TO: NOACA Board of Directors
FROM: Grace Gallucci, Executive Director
DATE: March 1, 2019
RE: Resolution No. 2019-018: Medina County FPA – Wadsworth FPA Boundary Modification Request

ACTION REQUESTED
The Board of Directors is asked to consider approving the facility planning area (FPA) modification requested by Medina County. Specifically, the item will transfer 1,216 parcels (3,517.9) from the Wadsworth FPA to the Medina County FPA.

This item was tabled at the December 14, 2018, and January 11, 2019, Board of Directors Meetings.

The Planning and Programming Committee and Water Quality Subcommittee recommends this action.

BACKGROUND/JUSTIFICATION FOR CURRENT ACTION
The current Wadsworth FPA includes areas in Sharon Township, Wadsworth Township and the City of Wadsworth that are served by Medina County sanitary sewers and two lift stations (North and South) (Attachment A). Medina County original request to NOACA included both the North and South Lift Stations' service area. NOACA previously presented a compromised request developed by NOACA staff since the two parties could not come to an agreement on the original request (Attachment B). Since the January 2019 Board of Directors meeting, NOACA-led negotiations resulted in an updated compromised FPA modification proposal that addresses the concerns raised by the Board at the last meeting. The updated request transfers 1,216 parcels (3,517.9 acres) from the Wadsworth FPA to the Medina County FPA (Attachment C). The boundary change would allow Medina County to redirect the North Lift Station’s wastewater flow and 321 Medina County customers from the Wadsworth Wastewater Treatment Plant (WWTP) to the Medina County Liverpool WWTP. The City of Wadsworth would receive Medina County assets, customers, settlement payments and added areas to the Wadsworth FPA. Medina County would also remain as a Wadsworth sewer customer under the current billing rate until 2021.

Rationale for Modification Request
Medina County already owns and operates the sewer infrastructure located within the area it wants to transfer into its FPA. The entire area would then flow by gravity to the north lift station and be pumped via a new force main to Medina County’s sewer lines for treatment at Medina County’s Liverpool WWTP. Medina County anticipates an annual savings from lower treatment costs at their Liverpool WWTP compared to the rate paid to the City of Wadsworth. The FPA modification would allow Medina County to reduce sewer rates within the FPA modification area. Medina County also plans to extend water from its existing water system to serve Sharon Township, which will improve water system performance; allow for better cycling of
water in its water towers; and benefit Sharon Township residents with increased water volume and pressure over existing levels. The proposed extension of water from its Northwest Water System requires Medina County to return wastewater flow back to the originating Lake Erie water basin, which the gravity sewer will help accomplish.

**Sanitary Sewer Service Agreement**
A 50-year sanitary sewer service agreement was signed between Medina County and the City of Wadsworth in 1975. Under the agreement, the wastewater from Medina County’s service area in the affected jurisdictions is to be pumped to the Wadsworth WWTP until such time as the County can provide its own wastewater treatment, which allows Medina County to conclude the agreement before October 2025.

**Affected Jurisdictions’ Comments**
The affected jurisdictions are Medina County, City of Wadsworth, Sharon Township and Wadsworth Township. The Medina County Commissioners, Sharon Township Trustees and Wadsworth Township Trustees submitted letters of support for the project. The City of Wadsworth objected to the proposed FPA modification based on stated economic harm to the City of Wadsworth and its water and sewer customers.

Three non-affected jurisdictions also submitted letters of support for the FPA modification. The support letters were from Ohio District 69 Representative and former Medina County Commissioner Steve Hambley, the Medina County Township Association and the Northeast Ohio Township Association (Attachment E).

**Affordability and Economic Harm**
Policy 4-6a states that the NOACA Board of Directors can decide if economic harm is suffered when a FPA modification is requested to pursue a lower cost option. Medina County stated in their FPA modification request to NOACA that a reason for the change is to realize reduced costs, both to the County and its customers, in diverting the wastewater flow from Wadsworth’s WWTP to Medina County’s Liverpool WWTP.

Upon analysis, the proposed FPA modification request will reduce revenue for the City of Wadsworth’s sewer system and increase revenue for Medina County’s sewerage systems. However, the estimated 10.5% or $2.71 per month increase to the City of Wadsworth’s sewer rate needed to compensate for the annual revenue loss of $343,843 from the County would result in an estimated sewer rate still well within the affordability standard detailed in Policy 4-6a of NOACA’s 208 Plan (Attachment D), and below that of Medina County’s customers as well.

**Medina County Original Proposal**
The proposal under Board consideration is an updated compromised FPA modification from NOACA staff. Medina County’s original proposal included the transfer of both the north and south lift stations’ service areas from the Wadsworth FPA to the Medina County FPA. Although still within the affordability standard detailed above, the original proposal’s financial impact to the City would be significantly higher. NOACA estimated a City sewer rate increase of 18.1% or $4.68 per month would be needed to compensate for the annual County revenues ($592,834 per year). The original proposal would have also removed all of the customers in both the City of Wadsworth and the Medina County Sewer Service Area the City and County sewer service area from the Wadsworth FPA. The compromised FPA modification proposal maintains over 97% of these customers within the Wadsworth FPA.

