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CITIZENS LEAGUE RESPONSE TO THE  
METROPOLITAN COUNCIL'S CONCEPT PLAN FOR  
SEWAGE COLLECTION AND TREATMENT IN THE TWIN CITIES AREA

Introduction and Summary

The Citizens League welcomes this opportunity to comment on what has been for a decade, and remains, one of the most critical issues facing the seven-county area . . . the basic policy decision about the use that is to be made of the river valleys through this urban area. And, specifically, the decision as to which stretches of these rivers are, or are not, to be used for the disposal of major quantities of domestic and industrial waste.

We fully concur with what we believe is the major recommendation of the Metropolitan Council's "concept plan" . . . that is, its strong recommendation that all treatment and major interceptors be planned, developed and operated as an integrated system by the Metropolitan Council or an areawide agency subordinate to it, which shall have overall responsibility for maintaining water quality in the Twin Cities area. This has also been the conclusion of studies by the Citizens League, in 1965 and before. In addition:

- \* We believe the concept plan has served effectively as a framework for the area's discussion of this major issue. It has begun to provide the planning and policy guidelines which the operating agencies require for their own decisions. This is the kind of contribution required from the Metropolitan Council. We believe the Council was wise in moving, even in haste and with an incomplete draft, to exercise this leadership.
- \* We believe the prospect of a number of regional plants operating within the seven-county area . . . a prospect which, as we will explain below, continues to trouble us in some respects . . . makes the creation of an areawide management authority for major sewerage facilities more, not less, essential.
- \* We believe that only an areawide management authority will make it possible to capture metropolitan benefits by offering an alternative outlet for waste to particular parts of the Twin Cities area which would otherwise have "no choice" but to discharge into the rivers nearest them, despite the harm this might cause to the area as a whole over the long run.
- \* We believe there are many questions remaining about this plan which cannot be answered, and many uncertainties which cannot be settled, in the next few months. The soundest policy, we believe, would be for the Legislature to assign to the Metropolitan Council (or to an operating sewer board responsible to it) the responsibility for carrying out the remaining studies required and for making the decisions about the proper location of plants and financing formulas to be followed.
- \* We believe the key principle that should be followed, as these decisions are made, is for the Metropolitan Council always to maintain as many options as possible, and to avoid committing new stretches of the rivers

for waste disposal until every possible alternative has been thoroughly explored.

We urge the Metropolitan Council to move rapidly this fall to complete the engineering, financial, and organizational aspects of this proposal. It is essential that a consensus within the area on this question be achieved roughly by the start of the legislative session. Four legislative sessions leading back to 1961 have produced no solution . . . largely because, as a number of legislators have pointed out, no agreement had been developed within the Twin Cities area itself as to what ought to be done. This situation has fundamentally changed with the creation of the Metropolitan Council as an official, representative body charged by the Legislature to study these issues and to bring back recommendations for action. We do not expect that in questions of this sort it will be possible to develop a unanimity of opinion. We do believe, however, that out of an extended discussion a substantial consensus will emerge. We do believe that, if the Council can, in the end, adopt a plan for the use of the various stretches of the major rivers, and a set of recommendations as to the forms of organization and financial powers required to insure that plants are, in fact, located in accordance with the plan, the Legislature will provide the tools required for the Twin Cities area to move speedily in bringing central sewer service to the outlying portions of the metropolitan area.

#### We Must Minimize the Risk to our Waterways

Before moving to the specific issues raised by the concept plan, we would like to make a few general remarks about the problem of protecting our rivers, as we see it.

We are frankly troubled by the impression recently created in the area that, with modern engineering techniques, waste disposal plants present "no problem." It is not always clear whether this means there would be no problem in meeting the standards set for the rivers, or whether there would be no problem created in the rivers themselves. There is a difference: Any given standard may permit undesirable conditions to occur in the river a certain proportion of the time. We believe there is, just now, a tendency to speak in absolute certainties, which is not justified.

We think it is noticeable that the discussion of this problem in the Twin Cities area has been unbalanced, on the technical side. We have had, all along, a very heavy input from engineers. We have had, partly for reasons discussed below, relatively little input from people deeply experienced in the problems of regulating waste disposal systems, and in the difficulties of enforcing water quality standards.

