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December 11, 2015

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, D.C. 20460

Dear Administrator McCarthy:

On behalf of the EPA's Local Government Advisory Committee (LGAC), we are writing to express our support for the EPA's encouragement of decentralized systems for small communities. In many communities across the United States, existing septic systems are not up to par with economic efficiency and public health standards. In Ohio, for example, 1 out of every 3 septic systems are failing. Half of the septic systems in Lowndes County, Alabama are broken as well, leaving residents vulnerable to hookworm and other diseases brought about by poor sanitation systems.¹

The amount of money needed to fix these problems is beyond what many smaller communities can afford. Decentralized systems can provide smaller communities with safe, reliable wastewater collection and treatment at a fraction of the cost of centralized wastewater systems. With today's existing technologies, decentralized systems can also be sustainable in the long-run.

Background: Decentralized wastewater treatment systems are set up to collect and treat wastewater on or near household and commercial properties. In 2012, the EPA Decentralized Memorandum of Understanding (MOU) Partnership, in realizing the benefits that these systems can bring to communities, released (4) papers on what decentralized wastewater systems are and the multiple benefits they provide.² These papers described decentralized systems and outlined

Frances Eargle, DFO

¹ Circle of Blue, "America's Spreading Septic Threat"

<http://www.circleofblue.org/waternews/2015/world/americas-spreading-septic-threat/>

² EPA, "Septic Systems (Onsite/Decentralized Systems)"

<http://water.epa.gov/infrastructure/septic/Decentralized-MOU-Partnership-Products.cfm>

the economic, environmental, and public health benefits that they bring to communities. The listed benefits include:

- Low operation and maintenance costs
- Utilization of natural soil treatment processes
- Use of gravity flow instead of energy to pump wastewater away from properties
- Preservation of greenspace
- Reduction of pollutants, nutrients, and contaminants

In 2012, the LGAC responded to these papers by putting forward a letter of recommendation supporting the Decentralized Wastewater MOU Partnership.³ We specifically recommended that the EPA use the papers to outreach to communities that may not know about decentralized system options, as well as to add conservation districts and local health boards as partners.

Finding: It is estimated that about 20 percent of homes in the United States are served by decentralized wastewater systems. Additionally these systems are utilized by small businesses, parks, etc. across the country. These systems are a much more affordable option for rural communities, particularly those that need to update or replace their existing water infrastructure systems.

Recommendation: The LGAC recommends that the EPA continue to administer the Decentralized Wastewater Memorandum of Understanding Partnership, with special consideration for small and rural communities that would benefit the most from developing decentralized sewer systems.

Finding: Supplemental Restraint System funding has been amended and is available for all states to use, but only a few states actually use the funding program to implement decentralized sewage. One of the biggest constraints of small and rural communities is lack of funding to improve water infrastructure. Without proper funding opportunities, small and rural local governments cannot provide much needed services to their communities.

Recommendation: The LGAC recommends that the EPA develop communication tools to inform small and rural communities of the funding opportunities that are available. For example, webinars to discuss funding options for decentralized systems such as the Clean Water State Revolving Fund (CWSRF) will arm small and rural communities with the information necessary to make informed decisions concerning decentralized sewer systems.

Recommendation: Furthermore, the LGAC recommends that small, rural, and EJ communities be provided with opportunities to have funding and technical assistance afforded to them to fully utilize the environmental and public health benefits of decentralized systems.

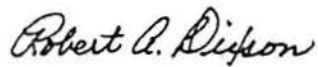
Finding: Even with funding sources, small and rural communities are often overcharged to install decentralized treatment systems.

³LGAC Letter of Recommendation, "Decentralized Wastewater Memorandum of Understanding (MOU) Partnership" http://www2.epa.gov/sites/production/files/2013-09/documents/2012_0511_lgac_letter_decent_sldwstewtrpartnership.pdf

Recommendation: The LGAC recommends that the Administrator addresses the American Society of Civil Engineers (ASCE) about equitable pricing schemes for decentralized sewer system installation in small and rural communities.

The LGAC appreciates the steps taken by the EPA to provide sustainable and affordable alternatives for wastewater management. When the late Mayor Murrell of Arcadia, Oklahoma first learned of decentralized wastewater systems, she immediately proceeded to gather more information about setting up this system in her community size of nearly 300 people. It is the hope of the LGAC that this exciting opportunity can be shared among other similar communities. The LGAC once again thanks the Administrator for all of her hard work to make a visible difference in communities, especially small and rural communities.

Sincerely,



Mayor Bob Dixon
Chairman



Commissioner Robert Cope
Chairman, Small Community
Advisory Subcommittee (SCAS)



Ms. Susan Hann
Chairwoman, Protecting America's
Waters Workgroup

