



The New York Water Environment Association, Inc.

The Water Quality Management Professionals

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5 May 2015

Richard Tobe, Director of Upstate Revitalization
Director of Upstate Revitalization
95 Perry Street
Buffalo, New York 14203

Re: Upstate New York Economic Revitalization Competition – The Inclusion of Water and Wastewater Infrastructure Improvements Should Be an Important Evaluation Criteria

Dear Mr. Tobe,

Through this letter, the New York Water Environment Association (NYWEA)¹ is encouraging you and the Upstate Strategic Plan Review Committee (the Strategic Committee) to recognize the vital importance of providing safe, dependable, high quality water to the people in New York State. This is essential to attract and keep valuable jobs in upstate New York. To accomplish this, a community's water and wastewater must be efficiently and effectively distributed, collected and treated. Because of the significant role water plays in every community we urge you and the Strategic Committee to award significant scoring points to those proposed projects which include sustainable water and wastewater infrastructure improvements as a key and integral part of their Upstate New York Economic Revitalization Competition proposal. There is a high need throughout NY State to immediately invest substantial public and private funds for water and wastewater infrastructure. New York is blessed with high quality water resources compared to many of the other states; however, those states have attracted more economic development in recent years. Since nature has given us a competitive advantage, it is imperative that we maintain that advantage by investing in the infrastructure necessary to use and protect our resources.

NYWEA applauds the recognition that the Upstate Economic Revitalization Competition is bringing to the critical infrastructure needs in communities across Upstate. Without safe, reliable infrastructure not only will New York be unable to attract new businesses and institutions and the jobs they bring with them, but will also lose many of

¹ NYWEA is a non-profit, professional organization that serves the best interest of the public by promoting sustainable clean water quality management through science, education, and training. It is made up of over 2,500 members across the State with great diversity ranging from treatment plant operators from small Villages, top level officials in New York City government, academics and students, regulators, engineers of all types, environmental scientists, and other interested professionals. NYWEA also has a robust Utility Executive's Committee with broad state-wide representation that provides unity and strength to address the growing regulatory and financial challenges facing wastewater utilities.

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the crucial business and employment opportunities that currently exist. The lack of reliable infrastructure is one of the key reasons existing employers do not remain in Upstate. We realize that water and wastewater infrastructure is just one type of infrastructure in which our local regional State and Federal governments must make investments. However, NYWEA believes that the specific recognition of sustainable water and wastewater infrastructure improvements as a part of Upstate Economic Revitalization Competition projects is vital if the money invested by New Yorkers in these projects is to ultimately lead to achievements of the Competition goals of “fulfilling infrastructure needs, achieving targeted job creation and maintaining a high quality of life that will sustain their populations.”²

Water and wastewater systems are the Nation’s hidden and, all too often, forgotten infrastructure. Yet without both of these key services, manufacturers can’t produce, colleges and hospitals can’t serve their constituents, businesses can’t serve tourists and other visitors and, overall, the quality of life in an area quickly declines. Society cannot exist without water.

NYWEA understands that you and your fellow members of the Strategic Committee are in the process of setting objective, transparent and defensible evaluation criteria through which the multiple applications received by the Competition will be judged. We believe that to serve as a meaningful step in Upstate revitalization, sustainable water and wastewater infrastructure improvements must be considered when evaluating competing proposals. Below are just a few of the reasons for this.

- Nationally, most of our water infrastructure is from the first half of the 20th century. Nearly a quarter of all water mains are more than 50 years old. The average age of a broken water main is 47 years. Upstate winters in particular are very hard on our below ground water and wastewater infrastructure. For example, this past winter by mid-February, Syracuse had at least 100 water main breaks since the start of the year, a large number for a city of 145,000³. According to the New York State Department of Health (NYSDOH) in 2008, “the conservative cost estimate of repairing, replacing, and updating New York's drinking water infrastructure is \$38.7 billion over the next 20 years.” Over \$10 billion of this need was in Upstate New York.⁴
- According to NY State Department of Environmental Conservation (NYSDEC) 2008 report titled, *Wastewater Infrastructure Needs of New York State*⁵ the conservative cost of repairing, replacing and updating New York’s aging and deteriorating wastewater infrastructure, over the next 20 years is \$36.2 billion. Both the NYSDOH and NYSDEC reports, now seven (7) years old, likely understate the need based on

² See, *Revitalizing Upstate New York's Economy*, 1/15/2015 available at <https://www.governor.ny.gov/news/2015-opportunity-agenda-restoring-economic-opportunity-0>.

