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Topics


PFAS
Wetland Regulations
Climate Change
New Federal Funding Sources

Emerging Contaminants Overview

PFAS

- ? What are PFAS?
- Sources of PFAS
- PFAS Concerns for Cities
  - Drinking Water
  - NPDES Permitting
  - CERCLA

Other emerging contaminants

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What are PFAS?

- Per- and polyfluoroalkyl substances (“PFAS”)
- Widely used, long-lasting chemicals. Often known as “forever chemicals.”
- Because of their widespread use and their persistence in the environment, many PFAS are found in the blood of people and animals all over the world and are present at low levels in a variety of food products and in the environment.

Sources of PFAS

Aqueous film forming foams (AFFFs)

- Used in firefighting

Industrial sources

- Manufacturers of PFAS
- Users of PFAS (e.g., textile and leather processors, paper mills, metal finishers, plating facilities, and other facilities using surfactants, resins, molds, plastics, and semiconductors.)

Household goods

- Cleaning products
- Water resistant fabrics
- Grease-resistant paper
- Nonstick cookware
- Personal care products, like shampoo, dental floss, nail polish, and eye makeup
- Stain-resistant coatings used on carpets, upholstery, and other fabrics

Passive Receivers of PFAS

Landfills

- Either from household goods or industrial wastes containing PFAS

Sewage Treatment Plants

- Industrial discharges
- Residential sources
- Landfill Leachate

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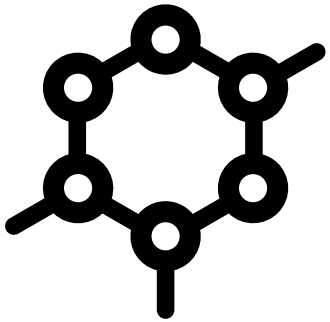

Exposure to PFAS

- Scientific studies have shown that exposure to some PFAS in the environment may be linked to harmful health effects in humans and animals.
- Exposure to PFAS may lead to:
  - Reproductive effects
  - Developmental delays
  - Increased risk of some cancers
  - Hormonal interference
  - Increased cholesterol and/or risk of obesity

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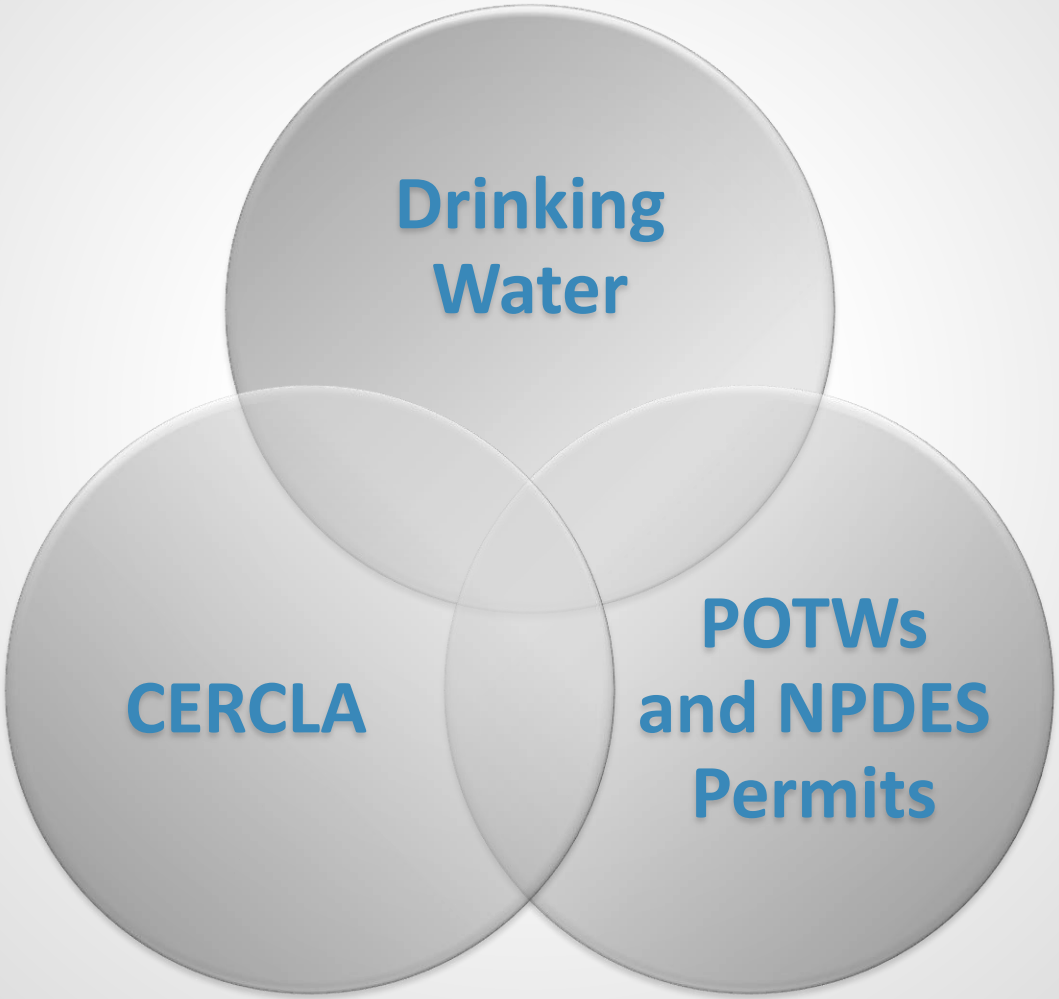
PFAS Concerns for Municipalities



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PFAS in Oregon

- Sampling of public drinking water systems in Oregon done between 2013 and 2015 showed no detections.
- More recent sampling (2021-2022) took 156 samples:
  - 149 below reporting limit;
  - 7 above reporting limit, but below Oregon HALs.
- Further monitoring will be done from 2023-2025.
  - All public water systems service more that 3,300 people.
  - Sample of systems serving fewer than 3,300 people.
- There are several sites in Oregon where PFAS have been found in groundwater, soil, surface water, and stormwater.
  - Primarily related to firefighting foam.

EPA's Proposed Drinking Water Rule

PFOA and PFOS

- Maximum Contaminant Level Goal (MCLG): ZERO
- Maximum Contaminant Leve MCL): 4 ppt
  - EPA has determined that 4.0 ppt represents what is achievable for best available technology given the standard of "reasonable cost based on large metropolitan water systems."

