

Tab 1



State Revolving Funds for the South

The American South faces urgent water infrastructure challenges amid historic federal funding opportunities through the Bipartisan Infrastructure Law (BIL). While State Revolving Funds (SRFs) provide crucial financing for water infrastructure, our analysis finds persistent barriers preventing funds from reaching communities most in need. This brief outlines key challenges and recommendations for improving SRF programs across Southern states.

What are [State Revolving Funds](#)?

State Revolving Funds (SRFs) provide federal funds to states and local communities to address water infrastructure upgrades. Two funds exist through the Environmental Protection Agency (EPA): the Drinking Water State Revolving Fund (DWSRF), which funds drinking water infrastructure projects, and the Clean Water State Revolving Fund (CWSRF), which funds water infrastructure projects beyond drinking water, such as wastewater treatment, stormwater management, and nonpoint source pollution.

EPA provides annual funding to state agencies based on each state's 4-year needs assessment survey. In addition, states are required to provide a 20% cost match each year. State agencies use this funding to provide low-interest loans to municipal water systems for capital improvement projects. Over time, municipal water systems repay the loan with interest, creating a “revolving” and ever-growing fund for the state to continue providing loans for future projects. At times, specialized grants or principal forgiveness loans are available through SRF programs.

The 2021 Bipartisan Infrastructure Law (BIL), authorized an unprecedented \$43 billion in funding to EPA's SRF programs over 5 years (2022-2026). Much of this funding must be used for grants or principal forgiveness loans, with 49% of funds required to assist disadvantaged communities (DACs). Out of BIL's \$55 billion in total water infrastructure investments, \$15 billion is allocated specifically to lead service line (LSL) replacement projects, with another \$5 billion allocated specifically to remediation of emerging contaminants, like per- and polyfluoroalkyl substances (PFAS).

BIL funding is limited. After 2026, any unallocated funds may be subject to reauthorization and redirection to other federal programs, potentially resulting in lost opportunities for water infrastructure improvements in the South. For more information on SRFs, please [visit EPA's website](#).

Why SRFs Matter for the South

Our vision for Southern water infrastructure builds on the region's rich history of environmental justice and civil rights organizing. Our region has historically been underserved by federal infrastructure investments, leading to disparities in water and wastewater access. Many Southern communities, particularly in rural and historically disadvantaged areas, still lack basic water and sewer infrastructure, or rely on severely aging systems that need replacement.

The South's water infrastructure challenges stem from multiple factors: (i) aging systems that are several decades old and at high risk of failure; (ii) unique climate vulnerabilities along the Gulf Coast; (iii) historical patterns of disinvestment in communities of color and low-income neighborhoods; and (iv) capacity gaps in water systems that struggle to navigate complex funding programs.

Our vision for Southern water infrastructure is guided by core principles:

1. Every Southern community deserves reliable access to clean, affordable drinking water and wastewater services. This means ensuring that basic infrastructure reaches historically disadvantaged communities and that water rates remain affordable for low-income households.
2. Infrastructure investments must prioritize communities that bear disproportionate burdens of pollution and disinvestment. This includes rural, urban, and Indigenous tribal areas. These investments should create economic opportunities through job training, workforce development, and engagement of local businesses.
3. Water infrastructure must be built to withstand growing impacts of climate change. As our region faces more frequent storms, floods, and droughts, our water systems need to endure these pressures while protecting public health and the environment.
4. Community voices must drive infrastructure planning and investment decisions. Local residents understand their needs best and must have meaningful input in shaping solutions.
5. Through peer-to-peer learning, resource sharing, and collaborative advocacy, we aim to build a unified Southern movement that uplifts the voices of underserved communities and advances water equity and climate resilience for all.

Key SRF Findings in Southern States

Our analysis of SRF programs across Southern states reveals barriers that could prevent this funding from reaching the communities that need it most. Understanding and addressing these barriers is critical for ensuring equitable access to clean and affordable water across the South.