**Board of Directors Meetings and Subsequent Negotiations**
At their December 2018 and January 2019 meetings, the Board of Directors voted to table the FPA modification request with the expressed desire for the conflicting jurisdictions to reach consensus. On both December 20, 2018, and January 3, 2019, NOACA staff organized meetings among representatives from Medina County and the City of Wadsworth, along with representatives from the Northeast Ohio Regional Sewer District (NEORSD) and North Royalton Mayor Robert Stefanik. At these meetings, NOACA staff presented the current situation; original Medina County proposal; Wadsworth counter-proposal; NOACA compromise proposal (tabled at December 2018 Board Meeting); as well as new NOACA proposals that "phased” or delayed implementation of the original Medina County proposal until 2025 (end of Agreement)
to mitigate the impact of revenue loss to the City of Wadsworth. The facilitators (NEORSD, NOACA and Mayor Stefanik) requested both parties consider the full roster of proposed scenarios. The facilitators also requested the City of Wadsworth determine whether or not they want the South Lift Station. NOACA staff held a workshop at NOACA on Tuesday, January 8, to inform Board Members on the proposed FPA Boundary modification request.

NOACA-led negotiations continued between Medina County and the City of Wadsworth at six (6) meetings in January, February and March 2019. Both Medina County and the City of Wadsworth proposed new and distinctive solutions to the FPA modification issues (Attachment E). At the March 1 negotiation meeting, a framework for an agreement was reached utilizing the City of Wadsworth proposal and cost information from the City of Wadsworth, Medina County, NOACA and Ohio EPA. The appropriate components of this agreement were integrated into the original NOACA compromise proposal.

**Current Compromise Proposal**

1. Median County will remain a Wadsworth sewer customer under the current sewer service agreement terms (status quo) until 2021.

2. The North Lift Station's service area will be transferred to the Medina County FPA.
   a. The North Lift Station's flow will be redirected to Medina County's Liverpool WWTP by 2021.
   b. The North Lift Station currently serves 321 Medina County customers.
   c. The North Lift Station comprises approximately 58% of the flow from the North and South Lift Stations currently treated at the Wadsworth WWTP.

3. The South Lift Station's service area will remain in the Wadsworth FPA.
   a. The South Lift Station currently serves approximately 600 Medina County customers.
   b. The South Lift Station's assets (sewer lines, lift station, etc.) and customers will be given to Wadsworth.

4. Areas will be added to the Wadsworth FPA to help offset the loss of 321 customers from the North Lift Station.
   a. The proposed additions to the Wadsworth FPA is anticipated to add 200 net customers by 2021. This net customer gain (200) will replace roughly two-thirds of the 321 customers to be lost by the redirection of the North Lift Station to the Liverpool WWTP.
   b. Approximately one-third of the customers lost by the North Lift Station redirection will not be replaced by the new customers in the added areas to the Wadsworth FPA.
   c. There is also potential for additional development and new customers within the South Lift Station's newly defined service area.

5. Medina County will pay a total settlement amount to Wadsworth of $538,975.
   a. Years 2019 and 2020 will be excluded from any settlement payment because there will be no impact to Wadsworth.
   b. The 50 year sewer service agreement between Medina County and Wadsworth ends on September 30, 2025.
   c. Medina County pays an average of $592,855 per year (2013-2018) to Wadsworth to treat the wastewater from the North and South Lift Stations. The sewer rate charged to Medina County is presumed to include fees for Wadsworth's debt service.
   d. The North Lift Station accounts for $343,843 (58%) of the average annual sewer treatment costs paid by Medina County to Wadsworth.
   e. One-third of the average annual revenue loss to the Wadsworth is $113,468.
   f. Medina County's annual settlement pay to Wadsworth from 2021 to the end of September 30, 2025, (4.75 years) is $113,468.

Both entities have agreed to the framework. Medina County has accepted the terms of the current compromise proposal. The City of Wadsworth is considering the financial aspects of the proposal.
**FPA Modification Request Status**
If there is not agreement between Medina County and the City of Wadsworth on the above settlement framework, then NOACA will present the original NOACA compromise FPA modification tabled at the December 2018 and January 2019 NOACA Board of Directors meeting for action.

**FINANCIAL IMPACT**
No financial impact to NOACA.

**CONCLUSION/NEXT STEPS**
Pending Board approval, NOACA staff will submit the updated FPA Boundaries to the Ohio Environmental Protection Agency (Ohio EPA).

