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Adam Krantz

April 7, 2016

The Honorable Sherrod Brown
713 Hart Senate Office Building
U.S. Senate
Washington, D.C. 20510

Dear Senator Brown:

On behalf of the nearly 300 public clean water utility members of the National Association of Clean Water Agencies (NACWA), I write in strong support of the Clean Water Affordability Act (CWAA). If enacted, the proposals contained in this legislative package would provide important assistance to local communities in addressing the very real affordability challenges posed by clean water infrastructure investments required under the Clean Water Act (CWA) to address wet weather-related issues.

The legislation codifies the Environmental Protection Agency's (EPA) Integrated Planning initiative and requires EPA to update its affordability criteria. The Integrated Planning program is an important initiative that provides municipalities an opportunity to prioritize CWA compliance obligations based on water quality outcomes. The CWAA ensures the initiative becomes a permanent feature of the CWA so that municipalities everywhere can rely on it as a standard compliance approach. The CWAA also directs EPA to update its guidance on calculating community affordability, making certain that clean water compliance obligations that address wet weather challenges more accurately account for the true financial situation of local ratepayers.

The legislation also contains important proposals for enabling communities with sanitary sewer systems to pursue more innovative and cost-effective wet weather management approaches that provide ratepayers better water quality outcomes. Currently, the CWA does not provide very effective tools for communities to manage wet weather flows in a sanitary sewer context, though there are several cost-effective technologies now on the market that can help them manage these flows more effectively to avoid unnecessary overflows.

Additional important components of the bill include reauthorization of the wet weather grant program specifically designed to help struggling communities pay for

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the costs associated with fixing older combined sewer systems and sanitary sewer systems, and encourage greater use of green infrastructure technologies.

NACWA thanks you for your leadership on the addressing very real affordability challenges confronting communities in managing their CWA obligations and ensuring they have the necessary tools to cost-effectively provide clean water services to ratepayers. We look forward to working with you to enact these proposals as quickly as possible.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Krantz". The signature is fluid and cursive, with a large loop at the end.

Adam Krantz, CEO