

Licking County Board of Commissioners

Albert O. Ashbrook
Jay N. Baird
Marcia J. Phelps



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The Donald D. Hill County Administration Building

Cheryl Roberto, Policy Advisor
Office of the Mayor
City of Columbus
90 West Broad Street
Columbus, Ohio 43215

Dear Ms. Roberto:

Thank you for meeting with us on September 28, 2000, concerning the Columbus Metropolitan Sewage Facilities Plan. As you requested, this letter is in response to the proposed Columbus Plan.

Regional facilities planning is a sensitive issue that is important to everyone. After reviewing all of the material provided, the Licking County Commissioners oppose the Columbus Metropolitan Facilities Plan.

Licking County's objections to the Columbus Plan are summarized as follows:

- The Columbus Plan's Facility Planning Area extends into incorporated and unincorporated areas of Licking County that are included in two sewer districts and currently have sewer service. (City of Pataskala, Southwest Licking Water and Sewer District, and Licking Sewer District # 2)
- The Columbus Plan limits flows to existing sewer facilities so that flows may not be increased.
- The Columbus Plan does not recognize Licking County's responsibility for wastewater treatment services and land use planning and development.
- The Columbus Plan prohibits alternative wastewater systems within the Facilities Planning Area.

Columbus Metropolitan Sewage Facility Plan

- The Columbus Plan forces annexation as a condition for sewer service.
- You have requested your Facilities Plan be incorporated in to the Ohio EPA's 208 Area-Wide Waste Treatment Management Plan.

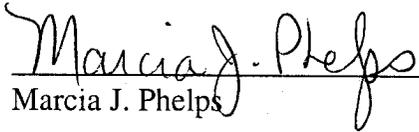
Should you have any questions, please call us at 740-349-6066.

Sincerely,

Licking County Commissioners



Albert O. Ashbrook, President



Marcia J. Phelps



Jay N. Baird



Kenneth E. Salsberry, Jr., Director
Water / Wastewater

CC: Mayor Bruce Baird, City of Pataskala
John Stiltner, Southwest Licking Water and Sewer District
Christopher Jones, Director of Environmental Protection Agency
Brent Shenk, Ass't. Prosecutor

Commissioners
Robert H. Huffer
Ruth E. Neff
John A. Stevenson

Clerk
Patricia Webb
Telephone: 740/474-6093
Fax: 740/474-8988

Pickaway County
Board of County Commissioners
139 West Franklin Street
Circleville, OH 43113

September 25, 2000

Cheryl Roberto, Policy Advisor
Office of the Mayor
City of Columbus
90 W. Broad Street
Columbus, Ohio 43215

Re: Columbus Metropolitan Facilities Update

Dear Ms. Roberto:

This letter serves as Pickaway County's response to the Columbus Metropolitan Facilities Plan Update. The Columbus Facilities Plan update is being submitted to Ohio EPA for incorporation into the 208 Areawide Waste Treatment Management Plan.

The proposed update will have a major impact on land use and wastewater treatment in Central Ohio for many years to come. Therefore, the Pickaway County Commissioners wish to participate in any further development of your plant update and will actively participate with Ohio EPA in development wastewater management plans for watershed affecting Pickaway County.

A summary of the major concerns of Pickaway County to the City's plans are described below:

- 1. The Columbus Plan fails to recognize the wastewater plans of Pickaway County.**
As you are aware, Pickaway County recently completed a wastewater study of Scioto and Darby Townships and has developed a publicly supported affordable plan to provide wastewater service for northwestern Pickaway County. The study considered tying wastewater in Pickaway County into the Columbus sewer system but we decided against that alternative considering that the costs of tying into Columbus was nearly twice the cost of building and operating our own regional waster system.
- 2. Pickaway County objects to Columbus moving it's facility planning boundary into northern Pickaway County.**
Pickaway County is working with all of the northern Pickaway County townships To develop land use plans. As noted above, the County has developed a waste-water plan to serve the northern townships west of the Scioto River. In addition,

Commercial Point recently constructed a sewer line to provide wastewater service to the northern portion of Scioto Township and is currently designing an expansion to their wastewater treatment plant to handle the growth in this area. Finally, a study is underway to evaluate needs and provide wastewater service to portions of Harrison Townships as well. An addendum to the Study for Darby and Scioto Townships contained preliminary investigations relative to sewer service to these northeastern townships.

Clearly, Pickaway County is actively working to provide wastewater treatment service to its residents. The Pickaway County Commissioners also wish to leave open the option of contracting for services with the City of Columbus, if such connection can occur in the manner that is mutually agreeable to the City of Columbus and the Pickaway County Commissioners wish to leave open the option of contracting for services with the City of Columbus, if such connection can occur in the manner that is mutually agreeable to the City of Columbus and the Pickaway County Commissioners.

The information received contains:

- no information on Columbus' existing sewage system, its conditions, capabilities and needs,
- no population and development projects, other than an assumed population density of 2020 for some areas, as determined by the work group
- no water quality information or assessment of the impacts on the watersheds,
- no wasteload allocation or Total Maximum Daily Load for the impacted waterways,

no priorities or time frames for providing services to the unsewered areas. Without this information, Pickaway County can not properly comment on the Columbus plan and therefore objects to any enlargement of the Facility Planning Area until such time as this analysis is completed.

4. **The Facility Plan update fails to address critical wet weather issues impacting the watershed including elimination of sanitary system overflows, and developing a comprehensive storm water management plant for the area.**

These wet weather issues are critically linked to wastewater treatment plans and availability of the Columbus sewer system to transport and treat existing and planned wastewater flow.

5. **The Columbus Plan improperly assumes that water quality within the watershed will be best if all wastewater is collected and treatment at one of the Columbus's two treatment plants on the Scioto River.**

This assumption fails to consider the impact on the major tributaries of removing all treated wastewater and discharging only to the Scioto River. The Columbus Plan will reduce flows within the tributaries and may exceed the assimilative capacity of the Scioto. Also, it is generally recognized that a watershed can assimilate more pollutants if the sources are spread out rather than if the sources are concentrated at one or two locations. Until Ohio EPA completes a TMDL for the Scioto and its major tributaries in Central Ohio and the water quality impacts are fully understood, the Columbus Plan should not be adopted.

