



Cleveland



Columbus



Cincinnati

EPA Integrated Planning

What it means for planners

**APA Cleveland Planning and Zoning
Workshop**

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Panel Overview

- Discussion of EPA Integrated Planning Framework
 - What it is
 - What opportunities it presents
 - Why planners are necessary
 - How to achieve legal compliance
- Active Northeast Ohio CWA Integrated Planning
 - City of Lakewood
 - NEORSD
- Questions

Clean Water Act and Your Community

- CWA obligations for all municipalities, many townships
 - 33 USC 1342: Discharges without a NPDES permit are illegal
 - Stormwater MS4 discharges
 - WWTP discharges
 - Collection system overflows
 - Combined Sewer Overflows (CSOs) require permit
 - Sanitary Sewer Overflows (SSOs) considered per se illegal
- Enforcement- Legal Mechanisms
 - NPDES permits (MS4, WWTP and CSO)
 - Federal and State enforcement
 - Judicial Consent Decrees
 - Administrative Consent Orders

Why an Integrated Planning Framework?

- Policy drivers
 - Affordability
 - Economic challenges for communities retrofitting old systems
 - CWA infrastructure funding is local only
 - Prioritization of environmental benefit
 - Construction coordination
 - Leverage non-ratepayer resources

USEPA Memo – June 12, 2012

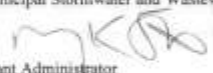



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN -5 2012

MEMORANDUM

SUBJECT: Integrated Municipal Stormwater and Wastewater Planning Approach Framework

FROM: Nancy Stoner 
Acting Assistant Administrator
Office of Water

Cynthia Giles 
Assistant Administrator
Office of Enforcement and Compliance Assurance

TO: EPA Regional Administrators
Regional Permit and Enforcement Division Directors

In recent years, EPA has increasingly embraced integrated planning approaches to municipal wastewater and stormwater management. EPA further committed to work with states and communities to implement and utilize these approaches in its October 27, 2011 memorandum "*Achieving Water Quality Through Municipal Stormwater and Wastewater Plans*." Integrated planning will assist municipalities on their critical paths to achieving the human health and water quality objectives of the Clean Water Act by identifying efficiencies in implementing requirements that arise from distinct wastewater and stormwater programs, including how to best prioritize capital investments. Integrated planning can also facilitate the use of sustainable and comprehensive solutions, including green infrastructure, that protect human health, improve water quality, manage stormwater as a resource, and support other economic benefits and quality of life attributes that enhance the vitality of communities.

To provide further guidance on developing and implementing effective integrated plans under this approach, we have developed, with extensive public input, the attached Integrated Municipal Stormwater and Wastewater Planning Approach Framework document. We are posting the framework document on our website and, as they become available, will provide practical examples of how municipalities are implementing this approach. We would like to thank Regions 2, 4, 5, 7 and 10 for their assistance in conducting public workshops to gain input on the draft framework. We encourage all Regions to work with their States to identify

IP Framework Principles

1. This effort will maintain existing regulatory standards that protect public health and water quality.
2. This effort will allow a municipality to balance CWA requirements in a manner that addresses the most pressing public health and environmental protection issues first.
3. The responsibility to develop an integrated plan rests with the municipality that chooses to pursue this approach. . . .
4. Innovative technologies, including green infrastructure, are important tools that can generate many benefits, and may be fundamental aspects of municipalities plans for integrated solutions.

IP Guidelines (Summary)

- Reflect state requirements and planning efforts
- Meet CWA obligations using existing flexibility in CWA
- Maximize effectiveness of funds
- Evaluate sustainable technologies, including green infrastructure
- Evaluate and address community impacts
- Ensure no delay in compliance
- Ensure a financial strategy is in place
- Provide opportunity for meaningful stakeholder input throughout the development of the plan

IP Plan Elements

Element 1

A description of water quality, human health and regulatory issues to be addressed in the plan.

Element 2

A description of existing wastewater and stormwater systems under consideration and summary of information describing current performance.

IP Plan Elements (continued)

Element 3

A process which opens and maintains channels of communication with relevant community stakeholders

Element 4

(see text for the heart of the integrated plan)

Element 5

Plan for measuring success

Element 6

Process for Improvements to the Plan

Is this just about Green Infrastructure? No!

