

MEMORANDUM

Areawide Wastewater Facility Planning Policies — Summary of Proposed Redline Edits

To: Areawide Facility Planning Sub Committee (AFPSC) / Technical Advisory Committee (TAC)
From: MVRPC Staff
Date: October 1, 2026
Re: Overview of proposed edits to the Areawide Wastewater Facility Planning Policies

Purpose

This memo summarizes and characterizes the edits proposed in the redline version of the Areawide Wastewater Facility Planning Policies, for working group review prior to Board consideration. The table below presents each edited passage with the current (redlined) language and the proposed clean language side by side, along with the type of edit and a brief note on its significance.

Overall Thrust of the Redline

- Renames “Facility Plan” to “Wastewater Master Plan” throughout, to match current terminology, and updates several related terms (e.g., “POTW” → “WWTF” in places).
- Shifts several review responsibilities between MVRPC staff, the AFPSC, and the Board — generally toward faster, staff-level handling (Policy C application review sequence; Policy F alternative-projections review).
- Adds a new staff-level approval pathway for annexation-driven FPA boundary changes that bypasses TAC and Board review (Policy C).
- Adds two entirely new subsections: “Permits to Install” (Policy E) and “Utilization of Alternative Population Projections” (Policy F), formalizing practices not previously documented in the policy.
- Narrows the AWQMP consistency test from three factors to two by deleting the “meets Ohio EPA’s regulatory and technical requirements” factor, and changes AWQMP Consistency Reviews from “required” to “available” (Policy E).
- Relaxes a mandate: FPA subdivision into Table 1 categories moves from “shall” to “may” (Policy D).
- Updates a stale data point (census year) and an administrative citation (OAC reference).

Redline-vs-Clean Comparison

Legend: ~~struck through red text~~ = proposed deletion. underlined blue text = proposed addition.

Location	Current Language (Redline)	Proposed Language (Clean)	Type / Notes
#1 Table of Contents	II.POLICIES FOR ~~FACILITY PLAN AND~~ FACILITY PLANNING AREA	II.POLICIES FOR FACILITY PLANNING AREA	Type: Terminology / formatting — <i>Heading shortened to match the 'Facility Plan' → 'Wastewater Master Plan' rebrand used throughout.</i>
#2 Introduction – Purpose	This purpose of this document is to present background and establish policies to guide MVRPC's process for review and approval of ~~updates to Wastewater Treatment Facility Plans~~ <u>new</u> and/or ~~modifications to their associated~~ <u>modified</u> Facility Planning Areas.	This purpose of this document is to present background and establish policies to guide MVRPC's process for review and approval of new and/or modified Facility Planning Areas.	Type: Clarification — <i>Clarifies that this policy governs new Facility Plans and/or modified FPAs, replacing ambiguous original phrasing.</i>
#3 Introduction – Background	Within the Miami Valley Region, MVRPC serves as the designated Areawide Planning Agency for Darke, Preble, Miami, Montgomery, and Greene Counties. This planning region includes portions of the Great Miami and Little Miami River watersheds. In the undesignated areas of Ohio, Ohio EPA carries out the municipal wastewater planning function. Wastewater Treatment ~~Facility~~ <u>Master</u> Plans and their associated Facility Planning Areas are the cornerstones of MVRPC's Areawide Water Quality Management Plan (AWQMP). The purpose of periodically updating ~~Facility~~ <u>Master</u> Plans and Facility Planning Areas is to ensure that wastewater treatment needs are met in ways that are protective of water resources into the future. Owners and operators of wastewater treatment plants (WWTPs, aka Publicly Owned Treatment Works or POTWs) are identified in the AWQMP as Designated Management Agencies (DMA). Each DMA is responsible for developing and maintaining a Wastewater Treatment Facility Plan (FP, <u>now more commonly referred to as a Wastewater Master Plan</u>) that identifies and prescribes wastewater management options in a surrounding Facility Planning Area (FPA). These management options must represent current and best understanding about where sewers will be extended and where areas will remain unsewered over the course of the next twenty years.	Within the Miami Valley Region, MVRPC serves as the designated Areawide Planning Agency for Darke, Preble, Miami, Montgomery, and Greene Counties. This planning region includes portions of the Great Miami and Little Miami River watersheds. In the undesignated areas of Ohio, Ohio EPA carries out the municipal wastewater planning function. Wastewater Treatment Master Plans and their associated Facility Planning Areas are the cornerstones of MVRPC's Areawide Water Quality Management Plan (AWQMP). The purpose of periodically updating Master Plans and Facility Planning Areas is to ensure that wastewater treatment needs are met in ways that are protective of water resources into the future. Owners and operators of wastewater treatment plants (WWTPs, aka Publicly Owned Treatment Works or POTWs) are identified in the AWQMP as Designated Management Agencies (DMA). Each DMA is responsible for developing and maintaining a Wastewater Treatment Facility Plan (FP, now more commonly referred to as a Wastewater Master Plan) that identifies and prescribes wastewater management options in a surrounding Facility Planning Area (FPA). These management options must represent current and best understanding about where sewers will be extended and where areas will remain unsewered over the course of the next twenty years.	Type: Terminology — <i>Introduces and applies the 'Wastewater Master Plan' terminology as the current name for what was called a 'Facility Plan.'</i>
#4 Introduction – Background	For all of the facility planning actions that were taken ~~in the past~~ , there had to be a rationale for each decision made by the DMA involved. In addition to MVRPC approval, Ohio EPA had to	For all of the facility planning actions that were taken, there had to be a rationale for each decision made by the DMA involved. In addition to MVRPC approval, Ohio EPA had to concur with each	Type: Wording — <i>Minor trim; no change in meaning.</i>