We think experience shows that even the most carefully designed systems are, in fact, subject to accidents and faulty operation. Despite all flight standards, airplanes do occasionally hit tall structures. Despite all standards about continuity of service, even highly sophisticated power systems do occasionally black out, and, despite all pollution control standards, waste treatment plants do occasionally go out of service. A former official in the Federal Water Pollution Control Administration has estimated that, in his experience, in a given year as much as twenty per cent of the sewage discharge may partially or completely by-pass treatment. In the Twin Cities area treatment plants serving a very large population (or population equivalent) have been out of service for a significant period of time.

We simply do not have a strong tradition, in this state, of aggressive regulation of waste treatment operations. The state agency responsible has never had the force of inspectors sufficient to cover the plants for which it is responsible oftener than once a year. There is, it appears, not even a system for

reporting outages and accidents. There has been a strong reluctance, over the years, similarly, to name names and to be specific about the point sources of pollution. As a result, the public tends not to be intimately familiar with the extent to which the waste treatment plants do not operate as specified.

Preservation of water quality is a uniquely difficult problem. First, a particular municipality, or region, incurs costs not directly for the benefit of its own residents, but for the benefit of residents of communities downstream. This sets up a normal, and inevitable, tendency for the owners and operators of any given plant to hold down on treatment, since this would minimize the cost to their taxpayers. A particularly difficult regulatory problem is thus created. Second, there tends never to be any single point of clear decision. No community, and no metropolitan area, ever consciously votes to destroy the quality of its waters. The question occurs in a long succession of very small decisions. Typically, a community or an industry requests permission to make some slight additional discharge into the waters. The benefits to them are very tangible and very immediate and very specific. The costs, on the other hand, are intangible and fall on the unorganized general public over the long run. "A little bit at a time," therefore, the natural resource is imperceptibly sliced away. The history of Lake Minnetonka, in our area, stands as a classic example of this lesson that a succession of such decisions, over the long run, can virtually destroy a valuable resource . . . and the lesson that such a resource can be protected, on the other hand, only by a firm (and often seemingly arbitrary) determination to keep the water clean.

We believe there is a danger, too, that this area may be tending to underestimate the growth ahead. It is peculiarly difficult for people to think beyond the magic Year 2000 . . . just as it must have been difficult for people in 1868 to contemplate the kind of growth that would take place past the year 1900. Yet the growth of the Twin Cities area will continue past the Year 2000. The capacity of our waterways to absorb waste, however, does not grow. We must, therefore, make special efforts to keep the long-run situation in mind.

In summary, we would urge the Council to move toward its final plan with a clear understanding that there are no certainties, that there are very strong pressures to "spread the waste around" so it will be less perceptible, and that to preserve any stretches of our rivers in a truly first-rate condition may require very firm policy decisions to restrict all discharges into these stretches altogether.

Obviously, the waste must be disposed of somewhere. What is required by the Council is a choice as to which stretches of which rivers are to be specialized for which uses. This is, of course, a basic planning and policy decision. Engineers can show us the consequences of different alternatives, but this is not a decision they can make or even recommend for us.

We would now like to look briefly at some of the specific issues before the Metropolitan Council and the State Pollution Control Agency.

#### The Issue of Upstream Plants: The Minnesota River

The Twin Cities area has traditionally tended to avoid the establishment of major new discharges on the upstream stretches of the waterways running through the urban areas. In the creation of the Minneapolis-St. Paul Sanitary District in 1933 the decision was for the two central cities to go jointly and build a central

plant at the downstream end of the area. A plant once located on Minnehaha Creek was taken out of service. A plant serving North St. Paul, discharging into the Keller-Phalen lakes was taken out of service. Just recently, the plant serving White Bear Lake, discharging indirectly into the lakes used for St. Paul's water supply, was retired. The long-standing policy, clearly, has been to avoid the risks inherent in upstream discharges, and no such policy should be reversed lightly.

