

Re: July 2 Op-Ed – Kirk: Dumping sewage into Great Lakes must stop

It is critical that your readers understand the impacts of the legislation discussed in this Op-Ed piece. While the intent may be to protect the Great Lakes, it would result in astronomical costs to local communities and delayed water quality improvements. If enacted, the legislation would likely be emulated in other regions of the country, potentially increasing costs by orders of magnitude.

There is no sector more dedicated to clean water than publicly-owned treatment works (POTWs), which provide their communities with clean water, ensure economic vitality and protect public health, the environment and our quality of life. Much of the improvement in water quality since enactment of the 1972 Clean Water Act (CWA) has been due to the tireless efforts of POTWs.

The costs of compliance and water quality improvement are ultimately borne by ratepayers – the residents and businesses of the community. Many communities are already facing affordability challenges. Expenditures need to be prioritized based on the value provided. Combined sewer overflow (CSO) reduction is an important component of improving overall water quality; however, the Great Lakes face challenges that go well beyond CSOs, including excessive nutrients caused by inadequate conservation practices and stormwater management. Addressing challenges holistically would lead to far greater water quality improvements than focusing solely on CSOs.

The proposed legislation directly contradicts and undermines over 20 years of CSO regulation and legislation developed through a meticulous, collaborative process by the federal government, states, municipalities and citizen groups. It conflicts with the 1994 Combined Sewer Overflow (CSO) Control Policy - incorporated into the CWA - that sets national goals and standards for CSO reduction and requires the development of long-term plans for compliance. The vast majority of Great Lakes dischargers are currently complying with this Policy.

Thus, Congress has already embraced a successful regulatory program to address overflows. This should not be summarily replaced by a hastily-crafted bill that was not introduced via the normal legislative process, but rather attached as a rider to an appropriations bill. The proposed legislation would undercut existing programs, raise ratepayer costs without meaningful environmental improvement, and set back overall efforts to improve the Great Lakes. We urge Congress to instead support holistic Great Lakes programs such as a federally-funded restoration bill or an allocation of integrated planning funds for POTWs. We look forward to working with Congress on such an approach.

*Ken Kirk, Executive Director, National Association of Clean Water Agencies*

*NACWA represents the interests of more than 300 public agencies and organizations that have made the pursuit of scientifically based, technically sound and cost-effective laws and regulations their objective. NACWA members serve the majority of the sewered population in the United States and collectively treat and reclaim more than 18 billion gallons of wastewater daily.*