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	concur with each of these decisions, at least as to the effects that they would have on receiving streams. DMAs had to develop and implement plans that would satisfactorily solve any pollution problems associated with their system. Expansion of a service area beyond that identified in the facility plan was allowed as long as they met all applicable water quality standards and had received the consent of affected jurisdictions.	of these decisions, at least as to the effects that they would have on receiving streams. DMAs had to develop and implement plans that would satisfactorily solve any pollution problems associated with their system. Expansion of a service area beyond that identified in the facility plan was allowed as long as they met all applicable water quality standards and had received the consent of affected jurisdictions.	
#5 Policy B – FPA Boundaries	MVRPC shall maintain master maps of each DMA’s FPA boundaries. The FPA serves as the “study area” for which each primary DMA shall develop and maintain a ~~Facility~~ <u>Wastewater Master</u> Plan to provide for adequate wastewater treatment within the FPA over a 20-year time frame. Each ~~facility~~ plan shall include prescriptions that describe how and by whom wastewater will be managed within that DMA, as well as allocations for projected growth within that DMA.	MVRPC shall maintain master maps of each DMA’s FPA boundaries. The FPA serves as the “study area” for which each primary DMA shall develop and maintain a Wastewater Master Plan to provide for adequate wastewater treatment within the FPA over a 20-year time frame. Each plan shall include prescriptions that describe how and by whom wastewater will be managed within that DMA, as well as allocations for projected growth within that DMA.	Type: Terminology — 'Facility Plan' → 'Wastewater Master Plan.'
#6 Policy B – Overlapping FPAs	The overlap of multiple FPAs will not be permitted in ~~Facility~~ a <u>Wastewater Master</u> Plan ~~and~~ <u>or</u> FPA updates. The Facility Planning process is intended to provide an organized and efficient approach to wastewater treatment planning. Allowing the overlap of FPAs brings undue confusion and conflict to the process, in addition to potentially resulting in duplication of effort, unwise public expenditures on redundant infrastructure, and excess plant capacities.	The overlap of multiple FPAs will not be permitted in a Wastewater Master Plan or FPA updates. The Facility Planning process is intended to provide an organized and efficient approach to wastewater treatment planning. Allowing the overlap of FPAs brings undue confusion and conflict to the process, in addition to potentially resulting in duplication of effort, unwise public expenditures on redundant infrastructure, and excess plant capacities.	Type: Terminology — 'Facility Plan' → 'Wastewater Master Plan'; 'and' → 'or.'
#7 Policy B – FPA Boundary Conflicts	More recently, with increased growth and development, and the renewed emphasis on wastewater treatment facility planning, there is greater potential for conflict between DMAs. Such conflicts may be in various forms: (1) One DMA desires to assume facility planning responsibility over a portion of an adjacent FPA, where that FPA’s Primary DMA has not provided desired wastewater planning; ~~or~~ (2) Two or more DMA’s desire to assume facility planning responsibilities in an area not within any FPA; <u>or (3) one DMA municipality annexes parcels in another DMA’s FPA.</u>	More recently, with increased growth and development, and the renewed emphasis on wastewater treatment facility planning, there is greater potential for conflict between DMAs. Such conflicts may be in various forms: (1) One DMA desires to assume facility planning responsibility over a portion of an adjacent FPA, where that FPA’s Primary DMA has not provided desired wastewater planning; or (2) Two or more DMA’s desire to assume facility planning responsibilities in an area not within any FPA; or (3) one DMA municipality annexes parcels in another DMA’s FPA.	Type: Substantive addition — <i>Adds a third recognized conflict scenario: one DMA's municipality annexing parcels within another DMA's FPA. This scenario is the basis for the new annexation fast-track added to Policy C.</i>
#8 Policy C – Application Review Sequence	Initial application for a change to an FPA shall be made to ~~the~~ <u>AFPSC MVRPC staff</u> , which shall provide input to ~~MVRPC staff~~ <u>the AFPSC</u> as to a recommendation and/or a resolution. Staff shall recommend an action to the Board of the MVRPC after consultation with the Technical Advisory Committee (TAC).	Initial application for a change to an FPA shall be made to MVRPC staff, which shall provide input to the AFPSC as to a recommendation and/or a resolution. Staff shall recommend an action to the Board of the MVRPC after consultation with the Technical Advisory Committee (TAC).	Type: Procedural / authority shift — <i>Reverses the review sequence. Initial FPA boundary-change applications now go to MVRPC staff first (previously AFPSC); staff</i>