GG/ea/3053b
RESOLUTION OF THE BOARD OF DIRECTORS
OF THE
NORTHEAST OHIO AREAWIDE COORDINATING AGENCY

WHEREAS, the Northeast Ohio Areawide Coordinating Agency (NOACA) is the Metropolitan Planning Organization (MPO) for the counties of Cuyahoga, Geauga, Lake, Lorain, Medina, the City of Cleveland and the areawide water quality management agency for the same region; and

WHEREAS, Clean Water 2000, the current update to the NOACA Section 208 Water Quality Management Plan, was adopted by the NOACA Board of Directors, certified by the Governor of Ohio, and approved by the United States Environmental Protection Agency; and

WHEREAS, Clean Water 2000 provides for modifications to wastewater treatment facility planning area (FPA) boundaries, subject to review by the NOACA staff, the NOACA Water Quality Subcommittee, and the NOACA Planning and Programming Committee; and

WHEREAS, the Medina County Sanitary Engineers (MCSE) propose a modification of the Medina County FPA – Wadsworth FPA boundary in order to redirect the north lift station’s wastewater flow from the Wadsworth WWTP to the Medina County Liverpool WWTP with the support of Sharon Township and Wadsworth Township, for the benefit of regional water quality and economic development; and

WHEREAS, the City of Wadsworth and Medina County Board of Commissioners agree on terms for the termination of their existing sanitary sewer service agreement which includes a $750,000 settlement payment from Medina County to the City of Wadsworth, the transfer of the Medina County’s south lift station’s assets and customers to the City of Wadsworth, and Medina County will not transfer any customers from the Wadsworth FPA before July 1, 2021; and

WHEREAS, the FPA boundary change will transfer all or portions of 1,216 parcels (3,517.9 acres) from the Wadsworth FPA to the Medina County FPA and transfer all or portions of 18 parcels (276.6 acres) from the Medina County FPA to the Wadsworth FPA.; and

WHEREAS, the NOACA Water Quality Subcommittee and the Planning and Programming Committee reviewed the request and recommended that the Board of Directors approve the modification request.

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of the Northeast Ohio Areawide Coordinating Agency, consisting of forty-five principal officials serving general purpose local governments throughout and within the counties of Cuyahoga, Geauga, Lake, Lorain, Medina, and the City of Cleveland that:

Section 1. The Clean Water 2000 Plan’s FPA Boundary Map is amended to reflect the transfer of all or portions of will transfer 1,216 parcels (3,517.9 acres) from the Wadsworth FPA to the Medina County FPA and 18 parcels (276.6 acres) from the Medina County FPA to the Wadsworth FPA as shown in Attachment C.

Section 2. The Executive Director is authorized to submit the new boundaries and prescriptions to Ohio EPA for certification by the Governor.

Section 3. The Executive Director is authorized to transmit certified copies of this resolution to appropriate federal, state, and local agencies.
Certified to be a true copy of a Resolution of the Board of Directors of the Northeast Ohio Areawide Coordinating Agency adopted this 8th day of March 2019.

Secretary: [Signature]

Date Signed: 3-8-2019
ATTACHMENT A: CURRENT FACILITY PLANNING AREA (FPA) BOUNDARIES AND AREA SERVED BY MEDINA COUNTY SEWERS FOR THE CITY OF WADSWORTH, SHARON TOWNSHIP AND WADSWORTH TOWNSHIP IN MEDINA COUNTY

DATA SOURCES:
- NOACA
- Medina County Sanitary Engineer

NOACA makes no representations or warranties with respect to the accuracy and/or completeness of the map.

Proposed Changes

Medina County FPA Boundaries

Current FPA Boundary
Jurisdiction Boundary
Parcels
Area Served by Medina County Sewers
Sewer Line
Lift Stations

0 0.5 1 Miles
ATTACHMENT B: NOACA ORIGINAL COMPROMISE - PROPOSED FACILITY PLANNING AREA (FPA) BOUNDARIES AND PROPOSED FPA TRANSFER AREA FOR THE CITY OF WADSWORTH, SHARON TOWNSHIP AND WADSWORTH TOWNSHIP IN MEDINA COUNTY

DATA SOURCES:
NOACA
Medina County Sanitary Engineer

NOACA makes no representations or warranties with respect to the accuracy and/or completeness of the map.

Proposed Changes
ATTACHMENT C: MODIFIED COMPROMISE - PROPOSED FACILITY PLANNING AREA (FPA) BOUNDARIES AND PROPOSED FPA TRANSFER AREA FOR THE CITY OF WADSWORTH, SHARON TOWNSHIP AND WADSWORTH TOWNSHIP IN MEDINA COUNTY

DATA SOURCES:
NOACA
Medina County Sanitary Engineer

NOACA makes no representations or warranties with respect to the accuracy and/or completeness of the map.

Proposed Changes

Modified Compromised FPA Boundaries

Jurisdiction Boundary
Parcels
Area Added to Wadsworth FPA from Original Compromise
Area to Medina County FPA
Sewer Line
Lift Stations

0 0.5 1 Miles
Attachment E

Affected Jurisdictions’ Comment Letter, Proposals and Other Correspondences
August 14, 2017

Mr. Eric Akin, Senior Environmental Quality Planner
Northeast Ohio Areawide Coordinating Agency
1299 Superior Avenue
Cleveland, Ohio 44114

Regarding: Medina County Sanitary Engineer’s (MCSE) Request to Amend the Medina County Facility Planning Area

Dear Mr. Akin:

As you are aware, the Medina County Sanitary Engineering Department (MCSE) is completing the engineering on a project to extend water from the existing MCSE water system located on S.R. 18 to the south, to serve the Sharon Township area. This extension of MCSE water utilities, and resultant increase in water drawn from the S.R. 18 area will improve water system performance across the S.R. 18 corridor and allow for better cycling of water stored in MCSE's water towers. This new water supply will benefit Sharon Township residents by increasing available water volume and pressure over existing levels, and allow the MCSE to decommission a water treatment plant and well system located on the Sharon Township Golf Club property.