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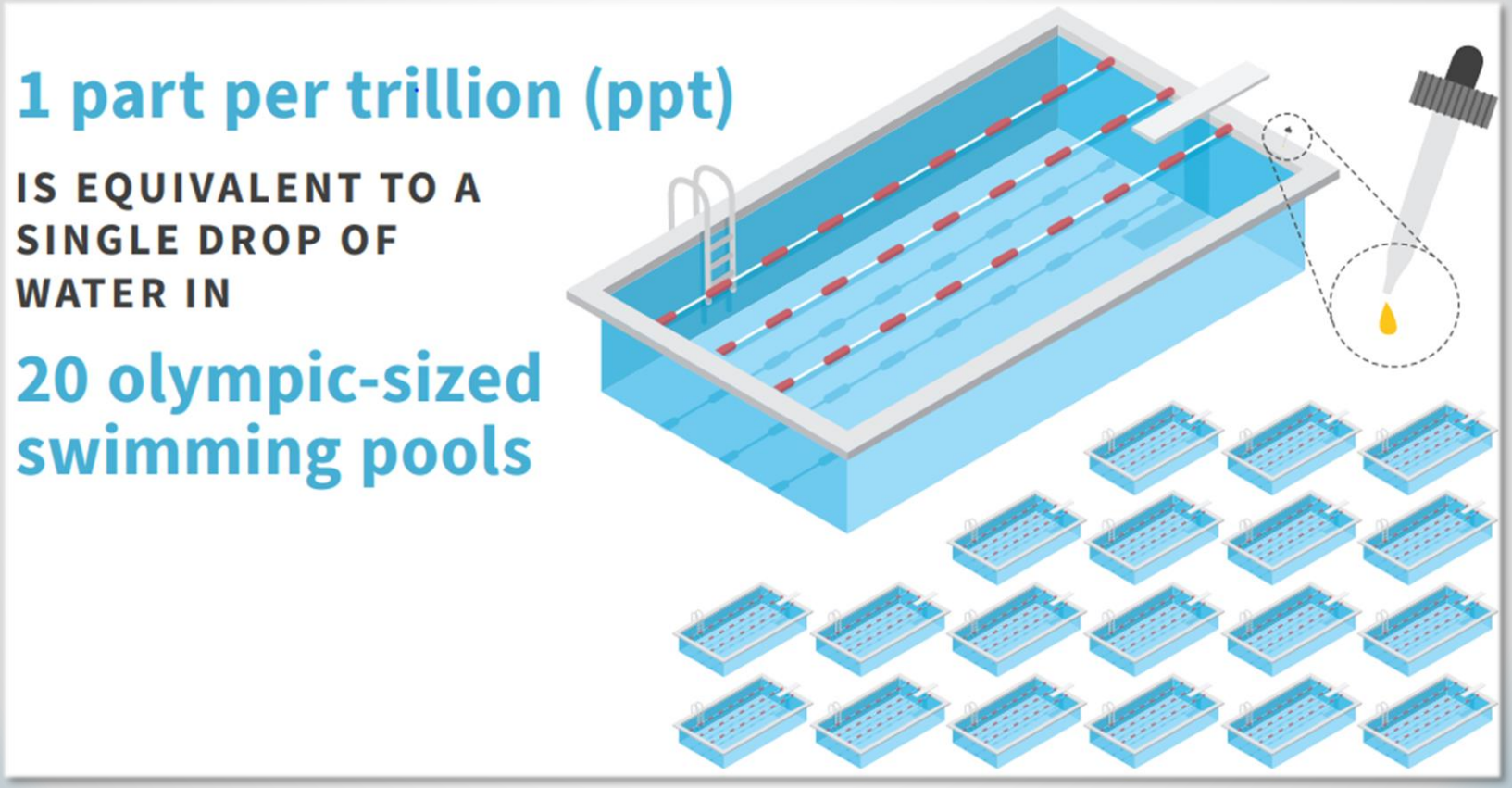
What does 4 ppt Look Like?



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How do I calculate the Hazard Index?

The Hazard Index (HI) is made up of a sum of fractions. Each fraction compares the level of each PFAS measured in the water to the highest level determined not to have risk of health effects.

Step 1. Divide the measured concentration of Gen X by the health-based value of 10 ppt
Step 2. Divide the measured concentration of PFBS by the health- based value of 2000 ppt
Step 3. Divide the measured concentration of PFNA by the health-based value of 10 ppt
Step 4. Divide the measured concentration of PFHxS by the health-based value of 9 ppt
Step 5. Add the ratios from steps 1, 2, 3 and 4 together

Equation

$$\text{Hazard Index} = \left(\frac{[\text{GenX}_{\text{water}}]}{[10\text{ ppt}]}\right) + \left(\frac{[\text{PFBS}_{\text{water}}]}{[2000\text{ ppt}]}\right) + \left(\frac{[\text{PFNA}_{\text{water}}]}{[10\text{ ppt}]}\right) + \left(\frac{[\text{PFHxS}_{\text{water}}]}{[9.0\text{ ppt}]}\right)$$

Step 6. To determine HI compliance, repeat steps 1-5 for each sample collected in the past year and calculate the average HI for all the samples taken in the past year

EPA's Proposed Drinking Water Rule

PFNA, PFHXs, PFBS, and HFPO-DA (Genx Chemicals)

Hazard Index of 1.0

- Simple definition of Hazard Index: formula and calculation to determine if the combined levels of these PFAS in the drinking water at that system pose a potential risk and require action. Formula limits the mixture of these PFAS materials that would result in an unreasonable health risk.

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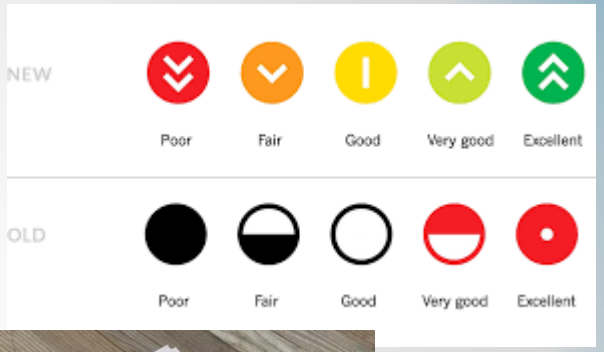
Effects of the Proposed Rule?

Providers will be required to:

- Prepare and deliver consumer confidence reports to their customers.
  - Including reference to PFOA, PFOS, PFHxS, HFPO-DA, PFNA, and PFBS, and the HI for the mixtures of PFHxS, HFPO-DA, PFNA, and PFBS (Fed Reg)
- Public notice obligations for violation of NPDWRs.
- For water systems with PFAS that exceed MCLs – Implementation of treatment technologies within 3 years of promulgation
  - Water treatment
  - PFAS source removal
  - Alternative water supply



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Other Municipal PFAS Concerns

- In addition to drinking water, the primary exposure for municipalities to PFAS issues is as the passive receivers and treaters of waste.
  - Municipal Landfills
  - Wastewater Treatment Plants (WWTPs)/Publicly-owned Treatment Works (POTWs)
- This raises issues under a variety of environmental laws.
  - Clean Water Act
  - CERCLA, aka Superfund

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NPDES Permits and PFAS

- For the moment EPA is in information gathering mode for PFAS in the NPDES context.
- EPA has issued a memorandum (dated December 5, 2022) outlining steps to take to reduce discharge of PFAS while the Office of Water works to develop water quality criteria to support PFAS effluent limits.
  - EPA recommends influent, effluent, and biosolids monitoring using draft analytical method 1633.
  - POTWs should identify all industrial users suspected of PFAS discharges
  - Update pretreatment permits/controls to require quarterly monitoring.
  - Develop local Best Management Practices or local limits for dischargers.
- When PFAS effluent limits arrive, significant challenges for POTWs await.
  - Technology needed to treat the volume of wastewater processed by POTWs in a cost-effective manner does not yet exist.

