



April 28, 2020

Chairman John Barrasso  
Committee on Environment & Public Works  
United States Senate  
Washington, DC 20510

Ranking Member Tom Carper  
Committee on Environment & Public Works  
United States Senate  
Washington, DC 20510

Dear Chairman Barrasso and Ranking Member Carper,

I write to you on behalf of the more than 5,500 individuals that make up the National Onsite Wastewater Recycling Association (NOWRA). Our members include installation contractors, service providers, manufacturers, suppliers, system designers, educators, and regulators. NOWRA works to educate and serve its members and the public by promoting sound federal, state, and local policies, to improve standards of practice, and increase public recognition of the need for and benefits of onsite and decentralized wastewater infrastructure. The most widely known examples are septic systems; however, there are a wide range of decentralized treatment technologies. These systems can sustainably serve a single home, a neighborhood, or an entire community including commercial and industrial facilities.

More than 85 million Americans—25% of the population—rely on decentralized recycling systems to treat their wastewater. Decentralized systems are used as the wastewater infrastructure for 30% of all new single-family homes built in the United States. Contrary to popular belief, decentralized system users are not found just in rural areas. Many systems serve suburban/urban communities. Even the U.S. EPA has reported to Congress and formally recognized that decentralized systems will continue to be a part of the nation's wastewater infrastructure.

Despite the widespread use of decentralized systems, this population receives less than one-half of one percent (1/2 of 1%) of funding distributed through the Clean Water State Revolving Fund (CWSRF). While the ratio of sewer to decentralized infrastructure is roughly 3:1, the funding disparity reflects a ratio of 200:1. This is fundamentally unfair to millions of taxpayers whose tax dollars fund the infrastructure needs of others while their own needs are ignored.

Most unfortunately, more than a million homes across the country lack adequate plumbing and nearly 200,000 homes lack a sewage system altogether, according to data from the U.S. Census Bureau.

Because of all this, it's critical that new sources of funding be directed to the critical infrastructure of decentralized wastewater systems. NOWRA supports language included in the draft text of *America's Water Infrastructure Act of 2020* (AWIA 2020) that creates a decentralized grant program for those in the most need for improved wastewater treatment. Below are policy recommendations for your consideration regarding Section 2010 of the draft text of AWIA 2020.

- **National Program**—While the need exists for increased decentralized system funding in the regions of the Mid-Atlantic, Appalachia and the Southeast; these needs also extend to the rest of the country as well. Thus, NOWRA recommends that the Committee does not limit eligibility of this grant program to any specific geographic regions of the country.
- **Larger System Eligibility**—While individual decentralized wastewater treatment systems (septic) are most common; larger, “cluster” decentralized systems may be most appropriate and cost efficient in some cases. For this reason, NOWRA recommends expanding eligibility to include these systems. We support adding the following language to Section 2010:

*“(3) for the installation of a larger decentralized wastewater system designed to provide treatment for 2 or more households in which eligible individuals reside, if—*

*“(A) site conditions at the households are unsuitable for the installation of an individually owned decentralized wastewater system;*

*“(B) multiple examples of unsuitable site conditions exist in close geographic proximity to each other; and*

*“(C) a larger decentralized wastewater system could be more cost-effectively installed.*

- **Authorized Funding**—Decentralized systems are often times the most appropriate and cost effective way to treat the wastewater of families in the most need of sanitation assistance. However, a failing onsite system can result in sewage overflow into people's yards, and even their homes, causing serious public health and water quality concerns. Because of the enormous need to improve the lives of 1.7 million Americans, NOWRA recommends increasing the authorized funding level for Section 2010 to \$50 million for both FY 2021 and FY 2022.
- **Expand Section 2011 Eligibility**—While the grant program created in Section 2010 recognizes the possibility that connecting a household to centralized sewer might be the most cost effective use of grant funding, NOWRA recommends that the grant program created in Section 2011 also recognize that installing, repairing or replacing a decentralized wastewater system may be the most cost effective use of grant funding. NOWRA proposes incorporating similar eligibility language for that program along the lines of the following:

*“(A) IN GENERAL.—In any case in which an eligible individual who submits to a private nonprofit organization an application for a subgrant under this section resides in a household that would be better served by a decentralized wastewater system, the private nonprofit organization shall conduct a cost analysis to determine whether*

*installing a decentralized wastewater system would be a more cost-effective use of subgrant funds, as compared to the eligible uses described in paragraph (1).*

*“(B) USE OF FUNDS.—If a cost analysis under subparagraph (A) demonstrates that installation of a decentralized wastewater system is more cost-effective than the eligible uses described in paragraph (1) with respect to the household, the eligible individual may use a subgrant provided under this subsection to install a decentralized wastewater system.*

NOWRA commends the Committee for producing draft legislation that takes important steps forward in improving the nation’s water infrastructure. We hope the Committee incorporates these recommendations into AWIA 2020 as it moves forward. NOWRA stands ready to work with the Committee in this process in hopes of improving and enacting this legislation as soon as possible.

Sincerely

A handwritten signature in black ink, appearing to read "Carl W. Thompson". The signature is fluid and cursive, with a large initial "C" and "T".

Carl W. Thompson, P.E.  
President, NOWRA

PS: For additional information or questions please contact NOWRA’s Executive Director, Eric Casey, as 703-836-1950 or at [wecasey@comcast.net](mailto:wecasey@comcast.net); and Tracy Hammond at 202-251-7435 or [thammond@polsinelli.com](mailto:thammond@polsinelli.com).