With the proposed extension of MCSE water from its Northwest Water System, it is critical that the MCSE return the wastewater back to the originating Lake Erie water basin. As such, the MCSE plans to eliminate one (1) existing pump station, and redirect the force main discharge from the second pump station back to the sanitary sewer system located on S.R. 18.

County officials first met with City of Wadsworth officials to discuss this project in February, 2014. It was made clear to the City, that the MCSE planned to pursue this project, and would be prepared to begin construction within the next 3 to 5 years. We felt it important to provide sufficient notice to Wadsworth officials to consider the impacts of the County's discontinued dependence upon the City for bulk domestic water provided from the north end of the City to the MCSE's Sharon Township customer base, and for wastewater treatment at the City's POTW per Agreement that had been in place since 1975.

Please accept this letter by the Medina County Board of Commissioners to support the Sanitary Engineer's pending amendment request to NOACA to modify the 208 Facility Planning Areas (FPAs) for both the City of Wadsworth and Medina County to advance this project. With your support, we anticipate construction may begin in mid-2018. Thank you in advance for your consideration.

Sincerely,
Medina County Commissioners

[Signatures]

Adam Friedrich
Patricia Geissman
William Hutson
SHARON TOWNSHIP
Board of Township Trustees

P.O. Box 7 • Sharon Center, Ohio 44274
TRUSTEES: Kimberly Bolas Miller • Raymond A. Lurtz • Brian Guccion
FISCAL OFFICER: Christine Lawson

Regular Meetings
Second & Fourth
Tuesdays
August 8, 2017

Mr. Eric Akin, Senior Environmental Quality Planner
Northeast Ohio Areawide Coordinating Agency
1299 Superior Avenue
Cleveland, Ohio 44114

Regarding: Medina County Sanitary Engineer’s Request to Amend their Facility Planning Area

Dear Mr. Akin:

As you may be aware, the Medina County Sanitary Engineer’s (MCSE) office is engineering a project to extend water from the existing MCSE water system located on S.R. 18 to the south, to serve the Sharon Township area. The extension of MCSE water will improve water volume and pressure to existing Sharon Township residents, and allow the MCSE to decommission a water treatment plant and well system located on the Sharon Township Golf Club property.

With the proposed extension of MCSE water from it’s Northwest Water System, it is critical that the MCSE return the wastewater back to the originating Lake Erie water basin. As such, the MCSE plans to eliminate one (1) existing pump station, and redirect the force main discharge from the second pump station, to return the wastewater back to the sanitary sewer system located on S.R. 18. As such, the MCSE will be responsible for providing water, and sanitary sewer service, to the Sharon Township area as the primary utility provider. In redirecting the wastewater, an amendment is requested to the 208 Facility Planning Areas (FPAs) for both the City of Wadsworth and the Medina County Sanitary Engineers office as recognized by the Northeast Ohio 208 Water Quality Management Plan. The Sharon Township Trustees support the Medina County Sanitary Engineer’s 208 map amendment request.

Sincerely,
Sharon Township Trustees

Kimberly Bolas Miller
Raymond Lurtz
Brian Guccion

11/12/17letters/mail/sharon_township_08082017.odt
September 7, 2017

Mr. Eric Akin, Senior Environmental Quality Planner
Northeast Ohio Areawide Coordinating Agency
1299 Superior Avenue
Cleveland OH 44114

RE: Medina County Sanitary Engineer’s Request to Amend their Facility Planning Area

Dear Mr. Akin:

As you may be aware, the Medina County Sanitary Engineer’s (MSCE) office is engineering a project to extend water from the existing MCSE water system located on S.R. 18 to the south to serve the Sharon and Wadsworth Township areas. The extension of MCSE water will improve water volume and pressure to existing residents and allow the MCSE to decommission a water treatment plant and well system located on the Sharon Township Golf Club property.

With the proposed extension of MCSE water from it’s Northwest Water System, it is critical that the MCSE return the wastewater back to the originating Lake Erie water basin. As such, the MCSE plans to eliminate one (1) existing pump station and redirect the force main discharge from the second pump station to return the wastewater back to the sanitary sewer system located on S.R. 18. As such, the MCSE will be responsible for providing water and sanitary sewer service to the Sharon Township area as the primary utility provider. In redirecting the wastewater, an amendment is requested to the 208 Facility Planning Areas (FPAs) for both the city of Wadsworth and the Medina County Sanitary Engineers office as recognized by the Northeast Ohio 208 Water Quality Management Plan. The Wadsworth Township Trustees support the Medina County Sanitary Engineer’s 208 map amendment request.