- Framework recognizes room to investigate and implement GI; *but see also* multiple references to “sustainable”
- GI application depends heavily on the CWA drivers and individual project locations (topography, nature of system, legal deadlines, etc.)
 - GI strengths in stormwater management
 - GI **not** strong for CSO control
- Under CWA, “Green” or “GI” are not complete synonyms for “sustainable,” “affordable,” “practical” or “legally sufficient”

IP Implementation

- “The integrated planning approach does not remove obligations to comply with CWA, nor does it lower existing regulatory or permitting standards, but rather recognizes the flexibilities in the CWA for the appropriate sequencing and scheduling of work.”
 - IP reflected in Consent Decrees
 - IP reflected in NPDES Permits

IP since 2012

- <http://water.epa.gov/polwaste/npdes/stormwater/Integrated-Municipal-Stormwater-and-Wastewater-Plans.cfm>
- Vigorous national discussion regarding affordability
- Industry discussion of alternative wet weather control strategies on longer timelines
- Planning, projects and agreements taking shape
 - Leading examples: NEORSD, City of Lakewood, MSDGC

IP in Consent Decree: MSDGC Lick Run

- Existing CD required \$500 million+ tunnel/treatment project in extremely challenging affordability context
- Unique combination of topographical, engineering, financial and legal circumstances
 - **This project is NOT fully transferable elsewhere**
- IP lessons are transferable
 - City of Cincinnati integrates City departments with County, State, and Federal entities
 - Leverage brownfields funding
 - Modernize transportation and leverage non-ratepayer funds
 - Set table for private investment in industrial neighborhood

Lick Run Valley View from Westwood car line, Cincinnati, Ohio.







PRELIMINARY URBAN WATERWAY PLAN

These preliminary design concepts for a proposed urban waterway in South Fairmount (Cincinnati, OH) were developed by the Metropolitan Sewer District of Greater Cincinnati (MSDC) with input from the community and public/private partners. The concepts were presented for public review at the Lick Run Community Design Workshop #3 on February 23, 2012 in Cincinnati as part of a preliminary Lick Run Master Plan. They will undergo additional refinement prior to integration into a final plan. The U.S. EPA has final approval over implementation of this project.



■ Existing Building ■ Potential to remain pending additional hydraulic and engineering design refinements ■ Potential relocation pending partner funding identification and structural integrity of resources



View A (Looking Northwest)



View B (Looking Southwest)



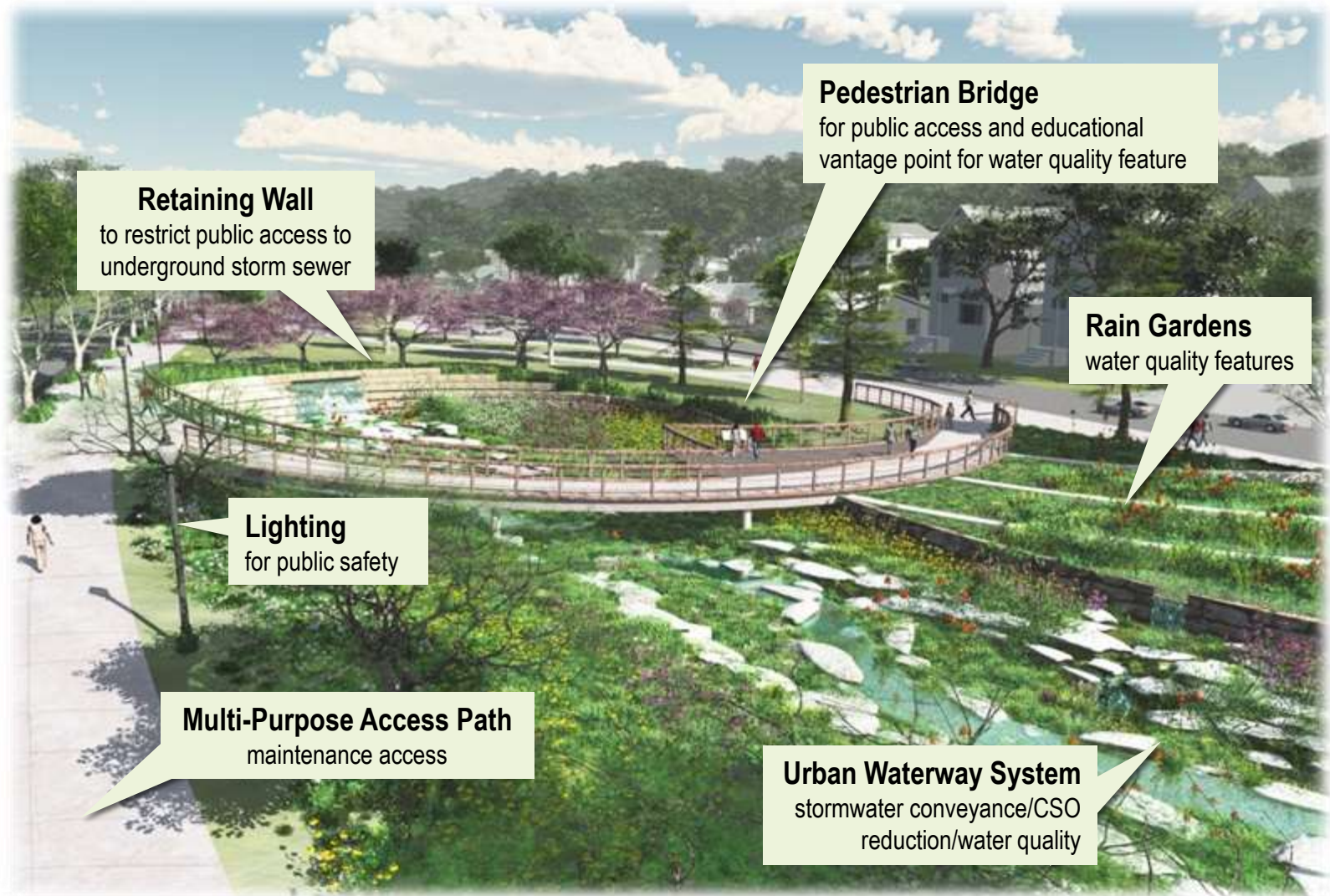
View C (Looking Northwest)



