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MEGHAN F. GEORGE
MAYOR

March 16, 2020

Lakewood City Council
Lakewood, Ohio 44107

Re: Integrated Wet Weather Improvement Plan Update (IWWIP)

Dear Members of Council;

The City of Lakewood continues to move forward with the implementation of our Integrated Wet Weather Improvement Plan (IWWIP) to update our unique 100-year-old sewer system. The prior administration established a team of experts which I have retained to continue to build on the progress we have established with the government regulators.

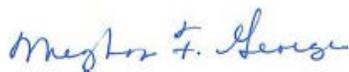
It has been a year since City Council approved and the City of Lakewood submitted its Integrated Plan to the Ohio EPA. This is an update of where implementation of the IWWIP is and is likely to go.

1. The next 8 years or so under the IWWIP will see:
 - a. By 2022, the \$25 million high rate treatment facility will come on line. This will mean that any flow we can get to the plant in the valley will not overflow into the lake untreated. Wet weather capacity will rise from 40 MGD to 70 MGD. By contrast, on a typical dry day our treatment plant treats about 4.6 MGD, and functions extremely well.
 - b. Likely, the construction of an additional 6 million gallon storage facility to capture the biggest overflow left going to the Rocky River.
 - c. Complete design of a storage facility to address the overflow at the Gold Coast, and that is presently projected to be on the Cove Church property.
 - d. Continue all the integrated projects and improvements when we do road and waterline reconstruction, like we did last year with Lake Avenue project.
2. Recall that the IWWIP was prepared after many years of investigation, and after considerable public participation, to identify and prioritize the measures Lakewood can take with our sewer overflows to come into compliance with the Clean Water Act. It produced a very detailed system model, for a "system" now recognized as "unique."
3. The approved plan is comprehensive and expensive. It will cost at least \$175 million in current dollars, and require the entire City's sustained commitment for many decades. The program is very much like the more than 15 year effort and hundreds of millions of dollars that Lakewood invested to rebuild all of our schools.
4. What we have been positioning for is to minimize any large capital commitments and create as much flexibility and time to integrate and innovate as we can.
5. Now US EPA has remained involved. You may recall that in August of 2018 US EPA sent a draft federal consent decree. They have not gone away, despite the passage of the Water Infrastructure Improvement Act amendments to the CWA in January 2019.



6. What we are very pleased to report is that in the discussions over the last year, US EPA (including at the highest levels in DC) and Ohio EPA have come to recognized that :
 - a. Lakewood's sewer system is really unique, and therefore not susceptible to 'off the shelf' solutions'
 - b. Lakewood has made excellent progress;
 - c. Lakewood's commitment to funding in the approved rates is exemplary
 - d. That our Lakewood IWWIP really has identified the most important projects that get the best environmental improvement up front.
7. We have the sense that they know Lakewood will not waste any flexibility they might give.
8. But there remains an insistence that some form of federal consent decree is necessary, even if it is partial, time limited and essentially what our plan calls for.
9. So there are very significant questions that will be coming up this year that the community, and this Council likely will need to address.
 - a. There could be the consideration of a consent decree that will bind the city to continue some part of the IWWIP.
 - b. Whether there is a consent decree or not, there will be the question of developing an equitable and affordable rate structure and revenue source for sustaining the progress.
 - i. The rate increases that are in place will pay for what is in construction now; it will not cover the large storage project to address CSO 052.
 - ii. Lakewood's rates today and as projected will be in the middle of the pack locally.
 - iii. The entire utility industry is forced by changes in water usage and these regulatory burdens to move away from sewer rates that are based on water usage. Especially where, as here, the capital projects are based on stormflow, not how much drinking water is used.
10. There is something of a paradox that is at work: we can get the flexibility and protections of affordability (through time) only by actually continuing with the most important projects. To avoid a condensed, imposed and crushingly unaffordable schedule, we have to sustain progress.
11. Just a reminder: in 2006, the City submitted a tunnel based plan that, in today's dollars, would have cost more than half a billion dollars within a 15-20 year timeframe. The plan we have today, under current projections, will cost less than half of that and is much more comprehensive in compliance, and time frame may be much more extended.
12. At least in terms of dollars, this is the supreme infrastructure, environmental and public health challenge facing Lakewood for the next several decades. It requires all aspects of the community, and certainly all parts of the city, to stay disciplined and coordinated to stay on track. But it is the type of commitment Lakewood has made before. And we have in the IWWIP a roadmap that is being recognized as a national leader.

Sincerely,



Meghan F. George