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July 14, 2011

The Honorable Lisa P. Jackson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Administrator Jackson:

The Local Government Advisory Committee (LGAC) and its Small Community Advisory Subcommittee appreciate having the opportunity to work with you and the EPA on a wide range of issues of interest and concern to local governments. More specifically, the Small Community Advisory Subcommittee is particularly grateful to have the opportunity to comment on the Partnership for Sustainable Communities' draft report: *Building Federal Support for Sustainable Rural Communities*. The LGAC has reviewed the draft document and pursuant to its charter, the Committee would like to offer the following comments regarding the agency's partnership with rural communities.

Overall the Committee believes the *Building Federal Support for Sustainable Rural Communities* report is a great start to an inter-agency partnership which focuses on providing rural communities with the federal collaboration and assistance that they need and deserve. Although each agency has its own definition for the term "rural," it is important to distinguish those communities within and outside of this report's purview.

The Committee suggests that the definition of the word "rural" be explored more in this document and in future communication.

The committee believes that varying threshold and compliance requirements within the EPA, and among the various federal agencies, can be daunting for communities to manage, especially after a natural disaster. A comprehensive approach to an economic development plan, especially for rural communities that have limited staff and resources, is ideal and should be the federal template for localities to implement. A one source and one stop assistance approach to help rural communities pull resources together (which may encourage the growth of manufacturing and real jobs) will help underserved areas identify where they need assistance and what they already do well, so they can build upon those strengths.

Additionally, business or development loan thresholds available through the federal agencies are often too high for small communities. For example, a \$100,000+ threshold loan level is often much too high for a rural, small community. A small developer or business may need only half that amount or less to help rebuild or construct, and may not qualify for the current threshold level loan. High level loan and financial assistance thresholds can effectively exclude many of the most needing small and rural communities from federal assistance.

The Committee recommends that the EPA consider smaller loan thresholds to make federal financial assistance dollars more obtainable for all sizes of communities.

The Committee notes that local university extension programs may be an ideal method for providing this type of localized training on federal loan information. Perhaps this rural community report and the Sustainable Community Partnership's future outreach would best gain access on the local level through university extension programs, especially as there is often already some outreach in economic development and training at these locations.


Finally, the Committee recommends that additional future case studies for this program focus on those communities that have been affected by emergency and natural disasters, including floods and fires.

Specifically, Greensburg, Kansas is a great example of a small community that has put a great deal of thought into smart growth and environmental planning when rebuilding the town after a devastating tornado in 2007.


The Committee appreciates the opportunity to provide suggestions on *Building Federal Support for Sustainable Rural Communities* draft report and looks forward to providing additional local and small community perspectives to the Partnership for Sustainable Communities. The

Committee understands that the Partnership for Sustainable Communities is still a fairly new partnership among federal agencies that focuses on sustainability. We look forward to providing additional input and recommendations as the Partnership's efforts unfold and evolve.

Sincerely,



Mayor Heather McTeer Hudson
LGAC Chair



Mayor Bob Dixon
Small Community Advisory Subcommittee