

INTRODUCTION AND INSTRUCTIONS

INTRODUCTION

This document provides the questions in the Water Research Foundation and Water Environment Federation survey on integrated planning. To take the online survey, please go to <https://www.surveymonkey.com/r/H2HCXRF>.

BACKGROUND

On January 14, 2019, President Trump signed legislation that amended the Clean Water Act (CWA) to include EPA's 2012 framework for integrated planning for municipal stormwater and wastewater. The statute allows local water agencies to develop plans to prioritize and sequence projects to address combined sewer overflows, sanitary sewer overflows, stormwater control measures, and wastewater treatment in an affordable manner. Integrated planning can be incorporated into Consent Decrees (including existing decrees) and National Pollutant Discharge Elimination System (NPDES) permits. Integrated plans can include water reclamation, recycling, reuse, or green infrastructure. The statute also establishes a municipal ombudsman within the EPA administrator's office to help municipalities with CWA compliance.

Integrated planning is voluntary. If a municipality decides to take advantage of this approach, the integrated plan that it develops provides information for the permit and enforcement processes and can support the development of conditions and requirements in permits and enforcement orders. For more information, please see EPA's website: www.epa.gov/npdes/integrated-planning-municipal-stormwater-and-wastewater.

In 2018, the Water Research Foundation published a Users' Guide for utilities/municipalities to follow while determining if an integrated plan is right for their community. The guide also includes information for communities to use when developing integrated plans. The guide is available at no cost at www.werf.org/a/ka/Search/ResearchProfile.aspx?ReportId=SIWM9R14. (If you don't have a Water Research Foundation account, you can create an account and download the Users' Guide at no cost.)

The Water Research Foundation and the Water Environment Federation have been working together on the topic of integrated planning. View the Water Environment Federation's recent webcast "Integrated Planning Amendments to the Clean Water Act: What you need to know" at https://wef.org/resources/online-education/webcasts/ArchivedWebcasts/IPAmendmentsCWA_Arch/.

INSTRUCTIONS

This survey is intended to provide information to update the Users' Guide by gathering information in each of the 10 EPA Regions on the status of integrated planning, the barriers (including lack of knowledge), and challenges associated with integrated planning. It is intended to take no more than 5-15 minutes to complete. Wherever possible, please answer this survey as a representative of your community's management group, rather than simply from an individual perspective.

(To ensure confidentiality, results will be aggregated. If verbatim answers are cited, they will only be attributed by EPA Region).

COMMUNITY INFORMATION

1. What is the name of your agency?

2. Which of these utilities is your agency responsible for? [Select all that apply]

- Wastewater collection system
- Combined sewer overflows
- Wastewater treatment
- Municipal separate storm sewer system (MS4)
- Regional stormwater / flood control
- Drinking water
- Recycled water
- Groundwater replenishment
- Other (please describe)

3. What is the estimated population served? [mark one]

- 1,000,000+
- 500,000-999,999
- 250,000-499,999
- 100,000-249,999
- 50,000-99,999
- 25,000-49,999
- <25,0000

4. What is your contact information? (This is only for survey follow-up, if necessary, and will remain confidential)

Respondent name		
Primary utility city		
State/province		[select state]
Email address		
Business Phone number		

5. Were you previously aware that integrated planning is now part of the Clean Water Act?

- Yes
- No

6. What is the status of integrated planning in your community? [mark one]

- Never considered [go to A]
- Considered, did not pursue [go to B]
- Currently considering [go to C]
- Currently undertaking [go to D]
- Completed [go to E]

A. NEVER CONSIDERED

7) Why has your community not considered integrated planning? [mark all that apply]

- Not enough knowledge about integrated planning
- No internal support
- No regulatory support
- Not enough resources to do integrated planning
- No consent decree
- No pending enforcement actions
- No difficulty meeting existing NPDES permit conditions
- No total maximum daily loads (TMDLs) that could make my permit difficult to comply with
- Other

8) In addition to US EPA's website and WRF's Users Guide (see introduction), what would be most useful for you to consider integrated planning? [mark all that apply]

- Notification by the state that this is an option for your community
- A regulatory requirement to submit an integrated plan
- Information on the state regulatory agency website
- Information on US EPA's website
- Online case study library
- Peer-to-peer network
- Series of national webinars
- National workshop
- State workshops
- Local workshops
- Other

