



TOWN OF BOONSBORO

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September 30th, 2022

Mr. Devon L. Dodson, Assistant Secretary
Maryland Department of the Environment
800 Washington Blvd.
Baltimore, Maryland 21230

RE: Drinking Water State Revolving Fund and Environmental Justice Screening Tool Eligibility Criteria

Dear Mr. Dodson,

First, I'd like to thank you for the consideration and guidance you've given to the Town of Boonsboro, recently. If you recall, Town Council and Staff met briefly with you, at the Summer MML Conference, to discuss our solar field power purchase agreement and your recent recommendation to forward our critical water projects agenda to Secretary Teblada yielded a productive phone meeting with Director Fretwell. Like many small towns across the country, we have significant and longstanding issues with our water and wastewater utility infrastructure. We're working hard to correct those issues and we appreciate support and interest from experienced state officials like you.

Like many of the phone meetings we've had with Director Fretwell, we were informed that Boonsboro's median household income was too high, and we don't qualify as a Disadvantaged Community, eligible for Drinking Water State Revolving Fund (DWSRF) grants and loan forgiveness. Mr. Fretwell also mentioned new DWSRF eligibility criteria were being considered, as part of the proposed Environmental Justice Screening Tool, and that the EPA and MDE were planning a 5-year increased funding plan to fund infrastructure projects.

With over \$800 Million in federal funds soon to be available to Maryland Municipalities, and Boonsboro perennially ineligible for grant funding, we discussed with Director Fretwell the process for providing comments and data which would hopefully lead to the enactment of new DWSRF eligibility criteria, that would account for Appalachia's unique economic disadvantages. Please consider our comments, below, as proposed additional eligibility criteria in the proposed Environmental Justice Screening Tool.

As you know, Washington, Allegany, and Garrett Counties are all located in the Appalachian Region. Appalachia is made up of 423 counties and 26.1 million residents, across 13 states, from southern New York to northern Mississippi. Boonsboro is an Appalachian Community and eligible for federal grant funds, through the Appalachian Regional Commission (ARC), an economic development partnership agency of the federal government. ARC's mission is to innovate, partner, and invest to build community capacity and strengthen economic growth in Appalachia and help the region achieve socioeconomic parity with the nation. ARC recognizes the economic disparities that exist for Appalachia, compared to other municipalities with closer proximity to the I-95 Corridor and established market opportunities supported by state infrastructure. We're recommending that MDE adopt ARC's eligibility criteria, for inclusion in the proposed Environmental Justice Screening Tool. ARC's program criteria and rationale are summarized, below:

ARC uses an index-based classification system, to compare counties located in Appalachia with national averages, using three criteria: three-year average unemployment rates, per capita market income, and poverty rates. Each county is then classified as one of five economic status designations: distressed, at-risk, transitional, competitive, or attainment. Washington, Allegany, and Garrett Counties are designated as "transitional," meaning our local economy is transitioning between a strong and weak market, and we rank between the worst 25 percent and the best 25 percent of the nation's counties.

The economic inequalities faced by Appalachia, and many rural areas in Maryland, are best evidenced in the attached ARC MD Economic Status Chart. You'll notice, the Appalachian Counties rank among the lowest in the

state for unemployment, poverty, and per capita market income, when compared to counties with proximity to Interstate 95 and the connecting industrial corridors.

The DWSRF eligibility criteria focuses on median household income, to qualifying as a “Disadvantaged Community,” but more consideration should be given to disparities that exist in our local economies. Small rural towns, operating modern water and wastewater utility systems, in what are essentially bedroom communities with stagnant/slow commercial growth, should also be given due consideration. We struggle with inflation, unemployment, poverty, and economic opportunity.

With the understanding that MDE is working to expand the scope of their eligibility criteria, in the direction of “environmental justice,” we’d be remiss if we didn’t advocate for Appalachia to that point: Appalachian Western Maryland has perhaps the greatest legacy of industrial manufacturing blight in the state, and probably one of the worst in nation. And while this legacy of industrial manufacturing is also one of great pride and the unique industrious spirit of our people, which helped build America through the pre- and post-Industrial Revolution through milling, iron production, coal mining and textile manufacturing, it has also presented unique and unmitigated environmental challenges across Appalachian Western Maryland.

The relative disparities that our residents face has been exacerbated over decades by the lack of remedial or transitional economic investment in the region, as those legacy industries dried up, and along with them, the jobs. Given this downward economic decline, so too were the necessary investments in roads, broadband and fiber, schools, and water, with has disproportionately benefitted areas like Baltimore and the Washington suburbs. Environmental Justice speaks directly to these legacy industries, the environmental morass that it inevitably created, and the almost predictable health and economic demographics that it has left in its wake.

We are proposing that MDE adopt ARC’s eligibility criteria, for inclusion in the Environmental Justice Screening Tool as a socioeconomic indicator, whereby the Maryland Appalachian Region’s economic status designation of “transitional” would qualify all municipalities in Washington, Allegany, and Garrett Counties for DWSRF grants and loan forgiveness. We’re hopeful that our eligibility for federal grant funds through the Appalachian Regional Commission draws a parallel with the DWSRF program and might help to streamline MDE and the EPA’s review and consideration.