6. **The Facility plan does not specifically state it, but it appears that the plan continues the City's policy of conditioning sewer service upon forced annexation as a precondition for sewer service.**
7. **The Pickaway County Commissioner opposes the strategy to prohibit all alternative wastewater treatment systems within the Facility Planning Area.**

The Pickaway County Commissioners agree that the planned transport of wastewater to centralized treatment systems is preferable, but prohibiting the evaluation of other alternatives to determine if they are cost effective and environmentally sound is presumptuous.

The strategy to prohibit alternative systems directly conflicts with Section 208 of the Clean Water Act, which requires that alternative systems be fully reviewed. It also conflicts with Ohio EPA's policy to consider such technologies under the anti-degradation rule, as well as the authority of the Director of the Ohio EPA to consider and permit alternative waste treatment systems under Chapter 6111 of the Ohio Revised Code.

The Columbus Plan overstates the potential for environmental impacts from such facilities. If designed, operated and maintained properly, these systems can and do provide safe, beneficial treatment. The key here is ensuring that there is a reliable entity to manage and maintain the systems. We do feel that Ohio EPA should include a permit term or condition to satisfy the need, similar to that proposed by the City of Columbus for treatment systems involving aeration for development Outside of Sewer Contract Areas.

Finally, treatment systems comprised of collector sewer tied to a package plant or alternative treatment facility should be allowed as an interim measure rather than individual septic systems. It is much easier and less costly to hook these systems up to a centralized system when it becomes available than it is to install collector sewer where individual septic systems have been installed and failed. Collector sewers are generally the most expensive system component to install when centralized sewer systems become available. Therefore, installing collector sewer and an "interim" treatment system when homes are first built can be a preferable alternative to installing individual systems. An OEPA Permit Condition should be included with

such systems that require the abandonment of the interim treatment facilities when the centralized sewers are extended to the area.

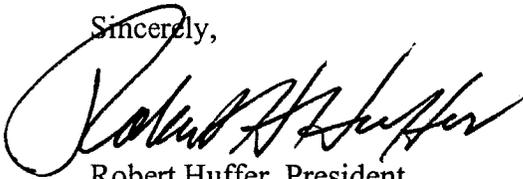
8. The Pickaway County Commissioners requests clarification of the language contained in the proposed strategy for wastewater treatment systems outside of the City's Sewer Contract Areas.

Limiting sewage treatment for a proposed commercial and institutional development to under 1500 gpd appears unnecessarily restrictive. Strategy Number 7 is also unclear as to whether residential development must also rely solely on site wastewater treatment systems. Considering our earlier comments, sanitary sewers and alternative or package treatment plants should not be excluded as an option.

Regional facility planning is critically important to the future of Central Ohio. The Pickaway County Commissioners oppose the Columbus Metropolitan Facilities Plan Update for the above cited reasons but are willing to assist in developing a mutually acceptable consensus that will promote sound wastewater planning as well as proper development planning in our region. The Pickaway County Commissioners request that the City and the Ohio EPA cooperate in a regional planning process under Section 208. The Pickaway County Commissioners are willing to participate in a meaningful dialogue to achieve a plan that will fully and fairly serve our region through the year 2020.

If you have any questions or wish to discuss our comments further, please feel free to contact me at 740-474-6093.

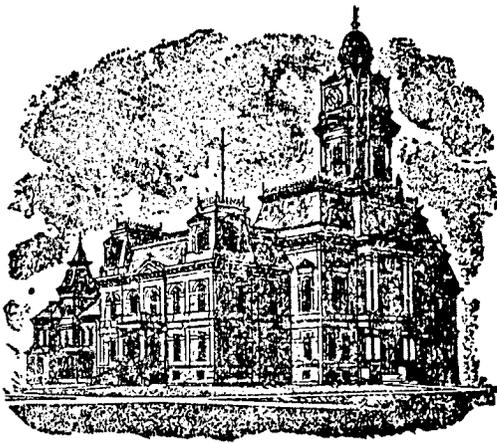
Sincerely,



Robert Huffer, President

BOARD OF PICKAWAY COUNTY COMMISSIONERS

CC: Christopher Jones, Director Environmental Protection Agency
William McCarthy, Central District Office, Ohio EPA



ERECTED 1890

Madison County Commissioners

P.O. Box 618

Courthouse, London, Ohio 43140

Phone (740) 852-2972

September 25, 2000

BOARD

HERBERT C. MARKLEY, Chairman
JOE D. YODER
DAVID DHUME
REGINA BOGENRIFE, Clerk

Cheryl Roberto, Policy Advisor
Office of the Mayor
City of Columbus
90 West Broad Street
Columbus, OH 43215

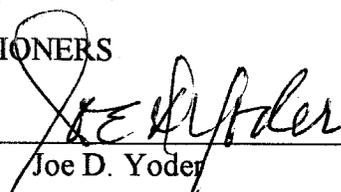
Dear Ms. Roberto:

We have reviewed your proposed draft of your Facilities Plan Update which adds the entire Big Darby drainage area in Madison County into your facility service area. In the draft you address some issues that concern us and impact us greatly. We are currently reviewing these issues internally and are withholding further comment at this time.

We would appreciate it if you would please continue to update us on your plan and any changes as they occur.

Sincerely,
MADISON COUNTY COMMISSIONERS


Herbert C. Markley

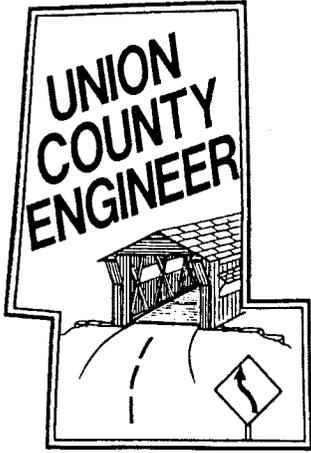

Joe D. Yoder


David Dhume

Cc: Ohio EPA
Franklin County Commissioners
Mayor of West Jefferson
Mayor Village of Mt. Sterling

Neil Babb - Madison County Engineer
Mayor of Plain City
Mayor of London
Mayor of South Solon

Jefferson Township
Darby Township
Canaan Township



STEVE A. STOLTE, PE/PS

**COUNTY ENGINEER
ENVIRONMENTAL ENGINEER**

County Office Building
233 W. Sixth Street
Marysville, Ohio 43040

(937)645-3018
*(800)258-8278
*(inside Union County)

Fax (937)645-3161

OFFICE HOURS
7:30 a.m. ~ 5:00 p.m.

