



Environmental Council of the States

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October 15, 2020

Benita Best-Wong, Deputy Assistant Administrator, Office of Water
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, D.C. 20460

Re: Early Engagement on FY 2022 – FY 2023 National Program Guidance

ECOS members appreciate the opportunity to provide early input on the Office of Water (OW) FY 2022 – FY 2023 National Program Guidance (NPG), including the early engagement call on October 8. EPA’s efforts to engage with states in enhancing planning and communication in water work will lead to improvements in our collective ability to protect human health and the environment.

In recent discussions with EPA senior leadership and with Office of Management and Budget, ECOS has identified four priority issues: adequate funding, flexibility, E-Enterprise for the Environment, and technology infrastructure. These priorities will be reflected in much of the input we provide for your consideration in developing the NPG.

Federal funding makes up about 27% of average state environmental agency budgets, and overall STAG funding has been flat for 18 years. Budget impacts from the COVID-19 pandemic stand to impose further challenges. Adequate federal funding and flexibility in the use of funds and in program implementation will be important to continued success in delivering results and accomplishing shared goals.

Joint governance under E-Enterprise for the Environment is a key tool for driving program modernization and coordinating needed investments in information systems. Support for technology infrastructure and the latitude for state pilot projects will accelerate the adoption of new more efficient tools to meet our shared goals. States also urge continued investment in data systems to improve the interoperability between state and federal databases.

In addition to considering these core priorities, states encourage EPA to find ways to shift the focus of some measures to capture environmental outcomes rather than the number of inspections or evaluations. States are also interested in better understanding EPA’s schedule for tracking progress, and encourage additional communication to states to clarify the process. ECOS is supportive of maintaining efforts to enhance capacity of small communities to meet water infrastructure challenges. ECOS encourages EPA to look to other associations for additional input and suggestions.

Thank you again for the opportunity to provide comments. ECOS looks forward to continuing the discussion during the development of the FY2022-23 priorities. If you have any questions about these comments, please contact ECOS Executive Director Don Welsh at dwelsh@ecos.org or 202-266-4920.

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