



April 29, 2024

The following are comments received on the Metropolitan District's (District) Integrated Plan Consent Order 2023 Annual Report and corresponding responses from the District. A draft of the 2023 Annual Report was posted on the District's website on February 13, 2024. The Connecticut Department of Energy and Environmental Protection (CTDEEP) provided written comments which were incorporated into the revised draft that was presented at the March 14, 2024 public meeting and updated on the website.

In addition, comments and questions were received from three (3) speakers at the public meeting and one of the speakers also followed up with written comments/questions. Below is a summary of the questions/comments received and the District's responses.

**March 14, 2024 Public Meeting – Comments/Questions during the meeting**

**Speaker: Bridgitte Prince**

**Comment/Question:** *Bridgitte thanked many people and commented .... we are happy to see how far this has gone in a few short months...*

**Response:** Comment noted. The District appreciates the positive feedback.

**Comment/Question:** *... I do have a question and actually I proposed this question to Jeff (King) last Saturday. We are in the same African-American Alliance meeting and we talked about a lot of the residents having outdated electrical systems and I know one of the other Commissioner from Hartford talked about this. Is it possible to actually get funded? I know it's not MDC's responsibility to deal with electrical systems but you have a lot of buildings and a lot of homes where it's going to be difficult for the Backwater valves to function properly if the electrical systems are not upgraded so we talked about that and I know Jeff had mentioned Rebuilding Together Hartford but I guess my question because I'm still thinking on a Federal level in the Bipartisan Infrastructure funds that are still available that I don't think has been fully tapped into and I don't know what the City of Hartford is doing and from what I understand too the MDC can't apply for specific grants but I think this is something that the City of Hartford needs to do so if the MDC can really work with the community to I mean you can't make the City of Hartford do*

*anything but you could make proposals to them to say Hey listen we need this money from the Bipartisan Infrastructure funds before it is dissolved....*

**Response:** Electrical systems are required to meet building codes for District's contractors to install sump pumps as part of the District's Sewer Backup Prevention Program (SBPP), also known as the Backwater Valve Program. The District will share these comments and responses with the City of Hartford and will continue to work with the City and the community. The District has communicated the electrical upgrades with the City and Rebuilding Together Hartford, a local Non-Profit Organization that can assist with such improvements. The property owners are recommended to contact these organizations for assistance.

**Comment/Question:** *...we still have a lot of the flooding that is happening in Upper Albany and Albany Avenue, and I know I was trying to understand how you decided which streets to work on which mains to repair in the North Hartford. I believe it's like about four streets, but we still have a large sector of upper Albany Avenue that is really horrific when it rains. Last July that's where a lot of the flooding occurred so I understand you were doing the study so in that study how long will it take after the study is done to kind of focus on some of those other areas that really require a lot of attention. Albany Avenue needs a lot of attention, so I guess those are my questions.*

**Response:** Albany Avenue is not included in Phase I of Long-Term Control Plan/Integrated Plan (LTCP/IP) in the District's Consent Order (CO). Phase I of the LTCP/IP does include a project titled Expedited Sewer Separation Contracts which includes work on Durham Street and portions of Branford, Woodstock, Westland, and Windsor Streets in Hartford (some of these projects were expanded in design to include additional portions of Garden, Risley and Main Streets). In addition, The District, in partnership with the City of Hartford, is undertaking the North Branch Park River Drainage study, which is expected to be complete this summer. The District will immediately use this information to support designs for sewer separation projects contained in Phase I of the LTCP/IP, specifically Granby 7, 8 and 9 that have Consent Order deadlines of 2028. Any additional separation work above and beyond what is included in Phase I, will be identified, ranked, and scheduled as part of the District's next LTCP/IP Update, which is due to CT DEEP by December 31, 2028 per Consent Order. To confirm that Albany Avenue street drainage systems perform adequately during wet weather events, the two parties that can provide daily and near-term impacts are the City of Hartford with continued street cleaning and the Connecticut Department of Transportation (CT DOT) with installing street drainage system that meets the CT DOT standards.

**Comment/ Question:** *...what can we do as a community to continue to support what you're doing? Who we need to see as far as getting more money if we have to go back to Senator Blumenthal or Congressman Larson we are willing to do that because we would like to see the whole city not just in North Harford fixed from the underground up so thank you for allowing me to speak and I just want everybody to know MDC you're doing a great job thank you.*

**Response:** Thank you. The community's effort has been tremendous to support the District and the LTCP/IP and bring projects to North Hartford. We look forward to the community continuing with similar efforts as we work to complete this Phase of the LTCP/IP and embark on subsequent phases.