We find it impossible not to voice our very grave concern about the decision, in effect, to reverse this decision on the lower Minnesota River, with the decision of the PCA, supported by the Metropolitan Council's concept plan, to establish two major plants below Shakopee. We sense a very real risk in this that we are overestimating the ability of what one member of the PCA has called "this little prairie river" to absorb the pressure that residential and industrial growth in this part of the area will impose upon it.

We have been particularly disappointed that the decision was made without as full a study of at least short-term alternatives as would have been possible. We indicated in our statement to the PCA hearing February 28, 1968, that we understood the City of Minneapolis has made studies which indicated that, for a relatively modest cost, the flows from Bloomington could continue to be handled through the existing Minneapolis connection for some years past the 1970 date, the termination date provided in the present contract. We urged that this possibility be aggressively explored by the PCA, in order that time could be preserved for a fuller study of the long-term solution on the Minnesota. We regret that this was not done.

We have noted from the comments of the Metropolitan Council's consultant the special steps that will have to be taken at the proposed plants . . . not only to maintain an adequate level of oxygen in the streams, but also to guard against coliform and to guard against the increased growth of algae in this slow-flowing river. We note also the comment of the PCA director that the plant proposed for Bloomington-Eagan-Burnsville, as a result of being located on a stream with relatively limited capacity, will have to be designed to a higher standard than any other treatment plant now operating in the area.

Even so, it would appear from the Metropolitan Council's concept plan itself that this system of upstream plants will be barely adequate. The plan (Page 10 of the appendix) says that "it appears feasible to discharge treated sewage effluent into the Minnesota River from all areas in the lower river basin and from certain adjacent communities (Lake Minnetonka and Lebanon areas). With treatment plants located as indicated, river standards can probably be met without incurring excessively difficult treatment problems or excessively costly treatment facilities." (Emphasis supplied)

We suggest this amounts to a decision to underbuild the capacity of a major public works system. We believe the common experience, here and elsewhere, has been that it has been almost impossible to overbuild capacity in major capital works of this sort, and that we have almost universally regretted our decision when we have chosen not to build larger and more adequate solutions at a relatively earlier date.

In the past it has been possible, in effect, to "bury" our mistakes. A substantial addition to the treatment plant serving White Bear Lake, not yet paid for, was abandoned in the middle 1960's in favor of a new trunk sewer constructed to carry the sewage through the St. Paul system to the Pig's Eye plant. It now appears that some facilities discharging into Lake Minnetonka, also expanded in very recent years, will be abandoned, and new sewers constructed to carry the sewage, or its effluent, away from the lake. It is questionable, however, whether, once the very

substantial kind of investment contemplated on the Minnesota River has been committed, any such decision to "cut bait" could be made. We must assume that a decision to start a plant on the lower Minnesota would be an irrevocable decision.

The Issue of Upstream Plants: The Mississippi River

We consider it essential that comparable risks be avoided as the Metropolitan Council comes to deal with the stretch of the Mississippi River from Anoka to Pig's Eye.

The central consideration in the decision in effect to write off the lower Minnesota appears to have been the turbidity of that stream which made it unsuitable for expanded recreation use. This condition does not exist in the upper Mississippi. The uses being made of this stretch of the Mississippi tend to encourage its preservation, and to militate against expanded use of this water for waste disposal. Specifically:

- \* This stretch of the river is the site of withdrawal for public drinking water systems serving all or parts of St. Paul, Roseville, West St. Paul, Maplewood, Minneapolis, Columbia Heights, Bloomington, Golden Valley, Crystal and New Hope.
- \* The St. Paul Planning Board has under way a study aimed at establishing the possibilities for improving the river, the shoreline, and the islands in the channel.
- \* In Minneapolis the City Planning Commission has directed its staff to do a comprehensive study of the Mississippi River as part of that city's comprehensive plan.
- \* The Minneapolis Housing and Redevelopment Authority, in connection with planning the Nicollet Island project, has studied the shoreline around Nicollet Island and beyond. Indications are the project plan will call for the development and redevelopment of uses attracting substantially more public activity on and around the water near the island.
- \* The Minneapolis and St. Paul chapters of the Minnesota Society of Architects are initiating studies to explore the possibility of beautification of the river gorge.
- \* The plans for redevelopment of the Cedar-Riverside Area recently approved by the Minneapolis City Council call for phasing out the city-owned industrial property at the foot of the old Washington Avenue bridge. They contemplate the redevelopment of the flat on the west bank into some kind of open space or recreational area, again attracting increased public use by the water.
- \* The Minneapolis Park Board currently has in the City's capital program for 1971, budgeted for \$250,000, a project to redevelop the property now used for parking on the east river flats, for an active recreation area for the public and for the students at the University.
- \* In connection with the Cedar-Riverside project, Minneapolis proposes an extensive rebuilding of the West River Road upstream along the shoreline past the new 35W bridge. Again, the effort is to develop the shoreline for more active public use and enjoyment.