Sincerely,

Wadsworth Township Trustees

Kevin Keiper
Robert Engler
James Gardner
August 11, 2017

Mr. Eric Akin, Senior Environmental Quality Planner

Northeast Ohio Arcwide Coordinating Agency

1299 Superior Avenue

Cleveland, Ohio 44114

Re: Medina County Sanitary Engineer’s (MCSE) Request to Amend the Medina County Facility Planning Area

Dear Mr. Akin:

Since my time as a Medina County Commissioner, I've stayed in touch with the Medina County Sanitary Engineer, Amy Lyon-Galvin, regarding the status of a project that began prior to my departure from that role in late 2014. As you are aware, the Medina County Sanitary Engineering Department (MCSE) is completing the engineering on a project to extend water from the existing MCSE water system located on S.R. 18 to the south, to serve the Sharon Township area. This extension of MCSE water utilities, and resultant increase in water drawn from the S.R. 18 area will improve water system performance across the S.R. 18 corridor and allow for better cycling of water stored in MCSE's water towers.

This new water supply will benefit Sharon Township residents, businesses, as well as Highland Local School District’s Sharon Elementary School, by increasing available water volume and pressure over existing levels. As I understand it, the current water volumes and pressures cannot provide the desired fire protection or maintain positive pressure in the water system under the duress of a major water main break without relying solely upon a City of Wadsworth supplemental
water feed. It would also allow the MCSE to decommission an aging water treatment plant and well system located on the Sharon Township Golf Club property.

With the proposed extension of MCSE water from its Northwest Water System, it is critical that the MCSE return the wastewater back to the originating Lake Erie water basin. As such, the MCSE plans to eliminate one (1) existing pump station, and redirect the force main discharge from the second pump station, to return the wastewater back to the sanitary sewer system located on S.R. 18.

County officials first met with City of Wadsworth officials to discuss this project in February, 2014. It was made clear to the City, that the MCSE planned to pursue this project, and would be prepared to begin construction within the next 3 to 5 years. We felt it important at that time to instruct Wadsworth officials to consider the impacts of the County's withdraw from the dependence upon the City for the supply of bulk and emergency water from the north part of the City to the MCSE's Sharon Township customer base, and for wastewater treatment at the City's POTW per Agreement that had been in place since 1975.

City officials are well aware of the County's intentions, and have been for over four (4) years. Please accept this letter as a demonstration of my continued support for the MCSE project, and strong recommendation that NOACA grant the County's amendment request to the 208 Facility Planning Areas (FPAs) for both the City of Wadsworth and the Medina County Sanitary Engineer.

Sincerely,

Representative Steve Hambley
Ohio House of Representatives
October 1, 2018

Mr. Eric Akin, Senior Environmental Quality Planner
Northeast Ohio Areawide Coordinating Agency
1299 Superior Avenue
Cleveland, Ohio 44114

Regarding: Medina County Sanitary Engineer - FPA Map Amendment request

Dear Mr. Akin:

The Medina County Township Association works very closely with the Medina County Sanitary Engineer’s (MCSE) office as the primary provider of water and wastewater utility service to unincorporated areas of Medina County. Additionally, the MCSE maintains efforts to improve service in those unincorporated areas. The pending project in the Sharon Township/Wadsworth Township area is an example of those efforts, and approval of the County’s FPA Map Amendment request by the Planning and Programming Committee on October 12th is encouraged.

Please be aware that the County has long supported our local townships with the provision of water and sewer utilities to meet the needs of our constituents, to compliment the different interests of our varied Townships, and to offset the loss of Township lands to neighboring cities when developers express interest in a public water supply. As such, the Medina County Township Association is writing this letter of support to NOACA for the County’s project to extend water from the existing MCSE water system located on S.R. 18 to the south, and to redirect wastewater from the County’s customer service area in Sharon Township/Wadsworth Township back north to the sanitary sewer system located on S.R. 18.

In juggling multiple responsibilities, it can be difficult for the Township Trustees in our membership to appear in person for a daytime meeting at NOACA. Please accept this letter as a demonstration of the Medina County Township Association’s understanding and support of the MCSE in continuing to better their utility systems, to continue their service to unincorporated areas, to provide the local Township Trustees a voice in the decision-making process, and to urge NOACA’s Planning and Programming Committee to advance the County’s FPA Map Amendment request. Thank you.

Sincerely,

Rick Monroe,
President, Medina County Township Association
York Township Trustee
October 4, 2018

Ms. Grace Gallucci  
Executive Director  
Northeast Ohio Areawide Coordinating Agency  
1299 Superior Avenue  
Cleveland, Ohio 44114

Dear Ms. Gallucci:

The Northeast Ohio Township Association supports the Facility Planning Area change requested by the Medina County Engineer from the City of Wadsworth's Facility Planning Area to the Medina County Facility Planning Area.

Yours truly,

[Signature]

Dick Heidecker  
President

cc: Amy S. Lyon-Galvin, P.E.
March 2, 2018

Mr. Robert Patrick, Service Director
City of Wadsworth
120 Maple Street
Wadsworth, Ohio 44281

Regarding: Wadsworth's Medina County Water/Wastewater Proposal

Dear Mr. Patrick,

I have reviewed the City of Wadsworth's proposal dated February 15, 2018 to extend City water services to Sharon Center/Sharon Township and take over sewer utilities and services in southern Sharon Township/northern Wadsworth. Presumably the proposal is to counter the County's pending project to extend County utilities from the S.R. 18 corridor. Unfortunately, the City's proposal is not sufficient to meet the County's overall utility objectives, and does not dissuade the County from its plan to establish self-reliant water and sewer services.

