



February 29, 2012

Water Docket

USEPA

Mail code: 4203M, 1200 Pennsylvania Ave.

NW, Washington, DC 20460

Transmitted via email to: OW-Docket@epa.gov

Attention Docket ID No. EPA-HQ-OW- 2011-0986.

The Metropolitan Sewer District of Greater Cincinnati, Ohio (MSDGC) commends USEPA for recognizing the need for flexibility to allow communities to develop an integrated plan to prioritize water quality and public health needs within the Clean Water Act. Prioritization and potential flexibility is necessary under the Clean Water Act requirements but recognition for sequencing to achieve the greatest public benefit is a critical recognition by both Federal and State agencies that would translate to more effective implementation and public support. MSDGC is in agreement with the five major elements of the plan and understand the need and importance of demonstrating each element effectively.

Our community is one of the five largest combined sewer overflow (CSO) utilities in the country. MSDGC ratepayers could spend up to \$3 Billion over the next 20 years to reduce CSOs within our service area as part of the 2009 Consent Decree. Given this anticipated investment and known affordability issues among our ratepayers, MSDGC welcomes the opportunity to develop an integrated plan that is based on the largest water quality and public health needs to tailor our approaches and outcomes for high priority and sequenced public health, recreational use, and environmental resource improvement.

The integrated planning framework should be further supported by both Federal and State regulatory agencies, particularly policy guidance for communities such as Hamilton County and the City of Cincinnati where ratepayers face numerous Clean Water Act priorities -priorities that are difficult for local governments to discern the proper way to prioritize actions. For each community and watershed, needs and priorities will differ. For our community, those priorities include combined sewer overflow, sanitary sewer overflow, stormwater management, aging infrastructure, asset management needs, and habitat and hydro-modification issues that all contribute to non-attainment of water quality goals and limit the water resources integrity or public health protection. We are also challenged with declining population and water usage, and other public, non-water resource/needs.

Over the last 3 years, MSDGC has been developing integrated watershed plans and utilizing a strategic separation approach to address stormwater and natural drainage that enters our combined sewers and through strategic separation – which is a form of partial separation in a combined sewer system. As part of those strategic separations, MSDGC has developed stormwater management solutions.

With a focus on Direct, Enabled and Inform and Influence projects, MSD has put a large amount of its focus on Direct Projects – such as large scale Sustainable Infrastructure. This includes both green and gray infrastructure utilizing both natural and piped systems to remove stormwater from the combined system, while addressing the quality and quantity of stormwater removed from the combined sewers. By taking this approach, MSDGC has also developed solutions that include opportunities to consider the repurposing of vacant or brownfield lands for potential integration into a watershed-based sustainable infrastructure solution.

In reviewing the draft framework, MSDGC believes that it is important to not consider Green Infrastructure too narrowly and ensure that when considering Green Infrastructure, it be integrated into a watershed with Grey Infrastructure as an Integrated Watershed Plan so that maximum benefits can be realized. MSDGC has partnered with both public and private entities to create Enabled Impact solutions – those solutions that are not in direct control or ownership of MSDGC but result in providing MSDGC with water quality or quantity benefits and are integrated into priority watersheds where buy-in and private redevelopment is needed.

Public input and community engagement has been a large undertaking by MSDGC in recent years as part of the watershed-based solution development. MSDGC has engaged in community forums to discuss and highlight potential alternatives as well as traditional CSO solutions. MSDGC has hosted a series of Open Houses and Community Design Workshops, where over 100 people attended 2-3-hour, evening meetings to seek input, engage with discussions affecting their neighborhood, and provide feedback needed to prioritize solutions and needs. This level of engagement has been valuable to strategically determine the maximum benefit water quality and public health improvement dollars can provide our ratepayers.

MSDGC has initiated a comprehensive watershed based bioassessment program to further develop our integrated prioritization system. Our bioassessment program is an important part

of our integrated planning and we anticipate continuing to utilize it for assisting with prioritization of capital improvements as well as education and partnership opportunities.

Overall, MSDGC believes that data collected within a watershed is critical to help define the priorities. Additionally, community input to is a step in the right direction for implementing Integrated Plans. We recognize there are more steps that must be followed to give local communities, in partnership with state and federal agencies, the ability to properly phase and schedule top priorities for immediate, mid-term and longer-term implementation.

MSDGC believes the flexibility offered by the Framework, enables communities to prioritize capital dollars for the biggest water quality and public health problems. A locally developed prioritization system results with more meaningful community investments having measurable quality, public health improvement and community vitality. USEPA and the States must be willing to keep a long-term view. In short, the dialogue at the workshops where Regulators emphasized the need for a long-term vision, not just considering a 5-year increment, encourages MSDGC.

Each watershed and community is different; scale and approach will be different. Good science and monitoring of current and post projects are important to adapt the integrated plan over time for continuous improvement and making progress towards use attainment.

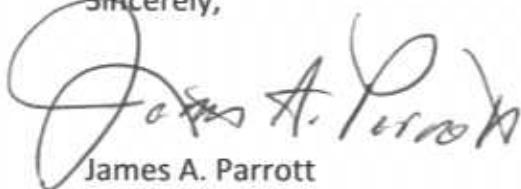
Within the next month, MSDGC will provide numerous tools and manuals to share, including the Lick Run Master Plan that 1)utilizes innovative solutions to convey natural drainage and stormwater, 2) offloads flow from the combined sewer and 3) show how utilizing these investments as a value proposition for the community can leverage additional funding and opportunities to create a sustainable community of the future.

Finally, MSDGC has developed a Sustainability LENS tool as a decision making tool for project selection. MSDGC's Sustainability LENS promotes the use of community planning and decision making by addressing various community goals in the area of environmental, economic and social themes using community and project specific key performance indicators. The system assists in evaluating green and gray infrastructure to develop successful wet weather solutions using an integrated planning approach. The benefits to community include a robust planning process that will help steward environmental protection, provide financial stability and meet community social values. In the LENS tool, MSDGC has captured key performance indicators of watershed projects and solutions to assist with decision making for community, the district and our stakeholders.

In short, MSDGC desires to develop and implement integrated stormwater and wastewater management plans and has developed a Sustainable Watershed Evaluation Process (SWEPP) manual for USEPA review and use. MSDGC continues to refine and revise this draft document that is a guideline for staff, technical service providers and stakeholders to help shape sustainable solutions that build a brighter future as part of CSO reductions.

MSDGC is very interested in providing information and assistance as a model case study or pilot community. Please feel free to contact me at 513-244-5121 or [Tony.Parrott@cincinnati-oh.gov](mailto:Tony.Parrott@cincinnati-oh.gov) or MaryLynn Lodor, Environmental Program Manager at 513-244-5535 or [marylynn.lodor@cincinnati-oh.gov](mailto:marylynn.lodor@cincinnati-oh.gov) if you wish to discuss our approach or the comments provided. Thank you.

Sincerely,



James A. Parrott  
Executive Director