- \* The industrial area in Minneapolis between Cedar-Riverside and downtown is not being designed for water-related industry; that is, either for processed water or water transportation.
- \* In the Upper Harbor plans are for water-related industry of both kinds. It now seems likely, however, that one of the major industries located in this stretch, and reportedly one of the most serious sources of pollution in the area, will be relocated in connection with the construction of the north ring freeway. This public expense should significantly improve the condition of the stream.
- \* Significant private investments, as for specialty restaurants, are beginning to be made along the river bank to take advantage of the view of the river.

These investments, we believe, are beginning to represent a major decision in favor of continuing to improve the quality of the water and the shoreline of the river through the heart of the built up area. We think it is essential that the Metropolitan Council's decision on waste treatment facilities support, and not conflict with, this emerging public policy.

#### The North Suburban Area Should Demand an Alternative

The status of the proposed plant, at Fridley, to serve the North Suburban Sanitary Sewer District is uncertain. It appears the district could have moved some months ago to reactivate its application if it had desired to do so, regardless of pending litigation in the Supreme Court. Yet to date the district has not done so. The status of the proposed plant is complicated by a contest we understand to have been filed by the owner of the land the district is seeking to condemn. . . the effect of which, if successful, would be to increase -- perhaps substantially -- the cost of land for the district's plant. In addition, the City of Minneapolis has filed an overriding condemnation on the site, seeking the property in order to build a raw water reservoir along the river bank. The Metropolitan Council in marking the proposed site as "questionable" has talked, at least informally, about requiring that the effluent of any plant at Fridley be carried downstream at least below St. Anthony Falls and perhaps as far down the gorge as the Lake Street bridge. Under Lake Street, of course, is the joint interceptor running to Pig's Eye. A pipe carried this far, instead of carrying effluent from a plant at Fridley, could just as well carry north suburban sewage to treatment at the MSSD plant downstream. The Council's consultant has also suggested, in order to protect the Minneapolis water supply, the possibility of requiring a dam across the Mississippi River between the plant and the water intake. Because of all this, and because it has not moved officially, the district may be interested still in considering alternative outlets for the waste collected in its interceptors.

The Fridley plant would, apparently, be a relatively expensive plant. As noted, special steps would have to be taken to protect the water intake and projected recreational uses in the gorge. We are informed the consultant will strongly recommend to the Council that the design of this plant not provide for a bypass of untreated or partially treated sewage. This would appear to mean that very substantial standby facilities would have to be provided. The question this raises is why the residents of this particular region, which is by no means the wealthiest part of the metropolitan area should be required to assume these relatively large costs in order to protect, not themselves, but residents and taxpayers of the communities downstream.

The question becomes all the more urgent in light of the previous findings, in the course of the Citizens League's study in 1965, which suggests that the cost of disposal at Pig's Eye might even be less than the cost of disposal at the Fridley site, when both construction and operating costs are considered.

The burden of proof, it seems to us, must lie on those who propose the upstream location. It seems clear to us that such a "solution" is being considered today only because a district was formed and a plant suggested by these northern communities at a time when no areawide agency existed which would have been able to provide an alternative outlet for their waste. In 1963 these communities truly had no choice. With the creation of the Metropolitan Council, however, a way has been opened for the area to reach a decision about an alternative solution.