The South Hartford Conveyance & Storage Tunnel (Contracts 2, 3 and 5) will provide a great CSO control benefit to the South end/South Branch Park River when it comes on line in 2026. The Consent Order also has projects deferred from Phase I and located throughout the City with a revised completion date range of 2030-2040. Work throughout the remainder of the City, as well as portions of the other seven Member Towns subject to the US EPA Consent Decree, will be identified, ranked, and scheduled as part of the District's next LTCP/IP Update, which is due to CT DEEP by December 31, 2028 per Consent Order. Financial support for property owners to address non-combined sewer related issues similar to the electrical improvements stated above and flooding related to natural storm runoff would be beneficial.

Additionally, as part of the District's sewer asset management program, the District will continue to assess and rehabilitate sewers in conjunction with Member Town paving programs. This work is scheduled and completed annually as Member Towns finalize their annual paving plans.

**Speaker: Cynthia Jennings**

**Comment/Question:** *Thank you. I had some concerns that I also wanted to address. One of the concerns is that there are patches that have created a real tire hazard in the City of Hartford. I know several people including myself who've lost \$200 tires... so I am wondering if there's any way that those patches could be looked at and fixed so that we don't have that hazard and that liability. If you go down Tower Avenue, you're going to see a whole lot of holes...*

**Response:** On February 6, 2024, Frank Dellaripa, City of Hartford, City Engineer/Assistant Director, emailed the District's Manager of Construction to inform him of complaints regarding pavement patches on Tower Avenue. Our construction staff reviewed the patches in the field and directed our contractor to repair the patches. The patches were repaired prior to the March 14, 2024 public meeting. A recent inspection (April 9, 2024) confirmed that the patches remain in good condition. Residents are encouraged to contact the District via our Outreach staff regarding any similar issues in the future.

**Comment/Question:** *...the other concern that I had was whether or not ... residents can get the free sewer lateral and does that mean everyone because I know some of the residents had clay laterals and they said well there was nothing wrong with them when they looked at them with a camera and they said they won't be replacing those well eventually I believe they'll probably have to be replaced so if there's enough money now to do all of them I think we should.*

**Response:** Phase I of the LTCP/IP includes sewer lateral lining of up to 4,699 laterals within the Sewer and Lateral Rehabilitation and Sewer Separation projects. As part of the lining process and the District's SBPP, a camera is used to determine the condition of the lateral. Laterals found

to be in “unlineable”, or poor condition are replaced through traditional dig and replace methods. Consequently, if a lateral is not part of a rehabilitation or sewer separation project area and does not have any structural defects at this time, it may not qualify for lining or replacement. As part of the next LTCP/IP Update, the District will evaluate the cost effectiveness of lateral lining and repairs completed to date with respect to reductions in Combined Sewer Overflows (CSOs) and Sanitary Sewer Overflows (SSOs). This evaluation will be critical in determining future similar financial commitments by the District and CT DEEP.

**Comment/Question:** *I just think if we had something very brief where you could say you could tell residents who are talking about this project what changes they can expect to see on their streets and in their homes as a result of the sewer separation project ...and make sure that there are maybe three things the residents can leave with that tells exactly what they could expect and why this sewer separation is taking place.*

**Response:** The District has a robust Outreach program that disseminates project information through project flyers, project information meetings, resident discussions with Outreach liaisons, and a project website. The District will be opening a project office in May 2024 at 179 Barbour Street. The District will prepare a brief document describing what to expect and why the District is performing this project.

**Comment/Question:** *okay the other question is ... have any residents found an increase in flooding after they had their basements done... and whether or not there's any increase in rodent activity.*

**Response:** The District is not aware of any increases in flooding at properties that participated in the Sewer Back Up Prevention Program . The District was made aware of a rodent (mice) issue at a single residence which was not a result of the District’s project work.

**Comment/Question:** *We are pleased to see the increase in the amount of Black and Hispanic workers on the job sites in north Hartford... I think it's very important that we continue that kind of activity.*

**Response:** The District has set a voluntary goal of 30% local work force for the North Hartford projects and continues efforts to transform local labor recruitment.

