



Building Equitable Water Infrastructure: Tools and Strategies

SRF money should flow to communities with the greatest need, including formerly redlined, low-wealth neighborhoods with lead service lines, municipalities with declining populations whose shrinking ratepayer base struggle to fund water infrastructure projects, rural communities bombarded with PFAS contamination, and indigenous communities who have limited to no built infrastructure connecting them to reliable, safe, and affordable drinking water and sanitation. Whether you work in a small community or represent a statewide organization, articulating your “why” connects the stories and lived experiences of the communities you represent to the often technical and complex SRF processes.

In addition to participating in the IUP public comment period, there are several arenas of influence that water advocates can and should engage within at the local government/utility level, state level, and federal level. This section includes tools and resources like sample letters and op-eds, social media and print out graphics, contact information, and more.

Initial Information Gathering – Questions for Reflection

What are my organization’s goals related to SRFs?

As you think about how you want to engage in shaping SRF processes, use these questions and suggestions to identify your goals, your partners (current and future), and possible tactics. Write down your ideas to begin creating a plan of action.

- To assist a specific water system to tap into SRF funding?
- To increase community engagement with our state agency to improve procedural justice in the SRF decision-making process?
- To increase my state’s overall distribution of funds to disadvantaged communities?
- To increase the number of green infrastructure projects that get onto our state’s PPL?
- To secure funding for PFAS or other emerging contaminants remediation in a certain county?
- To establish a workforce development program to deliver secure, well-paying jobs to individuals in frontline communities?
- To increase a city’s resilience to flooding?
- To improve our water/wastewater systems asset management plan?
- To implement affordable rate structures?
- To address issues in local waterways (streams, lakes) in one or more communities?
- Other

Who does my organization need to develop/ strengthen relationships with?

Depending on your goals, you should map what relationships you already have, where there are gaps, and key players you should reach out to.

- Municipal employees
- Water/stormwater utility employees
- Technical assistance providers
- Universities/academic researchers
- Organizations running workforce development programs
- Community based organizations
- Watershed groups
- Parks and Recreation agency staff
- Rural community members
- Neighborhood associations
- State SRF program employees
- State/local hazard mitigation staff (e.g., flooding)
- State legislators
- EPA regional office SRF employees
- Advocates with more experience with SRFs in other parts of the country

What short- and mid-term tactics do we need to use to accomplish our goals? For example:

- Educate staff, volunteers, members and/or wider public about what SRFs are and how they can benefit communities. Consider the best methods to reach your audience(s): hosting in-person or virtual workshops, speaking at neighborhood association meetings, setting up learning sessions with partner organizations, etc.
- Identify individuals/organizations with which to build strategic relationships (based on the previous reflection question) and establish necessary coalitions, coming to consensus on collective priorities. Develop shared solutions related to goals and priorities.
- Begin messaging: to traditional decision-makers (utility staff, state agency staff) and to community members. Proactively meet to talk about your goals and how SRFs can help accomplish them. Amplify public comment periods and hearings and draft talking points. Submit robust, detailed comments.
- Help find and secure technical assistance for application requirements to get projects on the PPL.

Letter & Email Templates

Working with Your Utility

Building working relationships with the entity that can actually apply for SRFs is a foundational step for effective advocacy. You may or may not already have a relationship with the water, wastewater, and/or stormwater utilities that manage your organization or community's water—and if you do have a relationship, it may be marred by a history of confrontation, disappointment, or mistrust. New efforts to make connections and provide your perspective and recommendations will take time and effort for all parties involved.

River Network and WaterNow Alliance's report *Building Blocks of Trust: Creating Authentic and Equitable Relationships Between Community Organizations and Water Utilities* highlights best practices and building blocks for local community groups and water systems to take to establish strong and authentic relationships.



Capital Improvement Plan: Capital improvement plans list all planned projects, equipment purchases, and major planning / engineering studies of a utility or municipality. These implementation plans provide a working blueprint for sustaining and improving the community infrastructure and typically include information about construction timeframes, and financing and funding needs.

You can find out what kind of projects your utility or municipality plans to complete by reading their capital improvement plan, but these may be hard to find or difficult to interpret; direct communication is likely your best way of getting the information you seek and provides a way to share your priorities and questions. It may be necessary to access information through your state's regulatory commission for regulated water systems.





EMAIL TEMPLATE TO INITIATE COMMUNICATION WITH STATE SRF STAFF

Initiate contact with your [state SRF program staff](#) via email or phone. If emailing, copy any relevant partners or coalition members who also want to be a part of the conversation. This template assumes you are reaching out before the release of a draft IUP and that this is the first time you've contacted them. Adjust as necessary.

