

WATER INFRASTRUCTURE POLICY RECOMMENDATIONS OF NASSCO, INC.

Communities nationwide are struggling with aging and degrading drinking water, wastewater, and stormwater infrastructure. With increasing incidents of failing sewer and stormwater collections systems, consumers are not receiving the reliability and high-quality service that utilities strive to provide. The need for more federal support for wastewater and stormwater infrastructure repair and replacement has been made even more urgent during the COVID-19 crisis because safe and reliable water infrastructure protects public health and promotes local economic recovery.

Key Facts and Figures About Wastewater and Stormwater Collections Systems in the United States:

- There are an estimated 19,700 wastewater pipe systems, comprising approximately 800,000 miles of sewer pipe
- Over 75% of all Americans rely upon well-built and maintained wastewater and stormwater collections and conveyance systemsⁱ
- A vast majority of the nation's sewer pipes were installed in the years just following World War II, which means they are at or beyond their design life (a typical design life is approximately 50 years)
- Increased volume and changes in population have placed a greater demand on these systems which have not proportionally benefited from the increased federal and state funding available for treatment works following passage of the Clean Water Act in 1971
- The Environmental Protection Agency (EPA) estimates that at least 23,000 and up to 75,000 sanitary sewer overflow events occur in the United States each year due to structural failure, blockages, and overflowsⁱⁱ
- Diminishing of the wastewater collection and conveyance system impacts public health, the environment, and the success of businesses large and small across America

While the national needs for repairing and upgrading our wastewater and stormwater infrastructure are significant and will require broad and substantial policy and funding solutions, NASSCO has put forth a set of recommendations for federal policymakers to adopt that will make meaningful headway towards improving the nation's wastewater and stormwater collections and conveyance networks.

INCREASED FUNDING FOR WATER & SEWER PIPELINE INFRASTRUCTURE

Recommendation	Specifics
Expand funding available through federal programs to increase funding to assess, rehabilitate, and replace wastewater and stormwater collections systems.	The percentage of funds that go toward collections and conveyance systems from the Clean Water SRF, Drinking Water SRF, U.S. Dept. of Agriculture Water & Wastewater Disposal Loan & Grant Program, are relatively small. For instance, less than 1.5% of all Clean Water SRF funds go toward stormwater infrastructure, while non-point pollution from municipal stormwater is a greater source of pollution in the watershed than point-source, which received the majority of Clean Water SRF funding ⁱⁱⁱ . The EPA and states should develop minimum funding levels committed through those programs towards sewer collections systems to meet CWA and state requirements.
The Government Accountability Office should complete a report to Congress analyzing the state of sewer collections infrastructure and the national need for its maintenance and repair.	While the EPA estimates a \$655 billion ^{iv} in wastewater infrastructure need over the next decade, data about sewer collections system infrastructure is limited. With most sewer collections systems decades old, policymakers need to know the size and cost of potential future investment needs for buried infrastructure.



STRENGTHEN ASSET MANAGEMENT REQUIREMENTS AND FUNDING

Recommendation	Specifics
Provide federal technical and grant assistance to communities that lack the financial and technical resources to develop comprehensive Asset Management Plans.	Communities with limited financial and technical capabilities face some of the largest infrastructure challenges. They need support through grants to help them develop comprehensive Asset Management Plans, which will protect residents, promote local economic development, and safeguard the environment.
Require that Asset Management Plans be in place for sanitary and/or storm sewer systems for all applications to federally-subsidized grants and loans.	Changes should be made to the Clean Water State Revolving Fund (SRF), Drinking Water SRF, U.S. Dept. of Agriculture Water & Wastewater Disposal Loan & Grant Program, U.S. Dept. of Transportation programs, and all other federal programs that fund collections infrastructure to require applicants submit an Asset Management Plan with applications for funding, and that all of the assets of the entire system be included in the Asset Management Plan. Grants and low-interest loans for Asset Management Plans should be made available through the Clean Water SRF and other federal funding programs.
Require that certified inspectors perform inspections of drinking water, wastewater, and stormwater collection and conveyance systems, and that a standardized identification and assessment method be used to assess pipe conditions.	In order to protect the interests of taxpayers and ensure that federal support for infrastructure investments are well spent, certified inspectors should perform pipe assessments and standardized inspection practices of drinking water, wastewater, and stormwater collection and conveyance systems should be required for projects funded with federal funds.

MAINTAIN REGULATORY COMPLIANCE ENFORCEMENT

Recommendation	Specifics
Full funding annually to federal programs and offices that directly and indirectly ensure that the Clean Water Act and National Pollution Discharge Elimination System (NPDES) permits remain in full regulatory compliance.	The EPA Office of Enforcement and Compliance Assurance, Dept. of Justice Environment Enforcement Section, EPA Water Pollution Control (Section 106) grants, and Section 319 Grants to States all represent programs that ensure compliance to federal and state water quality laws are maintained. These programs should be fully funded by Congress and robustly supported by federal and state regulatory agencies.



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For more information and to view a video about the important work of NASSCO members, please visit nassco.org/government-relations.

ⁱ American Society of Civil Engineers, “*Failure to Act: The Economic Impact of Current Investment Trends in Water and Wastewater Treatment Infrastructure*.”

ⁱⁱ Environmental Protection Agency, “*Sanitary Sewer Overflows: National Pollutant Discharge Elimination System*” November 2015

ⁱⁱⁱ Environment Protection Agency, “*2016 Annual Report: Clean Water State Revolving Fund Programs*” March 2017

^{iv} Environment Protection Agency, “*2016 Annual Report: Clean Water State Revolving Fund Programs*” March 2017, & “*Drinking Water Infrastructure Needs Survey and Assessment, Fifth Report to Congress*”, April 2013