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CERCLA Basics

- CERCLA liability is triggered when there is a release of a hazardous substance from a facility, and a party incurs response costs due to that release.
- Liability under CERCLA is:
  - Retroactive
  - Strict
  - Joint and Several
- A Potentially Responsible Party (PRP) is liable for
  - Investigation costs
  - Cleanup costs
  - Natural Resource Damages

Entities Potentially Affected By This Action

- PFOA/PFOS manufacturers (including importers)
- PFOA/PFOS processors
- Manufacturers of products containing PFOA/PFOS
- Downstream product manufacturers and users of PFOA/PFOS products, e.g., airports, fire stations, manufacturers of water-resistant clothing etc.
- **Waste management facilities, wastewater/ stormwater treatment facilities, and water utilities, e.g., municipal landfills, POTWs, etc.**

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Implications/Impacts of Listing PFOA/PFOS Under CERCLA

- EPA authority to order cleanups of PFOA/PFOS under CERCLA Section 106.
- EPA authority to recover investigation and cleanup costs from PRPs under CERCLA Section 107
- Parties (private or government) may bring:
  - Cost recovery lawsuits under CERCLA Section 107
  - Contribution lawsuits under CERCLA Section 113
- Requirement for any person/entity in charge of a vessel or facility to report releases of PFOA and PFOS of one pound or more within a 24-hour period (i.e., a “reportable quantity”)
- Disposal or releases of PFAS-impacted stormwater, wastewater and biosolids could subject municipalities to CERCLA liability.

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Status of Proposed Regulations

2022 Proposed Rule

- EPA originally anticipated a finalized rule listing PFOA/PFOS in August 2023
- This has been pushed back six months.

2023 Advanced Notice of Proposed Rule

- No stated timeframe within which EPA may formally propose a rule listing the seven additional PFAS, their precursors, or categories of PFAS under CERCLA

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Pushback to PFAS CERCLA Listing

- Once these rules are finalized, expect legal challenges from regulated entities.
- In addition, there is a substantial lobbying effort from municipalities and other "passive receivers" of PFAS to create CERCLA exemptions for them in any PFAS regulation or legislation.
- EPA stated its intent to withhold enforcement actions over PFAS contamination in relation to "passive receivers," but:
  - EPA's PFAS enforcement against other private or public PRPs may still subject passive receivers to contribution actions from those PRPs unless EPA establishes a policy to "settle out" passive receivers
  - Parties are understandably reluctant to rely solely on EPA's discretionary policies

Other Emerging Contaminants

- Cyanotoxins
- Manganese
- Microplastics
- Pharmaceutical and Personal Care Products
- Nanoparticles

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Regulation of Wetlands

- For most of the nation's history the regulation of water pollution was left almost entirely to the States and their subdivisions.
- The 1972 Clean Water Act (CWA) established federal jurisdiction over "navigable waters," defined in the Act as the "waters of the United States" for the first time. Referred to in shorthand as WOTUS.
- The U.S. Environmental Protection Agency and the U.S. Army Corps of Engineers jointly enforce the CWA. Most notably, the Corps controls the issuance of permits for dredging and filling in covered "waters".
- Since the CWA was enacted, there has been disagreement about the definition of "waters of the United States". There is a long history of agency interpretations and litigation on this issue.
- Some wetlands have always been considered to fall within the definition of WOTUS. Congress amended the CWA in 1977 to formally adopt agency guidance that "adjacent" wetland are covered.
- There has been much controversy over where you draw the line of which wetlands are "adjacent" enough to be regulated under the CWA.

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Different Positions on what Wetlands are WOTUS

Initially, the agencies took a broad approach to the definition of WOTUS, including for wetlands.

- WOTUS encompassed all waters that “could affect interstate or foreign commerce”, including adjacent wetlands. They defined adjacent to be “bordering, contiguous or neighboring” and clarified that adjacent wetlands included those that were separated from covered waters by manmade dikes or barriers, natural river berms, beach dunes and the like”.
- United States v. Riverside Bayview Homes (474 U.S. 121) affirmed this broad interpretation.

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Different Positions on what Wetlands are WOTUS (cont.)

- In the late 1980s, the agencies then went even further and issued what is known as the “migratory bird rule” which extended federal jurisdiction under the CWA to any waters or wetlands that “are or would be used as a habitat by migratory birds.”
- Under this rule, almost any water or wetland in the country could be considered subject to the CWA.

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Different Positions on What Wetlands are WOTUS (cont.)

- Supreme Court again considered this issue in 2001 in *Solid Waste Agency of Northern Cook County v. Army Corps of Engineers* (531 U.S. 159) (referred to as *SWANCC).* The Court rejected the migratory bird rule, holding that the CWA did not "extend to ponds that are not adjacent to open water."
- Agencies then issued guidance that focused on case-by-case decisions made by staff and resulted in very different enforcement.
- Supreme Court took the issue up again in 2006 in *Rapanos v. United States* (547 U.S. 715), but instead of clarifying things they made a big mess.
  - Justice Scalia (for the plurality) held that in order to be covered under CWA wetlands had to have a continuous surface connection.
  - Justice Kennedy (in concurrence joined by) introduced a new "significant nexus" test to determine which wetlands should be considered WOTUS.

WOTUS – Regulations since *Rapanos*

2015 – Clean Water Rule (Obama)

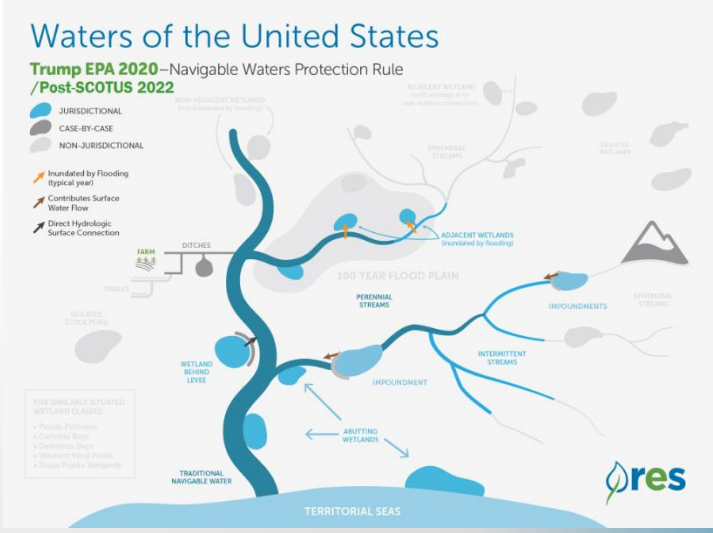
- Incorporated the "significant nexus" test: "wetlands, either alone or in combination with similarly situated lands in the region, significantly affect the chemical, physical and biological integrity" of waters.
- Intended to make the pre-2015 WOTUS regime simpler, faster, and more predictable.
- Repealed in 2019.

2020 – Navigable Waters Protection Rule (Trump)

- Eliminated the "significant nexus" test and limited covered wetlands to "adjacent wetlands".
- Vacated in 2021

2023 – Revised Definition of "Waters of the United States" (Biden)

- Restores the jurisdictional categories from the 1986 regulations but with limitations based on case-specific application of the "significant nexus" standard or "relatively permanent" standard.
- Preliminarily enjoined in 27 states.



