



Louisville and Jefferson County Metropolitan Sewer District
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www.msdlouky.org

April 10, 2012

██████████
██████████ Speed Ave
Louisville, KY 40205

Subject: Integrated Overflow Abatement Plan (IOAP)
Public Input Meeting January 24, 2012
Response to comments

Dear ██████████

Thank you for taking the time to attend the meeting and submit your comments relative to I-64 & Grinstead Drive storage basin project. Your comment is summarized below, and the transcription of your verbal comments is attached for reference.

Comment – Last year, in conjunction with the Waterfront Development Corporation, I met with members of the Charles River Watershed Watch and members of the Boston Metro area. At that time, they conveyed to us that they were able to take under their Abatement Program, all of their CSO's offline in a five year period and double the quality of their water in the Charles River in the Boston Metro area. So, my question for you is, in comparison to a much older sewer system, a much larger metro area, with a much bigger population; what is taking us so long?"

Response to comment – Sewer service in the metropolitan Boston area (which includes the Charles River watershed) is provided by the Massachusetts Water Resources Authority (MWRA). While MWRA serves a greater total population than MSD, its combined sewer system has fewer CSOs (84 versus 103), and the budget for its Long Term Control Plan is similar to MSD's Integrated Overflow Abatement Plan (\$885 million versus \$850 million). Based on information from the MWRA web page their overflow abatement plan was completed in 1994, and the associated construction program was initiated in 1997, with a scheduled completion date of 2015. This construction program is scheduled to take 21 years from the completion of the plan, which is very similar to the MSD's schedule of 19 years from the signing of the Federal Consent Decree. MWRA's progress to date has included the closure of 27 of the 84 CSOs, and a reduction in the number of CSO events in the remaining CSOs down to 2 – 4 events in the typical year. Complete elimination of CSOs is not envisioned in the MWRA plan. MWRA reports significant improvements in the water



Beneficial Use of Louisville's Biosolids
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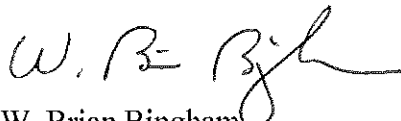
quality of the lower Charles River over the past 13 years, with much of the improvement attributed to the overflow control program. As a point of reference, MWRA's rates rose at approximately 5% per year over the past 20 years, with the current monthly sewer bill for MWRA's customers averaging \$66/month.

While MSD's overflow control program schedule is similar to MWRA's, the question remains - why can't we get the CSO issues addressed sooner? A number of factors went into developing the implementation schedule, including an Amended Consent Decree requirement to deal with the largest sanitary sewer overflows immediately, thereby tying up our resources to address this short-term imperative. We also prioritized green infrastructure and other source control projects for early completion, allowing us to demonstrate the effectiveness of source control and thereby "right-size" the gray infrastructure pipes, pumps, tanks, and treatment units to be implemented later.

In addition to providing a logical construction sequence, the IOAP schedule recognizes the significant impact of the construction program on our customer's rates. By spreading construction over the time allowed in the Amended Consent Decree we are able to fund the projects while limiting annual rate increases to 6.5 % per year or less (after the addition of the \$6.95/month Consent Decree surcharge on August 1, 2007). A quicker implementation schedule would have required much higher rate increases in the early years, putting additional financial burden on lower-income families already struggling with the uncertain economy. MSD believes the IOAP schedule achieves significant overflow reduction early in the program, allows source control benefits to be factored into overall project sizing, and controls rate increases to manageable levels.

This letter will be posted on MSD's Project WIN web page at the link www.msdlouky.org/projectwin.

Sincerely,



W. Brian Bingham
Regulatory Services Director

Attachment: Transcribed Comments

January 24th IOAP Public Input Meeting

██████████ Transcribed Comments (tape segment 1:22)

██████████: "Hi. My name is ██████████. I'm with the board of directors for the Kentucky Waterways Alliance and also the American Canoe Association. My question... Let me start with a comment. Last year, in conjunction with the Waterfront Development Corporation, met with members of the Charles River Watershed Watch and members of the Boston Metro area. At that time, they conveyed to us that they were able to take under their Abatement Program, all of their CSO's offline in a five year period and double the quality of their water in the Charles River in the Boston Metro area. So, my question for you is, in comparison to a much older sewer system, a much larger metro area, with a much bigger population; what is taking us so long?"

Brian Bingham, MSD Director of Regulatory Services- "I'm not as familiar with that project and program as some of the others, but we will look into that. The question of what is taking us so long to remove combined sewer overflows, to abate sanitary sewer overflows; it's a balancing act of what the community can afford versus what we can get out of the environment. I don't think there's anyone in this community if you ask them if they want clean streams and clean river ways that's going to say no. There are other issues. There's the economy. There's raising rates at a normal rate. I think we're actually on the path now to make some pretty fast progress. We're certainly not going to eliminate them in five years, but we have, I believe, one of the more aggressive Consent Decree programs. It's also one of the more reasonably priced ones. It's one of those things. If we can continue to find green, effective solutions, we believe, we may be able to do thing even faster. We may be able to do them to a higher level of quality. We will follow up with you, but let us look into that program and we will come back with a written response on that one because, as I said, I'm not familiar with that one.