

Steve King

Hello,

Thank you for the opportunity to comment. After attending a nutrient forum meeting on 8/11 and reviewing the financial section of the plan, we suggest that the financial section include a total cost estimate for achieving the objectives of the plan. For point sources, this can include costs that individual WWTPs will experience as well as the administrative and other costs that ECY will incur. These costs can then be used to back into a per capital cost or household cost, etc. This is what general sewer plans do to determine rate burden as an example. Most importantly, it is a good check to see if the plan is feasible or not and a way to identify funding needs either at the State or Federal Level. If funding cannot be generated, then it will most certainly result in a plan failure. With a funding estimate, there is a chance that advocates can help campaign for funding. It would be a simple exercise to query all impacted WWTP and ask for an estimate of the cost of hitting the 3,5,8 scenario in round numbers. Alternatively, ECY can look at the records of WWTP upgrades and make some generalized assumptions for what the costs are to upgrade plants.

I hope this is a helpful comment to help with success in getting the desired outcomes of the plan.