue facilitating the growth of IP. The funding directive in the Napolitano/Gibbs amendment will help the Agency better facilitate the development of IP across the country in line with Congress's goals.

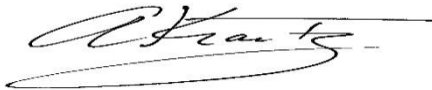
It takes significant work by a community, a state regulatory agency, and EPA to develop and craft an integrated planning approach from conception to implementation. EPA has provided some assistance to states and local governments by offering Technical Assistance, which ends September 1, 2021, to receive a free IP technical review from the Environmental Finance Centers at the University of Maryland and University of North Carolina.

While this assistance is helpful, more is needed and the Agency has yet to fully provide states in particular with needed guidance on how to review and appropriately consider integrated plans put forth by communities. Additional funding will also help with more information and guidance on the initial steps, knowledge, and resources needed to begin the IP process and how to best utilize it to meet CWA obligations and incorporate integrated planning concepts in CWA municipal permits.

The funding directed to EPA under the Napolitano/Gibbs amendment will be key to helping the Agency advance IP efforts at the state and local levels and ensure communities have the ability to utilize this important tool to make needed clean water capital investments and meet compliance obligations in a more targeted and affordable manner.

NACWA's members and the countless communities they serve that stand to benefit from the increased use of IP appreciate your consideration of this important amendment.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Krantz', with a long horizontal flourish extending to the right.

Adam Krantz
CEO