Dear [\[contact name\]](#),

Hello, my name is [\[name\]](#) and I work at [\[name of organization\]](#). [\[Provide a short description of what your org does, where it's located, who you represent, and how your work relates to water infrastructure. If you are sending email on behalf of a coalition or other partners, list them as well\]](#). I'm reaching out to you because [\[organization/coalition\]](#) would like to meet with you to discuss [\[state's Drinking Water or Clean Water State Revolving Fund program\]](#).

We would appreciate gaining insight on the timeline for when you expect to release the draft Intended Use Plan, and to discuss our priorities as it relates to [\[include your priorities here- is it the amount of time the IUP comment period will be open? Is it about the state's definition of affordability criteria or DAC? Is it about their ranking criteria for project prioritization? Is it about your community's project application?\]](#).

Please let me know some dates and times that you'd be available to meet. We look forward to hearing from you soon.

Sincerely,

[\[signature block\]](#)

STATE-LEVEL TOOL



Op-Ed Pointers

1. Consider your "targets." You want your messaging to resonate with your intended audience. Are you trying to reach out to the general public, elected officials, or agency bureaucrats?
2. If you have a specific news source in mind, check to find their word count limit and submission deadline.
3. "Asks," recommendations, or demands should be included—you want to see results! Specify what they are.
4. Include personal/community stories: why is what you are describing and asking for important? What's the impact? Cite local examples.

Structure of an Op-Ed

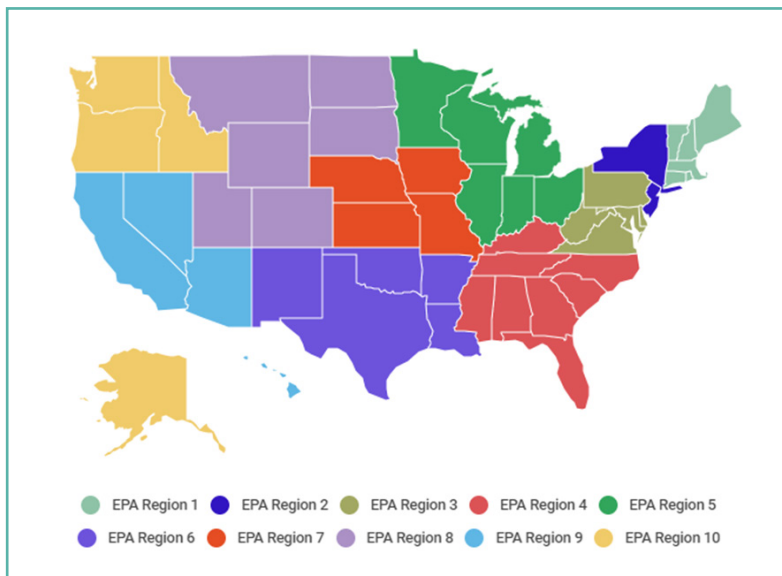
1. Introduce your relationship with the issue (drinking water contamination, flooding, etc.) and frame the issue within the context of SRFs.
2. Explain the impacts of action/inaction—what's the problem? Include a mix of facts and storytelling/personal narrative.
3. Drive home the solution you are proposing, how it will improve public health, your town's climate resiliency, workforce development and job opportunities, water affordability, etc.
4. End with a call to action/what to do next (come to a training to learn how to speak at a public hearing, write comment letters, contact your legislator).

Resource Media has a [great toolbox](#) with other messaging resources if you want to check out other advocacy templates and tips.

CROSS-LEVEL TOOL

Communicating with the EPA

The amount of money dedicated to SRFs is set by Congress, and the EPA then passes the money out to states, tribes, and territories based on determined criteria. While the EPA doesn't directly manage how most SRF funding is spent, the agency does play an important role in providing guidance to states, reviewing states' Intended Use Plans (IUPs), and providing technical assistance and support.



TEMPLATE LETTER TO REGIONAL SRF STAFF

Special thanks to Rebecca Hammer of NRDC and Julian Gonzalez of Earthjustice for developing this template and allowing for its inclusion in this toolkit.

