



# The City of Erie, Pennsylvania

Joseph E. Sinnott, Mayor

July 21, 2015

The Honorable Robert R. Casey, Jr.  
The United States Senate  
393 Russell Senate Office Building  
Washington, DC 20510

Dear Senator Casey,

I am writing to express our concern over provisions inserted in the Senate's proposed Fiscal Year (FY) 2016 Interior, Environment and Related Agencies Appropriations Bill (S.1645) that, if enacted, would have costly consequences for communities and ratepayers throughout the Great Lakes region and delay efforts to improve overall water quality in the Great Lakes. These provisions should be removed from the final spending package.

Section 428 of the spending package directly contradicts and undermines legislation Congress enacted in 2001 codifying the 1994 Combined Sewer Overflow (CSO) Control Policy with which the majority of Great Lakes dischargers are currently complying. The CSO Control Policy sets forth national goals and standards for the reduction of CSOs by publicly-owned treatment works (POTW) and requires the development of Long-Term Control Plans (LTCP) to comply with these standards. Over the past two decades the City of Erie has developed and implemented a plan that has eliminated almost all of our CSO's and significantly improved the water quality in Lake Erie and Presque Isle Bay. This required an investment of tens of millions of dollars.

If Section 428 is allowed to stand, communities along the Great Lakes would need to go back to the drawing board and spend tens of billions of additional ratepayer dollars to achieve a near impossible goal of zero overflows without regard to corresponding improvements in water quality. Further, the proposed provisions would prohibit communities from utilizing an important operations tool that safeguards the integrity of their wastewater treatment systems during periods of extreme wet weather, thereby imposing unnecessary additional costs by handcuffing communities as they attempt to comply.

The proposed provisions contained in Section 428 would require communities to spend limited ratepayer resources on eliminating CSO discharges at the expense of addressing the numerous other water quality challenges facing the Great Lakes, thereby setting back overall efforts to improve water quality by decades. The reduction of CSO discharges is an important component of improving water quality; however, the Great Lakes face water quality challenges that go far beyond CSOs and include excessive amounts of nutrients caused by inadequate conservation practices, soil erosion caused by inadequate stormwater management practices, and invasive species brought into the basin by a variety of sources. These challenges are also quite costly to address, but doing so would lead to far greater water quality improvements than focusing solely on CSOs.

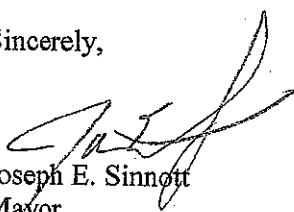


The CSO Control Policy was carefully crafted by the Environmental Protection Agency and key stakeholders and recognizes that chasing a goal of zero CSOs would waste precious resources that could be used to address other water quality challenges. The proposal contained in Section 428 of the Senate EPA spending package proposes a dramatic shift in clean water policy, one that would impose catastrophic costs to ratepayers throughout the Great Lakes region and result in negligible water quality improvement. At the very least, such a dramatic policy shift should be considered through the normal legislative process so that the policy and cost implications can be fully debated and the impacted communities can be fully heard, and not through the congressional appropriations process that does not allow for a full airing of concerns.

For the foregoing reasons, I urge you to remove Section 428 from the S. 1645, the FY16 Interior, Environment, and Related Agencies Appropriations package.

Thank you for your consideration of this matter and please do not hesitate to contact me, if you need further information.

Sincerely,



Joseph E. Sinnott  
Mayor

cc: Mr. Kyle Hannon, Erie Office



# The City of Erie, Pennsylvania

Joseph E. Sinnott, Mayor

July 21, 2015.

The Honorable Pat Toomey  
The United States Senate  
248 Russell Senate Office Building  
Washington, DC 20510

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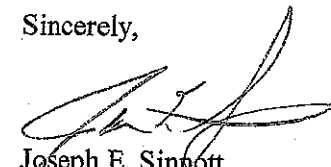


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Joseph E. Sinnott  
Mayor

cc: Ms. Sheila Sterrett, Erie Office