STATE REVOLVING FUND & NONPOINT SOURCE POLLUTION



CWSRF Best Practices Guide for Financing Nonpoint Source Solutions: An Introduction

Don Waye, US EPA Nonpoint Source Program Dec. 16, 2021



Hello. I am your friend.



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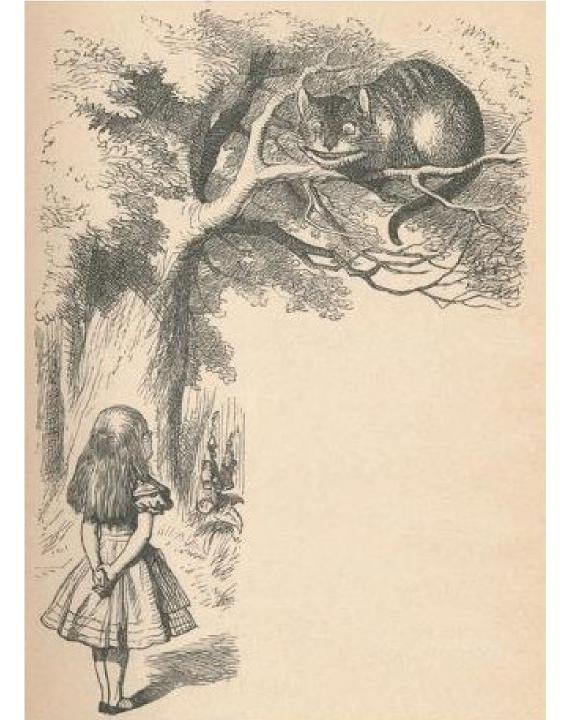
CWSRF Best Practices Guide for Financing Nonpoint Source Solutions

Building Successful Project Funding Partnerships



Find me at <u>www.epa.gov/cwsrf</u>

Or <u>www.epa.gov/nps</u> If you prefer.



"Would you tell me, please, which way I ought to go from here?"

"That depends a good deal on where you want to get to," said the Cat.

"I don't much care where—" said Alice.

"Then it doesn't matter which way you go," said the Cat.







2. Developing partnerships & overcoming barriers

3. Coordinating a successful financing approach



4. Customizing your strategy

Where are we going and how do we get there?

1. Understanding NPS & CWSRF Program Eligibilities

NPS has been a CWSRF eligibility since the program was established...