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Major New Decision from Supreme Court

***Sackett v. EPA*, 598 U.S. ___ (2023)**

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Major New Decision from Supreme Court

***Sackett II* (2023)**

- Ninth Circuit applied Kennedy's "significant nexus" test from Rapanos to find that the wetlands at issue were jurisdictional under the CWA.
- The majority threw out the "significant nexus" test and essentially adopted Scalia's plurality standard from the Rapanos case: only "adjacent wetlands" are covered, and adjacent means a "relatively permanent" body of water with a "continuous surface connection" with traditional navigable waters of the United States.
- Other Justices concurred with the result, but disagreed with how narrow the majority's new test is. They argue that "adjacent" by its ordinary meaning and its use throughout the history of the CWA has always included some nearby wetlands without a surface connection.

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What does *Sackett* Mean Nationally and in Oregon?

- Nationally, the extent of CWA-covered wetlands will be drastically decreased.
- There are very different levels of regulation over wetlands from state to state.

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Oregon Regulation of Wetlands

- Oregon has a comprehensive definition of waters of the state, and multiple water quality protection programs, including state removal/fill laws. These will remain in force after *Sackett*.

  Managing water and wetland resources is an integral part of the state's removal-fill permit program. The Oregon's Removal-Fill Law (ORS 196.795-990) is the primary state law, enacted in 1967, that authorizes the regulation of activities within waters and wetlands. In general, the law covers activities such as removal, fill and other ground-altering activities within "waters of the state" and requires people who plan such activities to obtain a permit from DSL. The state's goal is to maintain a stable resource base through avoidance and minimization of adverse impacts and by compensating for unavoidable impacts. Unavoidable impacts are required to be compensated for through compensatory mitigation.

  In addition to the removal-fill law, wetland conservation oversight was established by statute in 1989 through a comprehensive bill (ORS 196.668 and 196.672) that stressed the importance of wetlands. Developing standards and tools for identifying and assessing wetlands and streams
- Providing public information and training
- Reviewing and approving wetland delineations for planning and regulatory permitting

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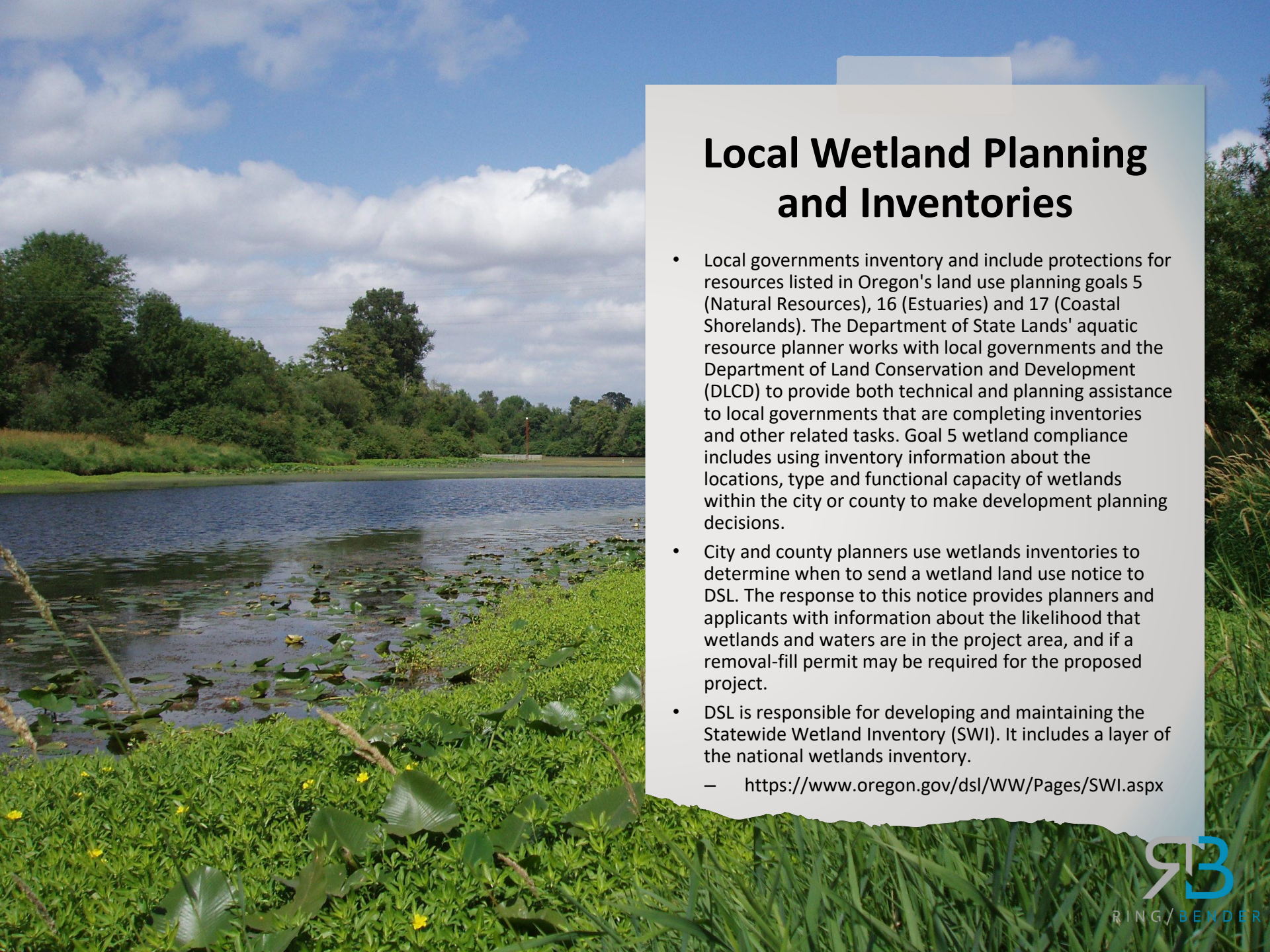

Local Wetland Planning and Inventories

- Local governments inventory and include protections for resources listed in Oregon's land use planning goals 5 (Natural Resources), 16 (Estuaries) and 17 (Coastal Shorelands). The Department of State Lands' aquatic resource planner works with local governments and the Department of Land Conservation and Development (DLCD) to provide both technical and planning assistance to local governments that are completing inventories and other related tasks. Goal 5 wetland compliance includes using inventory information about the locations, type and functional capacity of wetlands within the city or county to make development planning decisions.
- City and county planners use wetlands inventories to determine when to send a wetland land use notice to DSL. The response to this notice provides planners and applicants with information about the likelihood that wetlands and waters are in the project area, and if a removal-fill permit may be required for the proposed project.
- DSL is responsible for developing and maintaining the Statewide Wetland Inventory (SWI). It includes a layer of the national wetlands inventory.
  - https://www.oregon.gov/dsl/WW/Pages/SWI.aspx

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Climate Change

- Under the 2015 Paris Climate Agreement, virtually every nation agreed to “pursue efforts” to hold global warming to 1.5 degrees Celsius.
- The most recent report issued by the Intergovernmental Panel on Climate Change (IPCC), a body of experts convened by the United Nations (March 2023), offers the most comprehensive understanding to date of ways in which the planet is changing. It says that global average temperatures are estimated to rise 1.5 degrees Celsius (2.7 degrees Fahrenheit) above preindustrial levels sometime around “the first half of the 2030s,” as humans continue to burn coal, oil and natural gas.
- “The 1.5 degree limit is achievable, but it will take a quantum leap in climate action,” António Guterres, the United Nations secretary general, said.

