

# CSO Long-Term Control Plans National Perspective

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# Key Thoughts about LTCPs

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- It's Been Done Before
- Takes Longer than Expected
- Gets Incredibly Detailed
- Stay Calm and Be Patient
- Think about Integrated Planning
- Consider Affordability Carefully
- Evaluate Green Infrastructure Options
- Make Sure to Factor in Asset Management
- Think about How to Evaluate Enviro Benefit
- Find Out What Others Are Doing

# It's Been Done Before

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- Many CSO communities around country have done full LTCPs, approved by State and EPA
- So there are a lot of examples to review
- Some are good, some are bad
- Focus on recent plans, since they are more likely to reflect changes in guidance from EPA HQ

# Takes Longer Than Expected

- Numerous rounds of review by agencies at each step of process usually lead to development of plans taking a very long time – years longer than expected in many cases
- Use of Gantt charts to manage process can be very useful, so it's clear what the deadlines are for each party at each stage

# Gets Incredibly Detailed

- Review by agencies of deliverables usually gets very detailed
- This applies to modeling of system, water quality assessment, review of alternatives, financial capability assessment, etc.
- EPA often brings in specialized consultants to review and comment on submittals
- This is one of reasons why it can take so long to complete LTCP process

# Stay Calm and Be Patient

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- Remember that the cost impacts of getting the plan done right can be enormous
- So even if process is frustrating and takes a long time and a lot of effort, the costs involved in completing the process are still much smaller than the cost impacts of getting the right plan vs. the wrong plan

# Think about Integrated Planning

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- EPA has issued Integrated Planning Framework
- Communities can CHOOSE to make their LTCP an integrated plan
- Sometimes that will be good – but not always, so carefully consider the options and make sure that doing an integrated plan makes sense for you

# Consider Affordability Carefully

- Affordability is a key factor in reviewing alternatives and deciding which to choose
- Recent EPA guidance affords more flexibility in assessing affordability, so use that
- Consider impact on low-income residents
- Have to do EPA's calculation, but then can do your own too, inserting reality into assessment



# Evaluate Green Infrastructure

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- EPA wants to promote use of GI
- BUT EPA has not been consistent on this
- Sometimes GI is held to same requirements as gray, which will discourage communities from using GI
- SO carefully consider GI options, but make sure to evaluate risks
- Important to ensure that any GI requirements provide flexibility, particularly if GI does not work as planned

# Factor in Asset Management

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- EPA guidance specifies that costs of asset management can be plugged in to calculation of affordability for LTCP purposes
- Consider whether want to do a detailed AM analysis
- This can make large difference in schedule and in level of control for LTCP
- Still unclear – how much of the AM plan is enforceable?

# Think about Enviro Benefit

- Integrated planning indicates that purpose is to get more “bang for buck”
- So enviro benefit becomes relevant – how can you maximize benefit to water quality for available funds?
- Different ways of looking at benefit – gallons of CSOs discharged, number of days of standard violations in stream, etc.
- This assessment can have major impact on schedule and priorities in LTCP

# Find Out What Others Are Doing

- Some communities have obtained reasonable plans based on new EPA guidance
- Examples: Springfield, MA; Lima, OH
- Great disparities in what LTCP provisions have been negotiated in various communities across the country
- SO don't just accept what is proposed without assessing other options
- Good reference: NACWA CD Handbook

# Questions?

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