



MEMORANDUM

March 24, 2023

From: MVRPC Staff

To: MVRPC Areawide Facility Planning Subcommittee

Subject: FPA Boundary Adjustment Request from the City of Piqua – Completeness Review

On March 9, 2023 MVRPC staff received a request from the City of Piqua to enlarge the city's Facility Planning Area (FPA) prompted by a recent annexation on the south side of the city. After a preliminary review, staff asked Piqua for additional narrative or information regarding any public engagement conducted by the City regarding the annexation, or the FPA update, the City's Ohio EPA-approved industrial Pre-Treatment Program, and letter of concurrence or support from neighboring Designated Management Agencies or jurisdictions. Additional materials were received on March 16, 2023 and March 23, 2023. This completeness review uses all submissions to assess whether all elements of a FPA boundary update request, as specified in the MVRPC FPA Update Guidelines have been met.

Element A – Mapping. The city of Piqua did provide a GIS geodatabase with all required mapping elements. The area to be added to the Piqua FPA was adjusted through March as a result of discussions with City of Troy. Based on the narrative provided all areas proposed to be added to the Piqua FPA would fall under sub-area category 2: Areas expected to be served by sanitary sewers connected to an existing POTW in the next 20 years.

Element B – Twenty Year Population Projections. The City of Piqua did apply population projections consistent with MVRPC's population projections as developed for the transportation planning program. Within the narrative these projections were used to estimate additional flows from the city as a whole. The annexed properties have been zoned heavy industrial and do not expect to see residential development.

Element C – Description of Existing and Proposed Wastewater Treatment Options for the new FPA area. Based on the narrative, all portions of the proposed FPA addition fall under sub-area category 2: Areas expected to be served by sanitary sewers connected to an existing POTW in the next 20 years. The Piqua POTW is located at 121 Bridge Street in Piqua.

Element D - Description of plans to provide wastewater treatment to any proposed FPA additions and verification of capability to do so. In the narrative submission Piqua listed the POTW capacity and current utilization. As the newly annexed property is zoned for heavy industry, Piqua provided a report regarding an update to the City's Ohio EPA-approved industrial Pre-Treatment Program. These items demonstrate the technical and physical capacity to treat the expected flows from the new areas within the proposed FPA.



Element E - Table(s) showing current plant permit limits, existing plant capacities, and projected plant capacities. In lieu of tables, the City narratively provides information on the current capacity and utilization of the Piqua POTW. Through 2021 and 2022 the plant averaged 3.88 MGD, or less than half the rated capacity of the plant. No capacity increases for the POTW are planned at this time, having recently expanded the plant to 8.7 MGD in 2018.

Element F - Discussion of how the proposed wastewater treatment options (current and projected treatment type, capacity, coverage, etc.) will meet the needs of the projected population and/or additional population to be served by an FPA boundary modification. The City's narrative indicates expected development in the newly annexed property will occur over the next 5-10 years and will be industrial development. No new residential development is planned for this location. The existing POTW has the physical capacity to handle expected city-wide population growth plus the expected flows from the new development. The City's Ohio EPA-approved industrial Pre-Treatment Program has the technical capacity to characterize and manage flows from industrial customers.

Element G - Discussion of how the prescribed wastewater treatment options will be protective of pertinent critical water resources. The City's narrative indicates expected development in the newly annexed property will occur over the next 5-10 years and will be industrial development. No new residential development is planned for this location. The existing POTW has the physical capacity to handle expected city-wide population growth plus the expected flows from the new development. The City's Ohio EPA-approved industrial Pre-Treatment Program has the technical capacity to characterize and manage flows from industrial customers. The City fully expects to maintain compliance with the NPDES permit for the POTW. The City also committed to avoiding negative impacts to any wetlands within the proposed development area.

Element H - Discussion of how any proposed changes in the FPA boundaries and associated wastewater treatment options agree or conflict with the plans (zoning codes, comprehensive land use plans, watershed plans, etc.) of contiguous FPAs and potentially impacted jurisdictions. The proposed boundary includes newly annexed property to the City of Piqua, and wastewater treatment prescriptions align with the City's Heavy Industrial zoning for the location. The proposal does not alter the FPA for Covington. Discussions with the City of Troy through the month of March resulted in adjustment to the proposed Piqua FPA area, with which City of Troy concurs.

Element I - Documentation of any public participation involved in updating the FP and/or FPA along with endorsements from any other sewer districts, FPAs, and/or jurisdictions located within and/or adjacent to the Facility Planning Area. Piqua has not provided documentation of public engagement, or of concurrence of neighboring jurisdictions. On or after March 17, 2023 MVRPC forwarded information regarding this request to Washington Township, City of Troy, Village of Covington and the Miami County Sanitary Engineer seeking replies indicating a position on this proposal. Communication from City of Troy indicates concurrence with the FPA



MIAMI VALLEY

Regional Planning Commission

10 North Ludlow St., Suite 700
Dayton, Ohio 45402

t: 937.223.6323
f: 937.223.9750
TTY/TDD: 800.750.0750
www.mvrpc.org

boundary as developed on March 23. MVRPC is still seeking written documentation of this concurrence.

CONCLUSION

The narrative submission largely meets the technical intent of the FPA Update Guidelines. It describes the intended future land use for the additional FPA area as well as the city's technical and physical capacity to manage wastewater flows and loadings expected from the new development. The submission, however, lacks documentation of public engagement or inter-governmental coordination regarding this proposed plan update. MVRPC staff has requested review and comment from Piqua's neighboring jurisdictions to contribute to deliberations on this request. Of particular interest will be written confirmation of City of Troy, as the Troy FPA is modified by this proposal.

Pending the content of responses from impacted jurisdictions, this proposed update may or may not be ready for consideration by the MVRPC Board of Directors.