

Integrated Planning and Affordability

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History of Integrated Planning

- Inflexible EPA positions on decrees, Long-Term Control Plans, SSOs, other CWA issues
 - 2% of MHI / 20 years / 4 overflows per year
- Communities faced substantial costs without significant improvements to water quality
- Municipal groups voiced concerns to EPA
 - EPA not using the flexibility in existing Agency policies
- Communities need to be able to determine how to maximize environmental benefit of their CWA actions given limited resources

Development of Framework

- Memo issued Oct. 27, 2011 by Office of Water and Office of Enforcement
 - Stated EPA intention to develop integrated planning framework
 - Plans should use existing flexibility while maintaining regulatory standards
 - A municipality's ability to pay should consider ALL Clean Water obligations
- Final framework issued June 5, 2012
- Communities have been developing or considering integrated plans in many States

Key Elements of Integrated Plan

- 1: Describe environmental and regulatory issues to be addressed
 - 2: Describe existing systems and their performance
 - 3: Stakeholder involvement
 - 4: Evaluate and select alternatives and implementation schedules
 - 5: Measure success
 - 6: Process to improve the plan
- THEN: Implementation**

Steps in Integrated Planning

- Identify water obligations
- Define costs and schedules
- Look at financial capability
- Define enviro/health impacts of controls
- Develop prioritized schedule
- Evaluate legal constraints and need to use relief mechanisms
- Complete Integrated Plan
- During process, communicate with stakeholders and do agency outreach

Examples of Integrated Plans

- CSOs, SSOs, treatment plant upgrades, severe affordability issues, bonding capacity concerns
- CSOs, need for extensive asset management expenditures
- CSOs, need for ongoing asset management of old system, possible nutrient controls in future

Integrated Planning Being Developed, Planned or Considered

- Nutrients, CSOs, street flooding – combination of city and district
- CSOs, SSOs, POTW upgrades, blending, sensitive areas – combination of city and district
- CSOs and asset management, modifying total separation LTCP, with extreme affordability issues
- SSOs, POTW compliance issues, asset management
- CSOs, green infrastructure, extreme low-income affordability issues, already over 2% MHI
- MS4s, multiple TMDLs, wastewater and drinking water upgrades
- Combined sewer system (not POTW), MS4 permit, low-income affordability issues

Affordability Issues in IP Context

- Important to change agency mindset about limit of affordability
- Have to do EPA cost numbers, then do other analyses
- Often get into long disputes over tiny details in analysis – apartment buildings
- Concern about wholesale customers
- BUT: IP helps to promote broader perspective – get away from silos

More Affordability Issues

- Including asset management is key – consider accountability options
- Caution about rate options for lower income levels – not always doable
- IP stress on public participation helps to ensure that all issues considered, including how to reduce real impacts to ratepayers and increase the incremental water quality benefits derived

Key Points to Remember

- IP is a voluntary tool – use it if is helpful for the particular situation; assess relative to other options
- Does not need to include every regulatory requirement – scope can vary
- Two entities that share authority for a geographic area can do a plan together
- Think broadly – consider including stormwater, drinking water, other sources in watershed, etc.
- Complexity should be tailored to specific needs and goals of the community

Questions?

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