**Comment/Question:** *...was anything said about the office that opened up on Barbour Street because I think people need to know ...*

**Response:** The community outreach office was mentioned in the presentation (slide 4). The District also issued a press release on January 19, 2024 to announce the office. A ribbon cutting ceremony is planned for May 2024.

**Speaker: Judy Allen**

**Comment/ Question:** *Of special concern to me is how the public can access information about the 2023 integrated plan. Under this new plan the MDC must provide contact information about who to call with questions and concerns about the plan and that it be prominently displayed on the website. To me that means it would be on the very front page, in the cover letter in response to these requirements the MDC says they have prominently displayed a contact us option and that questions can be asked through this and given to the most appropriate person for a response. In reality on the main page there is an option for customer service and under that a link to contact us. And while there are phone numbers listed there none are for the 2023 integrated plan and none are for the North Hartford sewer Improvement projects...*

**Response:** The North Hartford Sewer Improvements webpage link (as well as the annual report itself) is available at the top of the main page of the website - the first thing someone would see when visiting the website, as it has been since last year. Links to the North Hartford/Integrated Plan page were also listed in three other places available on the main page of the website under the "Resources" tab, under the "Upcoming Meetings" section and in the "News" section of the website.

The "Contact Us" link is at the top left of main page of the website (as most websites have) which includes key phone numbers for the MDC starting with Emergencies, including a number for Construction Project Outreach. The Customer Service link on the main page, also links to the Contact Us page.

The extension listed is for Communications staff Julie McLaughlin, who has been the main contact for all construction project outreach (Clean Water Project/Integrated Plan or any CIP work) whether general or specific project-related, for over a decade. In addition, customers who are directly affected by the work in their neighborhood are provided via mailings and/or door hangers multiple MDC outreach and field construction staff contacts for questions and concerns about the project.

Under the "Contact Us" page, we have added the following text to further clarify the number (*this includes ALL construction projects including North Hartford work*). This same contact number is also separately listed on the North Hartford Sewer Improvements/Integrated Plan page. The number is available in two different pages from three different links on the main page.

**Comment/Question:** *...Under the notice for this meeting is a copy of tonight's presentation some of it has changed. What I was reading online I could not see a phone number or an email but at the very end was a link to a website that said simply not found that's if you go there. but that wasn't in tonight's presentation so maybe that's changed.*

**Response:** The presentation did change after it was originally posted. It was listed as a draft and per CT DEEP's comments, the presentation was updated with three (3) additional slides. The

website reflected those changes immediately upon posting updated document, noting the reason for the update with comments in parenthesis directly next to link for the presentation. The three (3) new slides, (Slides 8-10) were added to describe additional sewer separation work scope and proposed schedule change). Further, a fourth slide was shown at the meeting to provide a picture and update on the Outreach office at 179 Barbour St.

A contact email for comments was not in the body of the report, but on the Annual Report Information web page and the public notice.

**Comment/Question:** *there's a part of on the main page Resources by following links under resources I can find the North Hartford Projects with a phone number regarding construction concerns. If I call that number will someone be able to answer my questions regarding the schedule for work at the North Branch of the Park River. Is that a general number or a specific.*

**Response:** See previous answer regarding phone number contact from first section.

**Comment/Question:** *Also, under resources there's a link to the Clean Water Project web page with information that hasn't been updated since 2020 and, in some cases not since 2018. This is very confusing to me, and I think members of the public who might want to learn more. There needs to be a single place someone can access this information and it might want to learn more. There needs to be a single place someone can access and it should be of the website.*

**Response:** When the MDC initially submitted the extensive materials associated with the proposed Integrated Plan back in December 2018, that material was made available on the MDC's main website, so it was easier to find. The Integrated Plan was not formally adopted until September 2022, and then modified in July 2023, so there was no new work to update during that time from when it was submitted December 2018. When the Integrated Plan projects were eventually approved and began, the North Hartford/Integrated Plan page and related content was added on the MDC's website in the Fall of 2023.

The stand-alone Clean Water Project website does not have as modern or extensive features as the MDC's main site but has been kept up for historical and transparency purposes, and housed under the "Resources" section. This content is accessible not only from the main page of the website but any page of the website as it is part of the main navigation menu under Resources. The process of migrating all previous content with content from the project's current phase is underway as more content and information associated with the Integrated Plan becomes available and involves an extensive redesign of the site.