**MARYSVILLE
MAINTENANCE GARAGE**
16400 County Home Road
Marysville, Ohio 43040

RICHWOOD OUTPOST
190 Beatty Avenue
Richwood, Ohio 43344

JEFFREY A. STAUCH, PE/PS
Assistant County Engineer

MARY A. SAMPSEL, PE
Ass't. Environmental Engineer

October 11, 2000

RECEIVED
PUBLIC UTILITIES
DIRECTOR'S OFFICE

00 OCT 16 PM 12:33

John Doult
Director of Utilities
Office of the Mayor
City of Columbus
90 West Broad St.
Columbus OH 43215

RE: Facilities Plan Update

Dear John:

We have reviewed the summary document that appears on the city's web site and offer the following comments.

1. We appreciate your explanations of the plan and the process at the Village of Plain City offices on September 8th and at the meeting with Steve Stolte and Mary Sampsel on September 20th. We were disappointed, however, that we were not contacted earlier since part of your Facilities Planning Area is within Union County.
2. We disagree with your assertions in Section II. Alternative Wastewater Systems on page 2 under Strategies for Wastewater Service. We believe that Household Sewage Disposal Systems represent a greater threat to drinking water than alternative wastewater systems. We further believe that community wastewater systems which discharge to the waters of the state represent as great a threat to drinking water as do community alternative wastewater systems. In your Facilities Plan, do not preclude the use of Alternative Wastewater Systems in Union County.
3. Under section III. Centralized Wastewater Treatment, please add a paragraph D. Union County Area. Please word the paragraph as follows:
 - D. Union County Area
The unincorporated areas of Union County are currently served by individual sewage disposal systems or public sanitary sewers owned by the Union County Sewer District. Wastewater collected in the Union County public sanitary sewers is currently conveyed to the City of Marysville for treatment and discharge to Mill Creek. Such service shall continue until such time as Union County selects a different

**COUNTY
ENGINEER**

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**BUILDING
REGULATIONS**

means for treating its wastewater. If Union County desires to convey its wastewater to the City of Columbus for treatment, such conveyance and treatment shall occur in a manner that is mutually agreeable to the City of Columbus and Union County.

Existing (developed) commercial, industrial, institutional and residential properties within the area, shall be required to connect the Union County Sewer District sanitary sewer system when and if the system is extended to within 200 feet of the serviced structure. Such existing (developed) properties may continue to operate with existing sanitary facilities so long as those facilities are properly permitted for existing flows by the appropriate health department and/or the Ohio EPA. The flows to such existing sanitary facilities, however, may not be expanded nor increased.

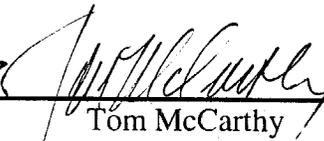
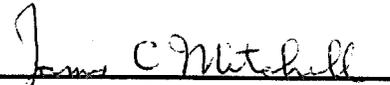
Thank you for the opportunity to comment on the Facilities Plan Update. We may wish to comment further at such time that OEPA seeks to include your Facilities Plan Update as part of a 208 area wide plan.

Sincerely,



Steve A. Stolte, PE/PS
Union County Engineer

Union County Board of Commissioners


Don Fraser
Tom McCarthy
Jim Mitchell

Metro Parks



1069 West Main Street
Westerville, OH 43081

Tel: 614.891.0700
TTY: 614.895.6240
Fax: 614.895.6208

Web site:
www.metroparks.net

Park Commissioners:

Kenneth F. Danter
Robert H. Jeffrey
Ellen L. Tripp

Director:

John R. O'Meara

Your Metro Parks:

Battelle-Darby Creek
Blacklick Woods
Blacklick Woods
Golf Courses
Blendon Woods
Chestnut Ridge
Clear Creek
Highbanks
Inniswood Metro
Gardens
Pickerington Ponds
Sharon Woods
Slate Run
Slate Run Living
Historical Farm
Three Creeks

Comments c/o Policy Unit
Office of the Mayor
City of Columbus
90 West Broad Street
Columbus, OH 43215

To Whom It May Concern:

Thank you for sending information about the proposed update of the Columbus Metropolitan Sewage Facilities Plan. I would like to suggest the following changes to the plan for your consideration.

If the Big Darby watershed in Madison County is to be added to the Sewage Facilities Plan, then environmental protections similar to those specified for the Environmentally Sensitive Development Area should be incorporated. Specifically, there should be riparian buffer restrictions along all perennial streams, comprehensive stormwater management plans should be enacted, and conservation development restrictions should be in place if development does not proceed in accordance with the current the current farmland preservation plan.

The Environmentally Sensitive Development Area should be expanded to include all remaining undeveloped areas in the Big Darby watershed in Franklin County, including all land west and southwest of the Grove City service contract area and the undeveloped land east of Hellbranch Run on the west side of Columbus and west of the current corporate boundaries. The riparian buffer requirements should be required along all perennial tributaries of Big Darby.

Riparian buffer requirements south of the Grove City service area would assist in the development of Greenway connections in southern Franklin County which would connect the Big Darby watershed to the Scioto River watershed. Metro Parks is working cooperatively with the City of Columbus, the Mid Ohio Regional Planning Council, and several other local governments to establish a regional system of Greenways to protect Franklin County's water resources and, where appropriate, to provide recreational trail opportunities.

Riparian buffers should be required on all perennial streams anywhere within the boundaries of the Sewage Facilities Plan. The Sewage Facilities Plan should also stipulate a no net loss of flood plain for the entire area.