1. Outreach to utilities and communities needs improvement, resulting in available funding going unused.

- Tennessee's first-come-first-served approach tends to disadvantage communities with limited administrative capacity.
- Short public comment periods for intended use plans, such as Texas' three-week window, limit community input on funding priorities.
- **Opportunity:** Enhanced outreach strategies like regional workshops, targeted engagement, and extended comment periods would allow more communities to participate and provide input in the SRF process.

2. Current definitions of disadvantaged communities (DACs) often miss communities with genuine needs.

- Texas' approach of assessing total service areas rather than project-benefit areas can overlook urban disadvantaged neighborhoods.
- Tennessee's county-level assessments don't adequately capture neighborhood-level needs in metropolitan areas and tribal communities.
- **Opportunity:** A multi-factor approach considering environmental and health indicators, demographic data, and infrastructure conditions at the census-tract level would more accurately identify communities most in need of assistance.

3. Technical assistance resources remain underutilized, creating challenges for smaller and rural utilities.

- In 2022, Alabama only used 7.1% of its available DWSRF set-aside, while the national average was 22% and the maximum allowed set-aside is 31%.
- **Opportunity:** Expanding technical assistance programs through targeted outreach and partnerships will build local capacity to access funds. An effective model for technical assistance is [North Carolina's circuit riders](#) program which provides training and assistance 24/7.

4. Green infrastructure and sustainability projects receive limited prioritization.

- In 2022, Louisiana's CWSRF only set aside the minimum requirement of funding for the green project reserve, and the DWSRF did not set aside any funding specifically for green projects.
- Tennessee's "green" projects often default to basic efficiency measures like water meter replacement rather than innovative solutions.
- **Opportunity:** Strengthening incentives for sustainable infrastructure would advance both water quality and climate resilience goals, such as increasing scoring bonuses for green projects and setting higher green project reserve levels.

5. Definitions of disadvantaged communities sometimes reflect agency priorities rather than community needs.

- Ex. Louisiana's DWSRF added "water systems serving <10,000 customers" as a parameter to define DAC, which fit their agenda to use money to consolidate water systems. This program also added "water systems not in compliance" as a parameter to define DAC, which fit their agenda to use money to improve compliance issues, even though noncompliance is a federal SRF priority regardless of community demographics.
- **Opportunity:** Developing more objective criteria for disadvantaged status would better align funding with genuine community needs.

6. BIL-specific funding for critical issues like lead service lines and PFAS mitigation remains underapplied for.

- The Sewerage and Water Board of New Orleans did not apply for lead service line replacement funding until October 2023, delaying Louisiana's access to these federal resources for at least two years.
- Alabama's Emerging Contaminants plan addresses PFAS contamination in just two North Alabama communities despite documented contamination across numerous utilities statewide.
- **Opportunity:** Creating simplified application pathways for specific contaminant issues may accelerate uptake of these critical funds.

7. Priority point ranking systems vary significantly across states and many create inequitable project ranking systems.

- Ex. Louisiana's CWSRF program gives 5 to 25 priority points for projects that cater to specific needs or priorities. In addition, if a loan applicant has all of their plans and designs completed, they receive an additional 1,000 points. If the loan applicant is ready to break ground, they receive a further 2,000 points. This creates a highly inequitable system where well-resourced projects and loan applicants are prioritized and given loans faster than disadvantaged communities that are under-resourced and may not have all of their planning, design, and construction requirements in place.
- **Opportunity:** Rebalancing ranking criteria would create more equitable access to funding, particularly for under-resourced applicants.

Key Recommendations

The Environmental Protection Agency must strengthen its oversight and guidance of state SRF programs:

1. Issue comprehensive guidance advising states to adopt standardized criteria for defining disadvantaged communities. These standards should ensure consistent recognition of historically underserved communities while allowing flexibility to address unique local circumstances.
2. Establish rigorous monitoring and evaluation protocols for annual assessment of state SRF programs. These evaluations should compare implementation across states, identify systemic barriers, and drive continuous improvement in program delivery. Results should be publicly reported to ensure transparency and accountability.
3. Reform technical assistance delivery by developing standardized training programs, expanding support for small and rural systems, and documenting assistance outcomes. EPA regional offices may need enhanced capacity to provide direct support to states and utilities.