**Comment/Question:** *...There's lots of information tied to this meeting I wonder what happens after the meeting where will that information go hope it doesn't disappear and that I'll be submitting some written comments and questions too by April 1.*

**Response:** In December 2023, when the first Integrated Plan Consent Order Quarterly Meeting was held, a specific webpage titled the "Integrated Plan Reporting Information" was created to

house content associated with the meeting including the agendas, presentations and associated materials as well as the video recording of the December 2023 meeting and all subsequent quarterly and annual meetings. The page can be accessed in the navigation menu on the left side of the webpage when the North Hartford Sewer Improvement Projects page (a sub-page) and is also the second link listed directly on the same page titled “Integrated Plan Reporting Information Page”.

### **Written Comments/Questions received on the March 14 Public Meeting**

From Judy Allen

**Comment/Question:** *Thanks for being able to provide comments regarding the Integrated Plan Implementation. Overall, I don't think the presentation would be understandable to the general public. Especially since the presentation seemed to be hurried. I have a better understanding than most and still was confused about parts. Some had to do with the organization of the presentation. If this were my first exposure to the MDC, I would not be inclined to attend another meeting. I know the MDC may see this meeting as another hoop to jump through. It could be seen as an opportunity for further public involvement, more people to learn about what the MDC does.*

*Some suggestions and questions (in no particular order) some may be in the presentation and I just didn't see it.*

**Response:** Comments noted. The District strives to make technical information simple and consumable by the public and always welcomes feedback for improvement. The District can present at a slower pace at the next quarterly meeting. Of note, much of the content is as required by Consent Order to report on.

**Comment/Question:** *Is the Integrated Plan the same as the Consent Order?*

**Response:** The CSO LTCP/IP is the planning document which outlines how the District will meet the goals of the Clean Water Act, as required per the 2006 Consent Order. The CSO LTCP/IP was formerly approved by CT DEEP via a modified Consent Order, first in September 2022, and then again in July 2023.

From the EPA.gov website: “Integrated planning is a process for municipalities to achieve clean water and human health goals while addressing aging wastewater and stormwater infrastructure, changing population and rainfall patterns, and competing priorities for funding. EPA developed the 2012 Integrated Municipal Stormwater and Wastewater Planning Framework to help municipalities maximize their benefits through integrated planning while meeting Clean Water Act requirements. The Framework describes six elements that should be included in any integrated plan. The Basics Integrated Planning Framework Reinforced by Law In 2019, Congress enacted the Water Infrastructure Improvement Act (WIIA), which officially recognizes the Framework as a voluntary path that municipalities can take to comply with the Clean Water Act. The WIIA also requires EPA to continue supporting communities as

they apply the Framework in their stormwater and wastewater planning efforts.”

**Comment/Question:** *The explanation of terms at the end plus the two slides after it would have been more helpful near the beginning.*

**Response:** Comment noted.

**Comment/Question:** *All slides with maps are not helpful as they are too small to read. Are they really necessary to clarify things? And if they are then make them large.*

**Response:** The presentation is posted on the website and enables viewer (+ button on the top center of screen) to zoom in/make larger as they see fit. The maps are included to provide a visual representation. The District will include key figures as separate stand-alone documents on its website for future such presentations.

**Comment/Question:** *Are all the CO projects also in an NRZ?*

**Response:** No, not all of the CO projects are located in a Hartford NRZ. For example, the Consent Order includes projects in West Hartford and Bloomfield, which are not located within a Hartford NRZ.

**Comment/Question:** *Perhaps a definition of NRZ and how it is being used would be helpful. The DEEP requirements don't appear to use this term but does refer to neighborhoods. Are they being used as meaning the same thing?*

**Response:** Neighborhood Revitalization Zones (NRZs) were created in Connecticut in 1995. The objective of the NRZ process is to revitalize neighborhoods through the collaborative involvement of residents, businesses and government to determine the vision and priorities of the individual neighborhoods. The NRZ process provides a mechanism for local stakeholders, along with local municipal officials, to develop a strategic plan to revitalize their neighborhood. Municipalities wishing to participate in the process may establish zones in one or more of their neighborhoods by a resolution of their legislative body. The City of Hartford coordinates with the NRZ for planning and community relations purposes. The District is identifying neighborhoods by its NRZ for the Consent Order requirements to identify what neighborhood a project is located in.

