



Citizens Advisory Council

to the Department of Environmental Protection

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POSITION STATEMENT RE: SEWAGE INFRASTRUCTURE NEEDS

There has been much public debate regarding the cost of upgrading sewage treatment plants to meet new limitations on discharge of nutrients into the Chesapeake Bay watershed. There has also been much dialog on how best to achieve the nutrient and sediment cap load allocations, with alternatives ranging from nutrient trading to capital upgrades. Regardless of the uncertainties surrounding how and how much it will cost, federal law requires that Pennsylvania reduce its contribution of nutrients and sediment to the Chesapeake Bay. What we need to be discussing is how it will be paid for, and by whom.

The Commonwealth is assuming a portion of the agricultural sector's cost of meeting its allocation through such initiatives as the tax credits provided through REAP and through Growing Greener grants. These valuable initiatives support the agricultural sector's ability to meet its obligations under the Bay agreement but benefit farmers and water quality statewide, not just in the Bay watershed.

Wastewater treatment plants in the Bay watershed must also reduce their contribution under the Bay agreement. This requirement is in addition to other necessary upgrades required to meet the demands of a growing economy, which applies to all plants, both within and outside of the Chesapeake Bay watershed. We recognize that at least some portion of the cost estimates for plants within the Bay watershed is for non-Bay-related upgrades.

While we agree that municipal authorities, treatment plants and their customers should assume some portion of the financial responsibility for upgrades, it is unreasonable and overly burdensome to expect them to assume the entire cost of achieving compliance with the Bay agreement standards. We recognize that there are equity issues with how much each sector must bear; these issues can be at least partially addressed by Pennsylvania providing financial support for upgrading sewage treatment plants, just as it is supporting agricultural sector efforts, and just as other Bay states are doing.

In addition, the federal government needs to resume an appropriate level of financial support through its Clean Water and Drinking Water programs, to support achievement of federal mandates. Nutrient pollution is a water quality issue across the country, not just in the Chesapeake Bay watershed. Estuaries and coastal waters such as Long Island Sound, the Gulf of Mexico, and San Francisco Bay among others are suffering the effects of excess amounts of nitrogen and phosphorus from a variety of sources, including wastewater treatment plants. States in the Northeast, Mid-Atlantic, Mid-West, South and West are all facing the need to upgrade their sewage treatment facilities beyond the standard secondary treatment requirements of 20 years ago. Just as the federal government had a significant and appropriate role to play then, so it does today in taking the next step in protecting and improving water quality across the nation.

Alternatives to capital upgrades, such as nutrient credit trading, may be useful tools in some circumstances and situations, as long as it can be demonstrated that measurable water quality improvements will be achieved, but these should not be viewed as a panacea. Infrastructure (structural or non-structural) upgrades and innovative technologies will still be preferable in many situations and, in fact, will be necessary to generate future credits to trade. Consequently, establishing funding sources at all government levels to achieve these upgrades should remain a priority.

Approved:
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