The County objects to the City's offer to take over any current County water customer base in the Sharon Center area. It is the County's position that the 1979 Water Agreement between the County and City has expired, and has little bearing on these continued discussions. The County is interested in supplying its own water to its current customer base, and to provide potential customers in Sharon Township and Wadsworth Township an option to access affordable public water without need to annex to the City of Wadsworth for those services. In addition, the City's proposal does not contribute to the optimization of the County's water system across the S.R. 18 corridor. In fact, the expansion of City services into Sharon Center area would unfairly inhibit optimization of the County's water system across the S.R. 18 corridor by reducing foreseeable customer areas and demand. Please know that we disagree with the City's perception of financial benefit to the County. The County is interested, however, in accepting the City's interim offer to reduce the bulk rate charged for water to the County to the rate of $1.79/1,000 gallons to match the bulk rate of Avon Lake.

The County also objects to City's suggestion that the County should make an investment in the lift station(s) and force main for the City's benefit, with subsequent loss of County customers. It is the County's position that the 1975 Sewer Agreement between the County and City grants the County the right to unilaterally withdraw from Wadsworth's wastewater treatment services since the financing for the sewer project outlined in that agreement is fully retired, and the pending MCSE project provides the County with access to its own facilities. The County intends to terminate the 1975 Agreement in accordance with Section 4, pursue the elimination of the south lift station, and reroute the force main discharge from the north lift station to the S.R. 18 collection system. The County will, however, honor the commitment made to the City nearly 5 years ago at the onset of
these project discussions, that the City may construct a pump station of their own if they so choose to retain sewer customers within the existing City limits. If the City is not interested in doing so, the County will willingly provide wastewater treatment to the City customers in a role reversal to the current arrangement. Conversely, if the City is interested in purchasing the County's south lift station, and the customer base tributary to it, the County would entertain those options. Please note the existing area tributary to the south lift station includes sewer service to a handful of customers located outside of the existing City limits.

The County has requested inclusion on NOACA's Water Quality Subcommittee meeting agenda on Friday, March 16, 2018, to present the merits of our case in moving forward with the FPA boundary modification as submitted to NOACA on September 1, 2017. Based upon the City's February 15th proposal it is apparent that the City is not in agreement with the County on these matters, however, we are always open to further discussion. At the same time, the County wants to be clear it will pursue the necessary approvals from NOACA to further advance the MCSE project.

Thank you.

Sincerely,

Amy S. Lyon-Calvin, P.E.
Sanitary Engineer

cc: Adam Friedrick, Medina County Commissioner
Scott Miller, County Administrator
Jeremy Sinko, P.E., Assistant Sanitary Engineer
Dave Bazilevich, Superintendent of Treatment
Brian Richter, Assistant County Prosecutor
Eric Akin, NOACA
March 2, 2018

Mr. Robert Patrick, Service Director
City of Wadsworth
120 Maple Street
Wadsworth, Ohio 44281

Regarding: Wadsworth's Medina County Water/Wastewater Proposal

Dear Mr. Patrick,

I have reviewed the City of Wadsworth's proposal dated February 15, 2018 to extend City water services to Sharon Center/Sharon Township and take over sewer utilities and services in southern Sharon Township/northern Wadsworth. Presumably the proposal is to counter the County's pending project to extend County utilities from the S.R. 18 corridor. Unfortunately, the City's proposal is not sufficient to meet the County's overall utility objectives, and does not dissuade the County from its plan to establish self-reliant water and sewer services.

The County objects to the City's offer to take over any current County water customer base in the Sharon Center area. It is the County's position that the 1979 Water Agreement between the County and City has expired, and has little bearing on these continued discussions. The County is interested in supplying its own water to its current customer base, and to provide potential customers in Sharon Township and Wadsworth Township an option to access affordable public water without need to annex to the City of Wadsworth for those services. In addition, the City's proposal does not contribute to the optimization of the County's water system across the S.R. 18 corridor. In fact, the expansion of City services into Sharon Center area would unfairly inhibit optimization of the County's water system across the S.R. 18 corridor by reducing foreseeable customer areas and demand. Please know that we disagree with the City's perception of financial benefit to the County. The County is interested, however, in accepting the City's interim offer to reduce the bulk rate charged for water to the County to the rate of $1.79/1,000 gallons to match the bulk rate of Avon Lake.

The County also objects to City's suggestion that the County should make an investment in the lift station(s) and force main for the City's benefit, with subsequent loss of County customers. It is the County's position that the 1975 Sewer Agreement between the County and City grants the County the right to unilaterally withdraw from Wadsworth's wastewater treatment services since the financing for the sewer project outlined in that agreement is fully retired, and the pending MCSE project provides the County with access to its own facilities. The County's intends to terminate the 1975 Agreement in accordance with Section 4, pursue the elimination of the south lift station, and reroute the force main discharge from the north lift station to the S.R. 18 collection system. The County will, however, honor the commitment made to the City nearly 5 years ago at the onset of
these project discussions, that the City may construct a pump station of their own if they so choose to retain sewer customers within the existing City limits. If the City is not interested in doing so, the County will willingly provide wastewater treatment to the City customers in a role reversal to the current arrangement. Conversely, if the City is interested in purchasing the County's south lift station, and the customer base tributary to it, the County would entertain those options. Please note the existing area tributary to the south lift station includes sewer service to a handful of customers located outside of the existing City limits.

