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WASHINGTON, D.C. 20460

LOCAL GOVERNMENT
ADVISORY COMMITTEE

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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 (SCAS) congratulate you on your appointment and confirmation as Administrator of the Environmental Protection Agency.

The LGAC provides advice and recommendations that assist the EPA in developing a stronger partnership with local governments. As partners in the ongoing effort to protect human health and the environment, we are pleased to know that your administration intends to place special attention to disenfranchised cities and rural areas including small cities and towns. The LGAC as well as SCAS would like to pledge their support in your efforts to help local governments and small towns mitigate and meet their environmental responsibilities.

In recent meetings the SCAS and LGAC have discussed how EPA can better support small communities and help them address their particular needs. One product of this effort is the recently produced "Small Communities Report" that highlights the particular challenges that small and disenfranchised communities face in mitigating environmental challenges. We would like to share with you the results of our discussion:

EPA Small Communities Offices or "Desks"

The SCAS recommends that a Small Community Office or "desk" be established within each region of the EPA. Within this office a small community ombudsman or liaison should be appointed to coordinate the regulatory, policy and financing needs that are unique to small communities. It is important to have a regional representative to manage and coordinate outreach efforts from the national, state and local perspective.

Frances Eargle
Designated Federal Officer
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We also recommend that a national small community office or “desk” be established within the Office of Congressional and Intergovernmental Relations to address these issues from a national perspective. This office or “desk” would contain or work closely with the Designated Federal Official for the SCAS, and develop a productive relationship with the Committee.

Access to funding for Small Communities: Increasing Opportunity

Though EPA offers many tools and resources to assist small communities with their environmental needs, one vital resource that is not reaching small communities is EPA grant funding. While we recognize the limitations of EPA’s grant budget, we have identified three major barriers that impact small communities: 1) Access to and information on grants (we believe our recommendations on Local Government Assistance Network); (2) The limited capacity of small communities to apply for and manage federal grants, especially in light of the ballooning administrative requirements imposed over the last few years, and Grant matching requirements.

The SCAS is of the opinion that most EPA grants require a significant investment in professional environmental and administrative expertise to apply for and manage them. For small communities, especially those under 10,000 people this is a difficult, if not impossible, proposition. These communities usually can’t hire a full-time (or even part-time) environmental professional; they can’t travel to conferences to learn about opportunities or avail themselves of technical resources; and because small town officials wear many hats they cannot delve deeply into specific issues or cover “the trade”, as is readily done in larger cities and counties.

The SCAS would like to offer five recommendations for addressing the capacity of small communities:

- ***Streamline administrative grant requirements:*** EPA should simplify the grant process for small communities that lack administrative capacity to fund needed projects.
- ***Microgrants for small communities:*** For small communities, a little seed money goes a long way. The SCAS recommends that EPA establish a ***Microgrant*** program for small communities, with minimal administrative requirements and flexibilities, perhaps modeled on the General Assistance Grants (GAP) for Tribes.
- ***Match Waivers or Reductions:*** Small communities with limited means should be able to receive “hardship” waivers from grant matching requirements. We understand that hardship waivers are used frequently for Tribes.
- ***Brownfields:*** A regional approach is essential, to engage stakeholders. Work with owners and or developers to find funding for cleanup.
- ***Certified Water Operator:*** Streamline water operator certification, allowing small communities to share a certified water operator except when treatment is necessary.

Access to EPA Tools and Resources

Broader and easier access to EPA's many tools and resources for small communities would greatly magnify their effectiveness. Therefore, The SCAS encourages EPA program offices to ensure that tools and information useful to local governments be accessible on Local Government Environmental Assistance Network (LGEAN). LGEAN (operated by the International City Managers Association with many partners, including EPA) is an effective pathway for the distribution of information of interest to local governments. The SCAS and LGAC look forward to the opportunity to review and comment on the upcoming "refresh" to LGEAN and ensure the changes are useful to local governments and small communities.

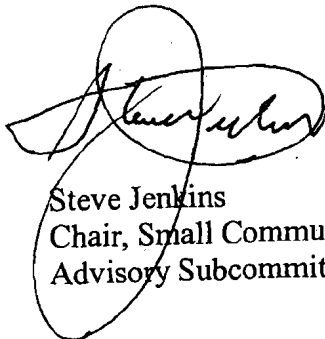
Conclusion

The Small Communities Advisory Subcommittee's mission is to strengthen the capacity of small communities throughout America and protect the health of their people and the environment in which they live. We believe that this recommendation along with EPA's current ongoing efforts will ensure that the particular needs of small communities are not overlooked.

Sincerely,



Roy Prescott
Chair, Local Government
Advisory Committee



Steve Jenkins
Chair, Small Community
Advisory Subcommittee