

OHIO MAYORS ALLIANCE

July 19, 2019

Dear Honorable Members of the Ohio Congressional Delegation:

On behalf of the Ohio Mayors Alliance, a bipartisan coalition of mayors in Ohio's largest cities, we write to you today regarding HR 1764, a bill that amends the Federal Water Pollution Control Act with respect to permit terms. We hope you will consider supporting and co-sponsoring this legislation.

As you know, local governments are responsible for implementing national clean water quality goals via enforceable mandates expressed as permit conditions. Local governments in Ohio invested \$4.1 billion of customer/citizen resources in 2015 – the latest available Census data – to provide public drinking water and wastewater/sewer services and infrastructure. Since the 1970's, over 15,000 wastewater/sewer facilities have had to bear the additional cost and human capital burden of renewing the Clean Water Act National Pollution Discharge Elimination System (NPDES) permits every five years. This is both unnecessary and inefficient burden on local governments.

More than forty years of 5-year permit terms requires spending more local resources than necessary to achieve clean water goals. The need for more effective resource management calls for modernizing the NPDES permit terms. HR 1764 would establish a commonsense approach to provide the U.S. Environmental Protection Agency or a delegated state with the discretionary authority to consider providing a permit term of up to ten years to public agencies that have demonstrated compliance with existing permit conditions.

Modern wastewater treatment often involves substantial investment of capital with construction terms that stretch out beyond the existing five-year permit term. When construction is required to meet permit compliance, the timeline can extend more than a decade, as cities try to meet the requirements of extensive environmental reviews, project design, scheduling, and labor and construction agreements. The current NPDES permit term of five years simply does not align with today's water infrastructure complexities and the timelines that growing cities are managing.

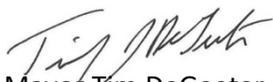
Criticism that ten years would open the door to increased water contamination ignores many reporting and treatment requirements that would not be affected by this bill. At the same time, existing permit reopener provisions would allow for new conditions to be inserted where needed prior to permit expiration and protects the public's involvement in the permitting process. Permits issued on a longer timeline would still maintain the same safeguards that exist in the current process.

Ultimately, HR 1764 addresses a key problem facing local governments- providing Ohioans with clean, safe water without exhausting local resources to comply with inefficient administrative burdens. Freeing up both the resources and time directed towards renewing permits on a 5-year basis allows local governments to utilize resources directly towards infrastructure projects that support their communities, rather than unnecessary administrative steps.

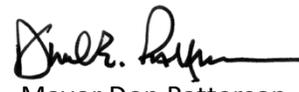
This legislation would allow federal, state, and local governments to coordinate more efficiently, easing the strain on local governments who are responsible for implementing national clean water standards. HR 1764 effectively reflects the modern challenges of managing water infrastructure and would implement a reasonable timeline for achieving clean water goals, without affecting public involvement and safety standards. We believe this bill can reduce local resource inefficiencies in the permitting process and will benefit the many public utilities providing sewer and wastewater services.

We, the undersigned members of the Ohio Mayors Alliance Board of Directors, and on behalf of the members listed below that make up this bipartisan coalition, ask for your support and co-sponsorship of HR 1764 to Amend the Federal Water Pollution Control Act:


Mayor John Cranley
City of Cincinnati


Mayor Tim DeGeeter
City of Parma


Mayor Andrew J. Ginther
City of Columbus


Mayor Don Patterson
City of Kettering


Mayor David Scheffler
City of Lancaster


Mayor Larry Mulligan, Jr.
City of Middletown


Mayor Nan Whaley
City of Dayton

OHIO MAYORS ALLIANCE MEMBERS

Mayor Daniel Horrigan, City of Akron
Mayor Steve Patterson, City of Athens
Mayor Bob Stone, City of Beavercreek
Mayor Tom Bernabei, City of Canton
Mayor John Cranley, City of Cincinnati
Mayor Carol Roe, City of Cleveland Heights
Mayor Andrew J. Ginther, City of Columbus
Mayor Don Walters, City of Cuyahoga Falls
Mayor Nan Whaley, City of Dayton
Mayor Gregory S. Peterson, City of Dublin
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Mayor Christina Muryn, City of Findlay
Mayor Richard "Ike" Stage, City of Grove City
Mayor Don Patterson, City of Kettering
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Mayor David Scheffler, City of Lancaster
Mayor David J. Berger, City of Lima
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Mayor Larry Mulligan, Jr., City of Middletown
Mayor Tim DeGeeter, City of Parma
Mayor Warren R. Copeland, City of Springfield
Mayor Wade Kapszukiewicz, City of Toledo
Mayor William D. Franklin, City of Warren
Mayor Jamael Tito Brown, City of Youngstown