

## General

- Opportunity for public input is very limited; additional opportunities should be provided as the task force proceeds

## Needs

- In estimating financing needs, DEP should take into account
  - local capacity and a community's willingness to proactively address its needs before they become environmental issues.
  - Compliance history; those who continue to exceed even new, subsidized capacity should not be rewarded with future subsidies
- Don't tie subsidy simply to the problem itself; this only rewards those who create a problem, instead of those who want to act to proactively address a situation before it becomes an environmental problem

## Innovative measures

- Goal should be to encourage the best mix of technologies that work, that are financially sustainable, and that are managed centrally.
- Designs that take advantage of gravity
- Nutrient trading would be a more useful tool if it were more stable and less risky; consider adding a nutrient credit bank to reduce trading risks and enhance predictability and effectiveness for both producers and buyers of credits.
- Incentivize/require conservation
- Implementing alternative ways to safely handle grey water would free up capacity for blackwater treatment.

## Financial Resources

- Attach [Position Statement Re: Sewage Infrastructure Needs](#)
- Attach "[Pennsylvania's Approach to Integrated Wastewater Management: A New Paradigm](#)"
- Finance statewide, not just in the Bay watershed
- Accountability: a grant/loan recipient should be held accountable and should have to pay monies back if subsidized capacity is exceeded.
- Only capital costs should be subsidized. O&M shouldn't become dependent on subsidies; require that grant/loan recipients implement a mechanism to set aside money for future OM&R
- On lot management and overall sewage systems management should be a local government responsibility; the rule rather than the exception. We need to encourage others to move in this direction.
- Incrementally address sewage problems where feasible

## Financial sustainability

- incentivize low O&M
- Require that grant/loan recipients implement a mechanism to set aside money for future OM&R

- Review and revise Pennvest and other programs to promote above considerations and financially sustainable alternatives
- No interest/low interest loans are better than grants; permits OM&R to be charged for from the beginning while giving the community a cost break; money comes back into the system for future users.
- Support regional administration/management, not just combining systems into ever larger treatment facilities. Regionalization of physical facilities (as opposed to management) depends on each situation. Need to develop most cost effective system for the area, depending on the geography and demographics.

#### Misc

- Enforcement needs to be a priority.
- DEP should guide permittees toward more financially sustainable approaches to meeting infrastructure needs.
- DEP and the Task Force need to get hands on experience and see successful alternatives such as Broad Top.