Please note, the following comments are staff-level technical assistance comments. We are submitting these comments in direct response to your request for technical assistance on H.R. 2206, and as such none of these comments should be considered to represent the Agency's or the Administration's formal position on or endorsement of the bill or of any specific provisions therein.

This bill provides funding for small system technical assistance. EPA supports technical assistance for small water systems as a means to bring water systems back into compliance, and to assist water systems remain in compliance with drinking water regulations. EPA believes the most effective technical assistance is linked to the state drinking water programs. State staff are familiar with all of the small systems in the state, and are best positioned to coordinate among funding authorities other assistance providers, and enforcement programs, where necessary.

The bill requires EPA to prioritize funding to organizations with the "majority of support from small community water systems." This is problematic, as EPA has no way to survey all small community water systems. The majority of these systems serve fewer than 500 persons, and are often homeowner associations or mobile home parks. Only state staff reach the majority of these water systems. Therefore, EPA believes that states are best positioned to provide technical assistance, or to determine what organizations can help a community address its needs.