

Enclosed are two copies of comments of the New England Interstate Water Pollution Control Commission relative to H.R. 15907. Officials believe that the States waste treatment plant construction programs will receive a major setback unless a percentage limit is placed on projects assisted under contractual arrangements with the balance of the funds allocated on a formula grant basis.

The Commission wishes to thank the Committee for the opportunity of submitting its views on H.R. 15907.

Very truly yours,

ALFRED E. PELOQUIN,
Executive Secretary.

COMMENTS OF THE NEW ENGLAND INTERSTATE WATER POLLUTION CONTROL
COMMISSION RELATIVE TO H.R. 15907

The New England Interstate Water Pollution Control Commission and the Compact signatory States have reviewed H.R. 15907 and considered its impact upon the individual State water pollution abatement programs.

It is recognized that the present level of appropriated funds under Section 8 of the Clean Water Restoration Act of 1966 is inadequate to sustain the level of construction of waste treatment facilities indicated in the State implementation plans submitted to the Federal Water Pollution Control Administration in compliance with the Water Quality Act of 1965. Means of obtaining additional funds must be developed if program momentum is to be maintained.

Lack of Federal construction grant funds and the reimbursement provision set forth in the Clean Water Restoration Act of 1966 led to legislative authorization for prefinancing the Federal grant share by the States of Connecticut, Maine, Massachusetts, New York and Vermont. The State of Rhode Island presently has such legislation under active consideration. These six States feel that with elimination of the reimbursement provisions from Public Law 660 as amended, it would not be possible to maintain the anticipated schedule of water pollution abatement, and it will be necessary for each State to reconsider its commitments to the Federal Water Pollution Control Administration relative to requirements of the Water Quality Act of 1965. Regardless of the method of providing additional construction grant funds, it is recommended that the reimbursement provisions of Public Law 660 be retained.

Limiting contractual arrangements to areas of 125,000 persons or more or a Standard Metropolitan Statistical Area would eliminate from consideration many communities in the New England Interstate Compact area. As shown in Table 1, there are 24 SMSA's in the New England Interstate Compact area and seven communities with a population of 125,000 or more. These communities are all within SMSA's. (Photocopies of State maps showing SMSA's in the New England Compact area are attached for reference.)

TABLE 1

State	Number of SMSA's	Number of communities 125,000 or more	Communities
Connecticut.....	9	3	Bridgeport, New Haven, Hartford.
Maine.....	2	0	
Massachusetts.....	10	3	Boston, Worcester, Springfield.
New Hampshire.....	1	0	
New York (compact area only).....	1 ¹	0	
Rhode Island.....	1	1	Providence.
Vermont.....	0	0	
Total.....	24	7	

¹ Part only.

Construction of waste treatment facilities for all other areas would be dependent upon the appropriated grant funds only, which admittedly, are inadequate. Existing State prefinancing authorizations in anticipation of subsequent