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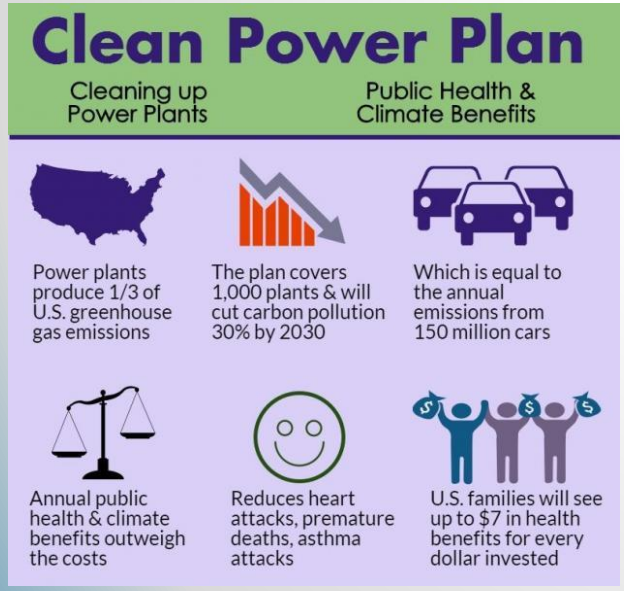


United States

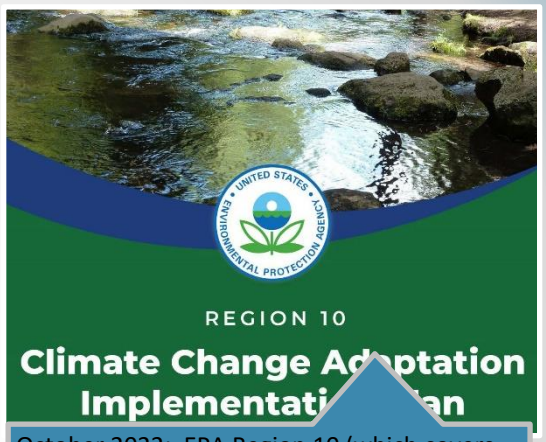
- United States officially signed on to the Paris Agreement (aka Paris Accords) in 2016. After a brief withdrawal under President Trump the United States is now again officially signed on to the commitments in the Paris Agreement.
- President Biden has issued a series of Executive Orders on this topic expressing the Administration's commitment to addressing climate change:

  > The United States and the world face a profound climate crisis. We have a narrow moment to pursue action at home and abroad in order to avoid the most catastrophic impacts of that crisis and to seize the opportunity that tackling climate change presents. Domestic action must go hand in hand with United States international leadership, aimed at significantly enhancing global action. Together, we must listen to science and meet the moment. (Executive Order 14008, January 27, 2021)

EPA

October 2021: EPA Issued its Climate Adaptation Action Plan

March 2022: EPA issues its 2022-2026 Strategic Plan



October 2022: EPA Region 10 (which covers Oregon, Washington, Idaho Alaska and 271 Tribal Nations) issues its Climate Change Adaptation Implementation Plan. It included a vulnerability analysis which provided an assessment of vulnerabilities of Region 10 programs to the impacts of climate change. Those included:

- Increased Precipitation Frequency and Intensity
- Changes in Precipitation State, Snowpack and Snowmelt
- Flooding and Fluctuating Groundwater Elevation due to Precipitation Changes
- Increased Drought
- Increased Number and Severity of Wildfires
- Sea-Level Rise
- Increase in Average Air Temperature
- Permafrost Thaw (Alaska)

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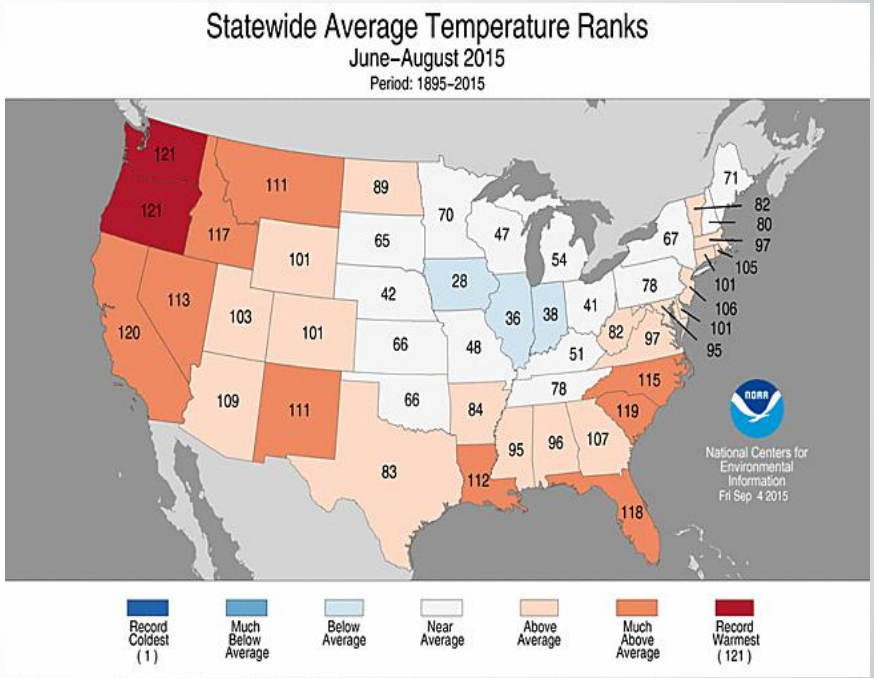
Oregon

- Oregon Climate Protection Program is aimed at dramatically reducing greenhouse gas emissions in Oregon over the next thirty years. It sets a declining limit on emissions throughout the State, including diesel, gasoline, natural gas and propane, etc. It targets a 90% reduction in greenhouse gas emissions from transportation fuels and natural gas by 2050.
- The U.S. Environmental Protection Agency has announced $3 million in grant funding to develop innovative strategies to cut climate pollution and build clean energy economies across Oregon. The Portland metro area was allotted $1 million.