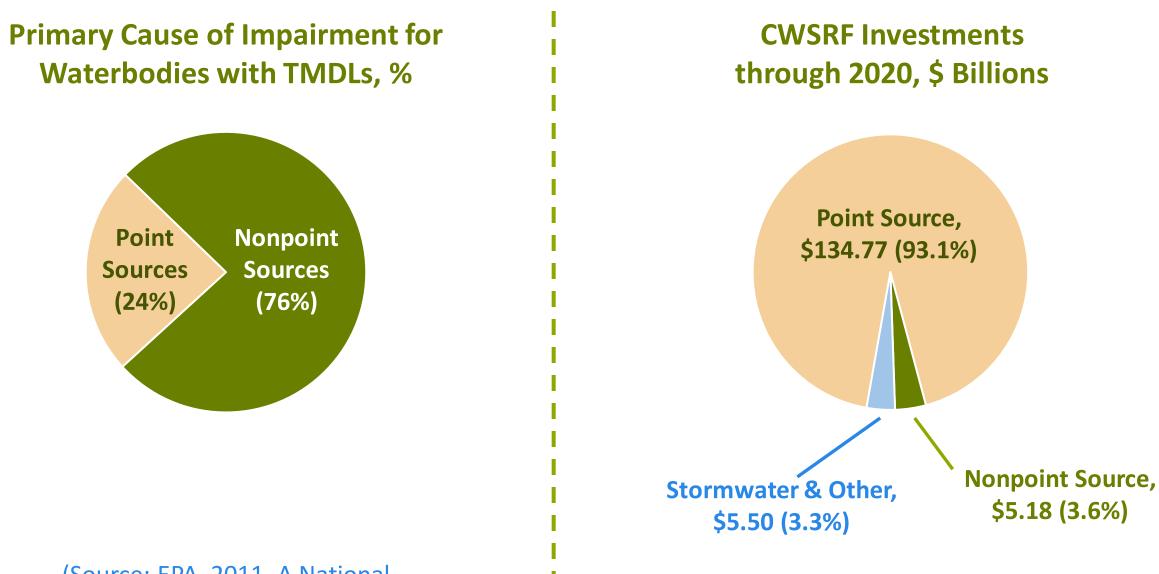
1987 CWA Amendments

- 603(c)(1) Construction of publicly owned treatment works (POTW)
- 603(c)(2) Implementation of a nonpoint source management program
- 603(c)(3) Implementation of a national estuary program CCMP

In 2014, WRRDA expanded eligibilities and flexibilities that emphasized even more creative uses of CWSRF

https://www.epa.gov/cwsrf/overview-clean-water-state-revolving-fund-eligibilities





(Source: EPA, 2011, A National Evaluation of CWA §319 Program)

CWSRF by the Numbers

- **\$145 billion** provided via the 51 CWSRF programs since 1988
- **\$7.48 billion** provided by the 51 CWSRF programs in FY20
- **42,800** assistance agreements (a.k.a. "projects") since 1988
- **1.2%** National average interest rate for CWSRF loan in 2020 (vs. 2.7% prevailing market rate)
- Just **3.6%** of overall funding pie has gone toward NPS

What kinds of things can be funded with the CWSRF and CWA §319?

The federal view...



CWSRF

NPDES-permitted wastewater & stormwater

Energy and water efficiency

Activities addressing NPDES permit enforcement actions

New sewer collection lines into decentralized/septicserved areas

Resilience of treatment works

Wastewater reclamation and reuse

Well capping

Landfill capping

Both

d Agricultural BMPs Te TMDL implementation Habitat protection & restoration BMPs that implement watershed-based plans Urban runoff not associated with an NPDES permit Abandoned mine drainage treatment & remediation Brownfield/Superfund sites: water quality issues Decentralized/septic wastewater system repair, replacement & upgrades

Land acquisition for watershed protection Development of watershed-based plans Erosion/sediment control

Streambank stabilization

Technical assistance & coordination from state NPS

§319

program staff

Salaries for regional/ local watershed coordinators

> NPS project management & oversight

Ambient water quality monitoring

NPS monitoring: general & project-specific

Septic system inspections

Examples of eligible uses of CWSRF and §319 funds

Challenges for Using CWSRF for NPS Needs







- Identifying a repayment source
- State-imposed restrictions on lending to NGOs and Community Development Financial Institutions (CDFIs)
- Higher administrative burdens associated with smaller loan sizes and greater # of projects (think "Ag BMPs vs POTW upgrades")
- Capacity constraints at state CWSRF agencies to explore new directions

This doesn't

Integrating State CWSRF and NPS Programs It starts with a conversation. Ask questions.

What are the key water quality issues in your state?

- How can the the mission of the state CWSRF program better align with these issues?
- How can the state §319 program and CWSRF program work more collaboratively on common goals and priorities?

Is your state CWSRF program maximizing the suite of SRF eligibilities?

- If not, why not?
- Identify obstacles and limitations

How can obstacles make way for opportunities? Should your SRF consider...

- ...standing up a subprogram ...priority ranking changes ...rules/statutory changes
- ...staffing changes ...expanded partnerships ...marketing and outreach

Setting up the Conversation: Building on Foundational Understanding & Common Goals

Align water quality goals and establish priorities Work collegially through questions such as...

- Are the programs targeting the correct issues and connecting with the appropriate assistance recipients and stakeholders?
- Is there overlap in project types that present opportunities for collaborative or innovative funding?



- Are there potential priority projects that exceed the funding available through the CWA §319 Program or other state funding sources?
- Should a state's CWSRF program consider making changes to its evaluation criteria or administrative rules to better facilitate the financing of priority NPS efforts?

Stakeholder Engagement



Work together to cast a broad net

SRF and 319 programs each have a broad suite of networking contacts.