The installation of sewage and stormwater facilities within one mile of Pickerington Ponds Nature Preserve (a portion of the recently expanded Pickerington Ponds Wildlife Refuge) should be required to be installed in a manner that will prevent lowering of regional groundwater levels. All pipes should be installed in a manner that prevents groundwater infiltration into the pipes and also prevents the flow of groundwater along the outside of the pipes. Clay bulkheads should be installed around all sewer and stormwater pipes at a

minimum distance of every 400 feet. Clay bulkheads should also be required around all manholes. (If groundwater elevation is lowered around Pickerington Ponds, the wetlands will be drained. Most of the wetlands of Pickerington Ponds are located on a gravelly substrate that dips below the elevation of the regional groundwater supplies. Metro Parks is planning on restoring a few hundred acres of wetlands at Pickerington Ponds in the next few years.)

Before sewers are extended to the area on the west side of US 23 in Delaware County within the boundary of your proposed facilities plan, Metro Parks would like to discuss mitigation of the potential impacts to the critical environmental and archeological resources of Highbanks Metro Park. Metro Parks would prefer to either acquire or limit development on much of this property.

Thank you for your consideration of these suggestions.

Sincerely,



John R. O'Meara
Executive Director

October 16, 2000

7400 Alum Creek Drive

Columbus, Ohio 43217-1246

614-491-1401

Fax: 614-491-0662

www.rickenbacker.org

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Executive Director

Bruce E. Miller

Ms. Cheryl Roberto, Policy Advisor
Office of the Mayor
City of Columbus
90 West Broad Street
Columbus, OH 43215

Dear Ms. Roberto:

The Rickenbacker Port Authority, is herein identifying several very important concerns relating to the Columbus Metropolitan Facilities Plan Update.

Rickenbacker International Airport (LCK) has emerged over the last decade as the largest public, cargo dedicated airport in the world. In 1990 it had no cargo flights of note, today it is ranked among the top 50 air cargo operations in North America. Columbus is the third largest port of entry for textiles in the USA after New York and Los Angeles. Today, Central Ohio business has direct air cargo access to 18 domestic markets and over 12 international markets in Asia, Europe and South America. Since its opening as a civilian international airport in 1982, LCK and Foreign-Trade Zone No. 138 have accounted for over \$130 million of public investment which has stimulated private investment of over \$3/4 billion, more than 13,000 jobs and 11 industrial parks with over 20 million square feet of class "A" distribution centers in the "Rickenbacker Area".

First, the Port Authority strongly opposes any Columbus Sewer (or Water) line extensions to connect areas northeast of Rickenbacker International Airport in Franklin County. These areas contain the primary flight approaches and departures to LCK. They are currently used primarily as agriculture and are compatible with the airport operations. Please refer to the attached map which generally shows LCK impact areas juxtaposed over the City's proposed Columbus service area.

Once sewer lines are extended into these areas, they can easily be utilized for residential use which is not compatible with existing airport operations and future airport expansion. Residential development in these areas will stop or severely limit the ability of this international airport to function. Once utilities are extended, it is impossible to prevent incompatible development even given the best intentions of governments utilizing land use and zoning restrictions. The inability to stop residential encroachment on airports is a hard lesson that has been learned in every major airport in North America. The only way we know to stop residential development in these areas is not to provide access to sewer and water facilities.

Ms. Cheryl Roberto
October 16, 2000
Page Two

Second, The Columbus Metropolitan Facilities Plan Update shows expansion of service into Pickaway County at LCK. The Port Authority does not envision any growth in this area that would require City of Columbus utilities.

Third, the City plan should also consider the impact that the Airport's growth will have on the City's need for facilities. This begins by factoring the Airport's National Pollutant Discharge Elimination System (NPDES) permit into the plan. It also involves considering the fact that as the Airport grows, most likely, there will be the discharge of additional glycol to City facilities.

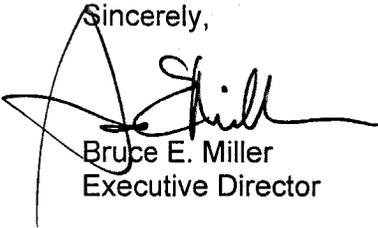
The Port Authority has, over the past several years, expressed these same concerns to City of Columbus officials regarding extending utilities into these same areas that are noise sensitive or that are required for future airport expansion. Significant public investment has been made at Rickenbacker by federal, state and local governments. It would be a waste of public funds to allow incompatible land uses to stifle continued growth at Rickenbacker. Rickenbacker Area development, although impressive in terms of private investment and jobs, is just beginning, provided incompatible land uses can be prevented around the airport.

The protection of Rickenbacker International Airport should be of crucial importance to the City of Columbus as it impacts Columbus' ability to continue to grow and develop as a major American city. If Columbus wants to maintain the possibility of developing a regional, international wide-body airport in our community, which would be a major economic catalyst for Columbus, the City should take the appropriate steps to prevent incompatible development in the Rickenbacker Area today. The City needs to take a leadership role in protecting the land surrounding the Airport from the intrusion of incompatible residential facilities and thus protecting the ability of future generations to continue to expand air service. Smart growth provides the City with the opportunity to take the necessary steps to begin this process by preventing the extension of sewer lines around the Airport in noise sensitive areas.

The Port Authority intends to continue to be an active participant as regional plans and policies are formulated regarding utility extensions that impact the Rickenbacker area. Considerable resources have been expended at Rickenbacker in planning and providing for the airport's future growth. We have also been an active participant in the land use and transportation planning prepared by the local governments that surround and include the airport. It is important that these existing plans be recognized in the Columbus Metropolitan Facilities Plan Update.

If you have any questions or if the Port Authority can provide any assistance, please call us at 614-491-1401.