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Thank you.

Sincerely,

Amy S. Lyon-Calvin, P.E.
Sanitary Engineer

cc: Adam Friedrick, Medina County Commissioner
    Scott Miller, County Administrator
    Jeremy Sinko, P.E., Assistant Sanitary Engineer
    Dave Bazilevich, Superintendent of Treatment
    Brian Richter, Assistant County Prosecutor
    Eric Akin, NOACA
March 16, 2018

Eric Akin
Senior Environmental Quality Planner
Northeast Ohio Areawide Coordinating Agency (NOACA)
1299 Superior Avenue
Cleveland, OH 44114

Regarding: The Medina County Sanitary Engineer’s Request to Amend the Medina County Facility Planning Area

The City of Wadsworth is in receipt of the Medina County Sanitary Engineer’s letter of March 2, 2018, responding to the City’s proposal for a solution to the County’s original request to modify the Facility Planning Area (FPA) recognized by the Northeast Ohio 208 Water Quality Management Plan. After many months of discussion, information sharing, and meetings, the County has made a request to NOACA to move forward with their original plans. The City of Wadsworth was very hopeful from the onset of discussions, last September, that an amicable solution could be determined that would benefit all customers in the area and not negatively affect either the County or the City’s system or customers. Given the County’s position in the letter dated March 2, 2018, the City of Wadsworth does not support the requested change in the FPA boundary modification as submitted to NOACA on September 1, 2017.

Overall, the result of the FPA modification would cause economic harm to the City of Wadsworth and its customer base. The current volume of sewage being accepted from the affected area is approximately 134,000,000 gallons per year. This equals approximately 11% of the overall treated wastewater at the City’s Wastewater Treatment Plant. Treatment of this volume equaled over $612,510 of revenue to the City of Wadsworth in 2017, 16% of the City’s total wastewater revenue. Loss of this revenue would result in a substantial fee increase to the City’s remaining customer base.

The City’s current operating costs are substantially lower than those of the County, and the rates for City of Wadsworth serviced customers is 30% lower than for those served by the county. The City’s proposal to the County could have resulted in a lower rate for the approximately 900 customers in the area, both those inside the City and those in Sharon and Wadsworth Townships.

The City has sufficient capacity at its Wastewater Treatment Plant after performing a plant upgrade in 2008, to increase the treatment capacity. This FPA modification would reduce the efficiency of the plant and put the capital investment that was made at that time at risk.

The City provided 13,536,389 gallons of bulk water to the County in 2017, for servicing a large portion of customers in the requested FPA modification area. The City has ample supply to continue this service and could even provide the necessary additional water to the Sharon Center area for which the County is seeking to upgrade service. The City could provide this additional water with a lesser capital investment by the County than the County is proposing. It is our belief that the County’s economics in their proposal have changed greatly with 50% more capital expenses being planned to properly serve
the area. The City’s proposal reduced the County’s estimates under their original plans and provides all the benefit to the area. The City’s current water rates are approximately 30% less than the County’s charges in this area. We feel there could be an economic advantage, higher water pressures, and greater fire protection to all customers, if we could work together to find the best solution.

The City, as the existing Designated Management Agency, is interested in continuing to work with the County to negotiate to provide the best solution for the customers in this area. We believe that the proposal from the County is not economically justifiable or in the best interest of the customer base of the City of Wadsworth, Wadsworth Township or Sharon Township. More time is requested before action is taken by the Water Quality Subcommittee so that further discussions can be had and the Townships can be further educated on the impacts of this FPA modification.

Thank you for the opportunity to comment. We would accept an offer to present our proposal to NOACA Staff or the Water Quality Subcommittee in the future.

Sincerely,

Robert Patrick
Director of Public Service
January 10, 2019

Mr. Robert Patrick, Service Director
City of Wadsworth
120 Maple Street
Wadsworth, Ohio 44281

Regarding: Pending NOACA 208 FPA map amendment
Medina County compromise proposal to Wadsworth dated January 10, 2019

Dear Mr. Patrick:

The County has taken a close look at Scenarios 3a, 3b, 4 and 5 proposed by NOACA staff, but it appears to us none of them quite fit the situation. The City has rejected any Scenario that calls for the area served by the South Lift Station to be transferred to the City because the City has determined the repair and maintenance of that system would be too expensive. The County rejected any Scenario that would call for a delay in the abandonment of the South Pump Station and diversion of flow to the North Pump Station because any delay in the project will result in much greater construction costs and the continued payment of excessive costs of treatment to the City. The primary goal of NOACA’s effort to mediate has been to mitigate the financial impact on the City, and the City has said the financial impact is its primary concern. The County hopes that the following Modified Scenario 4 might best address the mutual concerns of the County and the City:

Modified Scenario 4:
- County’s North and South Lift Station service areas are changed to the Medina County FPA. This would allow the County to replace the South Lift Station with gravity sewers and divert flow to the County’s system for a lower cost of treatment. It will be more cost effective for the County to bid this as a single project. This will also enable the County to reduce its sewer rates to its customers from $35.50/ERU/month to $30.25/ERU/month
- City will immediately reduce its sewer treatment rates to the County from $4.05/1,000 gallon consumption to $3.08/1,000 gallons until the County completes its construction project (estimated 12 months).
- In years 2020, 2021, 2022, and 2023, the County will pay to the City a declining settlement payment as a graduated offset to the City’s continued loss of revenue on July 1 of each year in the amount of $200,000; $150,000; $100,000; and $50,000; respectively.

