



January 11, 2022

The Honorable Radhika Fox  
Assistant Administrator for Water  
U.S. Environmental Protection Agency  
Washington, DC

Dear Assistant Administrator Fox:

On behalf of the National Association of Clean Water Agencies (NACWA), the Water Environment Federation (WEF), the Association of Metropolitan Water Agencies (AMWA), the American Water Works Association (AWWA), and the countless public drinking water, wastewater, and stormwater utility members and water professionals we represent, we write with a request for the U.S. Environmental Protection Agency (EPA) as it moves forward implementing further appropriations for the Water Workforce Infrastructure Development Grant Program. Specifically, we request that water utilities are given strong consideration as potential recipients, as provided for under the recently passed Infrastructure Investment and Jobs Act (IIJA) (Public Law No: 117-58).

Public drinking water and clean water utilities are uniquely positioned to utilize EPA workforce grant dollars to effectively provide direct and on-site education, training, and development to those who wish to begin and serve in careers as stewards of public health and the environment. Within this sector, there is a wide range of well-paying career opportunities such as engineers, operators, electricians, machinists, and mechanics, as well as environmental monitors and regulators, among others.

As a result, jobs in the water sector provide good careers with competitive wages that tend to pay more on average compared to all occupations nationally. The water sector is also unique in that it offers long-term career paths for many Americans who are considered "hard to employ," such as Opportunity Youth and individuals who have been through the criminal justice system. Careers in the water sector financially bolster the families of utility workers and the economies where utility workers live and work.

Unfortunately, over the next decade, the water utility workforce is expected to incur a retirement rate of over one-third. This number is alarming given the important daily work these public service professionals do to ensure communities have access to safe and reliable essential drinking water and clean water services and the extensive on-the-job education and training these careers require. It is critical that the experience and knowledge of the current generation of water utility workers be transferred to the next generation of workers, and that progress continues to ensure that the future workforce is diverse and reflects the communities served.

The COVID-19 pandemic has placed even greater strains on the current and future workforce needs of the clean water sector. As utility leaders weigh how best to ensure adequate staffing levels while protecting the personal health and wellbeing of their workforce, there is an added emphasis on finding and keeping staff for maintaining systems requiring around-the-clock attention.

NACWA, WEF, AMWA, and AWWA strongly supported the creation of the Water Workforce Infrastructure Development Grant Program in America's Water Infrastructure Act (AWIA) of 2018 (Public Law No: 115-270) and have continued to support subsequent increased fiscal year congressional appropriations that have been provided for the program, as well as reauthorization in the IJA.

Our associations appreciate clarification provided under the IJA that public works departments or agencies are directly eligible for these workforce development grants. Given the unique nature of how many public drinking water and clean water utilities are often structured and not always directly part of the local public works department or agency, we want to ensure that any publicly owned treatment works (as defined under the Clean Water Act, Sec. 212 [33 U.S.C. 1292]) or community water systems (as defined under the Safe Drinking Water Act, Sec. 1401 [42 U.S.C 300f]) are given consideration for a potential grant, whether part of their local public works department or agency or as a special district or other governance structure. We understand this is consistent with EPA interpretation.

We also urge that any projects funded should have a utility (or consortium of utilities) involved as partners, to ensure the selected projects lead to on the ground impacts in communities.

Thank you for your time and consideration and helping to ensure that the water utility workforce and the communities they serve are well-positioned in the years ahead.

Sincerely,

American Water Works Association  
Association of Metropolitan Water Agencies  
National Association of Clean Water Agencies  
Water Environment Federation

CC: Andrew Sawyers, Office of Wastewater Management  
Jennifer McLain, Office of Groundwater and Drinking Water