



Department Source: City Utilities - Sewer/Stormwater

To: City Council

From: City Manager & Staff

Council Meeting Date: November 5, 2018

Re: Setting a public hearing – adoption of the Our Columbia Waters Wastewater and Stormwater Integrated Management Plan

Executive Summary

Staff has prepared for Council consideration a resolution to set a public hearing on December 3, 2018, considering the adoption of the Our Columbia Waters – Wastewater and Stormwater Integrated Management Plan. This Integrated Management has been prepared as required by a Memorandum of Understanding with the Missouri Department of Natural Resources.

Discussion

The final document for the Our Columbia Waters – Wastewater and Stormwater Integrated Management Plan (IMP) is attached. Included with the attachments are all appendices to the plan, as well as, a summary five year action plan.

In 2011, the City received notification from the Missouri Department of Natural Resources of the potential need of an Administrative Order on Consent (AOC) to address wet weather sanitary sewer overflows. In 2011, the City also became a party to the Hinkson Creek Collaborative Adaptive Management (CAM) process to address the Total Maximum Daily Load (TMDL) for water quality impairments based on macroinvertebrate sampling. In 2012, the United States Environmental Protection Agency (EPA) released a new framework to help local governments meet Clean Water Act obligations. This framework is titled “Integrated Municipal Stormwater and Wastewater Planning Approach Framework” (IMP). The IMP framework assists EPA regional offices, states and local governments with developing voluntary storm and wastewater management plans and implementing effective integrated approaches that will protect public health by reducing overflows from wastewater systems and pollution from urban storm water runoff. This framework provides flexibility to pursue innovative solutions and allows communities to develop plans that prioritize their investments in storm and wastewater infrastructure.

Utilizing the IMP framework can benefit the City by allowing more flexibility and local control in determining the priority and schedule for projects necessary to meet regulatory requirements while still addressing current operation, maintenance and system rehabilitation needs. This flexibility allows for better decision making based on the community's priorities and helps keep user rates affordable compared to the traditional approach. The traditional approach typically involves an AOC with a rigid schedule and specific spending requirements. Prior to completion of work required in a typical AOC, additional improvements are often required by schedules of compliance included in operating permits which require additional funding in short time periods resulting in rapidly rising user rates.



City of Columbia

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MDNR agreed with the approach to use the IMP framework to address the wet weather overflows, operation, maintenance and system rehabilitation needs and to address other future regulatory requirements. As a result of negotiations with MDNR, the City and MDNR entered into an Abatement Order on Consent and a Memorandum of Understanding in December 2016. In the memorandum of understanding, the City agreed to develop an IMP for the wastewater and stormwater systems and MDNR agreed to use the plan as a basis for future regulatory decisions and compliance schedules in future operating permits.

In 2016, the City selected HDR Engineering, Inc., to assist with developing the IMP. Development began with identifying existing issues and evaluating current infrastructure and resources. Public outreach activities have occurred to support the plan including: an online survey, four public workshops, individual meetings with Council members, multiple meetings with MDNR, a Council work session and a 45-day comment period on the draft plan. Alternatives and timelines were developed that identified efficiencies and resolved competing regulatory requirements from separate wastewater and storm water programs. The IMP will help the City meet regulatory obligations while continuing to address related challenges in operating and maintaining existing infrastructure investments. An affordability analysis was performed to inform a long-term plan that allows the Utilities to maintain affordable user fees and leverage expenses to meet multiple goals. Finally a long term plan with a 5-year action plan to address the prioritized investments for the Sewer and Storm Water Utilities was completed. This flexible long-term IMP provides some control of the magnitude and timing of regulatory uncertainties and prioritizes sustainable and comprehensive solutions that improve water quality and provide multiple benefits to the community.

Fiscal Impact

Short-Term Impact: There is no cost associated with adoption of the plan and submittal to MDNR. If accepted by MDNR, long term impacts will occur with implementation of the plan. Long-Term Impact: The five year action plan identifies additional costs of approximately \$5.4 million for the Storm Water Utility over the initial five year period. The five year plan identifies additional costs of approximately \$17.6 million for the Sewer Utility over the initial five year period.

Strategic & Comprehensive Plan Impact

[Strategic Plan Impacts:](#)

Primary Impact: Infrastructure, Secondary Impact: Operational Excellence, Tertiary Impact: Tertiary

[Comprehensive Plan Impacts:](#)

Primary Impact: Environmental Management, Secondary Impact: Infrastructure, Tertiary Impact: Livable & Sustainable Communities



Legislative History

Date	Action
08/07/2017 12/19/2016	City Council Work Session Presentation B331-16 Authorizing a memorandum of understanding with the Missouri Department of Natural Resources relating to the development of an integrated management plan for City of Columbia wastewater and stormwater systems; authorizing approval of an Abatement Order on Consent with the Missouri Department of Natural Resources.
01/19/2016	B18-16 Authorizing an agreement for engineering services with HDR Engineering, Inc. for development of an Integrated Management Plan (IMP)
11/21/2011	Abatement Order on Consent Presentation at the November 21, 2011 Pre-Council Meeting

Suggested Council Action

Authorize the Resolution to set a public hearing on December 3, 2018 to consider the adoption of the Our Columbia Waters – Wastewater and Stormwater Integrated Management Plan.