We think it is important that the Metropolitan Council now move aggressively to give the residents and taxpayers of these northern suburbs, in effect, a "second bid" before they are committed to the proposed regional plant. This proposal must be developed with the same urgency as went into the publication of the concept plan last July.

Such a study, however, cannot be completed quickly. Steps must be taken, therefore, to make sure a short-range solution can be found while the study is in progress. We must not be trapped again, as we were on the B-E-B application, with allegations about a "crisis." The Metropolitan Council and the PCA should move aggressively with the City of Minneapolis to determine, in fact, what capacity exists or can be provided at moderate cost to carry the north suburban wastes while the study of the long-range alternate is in progress.

#### Only a Central Authority Can Assure That Water Quality Will Be Preserved

The Metropolitan Council's concept plan clearly proposes that the major collection and treatment facilities be owned, planned, built and operated by a central areawide authority . . . and that the regional plants must be operated as part of an integral system. With this conclusion we fully concur.

The major plants along these rivers are not like isolated plants. Each affects the others, and a problem at one, almost immediately, poses problems for the others. This situation cries out urgently for a regulatory authority that can make sure that overall water quality is protected, and that the costs and benefits are fairly spread.

It is much more than a matter of setting standards. The standards are, in fact, much like the State Legislature's basic framework of civil and criminal law. There is still required a whole apparatus of the courts and the police to interpret and enforce "standards" locally. Similarly, with sewage disposal, there is required an organization and personnel to interpret and enforce the basic "rules" locally, day by day.

We see this falling into two parts:

- \* First, the problem of adjusting the treatment system in order to maintain maximum water quality as conditions change. A number of variables

will be continually changing: The volume of flow in the river; the temperature of the river water; the volume of the waste discharges; the content and quality of the waste discharges; the degree of treatment provided at the various plants; the temporary withholding of sewage from discharge; the possibility of augmenting flows from upstream reservoirs; the direct introduction of chemicals or air into the stream. Any significant change in any of these variables, including a breakdown, or accident, or scheduled maintenance that takes some plant out of service will require adjustments elsewhere in the treatment system, in order to maintain water quality. If each of the treatment plants were independently owned and operated, we would have a situation in which one group of local officials and taxpayers would be responsible for paying the bills for another's shortcomings. Clearly, the treatment system requires a management authority able to assume temporary excess operating costs at any point in the system. Continuous monitoring of the water over the entire seven-county area will also, clearly, be required.

- \* Second, there will be a need to reallocate capacity among the various users, within existing standards, as the area grows and new discharges appear. The standards frequently allow a maximum pounds of BOD to be discharged in a given stretch of the river. As new industries are located, and new subdivisions built, a share of this limited capacity must be carved out for them. Some agency, knowledgeable about the local area, will be required to do this.

A central operating authority is needed, too, to develop the pool of specialized personnel and equipment that can assure we are fully protecting all the ecological factors along these rivers. Such personnel and equipment are scarce and expensive. We believe a central authority is more likely to insure that they are provided; independent districts would make it less likely that they would be provided.

#### Can the PCA Be the Central Operating Authority?

It is currently being suggested that the state regulatory agency can, within the framework of regional operating districts, perform these day-to-day operating functions for the entire system.

We think this is a question, not of what could happen in theory, but of what is likely to happen in practice. We think experience suggests that the state is not likely to provide this level of service to the Twin Cities area. We note, for one thing, that the PCA faces a very large job simply in performing its basic standard setting and enforcement responsibilities. We understand the PCA does not expect to receive, in the very near future, the personnel required to carry out adequately this statewide function.

We think the PCA is obliged to speak to this point, if the metropolitan area is to make a proper decision. If the state agency will, and can, perform this day-to-day operating responsibility for the metropolitan area, it should say so. If, on the other hand, it is not prepared to undertake this expensive operation, it is equally obligated to declare this, so the Twin Cities area can proceed directly to set up the organization and personnel required.



Important Questions About Financing Remain

An essential part of any real solution to the sewerage problem is the creation of an organization and a financing arrangement that will make it possible to "capture metropolitan benefits" . . . that is, to do those things that are in the interests of the area as a whole, making possible an alternative solution for a particular locality which, by itself, would have "no choice" except to follow a course harmful to the long-run interests.