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			<i>then report to the AFPSC (previously staff received input from the AFPSC).</i>
#9 Policy C – Application Documentation	All applications for the redrawing of existing FPA boundaries must be accompanied by ~~plans that demonstrate a written~~ <u>demonstration</u> that an environmentally acceptable and affordable Facility Plan exists. ~~These plans.~~ <u>The DMA</u> must demonstrate that the boundary change will not jeopardize the ability of the WWTP to comply with its NPDES permit conditions. These plans must also estimate the impacts on existing rate structure of that ~~POTW~~ <u>WWTF</u> . If the requested boundary change also involves a boundary conflict, the applicant and other affected parties are expected to make every effort to resolve the conflict prior to submitting for the boundary change, per the position stated in Policy B, above.	All applications for the redrawing of existing FPA boundaries must be accompanied by a written demonstration that an environmentally acceptable and affordable Facility Plan exists. The DMA must demonstrate that the boundary change will not jeopardize the ability of the WWTP to comply with its NPDES permit conditions. These plans must also estimate the impacts on existing rate structure of that WWTF. If the requested boundary change also involves a boundary conflict, the applicant and other affected parties are expected to make every effort to resolve the conflict prior to submitting for the boundary change, per the position stated in Policy B, above.	Type: Clarification — Requires 'a written demonstration' (was 'plans that demonstrate') and assigns the NPDES-compliance demonstration duty explicitly to 'The DMA' rather than 'these plans.'
#10 Policy C – Review Scope	The AFPSC shall consider the following factors when reviewing ~~an~~ <u>all</u> applications for FPA boundary changes:	The AFPSC shall consider the following factors when reviewing all applications for FPA boundary changes:	Type: Clarification — Broadens review from 'an application' to 'all applications,' ensuring the listed factors apply to every FPA boundary-change request.
#11 Policy C – Evaluation Factors	~~The degree to which the proposed change enhances the quality, sustainability, and coordination of growth, development and conservation planning in the Region and;~~		Type: Substantive deletion — Removes an entire evaluation factor concerning growth, development, and conservation planning coordination from the list AFPSC considers.
#12 Policy C – New: Special Case Annexation-Related FPA Boundary Changes	<u>Special Case Annexation-Related FPA Boundary Changes</u> <u>Under particular circumstances, as described below, applications for an FPA boundary update arising from a completed annexation, may be approved by MVRPC staff following AFPSC review. Such special case annexation-related FPA updates will not be subject to TAC or Board of Directors review and approval.</u> <u>Requests for an FPA boundary change that meet all of the following criteria may be approved by MVRPC staff following AFPSC review:</u> <u>The annexation process related to the requested FPA boundary change request has been completed</u>	Special Case Annexation-Related FPA Boundary Changes Under particular circumstances, as described below, applications for an FPA boundary update arising from a completed annexation, may be approved by MVRPC staff following AFPSC review. Such special case annexation-related FPA updates will not be subject to TAC or Board of Directors review and approval. Requests for an FPA boundary change that meet all of the following criteria may be approved by MVRPC staff following AFPSC review: The annexation process related to the requested FPA boundary change request has been completed	Type: Substantive addition / authority delegation — Adds an entirely new mechanism letting MVRPC staff approve FPA boundary changes tied to a completed annexation (following AFPSC review) without TAC or Board review, when three narrow criteria are met.