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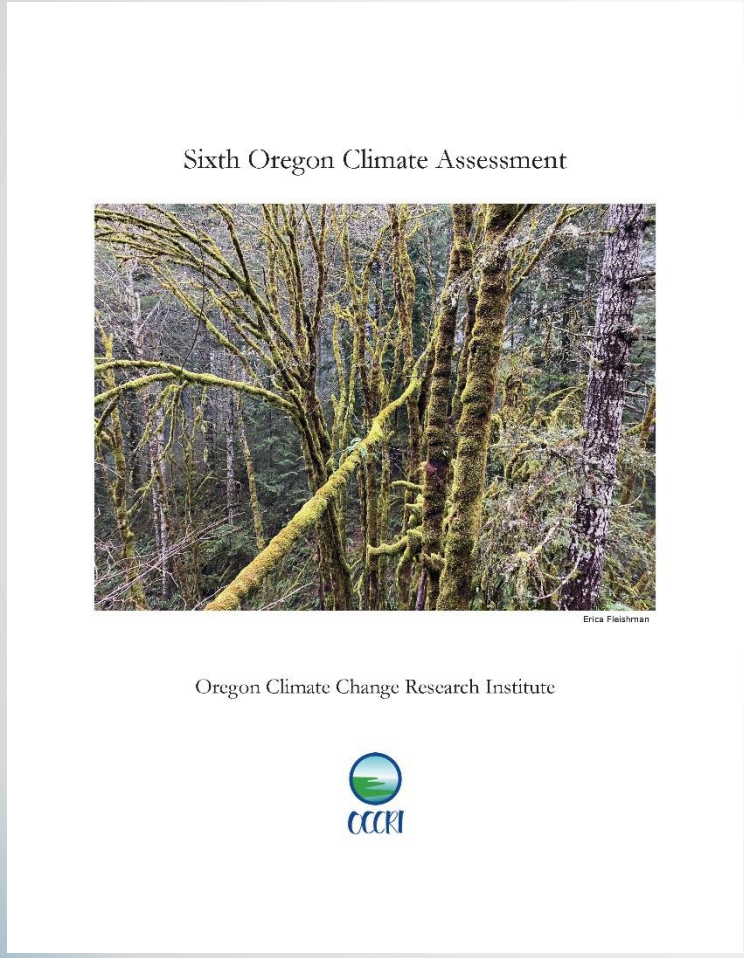
Oregon (cont.)



- The Oregon legislature tasks the Oregon Climate Change Research (OCCRI) Institute with monitoring the situation and the science in this state.
- The sixth Oregon Climate Assessment was issued in January 2023 and builds on the previous assessments by continuing to evaluate past and projected future changes in Oregon's climate and water supply. Like the fifth assessment, it is structured with the goal of supporting the state's mitigation planning for natural hazards and implementation of the 2021 Oregon Climate Change Adaptation Framework.

Oregon Climate Change Adaptation Framework

- Department of Land Conservation and Development (DLCD) is coordinating the State of Oregon's work on exploring the impacts of climate change and identifying how state agencies can effectively respond to them.
- DLCD is working with 24 state agencies on this project.
- Issued the Oregon Climate Change Adaptation Framework in January 2021.

2021 STATE AGENCY CLIMATE CHANGE ADAPTATION FRAMEWORK

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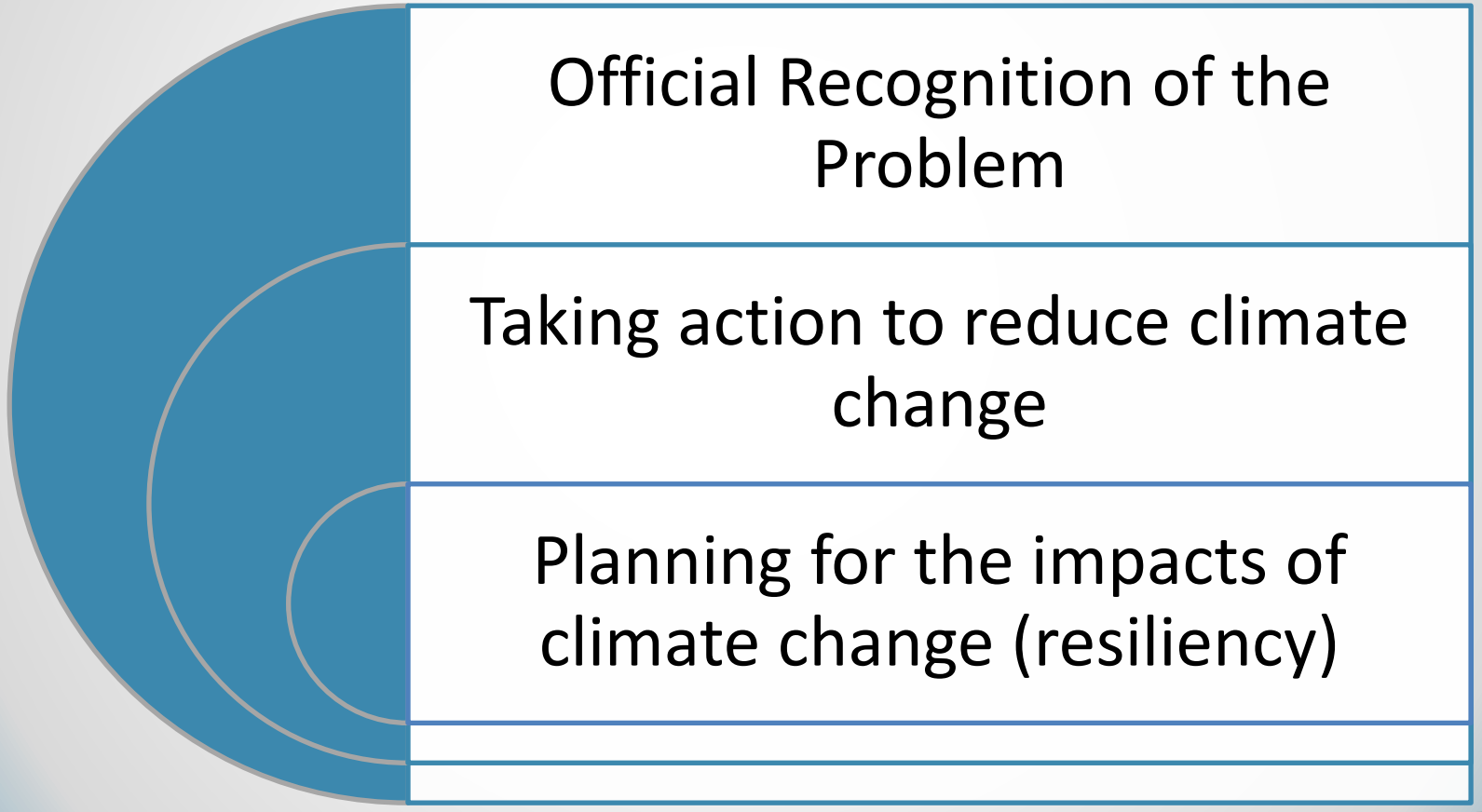
Climate Change Considerations for Municipal Governments



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Taking Action to Reduce Climate Change

Operational Decisions

Energy Use

Purchasing/Procurement Decisions

Public Affairs

Carbon Credits

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Planning for the Impacts of Climate Change (Resiliency)

- Municipal Climate Action Plans
- Emergency Preparedness
- Assessing Infrastructure
- Water Rights
- Stormwater Management
- National Discharge Pollutant Elimination Permits

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Oregon Water Rights Extensions and Fish Persistence

WaterWatch v. Water Resources Department et al.