TERMINATE SURVEY WITH ANNOUNCEMENT

B. CONSIDERED, DID NOT PURSUE

7) What primary factors played a role in your decision not to pursue an integrated plan? [mark all that apply]

- Not enough knowledge about integrated planning
- Did not face current regulatory pressures that would be relieved by an integrated plan
- Unable to integrate existing regulatory drivers
- Constrained by previously approved rate structures
- Internal issues such as staffing turnover, limited resources, and internal lack of coordination and collaboration
- Pursued other Clean Water Act flexibilities (site-specific criteria, compliance schedule, variances, use attainability analyses, etc.)
- Concerned about additional regulatory obligations
- Concerned about potential enforcement risks
- Uncertainty about regulatory agency expectations
- Lack of knowledge by state or federal regulators
- Lack of state flexibility or support
- Lack of US EPA flexibility or support
- Opposition to integrated planning by environmental advocacy groups
- Other

8) Would you reconsider doing an integrated plan, now that it is part of the Clean Water Act?

- Yes
- No

TERMINATE SURVEY WITH ANNOUNCEMENT**C. CURRENTLY CONSIDERING**

7) Did incorporating integrated planning into the Clean Water Act influence your decision to consider an integrated plan?

- Yes
- No

8) Why are you considering an integrated plan? [mark all that apply]

- Maximize environmental benefits
- Address environmental justice concerns
- Obtain public health benefits

- Mitigate climate change impacts
- Address water supply issues
- Improve utilization of resources
- Obtain ability to prioritize projects
- Obtain regulatory flexibility
- Address financial capability concerns
- Address affordability concerns
- Address economic justice concerns
- Other (describe)

9) What additional resources would be helpful for you to decide to pursue an integrated plan? [mark all that apply]

- More information on integrated planning
- Online case study library
- Peer-to-peer contact
- Support from your state regulator
- Support from your federal regulator
- Other (describe)

TERMINATE SURVEY WITH ANNOUNCEMENT

D. CURRENTLY UNDERTAKING

7) Did the incorporation of integrated planning into the Clean Water Act influence your decision to undertake an integrated plan?

- Yes
- No

8) Why are you undertaking an integrated plan? [mark all that apply]

- Maximize environmental benefits
- Address environmental justice concerns
- Obtain public health benefits
- Mitigate climate change impacts
- Address water supply issues
- Improve utilization of resources
- Obtain ability to prioritize projects

- Obtain regulatory flexibility
- Address financial capability concerns
- Address affordability concerns
- Address economic justice concerns
- Other (describe)

9) Are you expanding your integrated planning effort to go beyond EPA's framework (e.g., conducting an integrated water resource management plan or participating in a multi-jurisdictional planning effort)?

- Yes

9.1) Please elaborate on how you are expanding your integrated planning effort to go beyond EPA's framework.

- No

10) Is the integrated planning process requiring more resources than you anticipated needing?

- Yes

10.1) Why is the integrated planning process requiring more resources than you anticipated needing? [describe]

- No
- Unsure

11) Are you having difficulty identifying or predicting legitimate future Clean Water Act (CWA) requirements?

- Yes

11.1) What are the reasons you are having difficulty identifying or predicting legitimate CWA requirements? [mark all that apply]

- Moving targets under the CWA is making it difficult
- Regulators are narrowly focused on remedying current non-compliance issues
- Concern about identifying additional regulatory obligations
- Resources are not available to investigate
- Community doesn't see the value in spending resources to investigate
- Other (describe)

- No

12) Has it been challenging to select metrics to evaluate human health and water quality objectives?

- Yes

12.1) Why has it been challenging to select metrics to evaluate human health and water quality objectives? [mark all that apply]

- Accurately estimating costs and determining benefits
- Length of time needed to collect the data necessary to support development of metrics
- Lack of state or federal criteria in dealing with the issues in the integrated plan
- Other [describe]

No

13) Has it been challenging to evaluate affordability?

Yes

13.1) Why has it been challenging to evaluate affordability? [mark all that apply]

- Not enough guidance from the regulatory agencies
- Not enough acceptance from the regulatory agencies of alternative metrics (other than using median household income)
- Lack of guidance on balancing economic and environmental concerns
- Other (describe)

No

D8) Are you having trouble characterizing your system(s)?