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	<u>The FPA boundary change requests only the addition of parcels included in the related annexation</u> <u>The annexed parcels (and therefore the FPA update parcels) were previously not included in any other FPA</u> <u>MVRPC staff shall provide timely notice of such FPA updates to the Board of Directors.</u>	The FPA boundary change requests only the addition of parcels included in the related annexation The annexed parcels (and therefore the FPA update parcels) were previously not included in any other FPA MVRPC staff shall provide timely notice of such FPA updates to the Board of Directors.	
#13 Policy D – Categorization Requirement	The development of a Wastewater Treatment ~~Facility~~ Master Plan or Plan Update involves the identification of viable local wastewater management options or prescriptions. To accomplish this each FPA ~~shall~~ <u>may</u> be subdivided according to the type of wastewater treatment in existence, proposed, and/or predicted. The following categories generally occur:	The development of a Wastewater Treatment Master Plan or Plan Update involves the identification of viable local wastewater management options or prescriptions. To accomplish this each FPA may be subdivided according to the type of wastewater treatment in existence, proposed, and/or predicted. The following categories generally occur:	Type: Terminology + substantive — 'Facility Plan' → 'Wastewater Master Plan'; and 'each FPA shall be subdivided' → 'may be subdivided,' making Table 1 categorization discretionary rather than mandatory.
#14 Policy D – Category 6 Default Rule	The decision as to the classification of any given area is made by the Primary DMA in cooperation with any other affected jurisdictions, MVRPC, and the Ohio EPA. <u>In cases where the DMA does not expressly delineate category areas within their FPA, areas outside of the current service area will be considered category 6 by default.</u>	The decision as to the classification of any given area is made by the Primary DMA in cooperation with any other affected jurisdictions, MVRPC, and the Ohio EPA. In cases where the DMA does not expressly delineate category areas within their FPA, areas outside of the current service area will be considered category 6 by default.	Type: Substantive addition — Adds a default rule: areas outside the current service area that a DMA does not expressly categorize are automatically Category 6 (no wastewater management option declared).
#15 Policy D – Terminology/Wording	At present, DMAs develop sewerage plans that are optimized from an engineering standpoint within their FPA. While coordination with local jurisdictions regularly occurs when a ~~POTW~~ <u>WWTF</u> serves more than a single community, there is no provision in the existing AWQMP that would encourage engineering plans to be amended based upon the desire of a local government to manage growth within its jurisdiction. This policy update provides such a mechanism. Local governments are ~~being~~ encouraged to identify where they want central sewers and where they do not. The DMA in each FPA must consult with affected jurisdictions and take into account their input in cases that do not raise engineering or efficiency limitations.	At present, DMAs develop sewerage plans that are optimized from an engineering standpoint within their FPA. While coordination with local jurisdictions regularly occurs when a WWTF serves more than a single community, there is no provision in the existing AWQMP that would encourage engineering plans to be amended based upon the desire of a local government to manage growth within its jurisdiction. This policy update provides such a mechanism. Local governments are encouraged to identify where they want central sewers and where they do not. The DMA in each FPA must consult with affected jurisdictions and take into account their input in cases that do not raise engineering or efficiency limitations.	Type: Terminology / wording — 'POTW' → 'WWTF'; 'are being encouraged' → 'are encouraged.'
#16 Policy D – Regulatory Citation	In those areas where local officials want to restrict wastewater treatment to individual on-site systems, several conditions must be met. The county or municipal health departments responsible for	In those areas where local officials want to restrict wastewater treatment to individual on-site systems, several conditions must be met. The county or municipal health departments responsible for	Type: Regulatory citation update — Updates the cited on-site