Background FAQ for EPA Regional Office State Revolving Fund (SRF) Template Letter Clean Water for All Coalition – July 2022

1. Why should I contact my EPA regional office about my state's SRF spending plan?

Before a state can access its annual allotment of State Revolving Fund money from the federal government, the EPA must first approve the state's plan for how it intends to spend those funds. This plan is known as the Intended Use Plan (IUP) and Project Priority List (PPL). The review and approval process are typically performed by staff in the EPA's regional offices.[1] There are ten EPA regions, each responsible for implementing the agency's programs in a handful of states.

Unlike the IUP/PPL development process at the state level, there is no defined opportunity for members of the public to weigh in with EPA regional offices about states' SRF spending plans or push EPA to hold states accountable to the public. Nonetheless, it is valuable to communicate any concerns about your state's plan directly with the EPA regional office staff responsible for reviewing it—before they approve it and disburse that year's tranche of funding. EPA staff can then raise issues directly with state SRF program managers as part of any negotiations between EPA and the state over the contents of the final plan. The names and contact information for EPA regional office SRF program coordinators are listed at the end of this document.

EPA regional offices are also responsible for providing SRF technical assistance, advice, and consultation to states, so advocates can tell EPA regional staff what new or additional support you believe is needed in order to make your state's program more effective and equitable.

2. What authority does the EPA regional office have to influence my state's plans?

The Clean Water Act (CWA) and Safe Drinking Water Act (SDWA) establish the requirements for state IUPs. These guidelines are quite broad, giving states wide discretion to allocate funding if they adhere to basic federal rules around eligible recipients and project types and the distribution of additional subsidization (grants and principal forgiveness). As a result, the EPA's authority to influence state plans is somewhat limited.

That said, the EPA regional offices do possess some leverage over state plans by virtue of the fact that they hold the purse strings. For example, they can:

- Request more information from the states to ensure that statutory requirements are met.
- Review plans for compliance with cross-cutting federal rules such as the Civil Rights Act's non-discrimination standards.
- Ask states to voluntarily update their SRF policies and provide resources to help them do so.

In March of 2022, EPA issued a memo to the states on implementation of the SRF funds in the Bipartisan Infrastructure Law, signaling that it intends to take a more active role than usual in the IUP approval process. In particular, the memo stated that EPA will review state policies to ensure compliance with the BIL’s mandate to provide 49% of funds as additional subsidization, including by verifying that:

- Their “affordability criteria” and definitions of “disadvantaged community” are consistent with the CWA and SDWA.
- Their priority ranking systems for project applications will result in disadvantaged communities receiving funds.
- Their outreach, engagement, technical assistance, and application processes do not present barriers that would prevent disadvantaged communities from receiving funds.

Advocates can emphasize these agency commitments to your EPA regional office and provide your perspective on how your state’s plans do or do not comply with legal requirements.

3. What types of partners might I want to include in these conversations?

A lack of functioning or well-maintained water and sanitation infrastructure can affect many members of the community. Advocates communicating with EPA regional offices should consider including community leaders, grassroots groups, or any other individuals impacted by local infrastructure shortfalls. These voices are not always heard in state decision-making processes and even less frequently at the EPA regional level. Note that it is helpful but not necessary for these partners to have commented on the state’s IUP before elevating concerns to the EPA region, as long as your organization has engaged the state on these issues (EPA’s first suggestion is usually for NGOs to work directly with the state on its IUP).

4. Where can I find additional background information on the State Revolving Funds?

In the SRF Advocacy Toolkit! And EPA’s fact sheets and resources on the Clean Water and Drinking Water SRFs:

- [Clean Water State Revolving Fund \(CWSRF\) Factsheets | US EPA](#)
- [Reports and Fact Sheets about the Drinking Water State Revolving Fund \(DWSRF\) | US EPA](#)

Dear [name of EPA Regional SRF point person],

On behalf of [your organization], we write to share our perspective on [your state’s] plans for spending its State Revolving Fund (SRF) resources over the coming year. [Briefly describe your organization, its location, its purpose or goal, its membership base, and/or why you care about water infrastructure/clean water/public health.]

We thank the Environmental Protection Agency (EPA) for involving residents, community organizations, and environmental groups in the implementation of the SRF program. The SRF takes on heightened importance this year given the passage of the Infrastructure Investment and Jobs Act (IIJA), also known as the Bipartisan Infrastructure Law. The scope and size of the law’s new investments present an unprecedented opportunity to improve water infrastructure throughout our [community/state/country]. Community input on disbursement of these funds is a critical part of the implementation process and will result in more equitable and efficient investments.

