



September 14, 2015

The Honorable Rob Portman
448 Russell Senate Office Building
Washington, DC 20510

Dear Senator Portman:

As the Mayor of the City of Bowling Green, Ohio, I appreciate your support and effort to address issues of concern to all of our local constituents including the recent water quality issues in our Great Lakes region. However, I am very concerned about the cost effectiveness and detrimental nature of certain provisions that have been inserted into the Senate's proposed Fiscal Year (FY) 2016 Interior, Environment and Related Agencies Appropriations Bill. If enacted, there will be costly consequences for the City of Bowling Green, its citizens, and rate payers with virtually no improvement to water quality in the Great Lakes or even the local ditches and streams. I urge you to oppose these provisions.

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. Bowling Green has already implemented its LTCP with very good results. The CSOs were reduced to zero occurrences under typical rain conditions for the past three years. Based on the proactive operational changes since 2007 and the Treatment Plant expansion from 20 MGD to 30 MGD in 2012, it is determined that the City of Bowling Green has achieved the goal of reducing CSO occurrences to four (4) or less during a typical year. The EPA's Combined Sewer Overflow (CSO) Control Policy works when implemented as currently approved, achieving treatment of not just sanitary waste but storm water runoff as well. The balance, referred to as Combined Sewer Overflow is tested and confirmed to be better than stream quality (no degradation). Even building huge storage reservoirs to hold the water for later treatment is of little value because the water approaches treated quality.

If Section 428 is allowed to stand, the City of Bowling Green Department of Public Utilities Would have to either expand its treatment plant and/or construct water storage facilities that could cost upwards of \$15 million to comply, with almost no benefit. 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 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, soil erosion, 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.

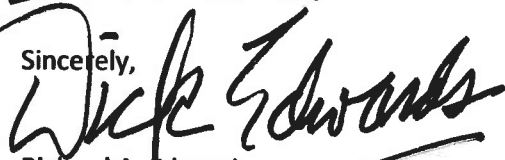
Finally, these costly provisions are included in a spending package that proposes to cut funding for the Clean Water State Revolving Fund (CWSRF) by nearly 30%. Imposing additional regulations on ratepayers at the same time as Congress proposes to cut infrastructure financing programs that assist with compliance will saddle ratepayers with an unfunded mandate that may well be insurmountable.

The CSO Control Policy was carefully crafted by the Environmental Protection Agency and key state, municipal and environmental 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, not through the congressional appropriations process that does not allow for a full airing of concerns.

For the foregoing reasons, I urge you to strip Section 428 from 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 at 419-354-~~5284~~ for more information.

Sincerely,

A handwritten signature in black ink, appearing to read "Dick Edwards", with a long horizontal flourish extending to the right.

Richard A. Edwards
Mayor