The Citizens League in 1965 proposed, in effect, a pooling of the financing . . . with the major facilities taken into areawide ownership. We think it is a fact that the controversy which surrounded this proposal centered, not so much on the basic concept, but rather on the particular price to be paid for the facilities in question. The matter of price was, presumably, subject to negotiation, given sufficient time and a proper forum for discussions.

The Metropolitan Council has now proposed a more complex approach, which avoids the so-called "buyout" but which is proving difficult for the public to understand. Essentially, it proposes taking all the major facilities into common ownership, to be managed by an areawide agency, but with the cost of construction and operation spread within "service areas" which are, in effect, special improvement districts. Where the Metropolitan Council or its sewer board decided that a particular service area ought not to discharge into nearby waters at the "logical point," it would decide to carry the waste to another site with the excess cost thus created being shared in part by the area as a whole as a "metropolitan benefit." It appears the price of this new approach is to give up, or to put off, the equalization of sewage charges over the area as a whole. The Citizens League has thought this equalization a desirable goal, which should not be abandoned quickly. Our feeling remains that it would be desirable to achieve this goal at least within service area at this time.

In, and since, our 1965 report we have favored setting charges on the basis of the total flow . . . a formula which takes the distance factor out of the matter of apportioning costs. We believe, that is, that a particular municipality should not be penalized by the accident of its location with respect to the rivers. We think this remains a desirable principle for cost apportionment. We would suggest one modification be considered, however. It is important to recognize that certain municipalities have wet industries which create relatively large flows. We do not think a municipality should be penalized for the accident of its type of industry, any more than for the accident of its location. Any formula providing for a "cutoff" of charges based on flow should, however, be careful not to set up any incentive to waste water. And steps should be taken in areawide planning to try to assure that in the future wet industries are located as close as possible to the major rivers.

Financing appears a particular problem within the Pig's Eye service area, where facilities useful to, and to be used by, the outlying areas have already been built at the expense of other communities within the area. Central city officials are concerned on this point, and, clearly, some provision for payment by the outlying communities for the facilities useful to them will be required. The major question seems to be whether these formulas are to be set, and costs allocated, through a continuation of the present "two-step" arrangement, in which the area sewer board would deal with Minneapolis and with St. Paul, which would then deal with the contracting suburbs; or whether, under the new arrangement, the area sewer board will be dealing directly with all the municipalities in the service area.

Beyond this, it is difficult to speak further until the concept plan is refined. Much is left to be filled in, particularly with respect to financing within service areas and the method of financing the "metropolitan benefits." We hope the Metropolitan Council will spell out these answers fully this fall.

We think it is important, in the process, not to expect too much of the engineers' report. They can properly cost out the various alternatives . . . and, we think, must do so in detail. But the choices involved in the decision about plants are choices which cannot be made by engineers. We question whether there is any sense in which the engineers can tell the Twin Cities area that it should, or should not, build any particular plant at any particular location. They can, it seems to us, only evaluate the consequences and highlight the implications and illustrate the costs of making one decision or another.

Three other points about financing merit attention:

- \* The areawide approach could reduce costs for the poorer communities. Not all parts of the metropolitan area are equally blessed with commercial and industrial property tax base. If the area develops in the pattern of independent regional districts constructing and financing their own facilities, the relatively poorest districts will be obliged to pay more for the cost of raising the capital required. If the area develops sewerage systems on a cooperative approach, covering the entire area, instead, it will be able to make use of the credit resources and rating of the entire seven-county area. This should be of advantage, particularly, to the communities in the northern half of the metropolitan area. It is a consideration which should not be lightly dismissed on a construction project of this magnitude.
- \* We have some concern as a result of our studies of the tax problems in the metropolitan area about the proposals in the Council's plan to finance a portion of the cost of sewerage works, or of the "metropolitan benefits," by ad valorem property taxes. Nothing has been so clear in our studies as the variation which still exists among communities in assessment levels. If a uniform tax levy is spread over the entire area, in other words, some communities, simply because of their assessment practices, will be shifting a real burden to other communities. We do not know what the answer to this problem is. Perhaps it is to spread costs on something other than an ad valorem basis. Perhaps it is to correct for differences in assessment levels, as is done in the state school aid program.
- \* One final point about metropolitan benefits. The July report does not indicate that the efforts to clean up Lake Minnetonka will be considered of metropolitan significance. Presumably, all the costs of removing existing plants and building new interceptors around the lake to the Minnesota River will fall on the Southwestern Sanitary District. Conversations with Metropolitan Council members, however, suggest the Council is, in fact, thinking of the Lake Minnetonka situation as a metropolitan benefit comparable to the St. Croix River. If so, we think it is essential for the Council to so state in its November version.