View D (Looking Southwest)

Leveraging Benefits of Integrated Solutions

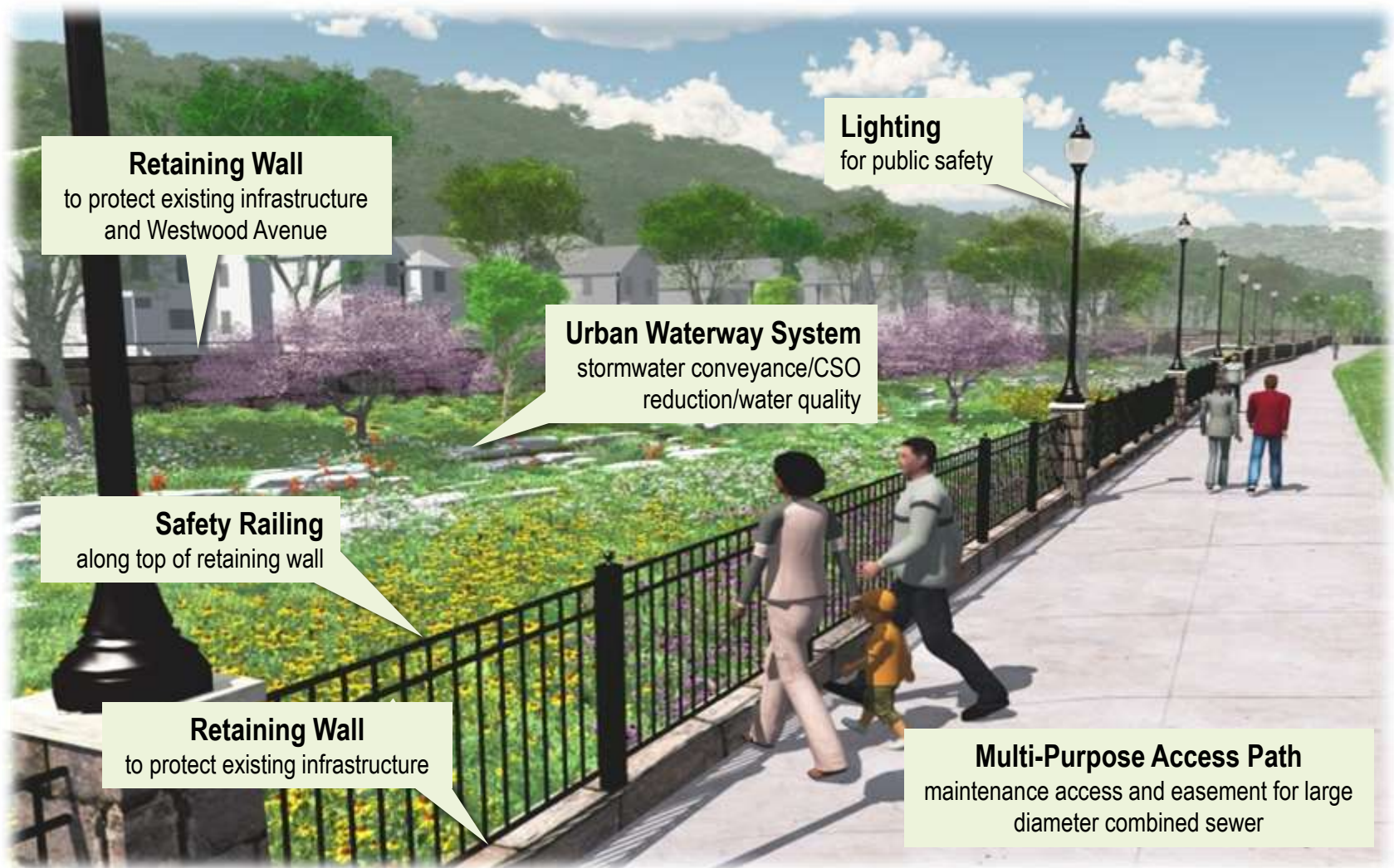
Western Gateway Zone



Looking north towards Queen City

Leveraging Benefits of Integrated Solutions

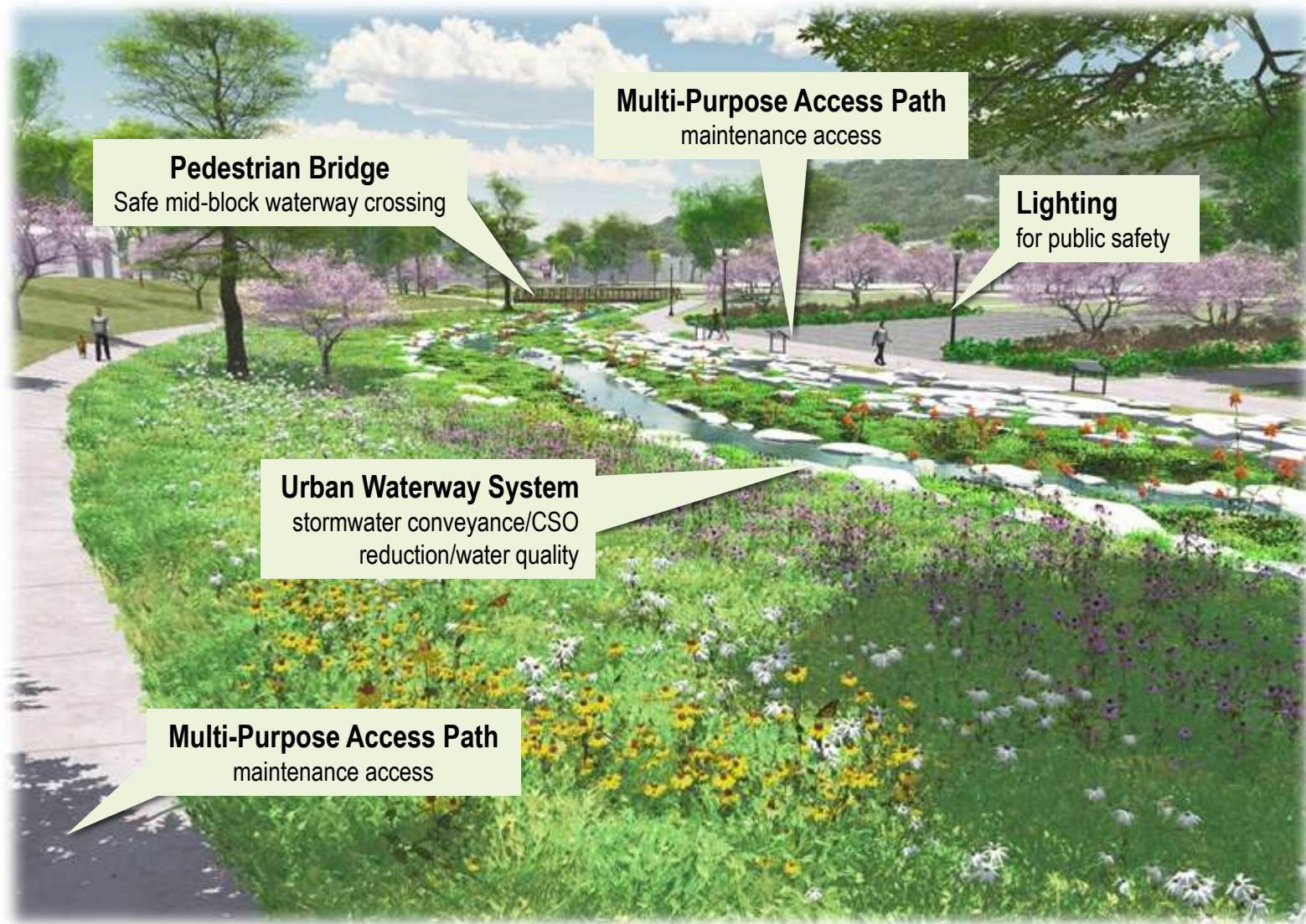
Narrow Channel Zone



Looking south towards Westwood Avenue

Leveraging Benefits of Integrated Solutions

Civic Recreation Hub



Pedestrian Bridge

Safe mid-block waterway crossing

Multi-Purpose Access Path

maintenance access

Lighting

for public safety

Urban Waterway System

stormwater conveyance/CSO