**Comment:** *Same for Expedited Sewer Separation Project and its relationship to the overall projects. The requirements from DEEP don't use the term ESSP so it would be helpful to know how MDC is using the term.*

**Response:** The term is used in the Modified Consent Order (posted on the MDC webpage under the following path: Integrated Plan Consent Order 2023 Annual Report Information/Background Information/Consent Order – Integrated Plan Document. The District refers to these sewer separation projects as “expedited” since the District is using existing On-Call Sewer contractors to construct the project and/or a condensed design schedule. This allowed the District to begin construction on these projects sooner than if the



standard bidding process was followed. The purpose of the ESSP was to get construction underway as fast as possible.

**Comment/Question:** *I find that slide 7 contains a lot of information that could use more explanation, especially since the type is so small. Perhaps the actual presentation could include more information about the specifics of certain projects, what is the project trying to accomplish, what needs to happen before it is done, what have been some stumbling blocks along the way? Not for all projects but for a representative few.*

**Response:** The District's website ([www.themdc.org](http://www.themdc.org)) has a page under Integrated Plan Consent Order 2023 Annual Report Information/Background Information/North Hartford Sewer Improvement Projects page dedicated to project descriptions/information. The District will consider adding additional information into upcoming Quarterly and Annual presentations.

**Comment:** *Where is the summary of projects completed?*

**Response:** The District started construction on these IP projects in August of 2023. While progress was made, none were fully completed in 2023. The District will have a summary of completed projects as they are completed at each quarterly and/or annual meeting moving forward. The 2023 presentation has a slide titled "Consent Order Projects & Timeline" that can be referenced for project completion deadlines.

**Comment/Question:** *Is slide 14 meant to be the short-term benefits for communities? Is this district wide or just ESSP?*

**Response:** The purpose of slide "Consent Order Projects: NRZ Impacts and CSO Reduction" is to report the CSO reduction by project for both the 1-year storm and the typical storm. The slide shown on the draft presentation on the website have some number missing. Below is the complete one. The contents of this slide are presented as required per the July 2023 Modified Consent Order.

# Consent Order Projects: NRZ Impact and CSO Reduction

Project Name	Neighborhood Revitalization Zone	1 Yr CSO Reduction (MG)	Typical Year CSO Reduction (MG)
I-4 (N-30) Improvements	West End	<0.1	<0.1
Tower Avenue Area Sewer Rehabilitation	North East	0.2	3.0
Current CIP Sewer Rehab (in Bloomfield and North Branch Park Area)	Blue Hills, Clay Arsenal, South Downtown, South Behind the Rocks	0.2	2.4
Current CIP Sewer Rehab (in Gully Brook Area)	Clay Arsenal, Asylum Hill, South Behind the Rocks	1.3	10.0
NBPR Drainage Study	Blue Hills, West End, Asylum Hill	*	*
Durham Street (CFQ-11, 2022B-29)	Expedited Sewer Separation Contracts (ROW)	Blue Hills	1.2
Woodstock and Brandford Streets (CFQ-12, 2022B-31)		Blue Hills	1.4
Westland Street Area (CFQ-13, 2022B-31)		Northeast	2.9
Windsor Street Area (2024B-20)		North Meadows	14.3
Expedited Sewer Separation Contracts (Private)	Various	*	*
18-in to 21-in Brick Rehabilitation	Asylum Hill, Clay Arsenal, South End, Marg	0.8	7.0
West Hartford SSES Implementation Contract 2012-59	N/A	0.2	1.2
Sewer & House Connection Rehabilitation (in North Branch Park River Area)	Blue Hills	0.9	11.5
Sewer & House Connection Rehabilitation (in Gully Brook Area)	Northeast	0.9	11.0
Sewer Backup Prevention (up to 1,500 properties)	Various	**	**
Sewer & House Connection (in North Meadows Area)	North Meadows	1.0	28.4
South Hartford Conveyance & Storage Tunnel Contracts 2, 3, & 5	South End, Marg, South Behind the Rocks	3.8	21.9
Granby 8 Sewer Separation	Blue Hills	0.3	3.4
Granby 9 Sewer Separation	Blue Hills	0.4	3.6
Granby 7 Sewer Separation	Blue Hills	0.4	3.8
Bloomfield Styrene Rehabilitation	N/A	<0.1	<0.1

\*CSO Reductions for the NBPR Drainage Study included in individual Granby Separation Contracts

\*\* CSO Reductions associated with Private Property Improvements included in associated ROW Project Reduction Estimates

