

Freshwater Society is a non-profit organization dedicated to educating and inspiring people to value, conserve and protect all freshwater resources.

BOARD OF DIRECTORS

Lisa Whalen, *Chair*
Mike Hanson, *Vice Chair*
Jeremy Duehr, Esq., *Treasurer*
Valery Forbes, Ph. D., *Secretary*

Rick Bateson
Julie Blackburn
Todd Bolin
Ryan Godfrey
Ryan Hurt
Lili McMillan
Joan Nephew
Corrine Ricard
David Webb
Bill Weimer, Esq.

Emeritus Directors
Richard S. Caldecott, Ph.D.
JoEllen Hurr
Barb Luikens, M.D.

Dear Ms. Huberty,

Communities are facing two kinds of uncertainty when planning for their future wastewater treatments needs: financial and regulatory.

1. Financial uncertainty: Financing maintenance and upgrades of aging plants is a challenge for small cities. The USDA rural development funding was slated for elimination (1/2 billion/year). Even without changes to treatment plants, ongoing expenses are difficult to absorb. With money not an option, the majority of the burden will be on state funding mechanisms.

What can the state do?

-Strategize and plan for how communities can finance the maintenance on, and upgrades to aging plants.

2. Regulatory uncertainty: Communities struggle with what to treat.

- Standards for treatment appear to vary and different-sized cities appear to have different expectations.
- New contaminants are being identified all the time and include cyanobacteria, chromium, pharmaceuticals and just regular salt.
- Communities must decide on whether to act now or wait to see how things play out; build in flexibility to adapt plants as new issues emerge; plan for water reuse and therefore build smaller plants anticipating decreases in consumption and discharge.

What can the state do?

-Provide guidance on determining the point at which the cost-benefit ratio of treatment degrades and further point-source control is economically ruinous compared to no-point measures with multiple benefits.

-Propose a study bill to explore use of treated effluent (and other waters) to enhance aquifer recharge.

Freshwater is prepared to further explore these topics with the LWC.

Respectfully,

Carrie E. Jennings, Research and Policy Director
Steve Woods, Executive Director



