



OFFICE OF WATER
WASHINGTON, D.C. 20460

April 12, 2024

MEMORANDUM

SUBJECT: Response to the Draft Memorandum: *Risks to Allotment of Infrastructure Investment and Jobs Act Funding for Lead Service Line Replacements Due to Data Reliability Issues*, Project No. OSRE-FY24-0022, April 4, 2024

FROM: Bruno Pigott, Acting Assistant Administrator

TO: Sean O'Donnell, Inspector General

For Best-Wong,
Benita

Digitally signed by Best-Wong, Benita
Date: 2024.04.12
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Thank you for the opportunity to review and comment on the draft memorandum, *Risks to Allotment of Infrastructure Investment and Jobs Act Funding for Lead Service Line Replacements Due to Data Reliability Issues* related to Project No. OSRE-FY24-0022. The Office of Water disagrees with several statements in the draft memorandum and the attached table contains our detailed technical comments and feedback.

The Office of Water would like to iterate that the methodology used to project lead service lines developed under the 7th Drinking Water Infrastructure Needs Survey and Assessment, or DWINSA, continues to provide the best estimate of lead service line replacement, or LSLR, funding needs at the state level. There is no other nationwide, statistically significant projection of service line materials to use for distributing *Infrastructure Investment and Jobs Act* LSLR funding. Additionally, the state revolving fund programs have several checks and balances to safeguard against any misuse of the funding, including a “self-correcting” mechanism where funding not used by states will be reallocated by the U.S. Environmental Protection Agency and redistributed to states, as required by the *Safe Drinking Water Act*.

For the 7th DWINSA and the lead service line information, the agency has devoted substantial level of effort to ensure we receive and use the best available data collected to date on service line materials. The EPA has also taken numerous critical actions to ensure data reliability by providing extensive state engagements and training, performing substantial level of QA/QC on the received data, and providing the opportunity for states and water systems to review, verify, and submit any changes through the one-time update. This updated information will be used to allot the FY24 and future Drinking Water State Revolving Fund LSLR funding.

Again, we greatly appreciate this opportunity to provide comments on the draft memorandum. If you have any questions, please contact me or your staff may contact OW's Audit Follow-Up Coordinator, Carla Hagerman, at Hagerman.Carla@epa.gov.

ATTACHMENT