

CHAMBER OF COMMERCE  
OF THE  
UNITED STATES OF AMERICA

CHUCK CHAITOVITZ  
VICE PRESIDENT  
ENVIRONMENTAL AFFAIRS &  
SUSTAINABILITY

1615 H STREET, NW  
WASHINGTON, DC 20062

October 11, 2019

Edna Primrose  
Assistant Administrator  
Rural Development, Water and Environment Programs  
U.S. Department of Agriculture  
400 Jefferson Drive SW  
Washington, DC 20250

**Re: U.S. Chamber of Commerce Comments to the Interagency Task Force on Water Quality**

Dear Assistant Administrator Primrose:

Small communities play a critical role in the overall economic health of America. They cannot attract and keep business without adequate infrastructure, including water and wastewater services. The U.S. Chamber of Commerce (“Chamber”) believes that addressing the unique water challenges of small communities and small companies should be a top priority. Recommendations from the Chamber to the Interagency Task Force on Rural Water Quality (“Interagency task force”), for inclusion in their year-end report to Congress, follow:

- **Mobilize private capital.** The Chamber is engaging U.S. government agencies, companies, and foundations regarding an innovative financing pilot to ensure increased private investment to address small community infrastructure affecting water quality. The Chamber invites Interagency task force members to join and build consensus on an approach.
- **Highlight funding mechanisms for specific treatment needs and emerging contaminants.** Numerous small communities are facing substantial capital costs to address water quality issues as EPA changes regulations or new sources of contamination are identified.
- **Promote the enabling environment to modernize small community water and wastewater infrastructure.** The Chamber supports developing policies to assist with project implementation and collaboration.
  - Show that there are models of collaboration and public-private partnerships that can work to co-fund and execute projects.
  - Identify ways to right size systems for areas, especially when the USDA population limits increases to 50,000, and explore new management and funding models (e.g., partnerships, regionalization, and bundling of services).
  - Support EPA in moving SRFs from 30- to 40-year loans.

- **Integrate green infrastructure, water reuse, and resilience into long-term small communities' planning and decision making.** Green infrastructure and reuse are important options for communities to build resilient infrastructure and address stormwater challenges. They should be explicit eligible activities under various funding and financing programs. The Chamber encourages the Interagency task force to work with the states to make such approaches eligible for predisaster mitigation efforts, including funding from FEMA's Building Resilient Infrastructure and Communities program.
- **Develop a guidebook in which communities can identify the approach and resources to get started.** The Chamber is collaborating with university and foundation partners to develop a guidance manual for local decision makers that provides basic information about water systems and where they can go for both public and private resources and assistance on various topics (e.g., technical assistance, financial assistance, partnerships, and technology). The document should include a checklist of questions to guide communities through investment and implementation options.

Thank you for your consideration of these recommendations, and we stand ready to assist the Interagency task force in its important mission of ensuring reliable water and wastewater infrastructure for rural and small communities and small businesses.

Sincerely,

A handwritten signature in black ink, appearing to read "Chuck Chaitovitz". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Chuck Chaitovitz  
Vice President  
Environmental Affairs & Sustainability