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	managing on-site systems must authorize their use in the area under discussion. The provisions of ORC 6111 and ~~OAC 3701-29-02 (L) and (M)~~ <u>OAC 3701-29-06 (I)</u> that require connection to sanitary sewers when they become available must be complied with. The designation of an area as “onsite systems only,” or Category 4 from Table 1, applies as long as Ohio EPA does not mandate sewers under ORC 6117.34 if a water quality problem is demonstrated.	managing on-site systems must authorize their use in the area under discussion. The provisions of ORC 6111 and OAC 3701-29-06 (I) that require connection to sanitary sewers when they become available must be complied with. The designation of an area as “onsite systems only,” or Category 4 from Table 1, applies as long as Ohio EPA does not mandate sewers under ORC 6117.34 if a water quality problem is demonstrated.	<i>system connection requirement from OAC 3701-29-02(L)/(M) to OAC 3701-29-06(I) — confirm this is the currently correct citation.</i>
#17 Policy D – On-Site Regulatory Framework	Policies of local health departments, which have legal responsibility and authority to influence <u>on-site</u> wastewater treatment, continue to be recognized under this policy. Ohio EPA and the Ohio Department of Health (ODH) coordinate on regulation of on-site wastewater treatment. Ohio Revised Code chapter 3718 and Ohio Administrative Code chapter 3701-29 govern regulation of home sewage treatment systems. ODH establishes statewide standards and local boards of health issue permits and conduct inspections. Local boards may set stricter standards than statewide minimums. ~~ODH are working in consultation with USEPA to develop a NDPES permitting policy that will apply to individual on-site wastewater treatment systems that have an off lot discharge. The AWQMP will incorporate the policy arrived at by this negotiation as soon as it is agreed to by Ohio EPA.~~	Policies of local health departments, which have legal responsibility and authority to influence on-site wastewater treatment, continue to be recognized under this policy. Ohio EPA and the Ohio Department of Health (ODH) coordinate on regulation of on-site wastewater treatment. Ohio Revised Code chapter 3718 and Ohio Administrative Code chapter 3701-29 govern regulation of home sewage treatment systems. ODH establishes statewide standards and local boards of health issue permits and conduct inspections. Local boards may set stricter standards than statewide minimums.	Type: Substantive update — <i>Replaces outdated language about a permitting policy 'being negotiated' between ODH and USEPA with a current description of the ODH/Ohio EPA regulatory framework (ORC 3718, OAC 3701-29).</i>
#18 Policy D – Local Plans Terminology	Local ~~community~~ <u>wastewater master</u> plans may remain flexible to the extent desired by the community. These plans serve to guide the wastewater management decisions of local landowners. It is recognized that all documented wastewater-related water quality problems that exist now or that develop in the future must be remediated in a timely manner by the best means available. Where wastewater-related problems do not exist, local jurisdictions can decide if they prefer to protect water quality by utilizing individual on-site systems or centralized sanitary sewers. By identifying the areas that have no plans for sewer extensions in the next 20 years in a Facility Plan, jurisdictions notify all landowners of the need for them to plan for the installation and maintenance of on-site systems. In areas where sanitary sewers are likely to be extended, repair and maintenance of problematic on-site systems may be warranted instead of total system replacement. In all cases, landowners are provided notice by this Facility Planning Policy to consult with local government officials before proceeding with their wastewater plans.	Local wastewater master plans may remain flexible to the extent desired by the community. These plans serve to guide the wastewater management decisions of local landowners. It is recognized that all documented wastewater-related water quality problems that exist now or that develop in the future must be remediated in a timely manner by the best means available. Where wastewater-related problems do not exist, local jurisdictions can decide if they prefer to protect water quality by utilizing individual on-site systems or centralized sanitary sewers. By identifying the areas that have no plans for sewer extensions in the next 20 years in a Facility Plan, jurisdictions notify all landowners of the need for them to plan for the installation and maintenance of on-site systems. In areas where sanitary sewers are likely to be extended, repair and maintenance of problematic on-site systems may be warranted instead of total system replacement. In all cases, landowners are provided notice by this Facility Planning Policy to consult with local government officials before proceeding with their wastewater plans.	Type: Terminology — <i>'Local community plans' → 'Local wastewater master plans.'</i>