Sincerely,

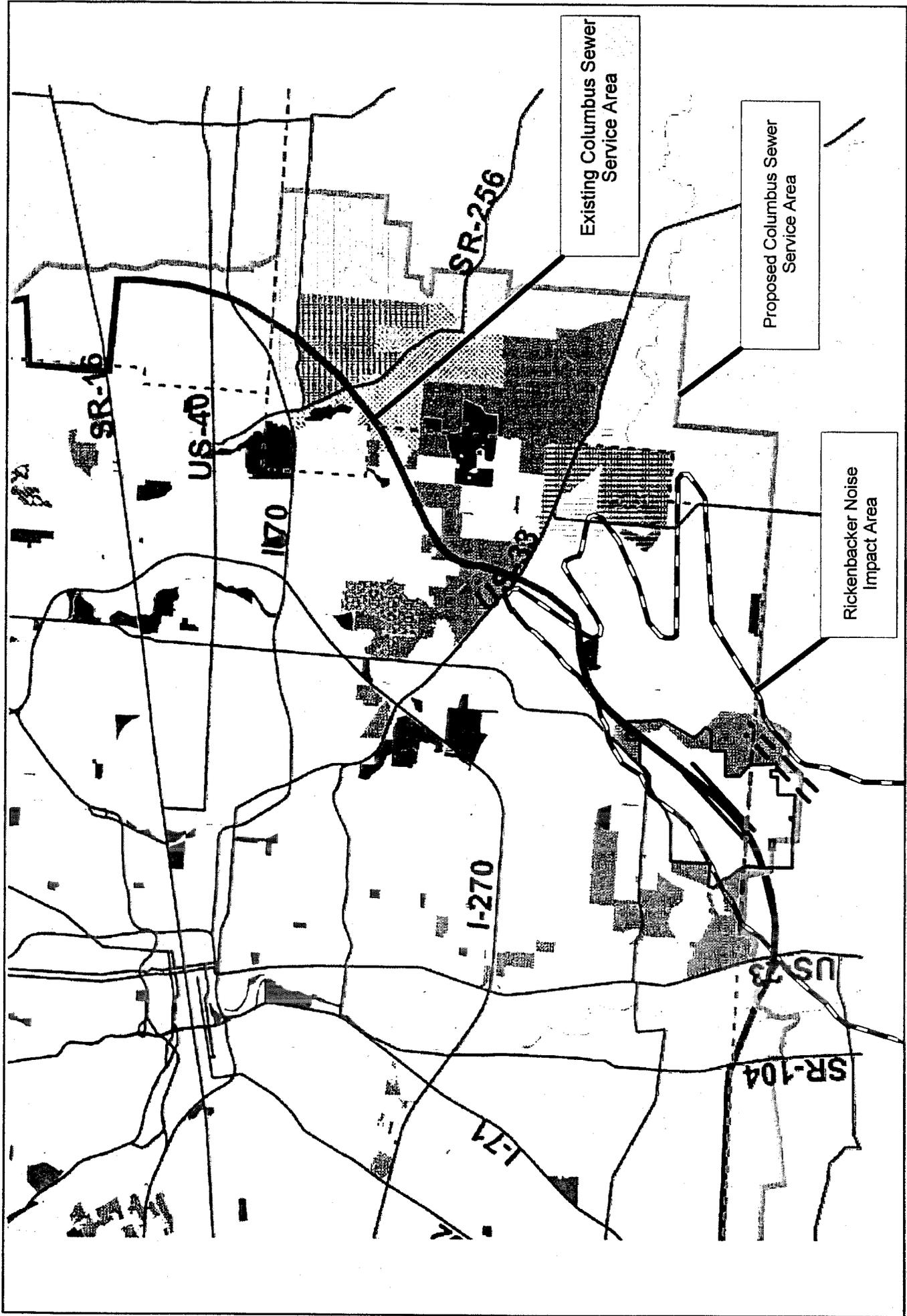


Bruce E. Miller
Executive Director

BEM/mp
Enclosure

Ms. Cheryl Roberto
October 16, 2000
Page Three

CC: Bob Taft, Governor, State of Ohio
Arlene Shoemaker, President, Franklin County Board of Commissioners
Robert Huffer, Chairman, Pickaway County Board of Commissioners
Lance Westcamp, Mayor, Village of Groveport
Marsha A. Hall, Mayor, Village of Canal Winchester
Irene Porter, Director, Detroit Airport District Office, Federal Aviation Administration
Brian Hicks, Chief of Staff, State of Ohio
C. Lee Johnson, Director, Ohio Department of Development
Christopher Jones, Director, Ohio Environmental Protection Agency
Gordon Proctor, Director, Ohio Department of Transportation
Lisa Morris, Chief, Division of Surface Water, Ohio Environmental Protection Agency
Barry A. Burton, Deputy Administrator, Franklin County
Mark Barbash, Director, Columbus Trade and Development Department
Nanisa Osborne, Administrator, Madison Township
N. Victor Goodman, Chairman, Rickenbacker Port Authority
Al Iacovone, Development Director, Rickenbacker Port Authority



Source: City of Columbus Division of Sewerage and Drainage Facilities Plan Update; sequad_f1.jpeg

Rickenbacker International Airport Noise Impact Area



part of the Citizens Utilities family

October 19, 2000

Cheryl Roberto, Policy Advisor
Office of the Mayor
City of Columbus
90 West Broad Street
Columbus, OH 43215

RE: Columbus Metropolitan Facilities Plan Update

Dear Ms. Roberto:

We appreciated the opportunity to meet with you and Director Doult on September 27, 2000 to discuss the City's Wastewater Facilities Plan Update. In our opinion, It would have been much better to get stakeholder involvement early in the planning process rather than wait until a draft of the Plan was completed and then ask for comments. The Central Ohio area continues to grow rapidly and because of that growth, there is a need for Regional Wastewater Planning. However, a body representing all interested parties should carry out this planning, not solely City of Columbus officials. As a tax paying, investor owned water/wastewater utility that provides services to over 25,000 citizens across Central Ohio, Citizens Utilities should be an active participant in any such planning body.

Citizens Utilities has owned and operated five water treatment facilities and three wastewater treatment facilities in Franklin County for over 25 years. We have a staff of competent, professional managers, engineers, OEPA certified plant operators, and support staff to ensure that our water and wastewater operations are environmentally sound and customer oriented. We are proud of our operations and believe that our compliance record is as good, if not better than many other wastewater systems in the Central Ohio area.

