



February 17, 2026

Honorable Denise Tepler, Senate Chair  
Honorable Victoria Doudera, House Chair  
Joint Legislative Committee on Environment & Natural Resources  
100 State House Station  
Augusta, ME 04333

**Re:** LD 2187 - An Act to Update Certain Water Quality Standards and to Reclassify Certain Waters of the State

Senator Tepler, Representative Doudera, and members of the ENR Committee:

**About LACWA-** The Lewiston Auburn Clean Water Authority (LACWA) was created by an act of the Maine Legislature in 1967 to provide wastewater treatment services to the cities of Lewiston and Auburn. The plant started operation in 1974, and was one of the first secondary wastewater treatment facilities in the State of Maine. Our Mission is to protect public health and the environment by treating the residential, commercial, and industrial wastewaters of our communities and returning clean water to the Androscoggin River.

**Discussion-** LACWA is proud of our efforts over the past 50 years which have contributed to the drastic improvement of the Androscoggin River. We are also delighted to hear that the river is meeting Class B standard nearly all of the time, and that reclassification to such a standard is even being discussed on a river that served as the impetus for creation of the Clean Water Act nearly 50 years ago. LACWA appreciates the triennial review process and commends the Department of Environmental Protection (DEP) for their efforts. In anticipation of bill amendments to reclassify, LACWA appreciates the opportunity to provide comments in respectful **opposition to LD 2187**.

Although reclassification is a goal of the legislature, the DEP has legal requirements to ensure 100% attainment of any reclassification through permitting means on all dischargers on the Androscoggin, and the EPA has ultimate oversight on these permits, meaning discharge permit impacts, and public cost impacts are truly unknown at this time and subject to interpretation.

If a reclassification were to happen without certainty of future attainment, then a total maximum daily load (TMDL) would likely be a result, which has the potential to trigger additional costs and uncertainty for our facility. Additionally, consideration doesn't seem to be given to the artificial oxygenation system within the watershed, and whether or not "credit" should be given to such an unnatural intervention, as attainment of class B standards seems highly unlikely without it. Having no control over a significant factor in classification attainment, such as the

artificial oxygenation system, creates tremendous trepidation on our part given the potential ramifications it could have if not operational at any point in the future.

While we support the recognition of improved water quality, we also worry that the regulatory burden to comply with such a reclassification could add additional financial burden to the citizens of the twin cities. Given that any changes to our permit would be subject to EPA oversight, the impacts are truly uncertain, and in the end could be more, or less stringent than noted by the DEP estimated impacts to our facility. However, based on the current assumption that our BOD limit would be reduced by 1/3, that our bacteria levels will be reduced to Class B standards, and that we would require a phosphorus limit, my best professional estimate of impacts to our facility would be:

- \$50,000/annually for chemical phosphorus removal. This would include the cost of chemical, pumping, instrumentation, reduced digestion, and increased overall sludge production.
- \$22,000/annual for additional disinfection and dechlorination.
- \$10-\$20-million-dollar investment to construct either an additional secondary clarifier, or a tertiary filter. Site location would likely dictate which technology would be needed. This cost does not include the additional operating cost of either technology.

These are significant burdens that would fall on the Authority and its ratepayers despite no corresponding improvement in the river's natural condition or water quality. These burdens may also hit on the heels of our current \$30-million+ CSO storage tank project, as well as a potential biosolids dryer project that is estimated between \$10-\$12-million.

With the assumed permit impacts from a reclassification, and without the above investments, the impacts to our facility, and the community could potentially be:

- A significant increase in discharge permit exceedances, which could result in unnecessary penalty and scrutiny.
- Local limits for industries, which may result in some industries needing to invest in additional pretreatment technology.
- Future community and business growth would be severely limited (or eliminated) without the infrastructure to support it, which appears to be counter to some of the upgrade proposal advocate's intent.

The Androscoggin River is currently beautiful, and serving as a critical environmental, recreational, and economic resource. Over the past several decades, the river has shown sustained improvement in water quality, supported by robust data and the success of modern wastewater treatment systems such as ours. Our commitment to environmental stewardship, and our mission to clean and return water back to the Androscoggin will not change regardless of the classification placed upon it. As an environmentalist tasked with making our discharge and river as clean as possible, while also doing so with the best interest of our community and the users of our system in mind, I continue to be torn with a position on all of this. LACWA largely supports the intent and aspirations of the Androscoggin River classification upgrade proposals, and recognizing the tremendous improvements made to Androscoggin River water quality, but

also agrees with the Departments recommendation to not support the upgrade proposals for the Androscoggin River from class C to class B, at this time. Ultimately, we strongly support all efforts to provide the best water quality reasonably possible throughout the State of Maine: however, we are concerned with the unknown regulatory requirements that will become legally binding on our facility as a result of reclassification, the practical attainment of the new water quality requirements, and the lack of transparency with the public on what the costs associated with such an attainment would be. Ideally, before setting such a goal, all parties involved in the process from proposing changes, to making final determinations on classification upgrades, ensure that the new standards are attainable, and that the full cost impacts are understood and made transparent. Ideally, the DEP would be able to ensure that Class B standards in all sections of the Androscoggin River are reasonable and technically feasible to attain, and that the cost to do so is negligible for all impacted communities, creating a win for all interested parties, including those that live, work, and recreate on this wonderful river.

Thank you for your time and attention.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Peaslee', written in a cursive style.

Travis Peaslee, P.E.  
General Manager  
Lewiston Auburn Clean Water Authority