**Comment/Question:** *Where will I find long term benefits and projected funding sources?*

**Response:** The long-term benefits of the District’s CO and Consent Decree (CD) work can be found in the 2018 CSO LTCP/IP. Specifically, Volume 3 shows the projected CSO reductions in 5-year increments (see Figures ES-4 & ES-5). The below link (may need to copy and paste into your browser) shows where this document can be viewed on the MDC website:

<https://www.dropbox.com/s/kwr0pds6dkbrzq4/Integrated%20Plan%20Volume%203%20-%20Integrated%20Plan%20-%20Final%20Dec%202018.pdf?e=1&dl=0>

Funding for future IP projects will be authorized annually as part of the District’s Annual Capital Improvement Plan annual budgeting process. Funding for IP projects initiated to date was included in both the 2023 and 2024 budget authorizations. The below link (may need to copy and paste into your browser) shows where annual budget documents can be viewed on the MDC website:

<https://themdc.org/finance-investor-relations/finance-investor-relations-information/>

**Comment/Question:** *Are the additional projects proposed to be completed in the coming year to deal with sewers the same as the ESSP?*

**Response:** There are not additional separation projects that are proposed to be completed in the coming year (2024) to deal with sewers the same as the ESSP. The ESSP project will continue through 2025 and the District will also be working on several sewer and lateral rehabilitation projects in 2024, and beyond as part of the District's sewer asset management program.

**Comment/Question:** *Where are the reasons for going past a deadline? Slide 10, what are the reasons that there needs to be project extensions and what would be a new deadline?*

**Response:** The proposed new deadline is 2025 for work in the public right of way (ROW) and 2026 for work on private property. As detailed on Slide 10, the scopes of these projects were expanded significantly from the initial concepts included in the July 2023 Modified Consent Order. As a result of these scope expansions, an additional 97 properties (60%) will be included in the private property separation, as well as increased levels of reductions in Combined Sewer Overflows are also anticipated. In order to properly design and construct these projects with the expansions in scope, an additional year was added to the schedule for Expedited Sewer Separation Projects.

**Comment/Question:** *What is a one- year storm? Typical year storm? Elimination storm?*

**Response:** One (1)-Year Design Storm- The historic event from October 1951 with a 24-hour depth of 2.4 inches and an average recurrence interval (ARI) of 1 year. This design storm has been used to control all CSO regulators except those that discharge to the North Branch Park River or Wethersfield Cove.

*Typical Year Storm-* The typical year evaluated had 42-inches of rain and was selected in the 2004 Baseline Conditions study using the long-term rainfall record at Bradley International Airport. The selection was agreed to by CT DEEP and followed the approach described by the USEPA's "Combined Sewer Overflows Guidance for Monitoring and Modeling" (USEPA, 1999), which includes analyzing individual storm event return periods, annual precipitation, and simulated CSO volume for each year in the historic record to find a representative typical year.

*Elimination Storm* - Tropical Storm Tammy was adopted for CSO elimination alternatives analysis through correspondence with CT DEEP during the 2012/2014 LTCP Update. The event referred to in the LTCP as Tammy was a combination of the remnants of that storm in combination with Subtropical Depression Twenty-Two. From October 7 to 15, 2005, 13 inches of rain fell at Bradley Airport. The heaviest rain fell on the 8th and the 9th and from the 14th to the 15th, with 5.0 and 5.8 inches falling over respective 24-hour periods.

**Comment/Question:** *What is ROW work and why does it appear so much when talking about projects?*

**Response:** ROW is an acronym for Right of Way. In the presentation it refers to construction happening on public property or typically the road, sidewalk or grass strip in between.

**Comment/Question:** *What is BWV/PPID?*

**Response:** BWV/PPID – is an acronym for Back Water Valve/Private Property Inflow Disconnect. Back water valves can be installed in basements to help prevent sewer back-ups. An example of a PPID is removing roof leaders from directly discharging to the sewer lateral and reconnecting them to a dedicated storm lateral pipe.

**Comment/Question:** *How are district wide performance indicators related to goals for specific projects? Are they separate parts of the CO? Is it like one CO is for specific projects and another for overall goals?*

**Response:** The key performance indicators are more related to progress rather than specific goals. The indicators report on how many feet of pipe is installed or rehabilitated and number of properties that have received work (i.e. Back water valves, separation (storm lateral) etc.). They are not separate parts of the CO but are included as an estimate for the project details/description, and as a means to provide a metric for measuring quantities of work completed in a given reporting period. The goal of the CO is to meet combined sewer overflow control policy and water quality standards.

**End of Comment/Question and Response.**