Recently, Citizens Utilities entered into an agreement with American Water Works Company, Inc. and it's subsidiary, Ohio-American Water Company to sell its' assets to Ohio American. Although a closing date has not yet been set, Ohio-American will take over the ownership of the aforementioned facilities in the near future. Upon closing, Ohio-American will continue to operate the facilities in the same professional manner and will look to expand and grow its business in Franklin County and surrounding areas as appropriate. When the term "Company" is used in this letter, it refers to both Citizens Utilities Company of Ohio and Ohio-American Water Company.

The following comments were developed in a short period of time and without the benefit of extensive research on the subject matter. Our comments are organized in a manner such that they reference the Sections as presented in the Draft Plan.

Methodology

Curbing urban sprawl – We question the use of utility provision as a tool to dictate where development should occur, particularly with respect to political subdivisions other than the City of Columbus. Townships and suburban communities should and do have the right to determine how, where and when they grow.

Strategies for Wastewater Service

- II. Alternative Wastewater Systems – The City's Plan proposes to prohibit the use of "Alternative Wastewater Systems" within the Facility Plan Area (FPA) boundary. The plan does not carefully define "Alternative Wastewater Systems". It does specifically mention spray irrigation and constructed wetlands systems, and states that these systems "threaten drinking water, give rise to adverse environmental impacts (particularly in the Darby Watershed), result in detrimental fiscal impact to local governments and deprive local governments of control over community patterns".

It could be argued that any wastewater system, be it alternative or centralized sewers with conventional treatment, if not properly planned, designed, constructed and operated, could cause the same adverse impacts as mentioned in the draft Plan.

The City of Columbus recently withdrew its opposition to an Alternative Wastewater System in Delaware County. This system is located in the vicinity of one of the City's raw water reservoirs, which could, if the City's contention is correct, threaten that drinking water supply. However, the developer provided design and operational features which satisfied the City. This system will be owned and operated by Delaware County and will provide revenue to the local government. The development received approval of the Township and County Planning Commissions so that local government had control of their community growth patterns. Therefore, it seems that the use of "Alternative Wastewater Systems", if properly designed, operated and regulated, can, in the eyes of the City, be an acceptable alternative to a centralized sewer system.

Alternative wastewater systems have been successfully utilized in Ohio, as well as all over the world. Prohibiting the use of these systems in the FPA boundary is contradictory to Section 208 Planning efforts and Chapter 6111 of the Ohio Revised Code.

- III. Centralized Wastewater Treatment

- A. City of Columbus Sewer System - The City's Plan states that all areas in the FPA except those particularly enumerated in Sections B and C of Section III of the Plan "**shall** be served by extending sanitary trunk sewers and branch sewers into the area" (emphasis added). It further states that "Wastewater collected from these areas shall be conveyed to either the Jackson Pike or Southerly wastewater treatment facilities for treatment and discharge". This precludes our Company, Franklin County and Township governments from being offered any choice as to when, where or how they might develop and/or expand. The Public Utilities Commission of Ohio (PUCO) and the Ohio Environmental Protection Agency (OEPA) regulate our Company. The PUCO has rules and requirements that our Company must meet before we can expand the service area of any of our facilities to meet consumers needs. The OEPA has requirements that we must meet before we are allowed to discharge treated wastewater into the waters of the state. The City's draft Plan appears to usurp the authority of these two agencies without going through the process of legislation or rule making. Under the proposed City Plan, our Company would be precluded from expanding to meet the needs of citizens who choose not to live in the City of Columbus but who still need wastewater service.

While we are not in a position to specify exactly what geographic area we might want to

expand into in the future, we would not want to be precluded from providing wastewater utility service wherever it might be economically and technically feasible throughout the FPA.

B. City of Columbus Sewer System with Special Conditions -

1. Environmentally Sensitive Development Area (ESDA) – The City's draft Plan fails to discuss the fact that our Company owns and operates a wastewater treatment facility (Lake Darby Estates) in the ESDA. This system has been in operation since the early 1970s and serves a population of over 4,000 people. We consider it to be a well operated and maintained facility and the discharge, in our opinion, has had no adverse impact on the water quality of Big Darby Creek. The long-term presence of Lake Darby Estates would seem to present a counter argument to the City's contention that only they can provide sewer service in the ESDA without causing environmental problems.

The proposed Plan would prohibit further development in the ESDA until the City determines that certain conditions are met. Further development in this area should not be determined by the City of Columbus, but rather by local political subdivisions, the OEPA, and/or other Regulating Authorities.

5. Citizens Utilities, a tax paying, investor owned utility company specializing in water and wastewater services, owns and operates three (3) centralized wastewater systems within the proposed FPA (not two as listed in the draft plan). They are Blacklick Estates, Huber Ridge and as mentioned above, Lake Darby Estates. We are attaching copies of exhibits showing the service areas of our three wastewater treatment facilities for your information and use.

As mentioned previously the submission of these comments is in no way intended to preclude the Company from submitting additional comments during the OEPA's review of the City's Proposed Plan.