³ *A Severe Winter Breaks Budgets as Well as Pipes* New York Times 2/15/2015. Available at http://www.nytimes.com/2014/02/16/us/a-severe-winter-breaks-budgets-as-well-as-pipes.html?_r=0.

⁴ See, *Drinking Water Infrastructure Needs of New York State* available at: https://www.health.ny.gov/environmental/water/drinking/infrastructure_needs.htm

⁵ See, <http://www.dec.ny.gov/chemical/42383.html>.

newly identified regulatory and resiliency needs, and hence the costs are anticipated to be even higher in the future.

- Proper sanitation (both providing good water and efficient wastewater collection and treatment) plays a critical role in protecting public health, and improving the water environment while promoting economic development and recreational opportunities. From these perspectives, the water and wastewater sectors are the most important infrastructures that can contribute to the Competition's goals, because they are on the frontline of protecting humans and creating a high quality living and working environment – both for the businesses and the employees in the area.

- New York has experienced firsthand the ravages of extreme wet weather events, including three devastating storms in one 15 month period⁶. It is not just the downstate coastal areas that were hit by these storms, but significant Upstate areas were also impacted. Since extreme weather events may affect the operation of the municipal wastewater treatment facilities, improving the resiliency of New York's wastewater infrastructure is the best safeguard against potential public health impacts which may occur as a result of disruptions in municipal wastewater treatment. Rewarding Competition applications that include water and/or wastewater resiliency aspects with higher evaluation scores will serve the region and the entire State for many years into the future.

- Using water and wastewater improvements as a positive scoring criterion in the Competition will not unduly promote one of the seven Upstate regions over the others, as all have significant water and wastewater infrastructure needs. As just one example, Appendix A provides a listing from the NYS Environmental Facilities Corporation's 2015 Intended Use Plan for the Clean Water Revolving Fund of virtually shovel-ready wastewater projects broken down by County. A similar Intended Use Plan (IUP) list is available for drinking water projects. In addition to the projects on the State IUP lists, there are myriad public, private and mixed public/private water and wastewater potential infrastructure projects around Upstate New York that could be included in Competition proposals.

- Investing some of the Competition award monies in water and wastewater infrastructure will also serve the overarching Competition goal of sparking Upstate Economic Revitalization. Some examples⁷:
 - An investment of \$188.4 billion nationally spread equally over the next five years would generate \$265.6 billion in economic activity and create close to 1.9 million jobs.
 - Investments in water and other infrastructure are one of the most efficient methods of job creation in the current economy.

⁶ Superstorm Sandy (October 2012), Tropical Storm Irene (August 2011) and Tropical Storm Lee (September 2011).

⁷ See, [Water Works: Rebuilding Infrastructure Creating Jobs Greening the Environment](http://www.waterforjobs.org/statisticsandreports), available at <http://www.waterforjobs.org/statisticsandreports>.

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- Infrastructure investments create over 16 percent more jobs dollar-for-dollar than a payroll tax holiday, nearly 40 percent more jobs than an across-the-board tax cut, and more than five times as many jobs as temporary business tax cuts.
- 90 percent of the jobs created by infrastructure investment are middle-class jobs⁸

NYWEA believes that New York State should reward those proposed projects that include this type of an investment. By doing so, the Strategic Committee would not only be supporting effective promotion of Upstate economic revitalization but also the protection of public health and water quality in New York State. Awarding significant scoring points to those municipalities committed to sustainable water and wastewater infrastructure improvements is sound economic and environmental policy and ultimately in the best interest of Upstate New York residents.

