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Adam Krantz

January 12, 2016

The Honorable Steve Chabot
Representative
2371 Rayburn House Office Building
Washington, D.C., 20515

The Honorable Marcia Fudge
Representative
2344 Rayburn House Office Building
Washington, D.C., 20515

Dear Congressman Chabot and Congresswoman Fudge:

The National Association of Clean Water Agencies (NACWA) is pleased to support H.R. 1093, The Clean Water Compliance and Affordability Act, designed to ensure that the Environmental Protection Agency's (EPA) Integrated Planning initiative to assist communities meet their regulatory obligations under the Clean Water Act (CWA) receives an opportunity to be effectively implemented.

EPA unveiled the Integrated Municipal Stormwater and Wastewater Planning Approach Framework (Framework) to help communities meet their regulatory obligations under the CWA in a prioritized and sustainable manner. Under the integrated planning approach, communities can create a realistic schedule of priority projects for wastewater and stormwater permit obligations to ensure available funds go to those projects yielding the greatest water quality benefit first.

H.R. 1093 would create a new pilot program for 15 communities across the country to work with EPA to develop integrated plans that best meet each participating community's particular needs. The pilot program would also encourage communities to pursue innovative and cost-effective approaches to meet the CWA standards and facilitate flexible compliance solutions by extending CWA permit terms up to 25 years for pilot communities with an approved integrated plan. H.R. 1093 would also require EPA to provide an annual report each year for the first five years after enactment on the progress of the integrated planning effort.

Requiring EPA to proceed with a pilot program would ensure EPA moves forward with a program of technical assistance to support communities interested in Integrated Planning with developing and implementing their plans successfully. Establishing a pilot program would also ensure that all areas of the country participate in this effort and that it is effectively evaluated nationwide. Requiring EPA to provide annual reports for the first five years will provide Congress, the public, and the clean water utility community with important information on the effectiveness of the integrated planning program and how it can be improved from year to year.

NACWA Letter of Support for The Clean Water Compliance and Affordability Act

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However, implementing the pilot program and related reporting requirement could be done in a much more effective manner if Congress also authorized additional, modest funding for EPA to implement the proposed legislation. The most direct beneficiaries of this funding would be the local communities participating in the pilot program, as well as the larger municipal clean water community as a whole that would gain valuable insights from the pilot studies and resulting EPA reports. For this reason, NACWA requests that H.R. 1093 be amended to include authorized modest funding to assist EPA in working with local communities on pilot projects.

As you well know, communities are under enormous financial pressure to maintain critical services for their residents, including education, fire and safety as well as critical public health infrastructure such as drinking water and clean water. An Integrated Planning approach to CWA obligations can potentially save ratepayers millions of dollars while focusing clean water investments in a way that ensures the greatest water-quality benefit.

Thank you again for your leadership on this issue and moving forward with legislation to support it.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Krantz". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Adam Krantz
CEO