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Ohio Chapter



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Columbus City Council, Public Utilities Committee

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Thank you for this opportunity to comment on the proposed 2009 sewer and water rates and the Wet Weather Management Plan. The Sierra Club is the nation's oldest and largest grassroots environmental organization, representing over a million members and supporters nationwide and 5,000 members in the Central Ohio Group. The Central Ohio Group has been a valued clean water advocate for years and remains interested in working together toward common goals.

The Columbus Division of Sewerage and Drainage is undertaking an extensive program to address sanitary and combined sewer overflows and treatment plant bypasses. Rate increases are inevitable to pay for necessary sewer maintenance and ongoing improvement projects, the same way money is needed to maintain a 100 year old house to keep it functioning and safe.

The Sierra Club respectfully offers the following comments to proposed rate increases for sewer and water, the low income discount program and the Wet Weather Management Plan.

Proposed Sewer and Water Rates for 2009

We are pleased that Columbus voters approved the sanitary sewer bond issue, which softens rate increases and allows the city to move forward with pressing sewer improvements. In light of the \$2.5 billion sewer plan, it makes sense for the DPU to increase customer education about the need for higher rates in order to protect our health, safety, economy and drinking water supply. The public may also respond more positively to quality of life benefits derived from infrastructure improvements that reduce raw sewage contamination.

Due to the funds required for sewer projects, the DPU should reconsider how the wet weather fee is applied under the current rate structure. The fee is based on impervious surface area but is capped at 1,000 E.R.U.s or two million square feet of impervious surface, which costs the city money and takes away incentives to reduce impervious surface. The wet weather fee for Ohio State University only reflects one-ninth of their impervious surface area (19,819,679 sq. ft.), so they are charged the same rate as a facility like Ohio Health Corp. Removing this cap provides an incentive to decrease impervious surface area through green infrastructure projects like pervious concrete, vegetated roofs and rain gardens. Large customers could also consider rainwater harvesting measures to recycle water and reduce runoff.

We appreciate SWAB's decision to increase the low-income discount from 15 to 20 percent to protect the most vulnerable residents from rate increases. The DPU should accompany the low income program with increased efforts to educate participants, and water customers in general, about conservation. In addition, DPU could educate rental property owners and builders to

encourage maintenance and provide information about water efficient toilets, water fixtures and appliances. We support the rain barrel cost share program and encourage additional incentives to reduce water consumption while protecting local watersheds.

The American Water Works Association offers resources to educate the public on water efficiency, and includes examples from states across the country. Those resources include simple steps to reduce consumption and a water use calculator to determine average household water use (<http://www.awwa.org/>). If customers see what they consume then they are more likely to conserve.

The DPU continues to use a declining block rate for commercial customers, meaning commercial customers pays less per cubic feet as they increase water consumption. The declining block rate discourages conservation. While we understand that conservation impacts revenue, we must also consider the longer term benefits of reducing the pressure on our sewer and water infrastructure and on our waterways.

Wet Weather Management Plan

For years, the Sierra Club Central Ohio Group has advocated for improvements to the Columbus sewer system and appreciates the City's commitment to the Wet Weather Management Plan. We have recently offered recommendations to strengthen the Plan, including the following:

- Perform additional evaluation and field verified modeling to address the volume of wastewater contributed by contract communities, the impacts of unlimited growth, and increased precipitation during atypical years.
- Move forward with source control measures to keep water out of the sewer system, which will reduce combined sewer overflows, prolong the life of sewer infrastructure, save money and protect Central Ohio watersheds.

We are pleased with the City of Columbus and the Division of Sewerage and Drainage for their efforts to increase green stormwater practices, and look forward to next Monday's meeting to discuss related proposals. We encourage the city to take the following steps, in addition to current measures required by the WWMP, to protect our water quality and make Columbus a better place to live:

1. Develop green infrastructure incentives to reduce impervious surface area and capture and absorb storm water at the source. For example, offer a credit on stormwater fees for customers who implement green BMPs (best management practices) like rain gardens, bioswales, vegetated roofs and rain barrels. Also continue to fund and expand rain barrel programs across the city.
2. Increase installation of rain gardens and other green BMPs on City properties to reduce storm water runoff, beautify neighborhoods and raise public awareness about conservation practices. Green infrastructure could enhance sewer project implementation, road construction, building redevelopment and neighborhood beautification projects.

3. Create a green infrastructure and development roundtable to educate the public, policy makers and developers on the benefits of green infrastructure, and to provide local resources and technical expertise.
4. Include language in satellite community contracts requiring the development of green infrastructure programs to further reduce stormwater runoff and protect local watersheds.
5. Develop an ordinance modeled after New York City to codify green source control practices to guide development. This will ensure that there are guidelines in place beyond the leadership of current elected officials.

We appreciate the opportunity to contribute ideas and concerns on behalf of our members and constituents. We are committed to working with the City of Columbus on the Wet Weather Management Plan and future projects. We will continue to monitor sewer improvement projects and provide input where possible to help ensure that money is spent in the best, most efficient way to achieve environmental benefits. Thank you for your consideration.