### Organization of the Metropolitan Sewerage Agency

In general, we support the basic concept in the July draft under which the Metropolitan Council would retain certain key policy and financing responsibilities for the area sewer system, while leaving to a subordinate areawide sewer board the actual responsibility for making specific decisions concerning the expansion and operation of the system of plants and interceptors. We have some feeling that the proposed division of responsibility between the Council and the board needs rethinking to keep key decisions in the Council, while delegating responsibilities that can be exercised by others. In particular, we think that somewhat more of the planning for the sewerage system itself can be left to the subordinate board, to be done in conformity with the concept plan as it continues to be refined by the Council.

We have a number of basic questions about the introduction of a "third layer" of committees within the sewer structure, as proposed in the July draft. We think it is useful and appropriate that officials of the municipalities within the various service areas be gotten together to form a "go-between" function between the metropolitan sewer board and the units of municipal government. This need for an intermediary between the metropolitan agency and the local communities is not peculiar to the sewer structure, however: it occurs in almost every program. It is not clear to us why this requires the creation of additional boards in a new third layer in the area sewer structure. Responsible and well staffed associations of local units already exist at county and metropolitan levels, who aim is to carry on precisely this function of representing municipal interests to higher levels of government. We would strongly urge the Council to talk this question through with representatives of the various county leagues of municipalities and with the Metropolitan Section of the League of Minnesota Municipalities, particularly in relation to the roles to be played by the sewer committee of the Metro Section.

### Conclusion

We think it is essential that, as discussion proceeds over the next several months, the area keep its attention fixed on the central objective: the protection of the stretches of our rivers, and our lakes, which must be preserved for recreational use in the future.

We have concluded that this objective cannot be obtained unless the basic responsibility for the area's major sewerage works is vested in the Metropolitan Council, an official agency set up on a representative basis and able to make the basic planning and policy choices.

Only if the Council, or its subordinate agency, is given an areawide responsibility for decision-making and for financing, will it be possible to capture the metropolitan benefits which are so crucial to the long-term attractiveness of the Twin Cities area. Probably there is no clearer example of what is at stake than the situation with respect to the St. Croix River. The communities along the St. Croix have as real and pressing and as growing a need to dispose of their sewage as do municipalities anywhere in the area. From a strictly sanitary engineering point of view, the St. Croix River is an "ideal" place for the disposal of waste: it is clean and pure, and its capacity to absorb sewage must surpass that of any other water body in the metropolitan area. It is, in this sense, a "logical" place for these east Washington County communities to dispose of their waste. Use of the St. Croix would represent by far the "cheapest" solution for them. Yet it is equally clear that, from another point of view, the St. Croix represents a unique opportunity to maintain

one major clean, pure river remarkably close to a major metropolitan area. . . to be developed intensively for recreational use. Residents of the St. Croix Valley, however, cannot be expected to forego their own needs for the benefit of the people from the rest of the seven-county area who would like to come to the St. Croix for recreation. As Washington County representatives quite rightly point out, their communities have no obligation to provide the "park land" for the entire metropolitan area. Thus, in the absence of some overall agency able to make decisions and provide financing, the St. Croix Valley will conclude that it has "no choice" but to discharge into the St. Croix. The inevitable result will be the loss of opportunities to maintain the quality of this natural resource. If the river . . . and other waters like it . . . are to be preserved, steps must be taken in 1969 to create the organizational and financing arrangements which are required to make it possible.