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#19 Policy E – Introduction	Planning for future wastewater treatment needs is an inexact science. Assumptions are made relative to the size and extent of population growth. During the engineering phase of some projects, obstacles sometimes arise that render previously preferred alternatives impractical. With time, local conditions can change, resulting in modifications to previously preferred alternatives. Additions to existing treatment works or new treatment works continue to be proposed to meet growth demands <u>and evolving NPDES permit requirements</u> . ~~Planning changes that resulted from these factors were accommodated in the Plan by the development of a consistency review procedure.~~	Planning for future wastewater treatment needs is an inexact science. Assumptions are made relative to the size and extent of population growth. During the engineering phase of some projects, obstacles sometimes arise that render previously preferred alternatives impractical. With time, local conditions can change, resulting in modifications to previously preferred alternatives. Additions to existing treatment works or new treatment works continue to be proposed to meet growth demands and evolving NPDES permit requirements.	Type: Wording + deletion — Adds 'evolving NPDES permit requirements' as a driver of treatment-works additions; deletes a sentence explaining the historical origin of the consistency-review procedure.
#20 Policy E – Reasons for Master Plan Updates	~~Changes~~ <u>Updates to Wastewater Master Plans</u> may be ~~requested~~ <u>needed</u> for a variety <u>(or a combination)</u> of reasons, including an increase in discharge, new discharges, <u>new discharge limits</u> , upgrades in treatment processes, the extension of sewer lines to previously unsewered areas, or the installation of pump stations. ~~As the Areawide Planning Agency, MVRPC is responsible for evaluating applications to ensure that they are consistent with the AWQMP.~~	Updates to Wastewater Master Plans may be needed for a variety (or a combination) of reasons, including an increase in discharge, new discharges, new discharge limits, upgrades in treatment processes, the extension of sewer lines to previously unsewered areas, or the installation of pump stations.	Type: Wording + deletion — Wording refresh ('Changes'→'Updates,' etc.); deletes the sentence stating MVRPC is 'responsible for evaluating applications to ensure consistency with the AWQMP.'
#21 Policy E – Consistency Review Requirement	All proposed <u>wastewater master</u> plan changes shall be ~~reviewed for consistency~~ <u>developed in a manner consistent</u> with AWQMP for two reasons: 1) the financial arrangements for the development of treatment works must be based on a sound estimate of future <u>service</u> requirements and <u>projections of financial resources</u> ~~service~~ ; and 2) The AWQMP requires planning for wastewater treatment capacity to meet only actual and anticipated treatment needs. These financial and planning issues are important concerns, thus AWQMP Consistency Reviews shall be ~~required~~ <u>available</u> for any project proposed by an Areawide DMA.	All proposed wastewater master plan changes shall be developed in a manner consistent with AWQMP for two reasons: 1) the financial arrangements for the development of treatment works must be based on a sound estimate of future service requirements and projections of financial resources ; and 2) The AWQMP requires planning for wastewater treatment capacity to meet only actual and anticipated treatment needs. These financial and planning issues are important concerns, thus AWQMP Consistency Reviews shall be available for any project proposed by an Areawide DMA.	Type: Substantive change in obligation — Changes 'AWQMP Consistency Reviews shall be required' to 'shall be available' for any DMA project — a shift from a mandatory review to an optional/available service. Also reorders financial-basis language.
#22 Policy E – Added Clarifying Sentence	<u>Specifically, a consistency review will look at proposed updates related to geography and population.</u> Under the AWQMP, any action proposed by a DMA shall be deemed consistent with the Plan as long as it:	Specifically, a consistency review will look at proposed updates related to geography and population. Under the AWQMP, any action proposed by a DMA shall be deemed consistent with the Plan as long as it:	Type: Clarification — Adds a sentence specifying that consistency review looks at proposed updates related to geography and population.
#23 Policy E – Consistency Factors List	(1) ~~Meets Ohio EPA's regulatory and technical requirements~~ , (2) Consists solely of actions that are within the existing FPA boundary, and	(1) (2) Consists solely of actions that are within the existing FPA boundary, and	Type: Substantive deletion — Deletes factor (1), 'Meets Ohio EPA's regulatory and

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	~~(3)~~ Conforms to accepted regional population projections (see Policy F).	Conforms to accepted regional population projections (see Policy F).	<i>technical requirements,' narrowing the consistency test from three factors to two (FPA boundary + population projections).</i>
#24 Policy E – New: Permits to Install	<u>Permits to Install</u> <u>On a regular basis Ohio EPA shares information from applications for surface water permits to install (PTI) received for the five counties within MVRPC's areawide designation. The PTIs can be for extensions of sanitary sewers or for installation (in certain cases) of on-site treatment systems.</u> <u>As a service to Ohio EPA permit review staff, MVRPC conducts a basic consistency review of PTI applications. These consistency reviews are strictly geographic reviews to ensure: (1) a proposed sanitary sewer project is within the existing Facility Planning Area for the wastewater treatment facility proposed to receive flows, or, (2) a proposed on-site treatment system project is not within a facility planning area or is in a portion of an FPA area for which the DMA has determined on-site treatment is the preferred treatment approach.</u> <u>Data regarding PTI reviews are saved in GIS format, and can be made available to the AFPSC on a regular basis or as needed.</u>	Permits to Install On a regular basis Ohio EPA shares information from applications for surface water permits to install (PTI) received for the five counties within MVRPC's areawide designation. The PTIs can be for extensions of sanitary sewers or for installation (in certain cases) of on-site treatment systems. As a service to Ohio EPA permit review staff, MVRPC conducts a basic consistency review of PTI applications. These consistency reviews are strictly geographic reviews to ensure: (1) a proposed sanitary sewer project is within the existing Facility Planning Area for the wastewater treatment facility proposed to receive flows, or, (2) a proposed on-site treatment system project is not within a facility planning area or is in a portion of an FPA area for which the DMA has determined on-site treatment is the preferred treatment approach. Data regarding PTI reviews are saved in GIS format, and can be made available to the AFPSC on a regular basis or as needed.	Type: Substantive addition — <i>Adds an entirely new subsection formalizing MVRPC's geographic consistency review of Ohio EPA Permit-to-Install (PTI) applications, a service not previously described in the policy.</i>
#25 Policy F – Population Projections / Census Basis	As time has passed, the population projections used in the original 1983 AWQMP have become outdated. MVRPC's original AWQMP and the Facility Plans it references were based upon population projections from the 1980 census. Facility Plan Updates and Facility Planning Area modifications since that time have been based on the most current census data available. MVRPC currently utilizes population projections based on the ~~2000-2010~~ census for all of its <u>water quality</u> planning purposes. <u>MVRPC will maintain FPA-scale and Census geography-scale population projections for the use of Designated Management Agencies in development of wastewater master plans, FPA updates, and even PTI application development, if desired.</u>	As time has passed, the population projections used in the original 1983 AWQMP have become outdated. MVRPC's original AWQMP and the Facility Plans it references were based upon population projections from the 1980 census. Facility Plan Updates and Facility Planning Area modifications since that time have been based on the most current census data available. MVRPC currently utilizes population projections based on the 2010 census for all of its water quality planning purposes. MVRPC will maintain FPA-scale and Census geography-scale population projections for the use of Designated Management Agencies in development of wastewater master plans, FPA updates, and even PTI application development, if desired.	Type: Data update + substantive addition — <i>Updates census basis from 2000 to 2010 (verify this is still current before adoption); adds 'water quality' before 'planning purposes'; adds a new commitment for MVRPC to maintain FPA-scale and Census-geography-scale population projections for DMA use.</i>
#26 Policy F – Wording	The Ohio Department of Development prepares the official population projections for the State of Ohio. They allocate projections to the county level. MVRPC further disaggregates the State's county-level projections into traffic analysis zones (TAZ) for its transportation planning counties (Greene, Miami, and Montgomery). This is accomplished based on an evaluation of	The Ohio Department of Development prepares the official population projections for the State of Ohio. They allocate projections to the county level. MVRPC further disaggregates the State's county-level projections into traffic analysis zones (TAZ) for its transportation planning counties (Greene, Miami, and Montgomery). This is accomplished based on an evaluation of	Type: Wording — <i>Adds a hyphen ('county-level'); no substantive change.</i>