U.S. Congress must take action to ensure the long-term success of SRF programs through several key reforms:

1. Increase the maximum allowable set-aside for state administrative costs from 4% to 6% of the capitalization grant. This would provide states with necessary resources to enhance technical assistance, conduct meaningful community engagement, and improve program management.
2. Strengthen oversight requirements by requesting annual reporting on project withdrawals, bypassed projects, and funding distribution patterns. This data would help identify and address systemic barriers facing disadvantaged communities.
3. Establish dedicated funding streams for technical assistance, requiring states to maintain minimum support levels for small and disadvantaged systems. This assistance should support pre-development planning, engineering assessments, and design work through regional coordination hubs and community partnerships, helping build long-term capacity for accessing SRF funding.

State agencies administering SRF programs must undertake reforms to ensure equitable access to funding:

- Reform ranking systems that negatively impact DAC applicants, such as small systems with aging infrastructure. States should remove point bonuses that favor well-resourced utilities, such as Louisiana's 2,000-point bonus for construction-ready projects. Ranking criteria should prioritize community needs, environmental impacts, and long-term sustainability.

- Maximize principal forgiveness, with up to 100% forgiveness based on community need. Geographic scope should shift from broad-service areas to specific project-benefit areas to prevent masking of neighborhood-level needs, particularly in urban areas where pockets of disadvantaged communities are shadowed by wealthier surrounding areas.
- Provide planning loans for high-ranking projects not yet ready to proceed, while enhancing project rating criteria.
 - Rating systems should specifically incentivize innovative green infrastructure and nature-based solutions that build community resilience, moving beyond basic efficiency measures.
- Expand technical assistance programs through strategic use of set-asides. States should establish regional coordination hubs that partner with community-based organizations to provide sustained support throughout the funding process, while building long-term capacity for effective project development.
- Implement robust tracking and reporting systems to ensure transparency and accountability. This includes documenting all SRF applications and their status, explanations for rejected applications, and detailed information about awarded projects, including beneficiary communities and levels of subsidization. States should also adopt rolling application processes to provide more flexible access to funding opportunities throughout the year.

What is the Southern Regional Workgroup?

The Southern Regional Workgroup is a coalition that collectively establishes policy priorities and organizational support for Southern-based local and regional water-focused organizations that advocate for and work with communities of color, low-income communities, and frontline communities in the South.

Advocating for water and climate justice in the South presents a unique set of challenges which are rooted in the history of racism, extractive relationships with our land and waters, and conservative decision makers that do not center the needs of our communities or value climate science. From plantations to petrochemicals, our region's land and waterscapes have been treated as "sacrifice zones," and our ancestors and communities have been seen as dispensable. As we strive for water equity and climate resilience, we call out race as it relates to water advocacy in the South, especially that of Black, Indigenous and migrant communities.

Many of our communities are situated near and on the Gulf Coast which is uniquely vulnerable to disasters, and our region is on the frontlines of climate change. Federal and state policies have continuously ignored and neglected the needs of Southern communities and deprioritized funding for marginalized communities across the South. With increasing risks of climate change and an unprecedented amount of federal funding available for water and climate reform,

Southern Water Call members recognize that now is the time to collectively champion Southern needs and priorities and to call on our national partners to help advocate for Southern communities.

While often overlooked and disregarded, the South is rich—culturally, economically, and socially—yet we are in need of greater resources, funding, and policies to address the centuries of harm we have faced. We are energized by organizing and movement work that originated in our region, including the environmental justice and civil rights movements. We see this moment as an opportunity to collaboratively advocate for our waterways and people, and we are demanding a seat at the table. As members of the Southern Water Call, we have identified the following priorities to advance our growing water and climate needs.

