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DEC 18 2013

Dear Administrator McCarthy:

Clean water is one of one of our Nation's most precious natural resources. Safe, strong, and sustainable water systems are some of the most important components of our Nation's public health and robust economy. As such, the LGAC appreciates the work the EPA is doing to ensure that our water infrastructure remains strong to meet the challenges now and in the future.

As state, local and tribal officials, we believe that continued federal investment in our water infrastructure and in partnership with local communities only serves to strengthen the infrastructure systems to assure safe drinking water and ultimately prosperous communities. This is critically important for small and underdeveloped communities with large health and socio-economic disparities and as well for struggling urban centers. For example every \$1 invested yields an additional \$3 dollars going to communities through EPA's Clean Water State Revolving Fund.¹ As local officials, we know that when water systems are cleaner, the communities we serve are healthier and more able to participate in economic prosperity.

With cleaner and safer water, our citizens and businesses are able to be more productive and prosperous. Importantly, our limited resources are not overburdened beyond their capacity due to an unsafe environment. This is true for both the largest cities and smallest towns in America. However, our greater challenges and opportunities are to provide the basics for water infrastructure for small communities to keep them sustainable and resilient.

With these challenges and opportunities in mind, the LGAC makes the following findings and recommendations:

Frances Eargle, DFO

¹ EPA's Clean Water State Revolving Loan Program 2009 Report

Technical Assistance for Small and Disadvantaged Communities

The EPA's Office of Water, in partnership with the U.S. Department of Agriculture (USDA), has created targeted online tools and guidebooks that are invaluable to small and disadvantaged communities in managing their water infrastructure and operations. As part of efforts to ensure sustainable rural and small communities, the EPA and USDA, with significant input from managers of small water systems, have recently produced a guidebook called the *Rural and Small Systems Guidebook to Sustainable Utility Management*, that gives small systems a comprehensive method of looking at what they need to do to manage their operations more effectively, including actions to make their infrastructure more resilient <http://water.epa.gov/infrastructure/sustain/watereum.cfm>. The EPA and USDA field tested the approaches in the Guidebook through a series of workshops with small system managers. In addition to the Guidebook, the EPA and USDA have also developed materials called the "Workshop in A Box" to help small systems and technical assistance providers conduct workshops on their own. These materials are available on EPA's website and the EPA will be hosting a webinar to "train the trainers" who can directly assist small system managers.

We commend the EPA and USDA for this important work and encourage you to highlight and provide the necessary support to make this effort a success. These tools will help small systems throughout the country adopt sustainable practices to ensure they can provide reliable water and wastewater services to rural and small communities and sustain our rural economy.

Recommendation: We encourage the EPA to continue working with the USDA, states, and other assistance providers to disseminate information and assist small and disadvantaged communities based on the tools described above. We also recommend that EPA Regional offices continue to work to identify these communities and work directly with states and locals to disseminate information. We also encourage the EPA to make use of targeted social media and to partner with USDA to promote these materials through their targeted outreach efforts.

Other Technical Assistance

The LGAC applauds EPA efforts to provide technical assistance through a diverse source of online and technical tools to aid local governments. For example, the Office of Water produced a stormwater calculator, CREAT, and other tools that could be beneficial to local governments.

Recommendation: The LGAC encourages the EPA to broadly disseminate these tools through EPA Regional offices and non-governmental organizations. Furthermore, we recommend the EPA work with national intergovernmental organizations, such as National Association of Counties, Rural Water Association, Rural Community Assistance Partnership, etc. for effective and targeted dissemination.

Funding Assistance and Capacity Building

We also commend the EPA's work through the U.S.–Mexico Border Water Infrastructure Program and the benefits it provides to address a critical economic zone and vulnerable region. For example, the program

provided: treatment of 450 million gallons of raw/inadequately treated sewage from being discharged into surface and groundwater, and provided 60,000 homes with safe drinking water and 544,000 people with adequate wastewater collection and treatment services. Supporting the EPA's small water systems and in

particular the US/Mexico Border Water Infrastructure program is vital to this region as well as small communities. The partnerships with local government and international systems help with infrastructure resources to assure the Rio Grande body of water is protected, which is the main drinking water source for this area. The return on this U.S. investment can be seen as: \$6 million was saved on avoiding and containing infectious water-borne diseases; \$13 million saved from ecological improvements; and an estimated \$75 million contribution to the U.S. GDP per year from 1998-2012². For example, in Laredo, Texas, a Wetland Development Program was created to restore the Rio Grande banks, and retention ponds. Clean-up activities are conducted and community gardens have been planted. This was the initial phase of the city's Greenspace Ordinance.

Recommendation: We encourage the EPA to consider these type of planning and design approaches to address critical infrastructure systems. We believe that its delivery of federal services provides a model approach for capacity building and leveraging private and public resources.

Partnerships

We applaud EPA's commitment to partnership with other federal agencies such as the USDA to achieve greater improvements, and to match federal dollars with on the ground results. Also, the EPA has established partnerships with several national organizations including the American Public Works Association, State Association of Drinking Water Association, Rural Community Assistance Partnership and Rural Water Association, which also provide key assistance to small communities.

Recommendation: We recommend that the EPA seek and continue to partner with the USDA and other entities to provide greater flexibility and open opportunities for small communities in providing clean and safe water infrastructure.

Regional and Geographic Initiatives

Regional and geographic initiatives create valuable partnerships in serving to promote sustainable and resilient water resources. Also, these initiatives are important in helping to deliver essential services to small communities through a variety of means (see attached letter co-signed by the EPA and USDA).

Recommendation: We encourage the EPA to continue the regional and geographic initiatives to promote sustainability of water infrastructure. We also encourage the EPA to monitor the environmental and economic results achieved so that 'lessons learned' can be applied to other areas.

²

EPA's U.S.-Mexico Program Office Fact sheet- <http://water.epa.gov/infrastructure/wastewater/mexican/>

The EPA has made significant, tangible progress in the improvement of water infrastructure throughout the country. Realizing this achievement in small and disadvantaged communities is an ongoing challenge and will require more focused attention. Ongoing technical assistance and further investment in water infrastructure through various types of assistance programs for small communities – especially in vulnerable and disadvantaged communities – are imperative.

The LGAC looks forward to offering what we can to help the EPA find the most effective, efficient, and innovative and strategic direction through our advice and recommendations from our local government perspective. In addition, by continuing to partner with local, tribal, state, and where applicable our Canadian and Mexican bordering governments, the EPA will leverage greater returns on water infrastructure investments.

Sincerely,



Bob Dixon, Chair



Robert Cope, Chair
Small Community Advisory Subcommittee (SCAS)



Sue Hann, Chairwoman
Protecting America's Waters Workgroup

cc: Nancy Stoner, Acting Assistant Administrator
EPA's Office of Water