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	available land for development, combined with local zoning requirements. Additional inputs are used as appropriate. The most recent TAZ population projections produced by MVRPC, are the ones to be used for consistency reviews. MVRPC staff will assist jurisdictions seeking the current population projections for the TAZs corresponding to their Facility Planning Areas.	available land for development, combined with local zoning requirements. Additional inputs are used as appropriate. The most recent TAZ population projections produced by MVRPC, are the ones to be used for consistency reviews. MVRPC staff will assist jurisdictions seeking the current population projections for the TAZs corresponding to their Facility Planning Areas.	
#27 Policy F – New: Utilization of Alternative Population Projections	<u>Utilization of Alternative Population Projections</u> <u>Designated Management Agencies may provide alternative population projections for use in master planning or PTI applications, with justification/explanation for their use.</u> <u>MVRPC staff</u> ~~AFPSC~~ shall review all Facility Planning applicants' <u>alternative</u> population projections for consistency with the MVRPC population projections. If an applicant's projections are not consistent, <u>the applicant's justification/explanation for why the alternative should be used over the regional projection will be reviewed. Staff, if necessary in consultation with the AFPSC, will determine if the alternative projections may be used in the subject case. will be notified of the discrepancy and of the need to justify and/or rectify the projections.</u>	Utilization of Alternative Population Projections Designated Management Agencies may provide alternative population projections for use in master planning or PTI applications, with justification/explanation for their use. MVRPC staff shall review all Facility Planning applicants' alternative population projections for consistency with the MVRPC population projections. If an applicant's projections are not consistent, the applicant's justification/explanation for why the alternative should be used over the regional projection will be reviewed. Staff, if necessary in consultation with the AFPSC, will determine if the alternative projections may be used in the subject case.	Type: Substantive addition / authority shift — Adds a new subsection allowing DMAs to submit alternative population projections. Review responsibility shifts from AFPSC to MVRPC staff (consulting AFPSC only 'if necessary'), and the outcome changes from applicant notification of a discrepancy to a staff determination on whether the alternative projections may be used.
#28 Policy G – Wording	The applicant is expected to make every effort to arrive at a solution acceptable to all parties. However, upon request, MVRPC's ongoing Facility Planning process will provide for a meeting with all affected parties in an attempt to ~~effect~~ <u>develop</u> a consensus agreement. When consensus cannot be reached, the MVRPC Areawide Facility Planning Subcommittee and Technical Advisory Committee will hear all viewpoints, and offer input to a staff recommendation that will be considered by the MVRPC Board of Directors.	The applicant is expected to make every effort to arrive at a solution acceptable to all parties. However, upon request, MVRPC's ongoing Facility Planning process will provide for a meeting with all affected parties in an attempt to develop a consensus agreement. When consensus cannot be reached, the MVRPC Areawide Facility Planning Subcommittee and Technical Advisory Committee will hear all viewpoints, and offer input to a staff recommendation that will be considered by the MVRPC Board of Directors.	Type: Wording — 'Effect' → 'develop' a consensus agreement; no substantive change.
#29 Policy H – DMA Application Requirements	All entities that are not designated as a DMA must apply for such status before their permit application can be processed. To become a DMA designee, the applicant must have adequate legal authority under Ohio law <u>to serve as a DMA. and Applicants must</u> clearly identify the geographical extent of its proposed facility planning area and the wastewater treatment options to be selected for the area <u>within a wastewater master plan</u> . It must also demonstrate that all affected local governments have been consulted in the development of the project. Evidence of support from all affected jurisdictions (municipalities in incorporated areas and county government in unincorporated areas) must be secured. Any FPA infringements must be resolved either with the approval of the	All entities that are not designated as a DMA must apply for such status before their permit application can be processed. To become a DMA designee, the applicant must have adequate legal authority under Ohio law to serve as a DMA. Applicants must clearly identify the geographical extent of its proposed facility planning area and the wastewater treatment options to be selected for the area within a wastewater master plan. It must also demonstrate that all affected local governments have been consulted in the development of the project. Evidence of support from all affected jurisdictions (municipalities in incorporated areas and county government in unincorporated areas) must be secured. Any FPA infringements must be resolved either with the approval of the	Type: Clarification — Restructures sentence; adds requirement that the applicant's proposed FPA and treatment options be identified 'within a wastewater master plan.'