- *WaterWatch challenged the Oregon Water Resources Department's (OWRD's) approval of several water providers' request for extension of time to fully develop their water permits.*
- *The basis for WW's challenge was that OWRD had not properly applied a new condition that required the agency to evaluate whether the conditions in the permits would "maintain, in portions of the waterways affected by water use under the permit, the persistence of fish species listed as sensitive, threatened or endangered."*
- *These permits were for water from the Clackamas River, where there are coho salmon, Chinook salmon and steelhead, which are all listed species under federal Endangered Species Act.*

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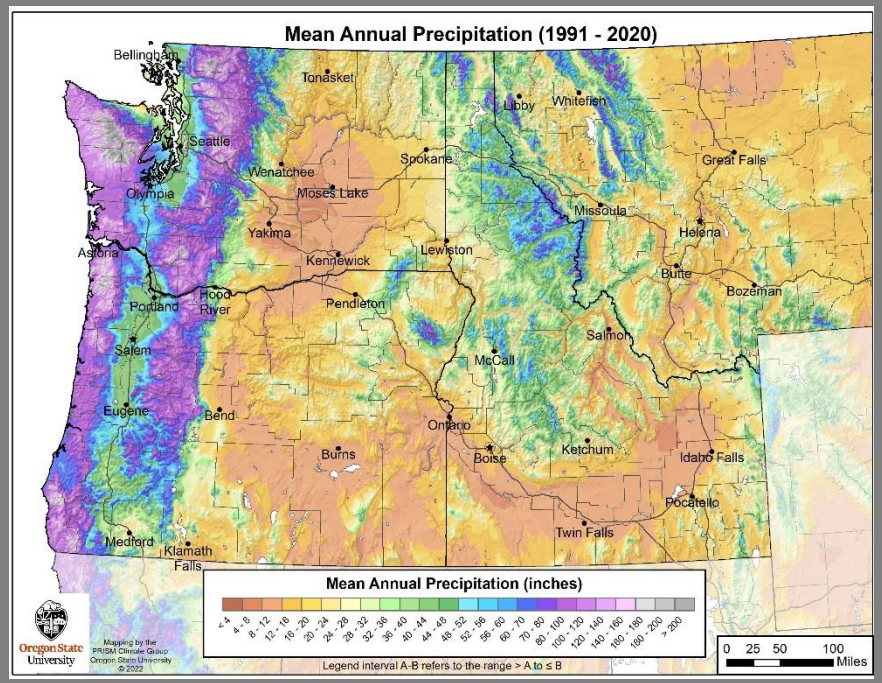

WW vs. OWRD case (cont.)

- The facts of the case were highly technical and related on complex water modeling and biological assessments.
- At the heart, the main assertion was that the volume of water allowed to be taken under the permits would impact temperature (make the water warmer) which would kill fish coming through those areas.
- WW strenuously argued that OWRD should consider climate change impacts related to future water flows. OWRD declined to do so but did impose conditions that require the water providers to meet annually with the agency to discuss the situation and curtail their use if appropriate.

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WW vs. OWRD case (cont.)

- The case was the first to consider the fish persistence requirement that had been passed into law in 2005. Until this time, water rights decisions were entirely separate from any ESA considerations.
- WW brought the case in 2008. We held several administrative hearings and went before the Court of Appeals twice before finally receiving a decision in favor of OWRD and the water providers in April 2023.
- WW has requested review by the Oregon Supreme Court but we think it is unlikely that they will take the case.

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WW vs. OWRD case (cont.)

WW has indicated in filings that it intends to continue fighting municipal extensions in water bodies with listed species:

> *"The issue of whether the department can extend the deadline for full development of municipal-use permits without finding that full use will not imperil fish, but only that the likely use won't, is not an issue for this case only. There are more than 40 not-yet-approved municipal permit extensions located across Oregon that are subject to this fish persistence standard."*

It is likely that we will continue to see this and other similar challenges that add new layers of consideration related to climate change to previously sacred water rights.

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The Good News: Federal Infrastructure Funding

Two major bills provide funding opportunities to local governments to support upgrades to infrastructure:

1) Infrastructure Investment and Jobs Act (IIJA) – 2021
   - A.k.a., the "Bipartisan Infrastructure Law."
   - Authorizes $1.2 trillion in infrastructure spending:
     - $650 billion reauthorizes existing funding,
     - $550 billion adds new funding.
2) Inflation Reduction Act (IRA) – 2022
   - Provides more than $368 billion in funding for climate solutions and environmental justice.

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Infrastructure Investment and Jobs Act (IIJA)

Dollars will be made available through two funding mechanisms:

1) Money to the States

   Over 60% of BIL funding will be distributed via formulas to states, some of which cities are eligible to receive.

2) Discretionary Federal Grants

   A subset of the remaining funds is available to communities via discretionary grants which cities may apply for directly from the federal government.

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IIJA – Money to Oregon

- IIJA will infuse DEQ's Clean Water State Revolving Fund (CWSRF) loan program with additional funding annually for five years, starting in fall of 2022, allowing the program to support more water quality and infrastructure improvement projects throughout Oregon.
- The CWSRF Program acts like an environmental infrastructure bank by providing below-market rate loans to eligible recipients for water infrastructure projects.
  - Loan applications are available on DEQ’s website.

IIJA – Money to Oregon

CWSRF – primary loan categories:

- Nonpoint source
  - Funding for projects that include animal waste management; agricultural conservation; protection or restoration of riparian (streamside) habitat; establishing conservation easements; acquiring riparian lands or wetlands, estuary management projects and other nonpoint source activities.
- Point source
  - Funding for design and construction of publicly owned wastewater facilities; building or rehabilitation of sewer collection systems; urban wet weather flow control activities, including stormwater; sanitary and combined sewer control measures.
- Planning
  - Funding of data collection and measurement, evaluation, analysis, security evaluations, report preparation, environmental review and any other activity leading to a written document.

IIJA – Discretionary Grants

There are at least 25 competitive grants funded through the IIJA that local governments can take advantage of to support infrastructure upgrades in the areas of:

- Transportation
  - E.g., buses, EV, highways, rails, ports etc.
- Climate, Energy & Environment
  - E.g., disaster risk mitigation, brownfield remediation, energy efficiency/resilience etc.
- Broadband/Cyber & other programs
  - E.g., broadband in rural communities, cybersecurity risk mitigation, smart grid etc.

IRA – At a Glance

Figure 1. Energy supply receives about half of IRA resources, with significant investments in clean manufacturing and housing (billions of dollars)

