

**INFORMATION FROM REGIONAL GOVERNANCE COMMITTEE
TO CHARTER COMMITTEE
REGARDING STORM DRAINAGE AND SANITARY SEWER ISSUES**

November 20, 1991

The Regional Governance Committee (RGC) appreciates the opportunity to offer the following thoughts regarding storm drainage and sanitary sewer issues for the consideration of the Charter Committee.

**HIGHLIGHTS OF INFORMATION AND RECOMMENDATIONS:
EFFICIENCIES BEING ACHIEVED AT LOCAL LEVEL**

This document includes the following key points:

- The storm and waste water fields are in the midst of major change. This is particularly true in the storm water field. New, integrated planning approaches are being used and local governments are being required to respond to stringent federal and state regulatory initiatives in very short timeframes.
- The efficiencies to be gained through coordination of planning and service delivery functions in the storm and waste water fields currently are being achieved at the local level throughout the region.
- The lead role for planning and service delivery in these fields should remain at the local level. However, Metro staff could provide useful coordination and information gathering services which will facilitate knowledge sharing and cooperation between governments in the three counties. This will also help to enhance the value of the current regional storm and waste documents which Metro files with the federal government to satisfy section 208 requirements of the Clean Water Act.

SUMMARY OF RGC PROCESS

As you know, for each major functional issue the Charter Committee addresses the RGC is using two matrices to organize and summarize our information. The first matrix simply describes the current system as we understand it. The second matrix describes our current thinking on what the future system should be.

Horizontal Axis/ Waste Water/Storm Water Issues: Along the horizontal axis we have organized the two matrices into two primary categories: 1) waste water; and 2) storm water. The first category, waste water, describes the sanitary sewer system in four subcategories: source control (measures which control the quantity and/or quality of sewage on-site before it enters the municipal system); collection; transport; and treatment. The second category, storm water, describes the storm drainage system in three subcategories: 1) source control (on-site quantity and/or quality control); 2) conveyance (transporting the storm water from the source to its destination); and treatment.

RGC has chosen to describe the waste and storm water systems according to their primary physical characteristics. However, it should be noted that these programs are implemented to achieve three fundamental public purposes: protect private property values, protect the public's health and safety, and protect the quality of water resources.

Vertical Axis/functions: Along the vertical axis we have identified a number of types of functions. "Resource quantity issues" and "resource quality issues" identify those entities who have a lead role in dealing with the water quantity and quality impacts respectively of waste and storm water. "Approval authority" means the body or bodies who must approve a plan before it can be implemented. "Funding" is the entity with lead financial responsibility. "Planning lead" means the entity responsible for preparing a long-range plan for approval. "Coordination lead" means the entity responsible for pulling together all of the parties who must prepare a plan. "Information gathering, analysis and support" means the entity responsible for conducting staff functions to support the planning process (e.g. research studies, computer modeling). "Service delivery" means the entity responsible to execute the plan.

The highlights of matrix B describing the recommended future system are briefly described below. We would be happy to provide additional detail or verbal testimony if the opportunity can be provided.

STORM AND WASTE WATER FIELDS UNDERGOING MAJOR CHANGE

It is not an overstatement to say that the storm water field is in the midst of a revolution. More evolutionary, but still significant change is also occurring in the waste water field. Among the most notable trends in these fields in the last few years are the following:

- Beginning to analyze storm and waste water issues in an integrated manner (i.e. overall water resource management);
- Analyzing water resource issues on a basin-wide scope;
- Beginning to identify and plan for the interrelationships between water quantity and water quality issues; and
- The promulgation of federal and state environmental standards which are very stringent and must be implemented by local service providers in very short periods of time.

The need to meet strict new federal and state standards very rapidly is creating severe difficulties for local service providers. There is no prioritized, comprehensive water resource environmental agenda at either the federal or state levels. Despite the new emphasis on integrated water quantity and quality planning the State of Oregon still deals with these issues in two separate agencies (Department of Environment Quality and Water Resources Department), whose programs and approaches are not always coordinated and consistent. Technical knowledge to fully understand how to effectively implement the new comprehensive planning approaches in these fields is badly needed, a comprehensive policy framework has yet to be developed, and institutional structures, particularly at the state level, have not been updated. The result often is standards and requirements which are costly and difficult to implement, yield uncertain results, and impose a cost which in some cases may be much higher than the derived benefits.

