From: Margaret Wooster <mwooster@adelphia.net>
To: "Joyce Coffee" <jcoffee@cityofchicago.org>
Date: 3/28/05 2:16PM
Subject: draft on CSO and SSO abatement

Hi everyone,

I agreed to try to synthesize some of the CH group members' comments attempting to frame alternatives for CSO/SSO abatement. Dale 's alternatives look at different funding and enforcement scenarios, Gary's at different approaches to technology-based solutions, and Mike and Marcia have added in the so-called "soft path" approaches addressing infiltration and inflow. I think the alternatives we evaluate need to address possible different mixes of all of these components.

But first they must be anchored to goals that are both aggressively protective of Great Lakes waters, and yet practical and realistic in terms of the world we now live in. So here are some questions we need to answer to get the best array of goals and alternatives for CSOs and SSOs:

Regarding cost and timetable goals: (have sent these questions to Region 2 EPA, but also need more help from Regions 5 and 3 as well).

* The estimated costs for CSO abatement in the GL basin is @ $8.6 billion. Nationally the EPA estimates a CSO abatement cost of $41.2 billion for 1,100 communities w/ CSOs. How many Great Lakes communities have CSO systems affecting the Great Lakes directly or through tributaries (need data from EPA regions 5, 2 and 3)?
* How many communities in the GL basin have corrected the problem?
* How many have adopted plans they are in the process of implementing?
* How many have draft plans waiting EPA approval?
* How many have no plans?

Knowing some of this would help us get reality-based recommendations. For example, say our goal was elimination of CSOs and SSOs by 2015. Let's say the total cost estimate for the GL basin for both CSO and SSO abatement is $10 billion, that would average $1billion/year starting in 2006. Total state revolving loan funds budgeted for the GL states in 2005 were $393 million; in 2006: $260 million. Say $500 million of this total amount in 05 and 06 went to CSO abatement. We'd have $9.5 billion to go.

Hypothetical alternatives

1. Our first alternative using this hypothetical goal could recommend $ 9.5 billion in federal funds for 2007 - 2015, or a little over $ 1 billion per year. Knowing how GL CSO communities are progressing in terms of their long-term CSO plans would further allow states to agree to a regional schedule for directing these funds over the next 10 year period. This alternative would be based mainly on GL communities' existing CSO abatement plans and it therefore would be engineering-based, following EPA CSO guidance.

Buffalo's LTCP, recently submitted to EPA, is probably somewhat typical: it looks at 4 alternative scenarios for CSO abatement ranging from about $200 million for system modifications to $1 billion for modifications plus deep rock tunnel. The preferred alternative is mid-way between these and entirely engineering based. None of the alternatives look at approaches for reducing infiltration and inflow such as regulating new development in its

outlying service areas to allow no net increase in runoff to sewer systems, or incentives or regs within the city to reduce runoff from developed or redeveloping properties. Nor do they look at reductions gained from enforcing (racheting down) permitted discharges into the system.

2. Our second alternative could include policy and regulatory changes that would reduce the need for engineering solutions.

For example, it could recommend that EPA amend its CSO policy to allow communities to address and include soft path measures in their CSO plans. This alternative would mostly benefit those communities now in the planning stages Federal funding could be weighted towards plans w/ strong i/i preventative components, and this might bring costs down considerably. This alternative could also require that EPA or states ensure existing SPDES permits and timetables are enforced as a condition of approval and funding LTCPs. Would it be possible to come up w/ a cost estimate for this alternative?

3. Our third alternative could combine # 2 with a local cost share component. Just to show we are willing to do our part. Even Buffalo, broke as it is and with a not very good financial rating, proposes several bond issues to help cover the costs of its LTCP. How much of the burden do communities typically share? How much can we afford? Here's where the Great Lakes mayors weigh in. This could be the most affordable, practical and likely alternative of them all - but it means we all have to do some heavy lifting, even just to be able to clearly state such an alternative for the region.

Note: I left industrial PP out, though Dale had it in because it is a problem beyond just CS0s. It should be dealt w/ by whoever is dealing w/ the general need for STP upgrades.

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