Yes

D8.1) Why are you having trouble characterizing your system(s)? [mark all that apply]

- Lack asset management information
- Lack of accurate “as-built” references
- Lack information on upstream or external sources of pollutants
- Lack ability to quantify pollutant loads
- Lack ability to quantify the impact of pollutant loads
- Other (describe)

No

14) Are you having problems getting stakeholders to provide input?

Yes

14.1) Please describe what problems you are having getting stakeholders to provide input.

No

15) Are you struggling to gain community-wide acceptance of integrated planning?

Yes

15.1) Please describe how you are struggling to gain community-wide acceptance of integrated planning.

No

16) Are you having trouble deciding how to prioritize projects?

Yes

16.1) Please describe why you are having trouble deciding how to prioritize projects.

No

17) What implementation schedule do you anticipate needing to comply with current CWA requirements? [mark one]

- Have not figured this out yet
- Five to 10 years
- 10-20 years
- 20-30 years
- 30-50 years
- Much longer

18) Please select the top three integrated planning resources (tools or guidance) that would be most beneficial to you.

- Generate asset management information
- Green infrastructure planning
- Quantify pollutant reduction
- Quantify water quality and/or environmental benefits
- Incorporating environmental justice
- Evaluation of alternatives
- Alternatives prioritization
- Affordability and financial capability
- Incorporating economic justice
- Organizational change
- Integrating nonpoint source projects into an integrated plan
- Other

19) Please select which three decision criteria that would be important for you to rank projects.

- Capital cost
- Benefit to receiving water quality
- Performance risk

- Project pollutant reductions
- Long-term community benefits
- Operation and maintenance costs
- Operation and maintenance feasibility
- Life-cycle costs
- Long-term public safety
- Sustainability of project
- Other – describe

20) Please identify any concerns you have about performance criteria and measures [mark all that apply]

- Uncertain about acceptable measures for monitoring combined sewer overflows
- Uncertain about acceptable measures for proving elimination of sanitary sewer overflows
- Uncertain about acceptable measures for stormwater project performance (individual projects)
- Uncertain about acceptable measures for stormwater project performance system-wide
- Lack methods to determine if the integrated plan is successful
- Other (describe)

21) Do you have a process for any of the following? [mark all that apply]

- Identifying, evaluating, and scheduling new projects
- Continued stakeholder engagement
- Modifying revenue streams

E. COMPLETED

7) Did you expand your integrated planning effort to go beyond EPA's framework (e.g., conducting an integrated water resource management plan or participating in a multi-jurisdictional planning effort)?

- Yes

7.1) Please elaborate on how you expanded your integrated planning effort to go beyond EPA's framework.

- No

8) Please select the three most challenging aspects of developing your integrated plan.

- Identifying regulatory obligations
- System characterization
- Stakeholder participation
- Establishing metrics to evaluate human health and water quality objectives
- Selecting alternatives

- Defining financial capability and affordability
- Regulatory negotiations
- Gaining community-side acceptance
- Other [describe]

9) How are you measuring success of your integrated plan [mark all that apply]

- Regulatory acceptance of integrated plan
- Meeting implementation milestones in the integrated plan
- Other [describe]

10) What environmental and public health benefits do you expect to achieve with your integrated plan?
[mark all that apply]

- Maximize environmental benefits
- Address environmental justice concerns
- Obtain public health benefits
- Mitigate climate change impacts
- Address water supply issues
- Improve utilization of resources
- Obtain ability to prioritize projects
- Obtain regulatory flexibility
- Address financial capability concerns
- Address affordability concerns
- Address economic justice concerns
- Other (describe)

11) Were the resources that you budgeted for the plan sufficient?

- Yes
- No

11.1) Why were the resources that you budgeted for the plan insufficient? [describe]

12) Do you have any advice for communities that want to undertake an integrated plan? [describe]

TERMINATE SURVEY WITH ANNOUNCEMENT**ANNOUNCEMENT**

Thank you very much for your participation in the survey.

Interested in Learning More about Integrated Planning?

Attend the Integrated Planning Roundtable Technical Session (Session #419) at WEFTEC in Chicago on Tuesday, September 24, 2019 from 1:30-3:00pm. This interactive session will include representatives from the Water Environment Federation's Integrated Planning Subcommittee, US EPA, Ohio EPA, and several municipalities. The session will include various insights and plenty of time for questions and answers.