reduction/water quality

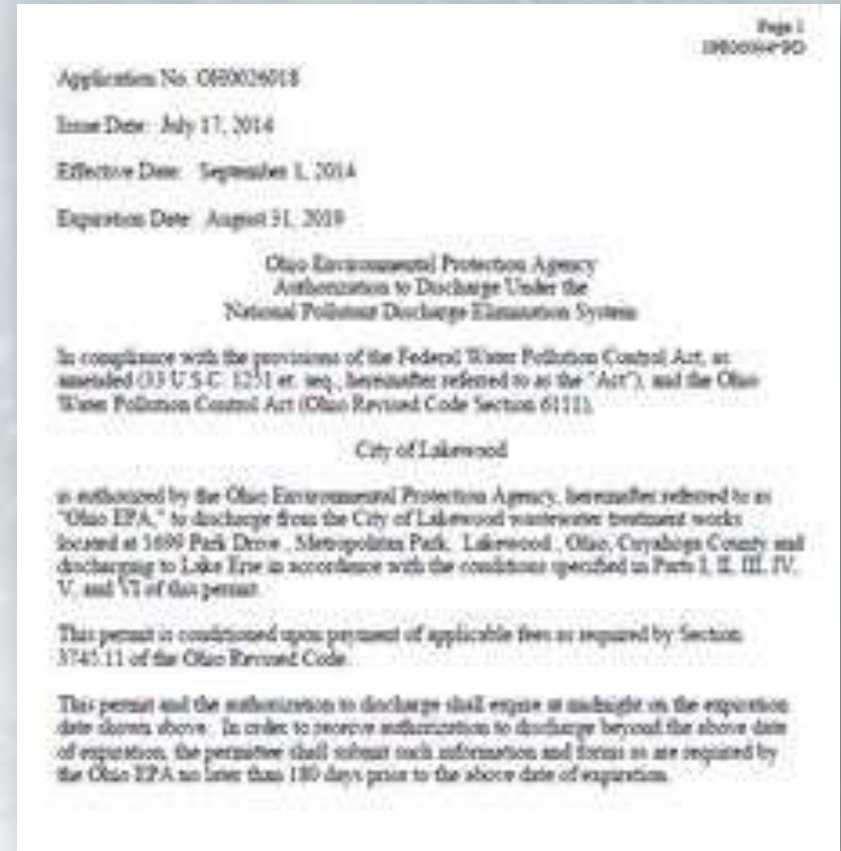
Multi-Purpose Access Path

maintenance access

Looking south towards Westwood

IP in NPDES Permit: Lakewood

- Permit recognizes presence of CSOs, storm flows and cross connections
- Requires elements of typical LTCP and more in 2 Phases of planning to accommodate pilot study
- Specifies an “Initial Control Measure”
- Requires schedule and funding plan for prioritized alternatives



Integrated Planning Opportunities

- IP represents an opportunity to shape legal compliance points
 - Schedule may vary from 'traditional' CSO limits
 - Gain local public input, legitimacy and support
 - Realize Co-benefits (brownfields and community redevelopment)
 - Lower costs from infrastructure/construction coordination
 - Leverage non-local dollars and private investment
- Benefits only flow to those who do the Planning
 - **Voluntary** effort to plan alternatives
 - Like costs of CWA compliance, burden solely on local community
- **“Don’t make us spend all of our 21st century resources on 20th century solutions to retrofit 19th century infrastructure.”**