Sincerely,



Michael Garland
NYWEA President

c/Senator Tom O'Mara
Assemblyman Steve Englebright
Joe Martens, Commissioner, NYSDEC
Matthew Driscoll, President, NYSEFC
Bruce Katz, Brookings Institution
Marc Morial, President National Urban League
Cesar Perales, NY Secretary of State
Susan Christopherson, Chair of City and Regional Planning, Cornell University
RoAnn Destito, NYS Office of General Services

⁸ See, , [Economic Analysis of Infrastructure Investment](http://www.treasury.gov/resource-center/economic-policy/Documents/infrastructure_investment_report.pdf) US Department of the Treasury, 10/12/2010. Available at http://www.treasury.gov/resource-center/economic-policy/Documents/infrastructure_investment_report.pdf.



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Appendix A

2015 Intended Use Plan for the Clean Water Revolving Fund⁹

NYSDEC Region	County	Total \$	Total # projects
3	DUTCHESS	\$194,030,190	27
3	ORANGE	\$288,258,968	39
3	PUTNAM	\$54,765,276	3
3	ROCKLAND	\$98,135,778	11
3	SULLIVAN	\$104,542,750	18
3	ULSTER	\$14,828,933	8
3	WESTCHESTER	\$794,696,577	47
4	ALBANY	\$128,123,434	23
4	COLUMBIA	\$6,712,000	2
4	DELAWARE	\$113,070,596	3
4	GREENE	\$27,314,000	4
4	MONTGOMERY	\$19,425,000	7
4	OTSEGO	\$27,809,000	8
4	RENSSELAER	\$41,528,832	8
4	SCHENECTADY	\$93,949,400	11
4	SCHOHARIE	\$12,499,000	5
5	CLINTON	\$53,456,000	11
5	ESSEX	\$50,787,407	17
5	FRANKLIN	\$49,190,456	13
5	FULTON	\$25,754,000	4
5	HAMILTON	\$6,465,000	3
5	SARATOGA	\$87,996,737	21
5	WARREN	\$41,696,095	17

⁹ See, <http://www.efc.ny.gov/default.aspx?tabid=112>.

NYSDEC Region	County	Total \$	Total # projects
5	WASHINGTON	\$24,622,000	6
6	HERKIMER	\$27,869,000	13
6	JEFFERSON	\$85,545,000	20
6	LEWIS	\$19,891,000	6
6	ONEIDA	\$520,213,596	27
6	ST. LAWRENCE	\$77,797,000	20
7	BROOME	\$64,661,000	6
7	CAYUGA	\$30,517,270	10
7	CHENANGO	\$20,232,000	3
7	CORTLAND	\$27,706,000	4
7	MADISON	\$29,467,000	6
7	ONONDAGA	\$227,467,000	23
7	OSWEGO	\$86,805,000	12
7	TIOGA	\$7,196,000	1
7	TOMPKINS	\$19,727,000	10
8	GENESEE	\$7,422,000	6
8	LIVINGSTON	\$23,999,000	6
8	MONROE	\$104,984,774	25
8	ONTARIO	\$20,580,053	10
8	ORLEANS	\$4,110,768	2
8	SCHUYLER	\$37,109,000	5
8	SENECA	\$2,568,000	3
8	STEUBEN	\$44,891,778	11
8	WAYNE	\$48,014,000	11
8	YATES	\$28,451,000	5
9	ALLEGANY	\$17,734,153	7
9	CATTARAUGUS	\$60,946,282	10
9	CHAUTAUQUA	\$87,207,470	12
9	ERIE	\$243,543,160	26
9	NIAGARA	\$40,170,200	23
9	WYOMING	\$9,176,658	3

TOTAL	\$4,385,659,591	642.0
Average	\$81,215,918	11.9
Median	\$40,849,516	10.0