Integrated Planning

Iowa began looking at Integrated Planning in 2013
Attended regional EPA workshop
Keys points that Iowa understood

• Agreements were between states and the municipality
• No EPA oversight or approval, but they’d like to be aware of what is going on
• Project and cost considerations can include all CWA needs as well as drinking water, air and other federal program requirements
Integrated Planning

Three paths to extended compliance schedules

- Consent Order (the legal route)
- Disadvantaged Community
- Integrated Planning

Goals of Integrated Planning

- Justify extended compliance schedules in NPDES permits
- Allow cities to choose their own path
Integrated Planning

Implementation in Iowa

• Integrated Planning is a blend of consent order and compliance schedule paths
• Financial justification and long term planning
• Longer compliance schedule than we would typically allow
• No lawyers needed!
Integrated Planning

Plans could be very simple

• Clear financial justification
• Prioritizing investment in I&I work over plant construction
• Understanding (and demonstrating) the real impacts to the environment
Integrated Planning

Impacts to municipalities
• City takes the lead
• City determines the priorities
• Allows city to develop IP internally without (necessarily) hiring a consultant

Impacts to state
• Less resource intensive (did I mention no lawyers?)
• The IP gives us the defense we need for a longer schedule
Integrated Planning

Along came the City of Boone

- Current compliance schedule for disinfection
- Significant I&I to collection system
- Design flows for disinfection project were very high
- Cost for disinfecting those flows were also very high
Integrated Planning

City of Boone Background

- Population = 12,000 persons constant for 50 years
- Area size = 9 square miles
- Sewer collection system size = 352,000 feet
- Sump Pumps encouraged to be connected to sewer collection system for “cleaning”
Integrated Planning

City of Boone Financial Background

• New Water Treatment Plant in 1998 = $8 million
• New Wastewater Treatment Plant 1996 = $10 million
• Sewer Collection System Improvements 2010 = $17 million
• Total Utility Debt = $35 million!
Integrated Planning

City of Boone Integrated Plan

• 2014 Permit had Original Compliance Deadline May 1, 2018 for E. Coli disinfection
• In 2015 Boone had Highest Sewer Rates in Iowa = 3.5% of median income
• In 2016 Integrated Plan approved
• New Compliance Deadline of March 1, 2023 = 5 year delay
Integrated Planning

City of Boone Integrated Plan Benefits

• Allowed additional time for compliance = No Permit Violation on record
• Allowed time for other previous project completion = no rate increase
• Allowed time to reduce sewer system I/I = Program results are 30% high flow reduction so far = 50% Target
• Allowed for more manageable design flows = smaller disinfection system = cost savings