Identify influential stakeholders that the programs do not interface with regularly.

Divide and conquer!



Educate the public on proposed plans to address water quality challenges and build support and participation

Gather feedback from a diverse cross-section of stakeholders.

Getting Commitments

Formalize the relationship with an agreement or MOU

- Roles and responsibilities clearly articulated
- Develop shared planning timelines
- Include a list and schedule of activities
- Identify critical milestones

Develop policies and procedures for implementation

- Regulatory changes
- Development of new financial assistance applications and agreements
- Marketing materials



Keys for Success



Make sure to engage partners and stakeholders early and often. Their participation in developing solutions will help galvanize commitment to the project!

Get creative. Think outside the conventional loan. How many ways can you finance a project in the CWSRF program?

Direct loans	Bond purchase agreements	Guarantees	Pass-through loans
Double pass- through loans	Linked deposit	Sponsorship	Sub-state revolving loan funds
ProFi loans	Watershed financing partnerships	Intermunicipal Lending	Interstate Lending

Test Your Approach with a Pilot Project



Target a specific water quality challenge or goal

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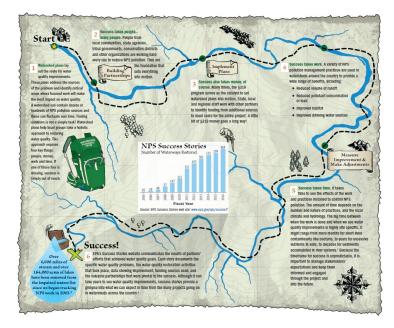
Take newly formed partnershipsAssess time and workload demands on staffOn a test runCalibrate accountability structures between
partnersGalvanize relationshipsCalibrate accountability structures between



Test viability of financing and loan repayment mechanisms before deploying the approach more broadly

Develop a Strategic Plan

- A good strategic plan is developed collaboratively to:
 - memorialize the mission
 - identify planning goals
 - manage expectations
 - strive for continuous improvement



Establish Accountability Structures

- Roles and responsibilities
- Mutually agreed-upon planning timelines

Implement New Solutions

- Activities required to realize the proposed solutions
- Project management approach with milestones and targets

Continuous Improvement

- Track project outcomes and benefits over time
- Showcase success stories
- Adjust for demand, emerging water quality priorities

Resources & Pilot Projects

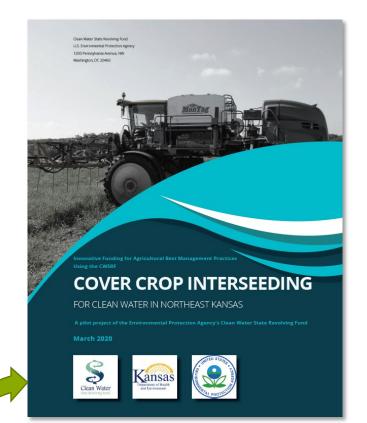
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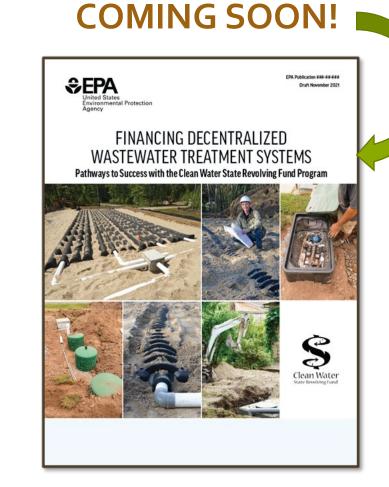
Sclean Water



Financing Options for Nontraditional Eligibilities in the Clean Water State Revolving Fund Programs

May 2017 EPA Publication Number 830817003 https://www.epa.gov/cwsrf/clean-water-state-revolving-fund-cwsrf-resources





EPA HQ has sponsored CWSRF nonpoint source
pilot projects in AK, AZ, KS, MD, MN, NC and WI.
Let your EPA Regional Coordinator know if you have a nonpoint source pilot project in mind!