Community Experience with Integrated Planning and WERF Toolbox

NACWA Regulatory Policy Committee
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2016 Survey of Community Insights on Integrated Planning
part of a larger project to create an Integrated Planning Toolbox

Funded by: Adrienne Nemura

Affordability is a Major Concern

- 41% - primary CWA challenge (WQ 2\textsuperscript{nd})
- 70% - top driver for integrated planning (fin mgt 2\textsuperscript{nd})
Context / Overview of WERF Project

- EPA’s integrated planning initiative: more questions than answers

- Research Project goals:
  - Identify community objectives for integrated planning;
  - Summarize expected outcomes; and
  - Identify integrated planning tools that communities can use

- Community Insight Survey: largest and most comprehensive to date
  - Open-end and closed-end questions produced a range of insights

- Case Studies: based on in-depth interviews

- Toolbox forthcoming at www.werf.org
Survey Respondent Characteristics

- General Government: 44
- Special District: 25

### Size (population served)

<table>
<thead>
<tr>
<th>Population Served</th>
<th>Percentage</th>
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<tbody>
<tr>
<td>large (500,000 +)</td>
<td>30%</td>
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<tr>
<td>medium (100,000-499,000)</td>
<td>30%</td>
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<tr>
<td>small (25,000-99,000)</td>
<td>25%</td>
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<tr>
<td>very small (&lt; 25,000)</td>
<td>15%</td>
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### Status

<table>
<thead>
<tr>
<th>Status</th>
<th>Percentage</th>
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<tbody>
<tr>
<td>Completed plan</td>
<td>26%</td>
</tr>
<tr>
<td>Currently undertaking</td>
<td>17%</td>
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<tr>
<td>Currently considering</td>
<td>26%</td>
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<tr>
<td>Decided not to</td>
<td>14%</td>
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<tr>
<td>Never considered</td>
<td>16%</td>
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</table>

- Wastewater: 91% General Government, 96% Special District
- Stormwater: 80% General Government, 28% Special District
- Drinking water: 73% General Government, 28% Special District
- Other: 18% General Government, 12% Special District
Top Community Priorities

- Financial Capability and Affordability
  - Affordability for all & especially low income groups

- Environmental and Public Health Benefits
  - Maximize water quality benefits

- Utilization of Resources
  - Setting priorities; cost effective resource allocation
Finding: there is an appetite for IP because of challenges, but ...
### Barriers to Integrated Planning

The top 4 barriers are regulatory / enforcement concerns. Internal issues are mostly less important.

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<thead>
<tr>
<th></th>
<th>Slightly</th>
<th>Somewhat</th>
<th>Very Important</th>
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<tbody>
<tr>
<td>Lack of EPA flexibility</td>
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<tr>
<td>Concerns of additional obligations</td>
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<tr>
<td>Increased enforcement risks</td>
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<td></td>
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<tr>
<td>Uncertainty about outcomes</td>
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<tr>
<td>Lack of State flexibility or support</td>
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<td>Lack of State knowledge</td>
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<tr>
<td>Investment of time/money required</td>
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<tr>
<td>Local Politics</td>
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<tr>
<td>Lack of internal dept. coordination</td>
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<td>Lack of How-to Information</td>
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<td>Lack of tools for Plan Element tasks</td>
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Sources of Information on Integrated Planning

- How frequently consulted and how useful
Insights from Those Who Have Considered or Undertaken Integrated Planning

- Where have you experienced problems or frustrations?
- What could have made a difference for you?
- What tools do you wish you had?

- Bureaucracy – EPA (esp. regions) and DOJ, community; less of an issue with state regulators
- Cooperation, partnership, flexibility from regulators
- Cited: templates, examples, case studies, technical tools
- A liaison dedicated to coordinating regulatory and permit issues with enforcement people
Advice from Respondents

- **Advice to Others**
  - “Be creative. This is an opportunity to create a site-specific program that is reasonable, affordable, and sustainable.”

- **Advice to EPA**
  - Change culture; codify; improve guidelines
  - “Communities that choose the integrated planning process also need to be supported in this effort.”

- **Final Thoughts**
  - More communication about IP & its effectiveness, especially, document how communities obtained regulatory relief
  - “Good communities and state level officials who are working together do not need to have this at the Federal level ... if they can work things out at the state level.”
Findings Relevant to Potential Legislative Proposals

Integrated Plans

- The most significant barriers to integrated planning involved regulatory and enforcement concerns

- Need for information sharing is strongly affirmed in the survey – desire for more useful information from EPA

- Concept of a municipal ombudsman seems important
  - Responses called for regulatory flexibility and “a liaison dedicated to coordinating regulatory and permit issues”
  - Advice to EPA that “Communities ... need to be supported in this effort”
Findings Relevant to Potential Legislative Proposals

Financial Capability Guidance

- Importance of affordability issues was repeatedly identified in response to various questions.

- Some of the highest priorities for communities were affordability for low income groups and more adequately assessing financial capability than is possible with current Guidance.

- Sizes of community programs are leading many to look at schedule lengths well beyond the 20-year period cited in the Guidance, as well as consent decree extensions that are quite substantial.
Schedule / Consent Decree Extension

- Consent Decree Extension

- Targeted length

<table>
<thead>
<tr>
<th>Schedule Length</th>
<th>11%</th>
<th>15%</th>
<th>26%</th>
<th>6%</th>
<th>6%</th>
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<tr>
<td>&lt;=5 years</td>
<td>11%</td>
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<td>6-10 years</td>
<td>11%</td>
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<td>11-15 years</td>
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<td>16-20 years</td>
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<td>21-25 years</td>
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<td>6%</td>
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<td>26-30 years</td>
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<td>6%</td>
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<td>30+ years</td>
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<td>35%</td>
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<tr>
<td>Unknown</td>
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<td>35%</td>
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Unknown, 35%
16-20 years, 35%
<=5 years, 18%
6-10 years, 6%
11-15 years, 6%
Other Notes on Potential Legislative Proposals

- Neither the Integrated Planning Approach nor the 2014 FCA Framework contains a clear statement about affordability
- FCA Framework’s emphases on sustainability, flexibility, and a continuum of financial capability are not followed by regulators
- In a 2016 survey, 85% + said regulators showed:
  - Unwilling to balance CWA with other environmental issues
  - Unwilling to consider other community needs
  - Insistence on spending even when costs outweigh benefits
  - Lack of consideration of impacts on vulnerable households
  - Lack of consideration of impacts on businesses
Current/Future Research Activity

- Commissioned to conduct independent study to create definition and framework for community affordability
  - Facilitated forums
  - Stakeholder discussions
  - Consult national organizations

- Report should be available to subscribers soon (and for purchase by others)
- Toolbox, case studies later
- Subscribers can also ID issues for WERF’s future research agenda
Questions / Discussion

- Thank you!

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