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February 20, 2014

The Honorable Gina McCarthy

Administrator

United States Environmental Protection Agency

1200 Pennsylvania Avenue, NW

Washington, DC 20460

Dear Administrator McCarthy,

As you finalize the Fiscal Year (FY) 2015 budget request for the U.S. Environmental Protection Agency (EPA), we urge you to include \$15 million for a pilot project to assist communities successfully implement EPA's Integrated Planning initiative.

In 2012, EPA released the Integrated Municipal Stormwater and Wastewater Planning Approach Framework outlining a new model to help communities meet their regulatory obligations under the Clean Water Act (CWA) in an integrated manner. If successfully implemented, this model could help communities more affordably manage their clean water obligations while ensuring continuous progress toward water quality goals. The approach could also be quite helpful in assisting communities better plan for future water-related infrastructure needs related to climate change and resiliency.

However, for this model to succeed communities must develop an Integrated Plan outlining water quality goals, human health and regulatory issues that they need to address, an assessment of existing systems, an evaluation of the communities' financial capability, an evaluation of cost-effective approaches for addressing identified issues, metrics to measure success, and a process for incorporating adaptive management techniques. Putting together these plans will require resources.

The requested funding would support communities in each EPA region develop Integrated Plans. This would enable EPA to guarantee that all regions of the country participate in this effort and see to it that this new model for meeting CWA obligations receives an opportunity to effectively be evaluated.

Thus far, we have only seen interest from communities already facing enforcement actions and negotiating consent decrees. We believe in order to test whether the Integrated Planning model to water quality management could work for all communities, implementing it through the regular NPDES renewal process is necessary.

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As you well know, communities are under enormous financial pressure to maintain critical services for their residents, including education, fire and safety and critical public health infrastructure including drinking water and clean water. They are also facing future challenges due to climate change and will need to undertake system improvements to ensure resiliency in the face of extreme weather events. NACWA applauds EPA for proposing a new model for helping communities meet their regulatory and non-regulatory obligations under the CWA and we have been strong partners with EPA in encouraging communities to come forward with Integrated Plans. But these plans are not cheap and with some additional assistance from EPA, communities would be able to take better advantage of this opportunity and ensure that this new model succeeds.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "K Kirk". The signature is stylized with a large "K" and a cursive "Kirk".

Ken Kirk  
Executive Director

cc: Deputy Administrator Bob Perciasepe