Sincerely,
CITIZENS UTILITIES COMPANY OF OHIO


Stephen H. Henson, P.E.
General Manager

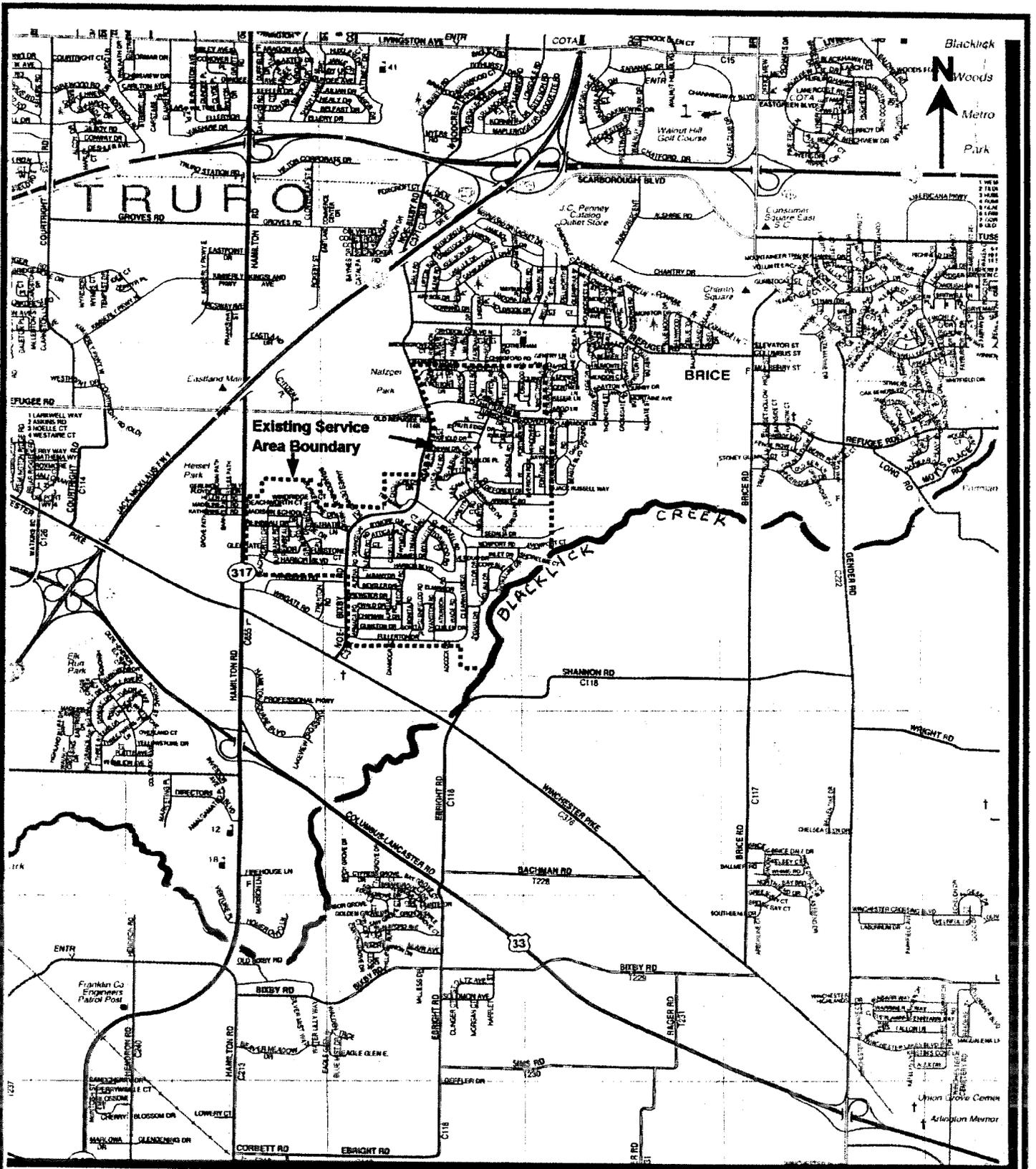
Attachments

Cc/w attachments John Doult, P.E.
 Director of Public Utilities
 City of Columbus

Christopher Jones, Director
Ohio Environmental Protection Agency

Alan Schriber, Chairman
Public Utilities Commission of Ohio

T. Wilkes Coleman, Vice President
Ohio-American Water Company



Existing Service Area Boundary

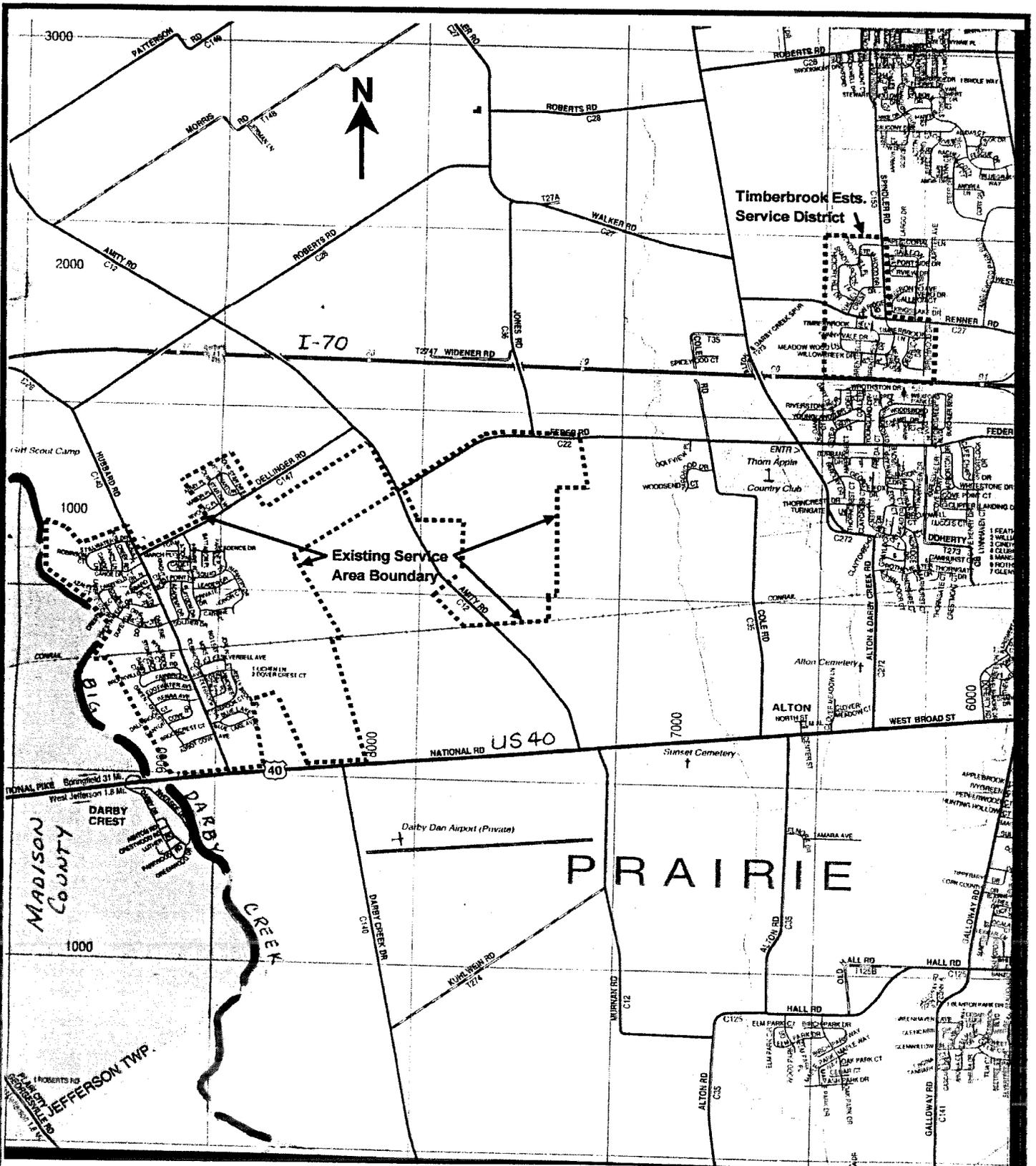
CITIZENS UTILITIES CO. OF OHIO
 5481 Buenos Aires Blvd.
 Westerville, OH 43081
 Ph:614-882-1658 Fax:614-882-2178
 Citizens Water Resources