RGC RECOMMENDATIONS

RGC believes that at this point in time local governments are best equipped to continue in the lead role of planning for and delivering storm and waste water services. In many cases there are efficiencies and planning and financial capabilities which can be gained from coordinating the waste and storm water programs of various local entities in geographic proximity to each other. This coordinating is occurring at the local level. Storm and sanitary sewer services for nearly all of the urbanized population of Washington County is now provided by the Unified Sewerage Agency. Most of Multnomah County's urbanized population is served by an integrated system, and Clackamas County is beginning this process as well.

There are some benefits to coordinating storm and sanitary systems between the three counties, but these benefits are much less significant than those achieved by coordination within each county. Metro currently prepares regionwide sanitary and storm sewer plans which comply with Section 208 of the federal Clean Water Act. To date these documents have been prepared primarily for the purpose of complying with a federal requirement; they are mainly a compilation of local plans and not true regional planning documents. This is particularly true of the storm water 208 plan, which has not been updated since 1982.

RGC recommends that Metro staff play an enhanced role in providing coordination and information gathering and support services for the local governments. While there is no advantage to be gained from shifting the planning or service delivery lead from the local level at this time, Metro could help to provide a forum for local governments to communicate, share information, and develop common approaches to solving problems when appropriate. This would be particularly useful for adjacent areas of the service territories of the three counties. This enhanced staff role for Metro would also help to build in-house capability and improve the quality of the largely perfunctory section 208 plans which are filed by Metro now.

RGC strongly believes that it would be a mistake to attempt to shift planning or service delivery in the waste and storm water fields to Metro in today's regulatory environment. There are no identifiable benefits to doing this, and the extremely short regulatory timeframes governments are responding to would be even more difficult to meet if a major structural reorganization in these fields occurred. An already difficult situation would be made much worse.

RGC appreciates the opportunity to offer these comments and would be happy to provide additional information on request of the Charter Committee.

Storm Sewer and Sanitation Drainage Subcommittee
MATRIX A: SUMMARY OF CURRENT SYSTEM

	RESOURCE QUANTITY ISS.	RESOURCE QUALITY ISS.	FUNDING	PLANNING LEAD	COORDINATION LEAD	INFO. GATHERI SUPPORT	SERVICE DEL. LEAD
WASTE WATER							
• Source Control	Local	Fed/State/ Local	Private/ Local	Fed/State/ Local/Metro*	Local	Local	Local
• Collection	Local	Local	Local/private	Local/Metro*	Local	Local	Local
• Transport	Local/State	Local/State	Local	Local/Metro*	Local	Local	Local
• Treatment	State	Federal/State/ Local	Local	Local/Metro*	Local	Local	Local
STORM WATER							
• Source Control	Local/Federal	Federal/State Local	Local/private	Local/Metro*	Local	Local	Local
• Conveyance	Local/Federal	Fed/State/ Local	Local	Local/Metro*	Local	Local	Local
• Treatment	Fed/State/ Local	Fed/State/ Local	Local/Metro	Local/Metro*	Local	Local	Local

Local= cities, counties, special districts or combinations thereof
 Private= individual property owners involved in new development projects
 Metro= Metropolitan Service District
 State= State of Oregon
 Federal= Federal Government

* Note: Metro's role is through Section 208 Clean Water Act plans

Storm Sewer and Sanitation Drainage Subcommittee
MATRIX B: SUMMARY OF PREFERRED SYSTEM

	RESOURCE QUANTITY ISS.	RESOURCE QUALITY ISS.	FUNDING	PLANNING LEAD	COORDINATION LEAD	INFO. GATHERI SUPPORT	SERVICE DEL LEAD
WASTE WATER							
• Source Control	Local	Fed/State/ Local	Private/ Local	Fed/State/ Local/Metro*	Local/Metro*	Local/Metro	Local
• Collection	Local	Local	Local/private	Local/Metro*	Local/Metro*	Local/Metro	Local
• Transport	Local/State	Local/State	Local	Local/Metro*	Local/Metro*	Local/Metro	Local
• Treatment	State	Federal/State/ Local	Local	Local/Metro*	Local/Metro*	Local/Metro	Local
STORM WATER							
• Source Control	Local/Federal	Federal/State Local	Local/private	Local/Metro*	Local/Metro*	Local/Metro	Local
• Conveyance	Local/Federal	Fed/State/ Local	Local	Local/Metro*	Local/Metro*	Local/Metro	Local
• Treatment	Fed/State/ Local	Fed/State/ Local	Local/Metro	Local/Metro*	Local/Metro*	Local/Metro	Local

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