We understand that EPA Regional Offices are responsible for engaging with state SRF agencies and reviewing their plans to ensure consistency with federal requirements. Given your important role in holding states accountable, we ask that you consider our views on [your state’s] proposed SRF plans and our experiences engaging with [state agency] on this issue.

[Describe your organization’s engagement in your state’s SRF process, such as the development of its most recent Intended Use Plan (IUP). Did you submit comments? If so, attach them to this letter. Did you testify at a public hearing or meet with state agency staff?]

[Next, describe your organization’s priorities for the IUP or the state’s water infrastructure investment strategy more generally—for example, directing funds to disadvantaged communities; funding a specific project; funding projects in a specific community; maximizing funding in the form of grants or principal forgiveness; prioritizing green projects; considering climate impacts and enhancing resilience; providing technical assistance for potential applicants; and/or ensuring projects support local workforce development.]

[Describe how your state responded to your input. If the state’s response—or lack thereof—did not address your concerns, explain why that response was not adequate. You may want to reference EPA’s March 2022 Bipartisan Infrastructure Law SRF implementation memo.]

We ask that EPA Region [#] not approve [your state’s] IUP unless it makes key changes to address these issues. [If not already clear, describe the changes you consider critical.] We also request a meeting with your office to discuss how Region [#] can work with [your state] to ensure that [your objectives] are achieved.

Thank you for considering this request. We look forward to hearing from you soon.

Sincerely,

[signature block]

For more ideas on taking action related to water infrastructure decision-making processes, explore the “[Decision-Making and Influence](#)” section of River Network’s Equitable Water Infrastructure Toolkit.



IMPORTANT CONTACTS

Who should I contact at EPA?

EPA Regional SRF Staff – There are 10 regional offices across the country. Regional EPA staff are the ones who review and approve states’ IUPs. After you’ve submitted comments on your state’s draft IUP, share your suggested changes with your EPA regional SRF point person too; they can ask a state to make changes before approving the draft IUP.

EPA Office of Water – Based in Washington, D.C., and responsible for implementing the Clean Water Act and Safe Drinking Water Act, the [Office of Water](#) works with the 10 EPA regional offices, as well as other federal agencies, tribes, state and local governments, and other stakeholders.

EPA Office of Environmental Justice & External Civil Rights – This [office](#) includes staff at EPA headquarters and regional offices who oversee the agency’s delivery of Justice40 benefits and engage communities with environmental justice concerns and enforces federal civil rights laws.

EPA Municipal Ombudsman – EPA employs a “[Municipal Ombudsman](#)” to serve as a resource for communities as they strive to comply with the Clean Water Act. Therefore, issues related to the CWSRF fall under the purview of the Ombudsman. Reach out to the Ombudsman if you’re running into issues with other EPA offices, since they can help coordinate with EPA officials and other stakeholders to serve as an intermediary to resolve problems. Cities, towns, boroughs, districts, tribes and tribal organizations can access these services (if in doubt, reach out).

National Environmental Justice Advisory Council (NEJAC) – A federal advisory committee to EPA that provides independent advice and recommendations. Several council members have expertise on water issues. Find out about upcoming NEJAC meetings [here](#).

National Tribal Caucus – A national body of high-level tribal representatives who work with EPA to provide information and advice on the agency’s tribal programs and environmental issues. Contact information of Tribal Caucus members can be found [here](#).

EPA Regional Contacts

State SRF websites and contact information [can be found here](#), along with EPA Regional SRF Coordinator contact information and EPA Regional tribal contact information. *Something outdated? Email us at infrastructure@rivernetwork.org*

Graphics

The graphics included throughout this toolkit are available for you to share electronically or to download and print. Download them by clicking the following links:

- [SRF Process Map](#)
- [SRF Key Roles](#)
- [Lead Service Line Graphics](#)
- [PFAS Graphics](#)
- [RCAP Regional Partners](#)
- [What’s in an IUP?](#)
- [Eligible PFAS/Emerging Contaminants Projects](#)
- [Who do I talk to?](#)

We have also developed social media graphics to highlight the importance of SRFs. [Download them here](#) and feel free to adapt them to your organization’s members/audience.



Community orgs and water advocates have opportunities to influence the process:

Including through public comment periods, building relationships with local utilities, meeting with appropriate agency staff, and amplifying infrastructure needs.

Clean Water and Drinking Water SRFs were first established in 1987 and 1996, respectively.

The purpose of SRFs is to provide financial assistance for a wide range of water infrastructure projects.

An estimated \$473 BILLION dollars over the next 20 years is needed to provide safe, clean, reliable water across the country.