Thanks again for your support and guidance. We’re working hard to ensure Boonsboro will always be a great place to live and work, for generations to come. If you have any questions or comments, please reach out to Town Manager, Paul Mantello (301-432-7600, townmanager@townofboonsboro.com).

Sincerely,



Howard Long, Mayor
Town of Boonsboro

Cc (email): The Honorable Benjamin L. Cardin, United States Senate
 The Honorable Chris Van Hollen, United States Senate
 The Honorable J. David Trone, U.S. House of Representatives
 The Honorable Paul D. Corderman, Maryland State Senate
 The Honorable William J. Wivell, Maryland House of Delegates
 Mr. David R. Brinkley, Secretary of Maryland Department of Budget & Management
 Mr. Horatio A. Teblada, Secretary, Maryland Department of the Environment
 President Jeffrey A. Cline, Washington Board of County Commissioners
 Mr. Jeffrey K. Fretwell, MWQFA Director, Maryland Department of the Environment

County Economic Status in the United States, Fiscal Year 2023

Appalachian Regional Commission

FIPS State	County	ARC County	County Economic Status, FY 2023	Absolute Data Values			Indicator Index Values				Composite Index Value, FY 2023	Index Value Rank (of 3,113 counties in U.S., 1 is the best), FY 2023	Quartile (1 is the best), FY 2023
				Three-Year Average Unemployment Rate, 2018-2020	Per Capita Market Income, 2020	Poverty Rate, 2016-2020	Three-Year Avg. Unemp. Rate, Percent of U.S., 2018-2020	PCMI, Percent of U.S., 2020	PCMI, Percent of U.S., Inversed, 2020	Poverty Rate, Percent of U.S., 2016-2020			
United States				5.2	46,638	12.8							
Maryland				4.7	54,502	9.0							
24001 Maryland	Allegany		Transitional	6.0	26,785	15.6	116.3	57.4	174.1	121.6	137.3	2,286	3
24003 Maryland	Anne Arundel	ARC	Attainment	4.0	61,275	5.7	76.9	131.4	76.1	44.5	65.9	103	1
24005 Maryland	Baltimore		Competitive	4.8	53,152	9.3	91.8	114.0	87.7	72.3	83.9	503	1
24009 Maryland	Calvert		Attainment	3.9	55,425	4.4	75.0	118.8	84.1	34.1	64.4	90	1
24011 Maryland	Caroline		Transitional	4.2	33,254	13.3	81.4	71.3	140.2	103.3	108.3	1,354	2
24013 Maryland	Carroll		Attainment	3.7	55,329	4.8	70.7	118.6	84.3	37.1	64.0	84	1
24015 Maryland	Cecil		Transitional	4.7	38,885	9.5	90.2	83.4	119.9	74.3	94.8	871	2
24017 Maryland	Charles		Competitive	4.6	50,276	6.8	89.5	107.8	92.8	52.6	78.3	344	1
24019 Maryland	Dorchester		Transitional	5.4	32,406	16.2	104.0	69.5	143.9	126.1	124.7	1,903	3
24021 Maryland	Frederick		Attainment	4.1	56,344	6.8	79.3	120.8	82.8	53.1	71.7	177	1
24023 Maryland	Garrett	ARC	Transitional	5.2	33,050	10.6	99.2	70.9	141.1	82.5	107.6	1,330	2
24025 Maryland	Harford		Attainment	4.2	51,412	6.8	80.1	110.2	90.7	53.2	74.7	242	1
24027 Maryland	Howard		Attainment	3.6	72,786	5.1	88.8	156.1	64.1	39.8	57.6	35	1
24029 Maryland	Kent		Transitional	4.9	47,289	11.0	93.6	101.4	96.6	85.6	92.6	782	2
24031 Maryland	Montgomery		Attainment	4.1	79,465	6.6	78.4	170.4	56.7	51.3	62.8	72	1
24033 Maryland	Prince George's		Competitive	5.3	42,881	8.6	101.4	91.9	108.8	66.9	92.4	768	1
24035 Maryland	Queen Anne's		Attainment	3.9	56,063	6.2	75.0	120.2	83.2	48.0	68.7	130	1
24037 Maryland	St. Mary's		Attainment	3.9	50,491	8.0	75.7	108.3	92.4	62.5	76.9	305	1
24039 Maryland	Somerset		Distressed	7.0	17,866	20.0	135.3	38.3	261.0	156.0	184.1	2,964	4
24041 Maryland	Talbot		Attainment	4.3	60,237	8.5	82.5	129.2	77.4	66.2	75.4	260	1
24043 Maryland	Washington	ARC	Transitional	4.9	36,681	12.0	94.7	78.7	127.1	93.8	105.2	1,245	2
24045 Maryland	Wicomico		Transitional	5.7	29,830	15.8	109.8	64.0	156.3	123.3	129.8	2,052	3
24047 Maryland	Worcester		Transitional	8.7	42,815	9.2	168.3	91.8	108.9	71.9	116.4	1,630	3
24510 Maryland	Baltimore (Independent City)		Transitional	6.4	35,663	20.0	123.9	76.5	130.8	156.0	136.9	2,271	3