

May 28, 2019

TO: Great Lakes St. Lawrence Governors and Premiers

RE: Clean, safe, affordable and accessible water for the Great Lakes region

Dear Chairman Evers, Vice Chair DeWine, and Great Lakes and St. Lawrence Governors and Premiers:

The undersigned groups write to you today to ask you to commit to bold and accountable action on a pressing issue in our region: clean, safe, affordable and accessible water for the millions of residents of the Great Lakes region. We request that you commit to water actions in four areas: data and monitoring, standards and best practices, affordability and access and funding.

The Great Lakes are home to the largest source of surface freshwater in the world and provide drinking water for roughly 40 million people in the region. It is logical and imperative that the protection and preservation of the Great Lakes should follow from the source all the way to the tap – ensuring clean water in all its forms for all members of the Great Lakes community. Yet the Great Lakes region is facing a crisis of water contamination, aging infrastructure and the rising cost of water. An estimated \$179 billion is needed over the next 20 years to improve, upgrade and repair infrastructure in the region to deal with these threats.¹ The U.S. federal government has drastically decreased investment in water infrastructure for decades, from 63% of spending in 1977 to 9% today.² These costs are ultimately being passed on to those who can least afford it, with a steep rise in water utility rates over the last decade in Great Lakes cities across the region. For example, in Cleveland, OH, water rates have more than doubled from 2010-2018 – with average cost hovering around \$1300 annually for a family of four.³ The threats facing the Great Lakes region will worsen as climate change brings longer periods of heavy rainfall that overwhelm sewer systems and stress our already deteriorating infrastructure. Now is the time to redesign our cities for equity, climate change resiliency, and sustainable growth that supports people and nature.

The undersigned groups, with representation from across the region, respectfully ask that the Great Lakes St. Lawrence Governors and Premiers take the following actions to preserve, protect and provide water for all residents of the Great Lakes Basin.

1. Data & Monitoring:

- a. Develop, use and share common monitoring and testing protocols, including real-time monitoring where possible, for contaminants of concern, such as PFAS, lead, nitrogen and phosphorus and water pollution from combined sewer overflows (CSOs). States and

¹ U.S. E.P.A. 2016. “Clean Watersheds Needs Survey 2012: Report to Congress.” Pp. A-1 – A-2. https://www.epa.gov/sites/production/files/2015-12/documents/cwns_2012_report_to_congress-508-opt.pdf; U.S. E.P.A. 2013. “Drinking Water Infrastructure Needs Survey and Assessment: Fifth Report to Congress.” P. 19. <https://www.epa.gov/sites/production/files/2015-07/documents/epa816r13006.pdf>

² American Public Media. 2019. “So Close, Yet So Costly.” <https://www.apmreports.org/story/2019/02/07/great-lakes-water-shutoffs>

³ American Public Media. 2019. “So Close, Yet So Costly.” <https://www.apmreports.org/story/2019/02/07/great-lakes-water-shutoffs>

provinces can provide leadership where they are strongest and learn where they have gaps.

- b. Commit to using Blue Accounting as a shared platform for aligning monitoring and reporting efforts for the contaminants of concern affecting our shared waters.

2. Standards & Best Practices:

- a. In areas where federal policy is not developed sufficiently the Great Lakes states and provinces should collaborate to develop common clean water guidance and standards for state and provincial adoption to protect human and ecosystem health, including for PFAS, lead service line replacement, harmful algal blooms/cyanotoxins, nitrates and additional emerging contaminants of concern. Within one year, the states and provinces should issue a set of recommendations to support the individual jurisdictions' efforts and serve as a platform to use to educate local and federal partners on policy needs for the Great Lakes.
- b. Advocate for increased coordination across drinking water, wastewater and stormwater utilities and promotion of innovative technologies and nature-based solutions to advance efficient, effective and equitable delivery of and access to water for all residents of the Great Lakes Basin.
- c. Recognize "protection of public health" in the definition of water services that utilities provide to ratepayers.