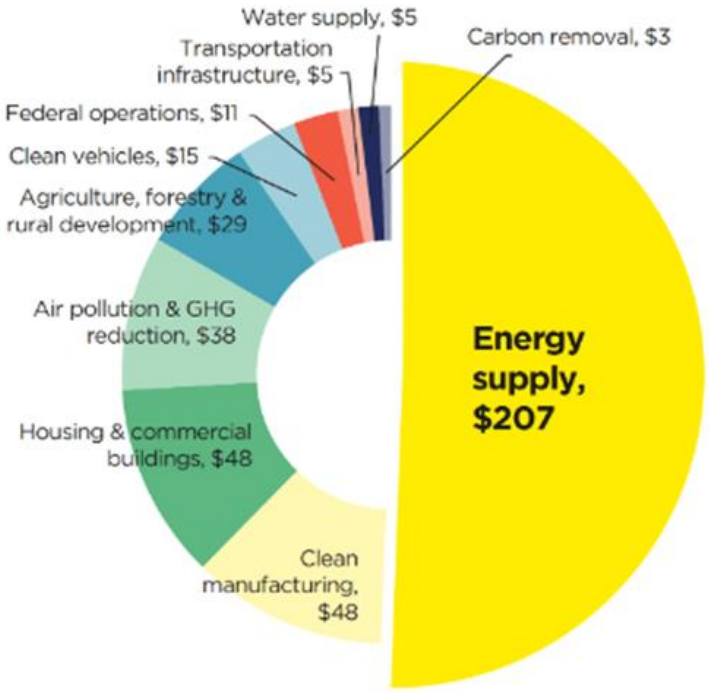
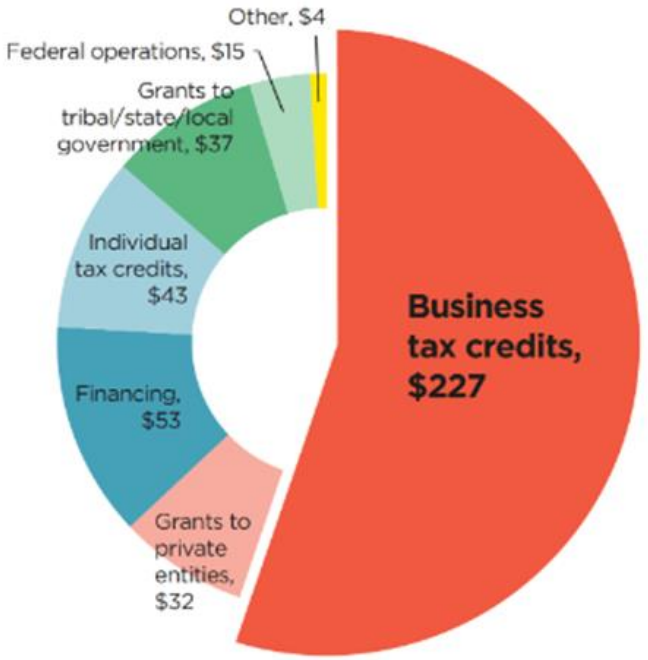


Figure 2. The largest share of IRA funding will be available as tax credits to businesses (billions of dollars)



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IRA - Funding for Local Governments

6 ways local governments can take advantage of the IRA:

1. Direct IRA funding
2. Direct to consumer tax credits and grants
3. Rebate programs through states and state energy offices
4. Clean energy tax credits
5. Port decarbonization
6. Set asides for disadvantaged, low-income and “energy” communities

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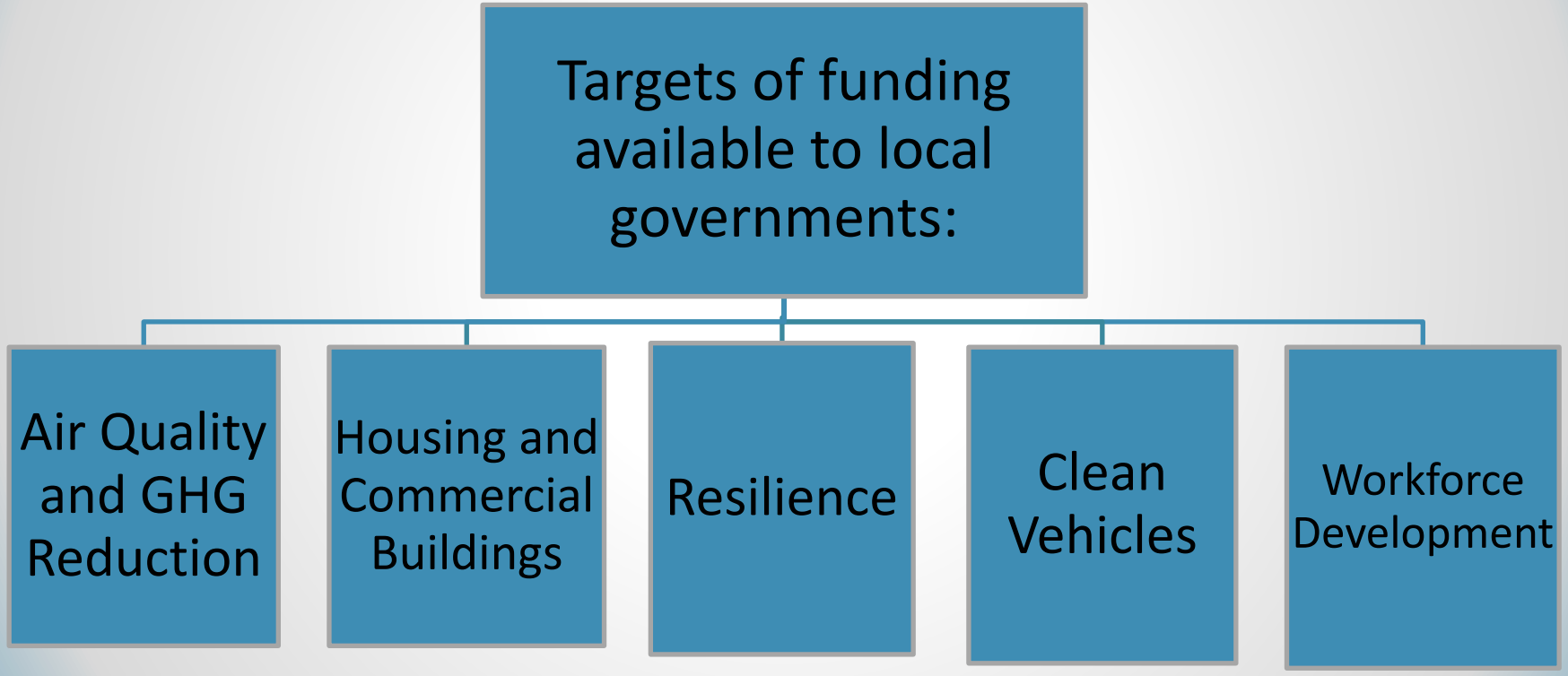
IRA - Funding for Local Governments



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IRA - Funding for Local Governments

Air Quality & GHG Reduction

$5B – GHG Air Pollution Plans and Implementation Grants

$280M – Air Pollution Monitoring and Screening

$3B – Grants to Reduce Air Pollution at Ports

$3B – Neighborhood Access and Equity Grant Program

$27B – Greenhouse Gas Reduction Fund

$3B - Environmental and Climate Justice Block Grants

Housing and Commercial Buildings

$1B – Affordable housing energy/water efficiency and climate resilience improvements

$1B – Assistance for Latest and Zero Building Energy Code Adoption

$360M – Energy Efficient Commercial Buildings Deduction

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IRA - Funding for Local Governments

Resilience

$1B – Affordable housing energy/water efficiency and climate resilience improvements

$4B – Drought Mitigation in the Reclamation States

$550M – Reclamation Domestic Water Supply Projects

$2.6B – Investing in Coastal Communities and Climate Resilience

$1.5B – Urban and Community Forestry Assistance Program

Clean Vehicles

$1B – Clean Heavy-Duty Vehicles

$3.6B – Commercial Clean Vehicle Credit

$1.7B – Alternative Fuel Refueling Property Credit

Workforce Development

$250M – Environmental Product Declarations Assistance

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Resources for Obtaining Funding

- DEQ's Clean Water State Revolving Fund
  - https://www.oregon.gov/deq/wq/cwsrf/pages/default.aspx
- League of Oregon Cities
  - https://www.orcities.org/resources/reference/bipartisan-infrastructure-bill
- Your elected representatives

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Thank you!

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