Southern Priorities

- ❖ *Shared Regional Knowledge*
- ❖ *Narrative Change and Communications*
- ❖ *Stakeholder Engagement*
- ❖ *Leveraging Federal Funding*

Southern Water Call Advocacy Areas

- ❖ ***Coastal Resilience & Wetlands Protections***
- ❖ ***Green Infrastructure & Nature-Based Solutions***
- ❖ ***Urban, Rural, and Tribal Water Management***, including lead service line abatement, stormwater management, drinking water and wastewater quality and access, water affordability, and water system privatization and consolidation
- ❖ ***Workforce Development***

This work cannot be accomplished on our own. We call on Water Equity and Climate Resilience (WECR) Caucus members to learn about the unique challenges and historical inequities we face in the South; to learn from our struggles and successes; to bring resources, expertise, and opportunities to the South; and to play a pivotal role in supporting the priorities and needs of Southern Water Call members and Southern communities.

Lessons learned in the South can inform efforts to build climate resilience, replace aging infrastructure, expand access to clean water, and revitalize communities. Supporting work on the ground in the South provides opportunities for WECR to deepen relationships with community leaders, pilot new approaches, and refine best practices for regional scaling. By collaborating to advance priorities in the South, we can build knowledge and capacity that ultimately advances WECR's mission to secure water equity, climate resilience, and environmental justice for all.

Resources to share with brief

Get Involved on SRF Advocacy

Join the Southern Water Call - Monthly coalition calls featuring updates on regional water policy and infrastructure funding

Join our listserv to connect with other Southern water advocates

Visit: [URL for Southern Water Call landing page]

Contact: [Coordinator contact info]

SRF Advocates Forum - Join our online community of advocates working to improve SRF programs

Share experiences, strategies, and resources with peers across the South

Regular updates on funding opportunities and policy changes

Sign up at: [Forum URL]

Contact your reps (and info on where to find reps) - Find your state's SRF coordinators:

Subscribe to receive state IUP notifications and funding announcements

Participate in public comment periods on annual Intended Use Plans

Request meetings with agency staff to discuss community needs

- River Network SRF Training Series: Comprehensive online modules covering program basics and advocacy strategies [URL to be added]

Research and Analysis

- Policy Link SRF Report (Coming January 2025): Analysis of equity in SRF programs with Southern state case studies
- EPIC State Revolving Fund Tracker: Interactive tool for tracking investments and outcomes [URL to be added]

Additional Resources

River network training

PL SRF report (out in Jan)

EPIC SRF tracker

Explainer/Factsheet: How Southern priorities and SRFs connect, how to access funds, possible federal reforms → identify what's more viable, then what will we organize around at the federal level

- Disengagement on state side – need to bridge education on how to access funds / how this impacts state and local work
- Southern communities have expressed poor interactions/experiences with EPA resources, EFCs, TA programs, etc. Consider how those different views as we come up with recs for EPA
- Can add in local piece of what Houston has done

Possible Federal Reforms / Refreshed Leave Behind (brain dump by end of Nov; polished piece early 2025):

- The biggest way to plug in at the federal level, for me, felt like regulatory reform (however possible). → is there a way to even advocate for this? Oversight oversight oversight - getting EPA to do stuff by persuasion/by law. (things they can do but aren't, and what can't they do, but we need a bill so they can), monitoring/eval, better needs assessments, etc.
- Are there things EPA can do now but isn't doing? And if not, could there be a bill/what reform can look like?
- I've seen listserve threads where southern communities have expressed poor interactions/experiences with EPA resources, EFCs, TA programs, etc. Might be a good time to consider those differing views as we come up with rec's for what EPA could do better

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- Factsheet on connecting southern water priorities to SRF funds as resources
 - explainer on SRFs/BIL SRFs that they could use as an explainer/info sheet for the start of the southern call next year (to kick things off), with some specific framing/facts/or info from SRFs in southern states (we can share the SRF material we've developed in the past to build something complementary to it or adds to it)