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July 8, 2022

State Revolving Fund
Iowa Department of Natural Resources
ATTN: Theresa Enright
Wallace State Office Building
502 East 9th Street
Des Moines, IA 50319
Email: water-infrastructure@dnr.iowa.gov

RE: Bipartisan Infrastructure Law Funding Implementation Plans for Clean Water and Drinking Water SRF

Dear Ms. Enright:

The Iowa Environmental Council (IEC) offers the following comments on the implementation plans for the Bipartisan Infrastructure Law funding through the Clean Water and Drinking Water State Revolving Funds. These comments represent the views of the Iowa Environmental Council, an alliance of more than 100 organizations, at-large board members from business, farming, the sciences and education, and over 500 individual members.

IEC recognizes the efforts the Department of Natural Resources (DNR) has made to broaden the criteria that is considered in the definition for Disadvantaged Community (DAC). This information will help identify communities that lack access to clean and safe drinking water. However, it could be more closely aligned with the vision put forth in the Biden administration's Justice40 initiative. This initiative aims to right some of the wrongs caused by harmful government policies like redlining, historic underinvestment in marginalized communities, and disproportionate pollution burden. The DNR should include climate and environmental indicators that are necessary for alignment with Justice40. These are factors such as proximity to hazardous waste facilities, diesel particulate matter exposure, and low life expectancy. Other indicators can be found in the [Climate and Economic Justice Screening Tool methodology](#).

An additional factor the DNR should consider adding to the definition is cumulative impacts of environmental stressors. The total burden of chemical and non-chemical stressors and their interactions can affect health, well-being, and quality of life significantly. Accounting for the cumulative impacts of environmental stressors will help the state identify communities that face a disproportionate burden of pollution. This will ensure that dollars are being directed to communities facing the legacies of environmental racism and underinvestment.

Finally, DNR should include age as a factor when identifying communities to prioritize lead service line replacement. The impact of lead in drinking water on children is well-documented.

Communities with a larger proportion of young children should be given primacy in receiving the additional federal investment to replace lead service lines. This is especially relevant in Iowa where 76% of children have detectable levels of lead in their blood.

Thank you for the opportunity to comment. If you have questions or we can clarify these comments further, please feel free to call.

Sincerely,

/s/ Alicia Vasto

Alicia Vasto
Water Program Associate Director
Iowa Environmental Council