We look forward to receiving the City’s written response to this proposal.

Sincerely,

Amy S. Lyon-Carvin, P.E.
Sanitary Engineer

cc: Medina County Commissioners
Scott Miller, County Administrator
Jeremy Sinke, P.E., Assistant Sanitary Engineer
Mike Lyons, Chief Assistant, Civil Division, Medina County Prosecutors Office
Grace Gallucci, Executive Director, Northeast Ohio Areawide Coordinating Agency (NOACA)
Eric Akin, Senior Environmental Quality Planner, NOACA
Robin Laubaugh, Mayor, City of Wadsworth
Tammy Guenther, Clerk, Wadsworth City Council, for distribution to City Council
February 12, 2019

Amy Lyon-Galvin  
Medina County Sanitary Engineer  
791 W. Smith Rd.  
Medina, OH  44258

Re: MSCE FPA Boundary Modification

Dear Ms. Lyon-Galvin:

As indicated in our January 31, 2019 proposal letter, the City reviewed the County’s proposal dated January 10, 2019 and did not, and continues to feel, that this proposal is not in the best interest of all the parties involved. Therefore, the City came up with a proposal that would meet these needs, not just for the City and the County but the Sharon and Wadsworth Township residents in this FPA modification area.

The City proposed, after much additional consideration, that the County turn over all assets associated with the North and South lift stations including the associated collection system to the City. All billing, maintenance and operation would be performed through the City in the future. This proposal would accomplish many wastewater concerns associated with all parties involved.

- The City would continue to treat wastewater from this area at the Wadsworth Regional Wastewater Treatment Plant, which was established using the best practices “sewershed” approach and planned to treat this area for years to come with millions in investment, as recently as the past 5 years.
- The County would no longer be losing $100,000, as you indicated, in revenue since the City would be responsible to maintain and operate the entire system.
- No new infrastructure would need to be constructed to divert flows across the continental divide and thus save the County and Public dollars in excess of $2 million dollars.
- The County could concentrate on needs elsewhere and divert monies that were to be spent on this project somewhere else, possibly taking more costly WWTP’s out of service.
- The City resident rates in this area would be lowered to that equal to other city residents. Outside city customer rates would also be lowered.
- No FPA boundary modification would be required.
- The Great Lakes-St. Lawrence River Basin Water Resources Compact would not be impacted. This proposal would not require the continental divide to be crossed.
- The proposal would not require NOACA Board approval.

In addition, the City proposed that the County pay the City $100,000 per year settlement payment for the next 6 years until the end of the 1975 agreement.

This proposal is contingent on the North lift station being inspected by the City to verify the claim by the County that the North lift station is in good operating order. We would request access to the lift station, all maintenance records and recorded flow data the County has on this facility. After the inspection and receipt of the data, the City would respond within 3 weeks. Furthermore, this proposal is contingent on the approval of accepting assets and property by the City of Wadsworth, City Council and the approval of
necessary rate changes to our customers. Under this proposal, the City will accept the South lift station in its current state as you have explained it is in satisfactory working condition for the current flow being experienced.

During our last meeting the County indicated that they did not accept the City’s proposal due to the plan not meeting the County’s future growth and expansion strategy for this area. The City requests that the County revisit this decision especially due to the fact that in the Supplemental Wastewater Planning Declarations in Appendix Table 4-4 of the Clean Water Plan’s Wastewater Management Facility Planning section, it states “Sharon Township requests that no expansion of sanitary service be allowed within the township.” Furthermore, wanting to remove such a substantial area from an existing regional wastewater treatment plant for future economic growth of water and sewer services is contrary to the underlining foundation for the entire 208 plan and FPA boundaries.

This next item does not pertain to our proposal above, but after the conclusion of our last meeting, the City received the engineering estimate from Wade Trim for the improvements to the south lift station and the associated forcemain. These improvements would be necessary due to the reduction in flow if the North lift station flows were diverted to the north. Since the County has indicated that they do not have daily meter data for the north and south lift stations, Wade Trim based their calculations on the County’s belief that the north pump station accounted for 58% of the total flow and the south pump station accounted for the remaining 42%. Wade Trim estimated the cost to install smaller pumps, new control system and smaller forcemain to achieve the thresholds set forth by Ohio EPA at $1.7 million.

We look forward to the County’s response based on this new data. Please feel free to contact me if you have any questions.

Sincerely,

[Signature]

Robert Patrick
Director of Public Services

CC: Robin Laubaugh, Mayor, City of Wadsworth
William Hutson, Commissioner, Medina County
Grace Gallucci, Executive Director, NOACA
Scott Miller, Administrator, Medina County
Eric Akin, Senior Environmental Quality Planner, NOACA
Bob Thurber, President, City of Wadsworth City Council