3. Affordability & Access:

- a. Acknowledge that water infrastructure is a matter of public health protection and is one of the greatest public health achievements of the 20th century.
- b. Acknowledge that many utilities have shifted their overarching framework toward water security and public health with an eye toward customer assistance and water affordability. Leaders should uplift and encourage this work from utility financial consultants & water systems regulators.
- c. Great Lakes states and provinces should acknowledge that continued disinvestment in water infrastructure has left systems in disrepair and created a growing crisis of both needed upgrades and maintenance and unaffordable rates for consumers to fund those improvements. Leaders should convene a regional collaboration to review current research and recommendations to address needed water infrastructure improvements and equitable and affordable rates and develop a regional strategy to achieve clean water outcomes for all Great Lakes residents, including defining affordability in state policy and providing guidance for municipal governments.
- d. Advocate for legislation that provides an integrated approach to improve water affordability, including prioritized funds for disadvantaged communities, support for low-income assistance programs, and incentives for utilities to adopt more equitable rate structures.
- e. Commit to clean water and sanitation for residents of the Great Lakes Basin as a human right and create transparent, just and equitable opportunities for engagement and consultation with those most affected by issues of affordability and access including but not limited to urban, rural and tribal and First Nation communities.
- f. Support and continue to implement drinking water source protection programs and their associated regulations.

- g. Evaluate and implement options for innovative uses of state revolving funds, such as for lead service line replacement and septic system replacement on private property.
- h. Commit to proactive full replacement of lead service lines throughout Great Lakes states and provinces.

4. State, Provincial & Federal Funding:

- a. Work with federal legislators to **triple** the current Clean Water and Drinking Water State Revolving Funds, including prioritization and set-asides for low-income communities and nature-based solutions.
- b. Support funding and implementation of current federal programs to ensure needed water infrastructure work promotes local economic development and job growth in urban and rural communities, such as the HUD Section 3 and USDA's National Apprenticeship programs.
- c. Work with state legislators to investigate and develop opportunities for dedicated state revenue for water infrastructure maintenance, lead service line replacement, grants to low-income and vulnerable communities and the development of water affordability programs.
- d. Prioritize Great Lakes St. Lawrence water service investments in future federal government infrastructure plans, such as the *Investing in Canada: Canada's Long-Term Infrastructure Plan*, and in bilateral agreements around cost-sharing between federal and provincial governments.
- e. Maintain stable and adequate funding for drinking water source protection frameworks and their implementation in Ontario.
- f. Ensure transportation infrastructure investments utilize an asset management approach that wholly integrates and optimizes green infrastructure and nature-based solutions as the default in retrofit, maintenance, and new projects.

We believe a regional agreement to work together toward these goals is of the utmost importance, and the Great Lakes St. Lawrence Governors and Premiers are well positioned to lead on these comprehensive solutions to the water challenges we must face as a region. By committing to the actions above, the Great Lakes and St. Lawrence Governors and Premiers have an opportunity to become national leaders in the movement to ensure clean water for all residents of the Great Lakes. We appreciate the work that has been done to date on clean water in our region and look forward to your continued efforts toward this end.

Sincerely,

Joel Brammeier

President & CEO, Alliance for the Great Lakes

Theresa McClenaghan

Executive Director and Counsel, Canadian Environmental Law Association

Brian Smith

Associate Executive Director, Citizens Campaign for the Environment

Katie Rousseau

Director, Clean Water Supply, Great Lakes, American Rivers

Mark Redsten

President and CEO, Clean Wisconsin

Howard A. Learner

Executive Director, Environmental Law & Policy Center

Jill Ryan

Executive Director, Freshwater Future

Jennifer Walling

Executive Director, Illinois Environmental Council

Debra Cronmiller

President, League of Conservation Voters of Wisconsin

Lisa Wozniak

Executive Director, Michigan League of Conservation Voters

Cheryl Nenn

Riverkeeper, Milwaukee Riverkeeper

Brenda Coley and Kirsten Shead

Co-Directors, Milwaukee Water Commons

Mike Shriberg

Executive Director, National Wildlife Federation

Kristy Meyer

Vice President of Policy, Ohio Environmental Council

Raj Shukla

Executive Director, River Alliance of Wisconsin

Katherine Baer

Director of Science and Policy, River Network

Dalal Aboulhosn

Deputy Legislative Director, Lands and Water, Sierra Club

Monica Lewis-Patrick

President & CEO, We the People of Detroit

Kerry Schumann

Executive Director, Wisconsin Conservation Voters