Location	Current Language (Redline)	Proposed Language (Clean)	Type / Notes
	affected DMA or by appeal to the MVRPC Board. The applicant may propose an area for designation as an FPA that is larger than the current or proposed project service area. This can be done where it makes sense for purposes of future sewer planning.	affected DMA or by appeal to the MVRPC Board. The applicant may propose an area for designation as an FPA that is larger than the current or proposed project service area. This can be done where it makes sense for purposes of future sewer planning.	
#30 Recommendation A	Recommendation A: The content and recommendations found in local and regional land use plans and comprehensive plans should be incorporated into the development of individual Wastewater Treatment Facility Plans and the AWQMP. <u>As broader community plans are updated, it is recommended that wastewater master plans also be updated to reflect community priorities.</u> The effectiveness of the AWQMP will be enhanced to the extent that it is consistent with these locally approved documents.	Recommendation A: The content and recommendations found in local and regional land use plans and comprehensive plans should be incorporated into the development of individual Wastewater Treatment Facility Plans and the AWQMP. As broader community plans are updated, it is recommended that wastewater master plans also be updated to reflect community priorities. The effectiveness of the AWQMP will be enhanced to the extent that it is consistent with these locally approved documents.	Type: Substantive addition (minor) — <i>Adds encouragement to update wastewater master plans in step with updates to community/land-use plans.</i>
#31 Recommendation B	Recommendation B: Local jurisdictions should consider the use of the Joint Economic Development District (JEDD) approach or the Community Economic Development Agreement (CEDA) approach to address conflicting interests in the process of wastewater treatment infrastructure. Numerous cases exist in the Region where a municipality owns and operates a POTW whose FPA includes portions of surrounding townships. Some of these communities have a policy of extending sewer service only to areas that are annexed into the community. This is required because the municipalities have used their tax base to support the construction, operation, and maintenance of their sewer infrastructure and are attempting to ~~insure~~ <u>ensure</u> all beneficiaries pay a fair share of these costs. Annexation is the tool that they choose to use to accomplish this, but compulsory annexations in order to receive sanitary sewer service are often strongly contested.	Recommendation B: Local jurisdictions should consider the use of the Joint Economic Development District (JEDD) approach or the Community Economic Development Agreement (CEDA) approach to address conflicting interests in the process of wastewater treatment infrastructure. Numerous cases exist in the Region where a municipality owns and operates a POTW whose FPA includes portions of surrounding townships. Some of these communities have a policy of extending sewer service only to areas that are annexed into the community. This is required because the municipalities have used their tax base to support the construction, operation, and maintenance of their sewer infrastructure and are attempting to ensure all beneficiaries pay a fair share of these costs. Annexation is the tool that they choose to use to accomplish this, but compulsory annexations in order to receive sanitary sewer service are often strongly contested.	Type: Typo fix — <i>'Insure' → 'ensure.'</i>