CITIZENS WATER RESOURCES

BLACKLICK ESTATES SERVICE AREA

Blacklick Estates.xls

Oct. 2000
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Existing Service Area Boundary

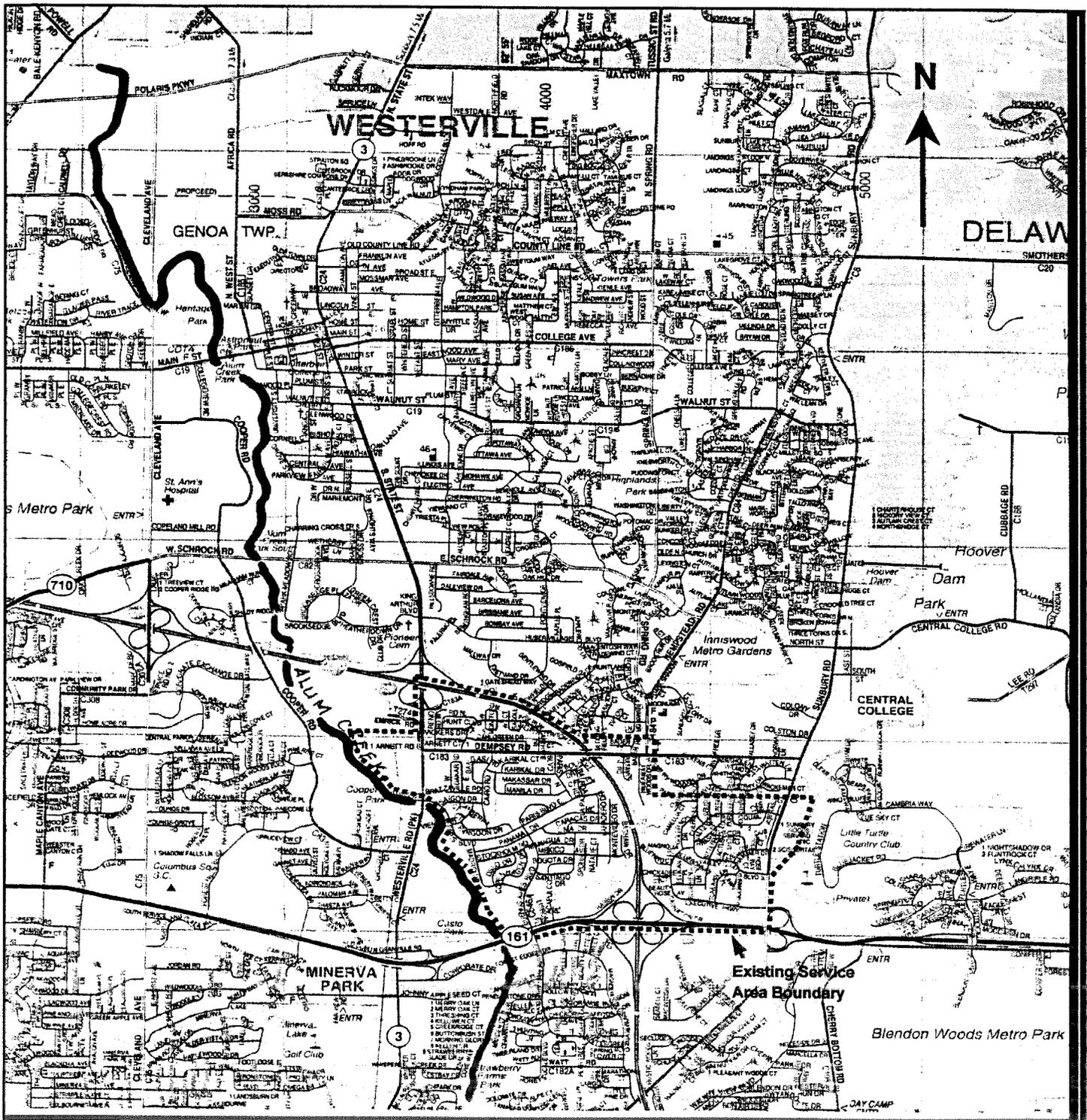
CITIZENS UTILITIES CO. OF OHIO
 5481 Buenos Aires Blvd.
 Westerville, OH 43081
 Ph.614-882-1658 Fax.614-882-2176
 Citizens Water Resources

CITIZENS WATER RESOURCES

LAKE DARBY ESTATES SERVICE AREA

Lake Darby Ests.xls

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Existing Service Area Boundary

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HUBER RIDGE SERVICE AREA

HuberRidge.xls

Oct-00
 10/19/2000