

6.1 Communication Plan Development

The Communication Plan developed and documented here is a requirement of the 2002 Stipulation Agreement (Stipulation) (1) between the State of Wisconsin and the Milwaukee Metropolitan Sewerage District (MMSD or District). The Communication Plan serves to document the types and frequency of communications that will be prepared and distributed regarding the implementation of the Capacity, Management, Operations and Maintenance (CMOM) Program.

CMOM principles were proposed by the United States Environmental Protection Agency (USEPA) as a part of the draft Sanitary Sewer Overflow (SSO) rule (2) that was subsequently withdrawn. The withdrawn SSO rule, although never formally adopted, was considered, in the absence of other guidance, in developing the District Communication Plan. However, the Stipulation requirements and District CMOM objectives were the primary considerations.

This Communication Plan is a further development of the Communication Plan Strategy that was documented in the *MMSD CMOM Readiness Review and Implementation Strategy Development (CMOM Strategic Plan)* (3) completed in December 2005. There are many items that were identified during the readiness review and strategy development and documented in the *CMOM Strategic Plan* that have been partially or completely addressed as of the completion of this document. These items are still included to provide background information and continuity to the evolution of the Communication Plan from readiness review to strategy development to final plan. In addition, the strategies, tactics and performance measures described in this Plan will be subject to change and refinement as the District continues implementing and gains experience with the CMOM Program.

The withdrawn SSO rule, Stipulation requirements and CMOM objectives are discussed, respectively, below.

6.1.1 Stipulation Requirements

The Stipulation requiring the CMOM Program is the primary driver of the Communication Plan. The Stipulation states:

“7. While sanitary sewer overflows in the District’s system have been significantly reduced, there are still sanitary sewer overflows within the District’s and its satellite municipalities’ sanitary sewer systems. To continue the District’s program to reduce with the goal of eliminating all non-permitted sanitary sewer overflows, the District shall implement the regional Capacity, Management, Operation and Maintenance (CMOM) program. The regional CMOM shall be comprised of four integrated components:”

The fourth component listed is:

“D. *Communication and Program Audit Plan.* On a regular basis the District shall report to the Department on the implementation and performance of the CMOM program. The communication and program audit plan shall allow for public input during the development and implementation of the CMOM.”

Although the communication and audit portions of the CMOM program are listed together in the stipulation, they are addressed in separate plans. The communication portion is addressed in this plan and the audit portion is addressed in Chapter 7 of this document.

6.1.2 Principles from Withdrawn SSO Rule

In the withdrawn SSO rule that had been proposed by the USEPA in 2001, communications requirements were listed as shown below (taken from §122.42 (e) (3) of the withdrawn rule).

“Communications. – The permittee should communicate on a regular basis with interested parties on the implementation and performance of its CMOM program. The communication system should allow interested parties to provide input to the permittee as the CMOM program is developed and implemented.”

Although the withdrawn SSO rule was never promulgated, these principles were considered, in the absence of other guidance, in the development of the CMOM Program, including the Stipulation-required Communication Plan.

6.1.3 District Objectives

The second objective listed in the District CMOM Management Plan (Chapter 2, section 2.2.1.1.2 of this document) is to “Communicate the goals and objectives of the CMOM program to internal and external stakeholders, monitor the CMOM program implementation, and institute program modifications.”

The items discussed in the Management Plan include:

- Preparing an annual CMOM report
- Having a web page for internal District use to distribute CMOM-related information and reports and receive feedback and suggestions from District staff
- Annual memoranda to the District Commission
- Annual presentations to the Technical Advisory Team (TAT), District Consultants, and District Contractors
- Maintaining a publicly accessible web page that includes the CMOM Program documentation, annual reports and a portal for providing suggestions and input

6.1.4 Communication Plan Components

The Communication Plan will first describe the products that will be generated as part of the CMOM Program (section 6.2.1 below). These products will be delivered to four targeted groups. The groups and the associated part of the plan where the communications are addressed are:

- Internally to District staff (6.2.2)
- District Satellite system owners (6.2.3)
- District Regulators (6.2.4)
- Other Stakeholders (6.2.5)

6.2 Communication Plan

The Communication Plan includes:

- A description of the reports and summaries that will be prepared by the District related to CMOM implementation
- The targeted audiences for the reports and information
- The methods of delivering the information to the targeted audiences
- The methods for receiving input regarding the CMOM Program

The report products will be discussed first (section 6.2.1 below), followed by the targeted audiences (sections 6.2.2 through 6.2.5). Included in each section for the targeted audiences will be the methods of delivery and receiving input.

6.2.1 Communication Plan Products

The products that will result from the District CMOM Program are:

- CMOM Program documentation (this document)
- CMOM Program annual reports
- CMOM Program annual highlight reports
- CMOM Program Audit Report
- Input Compilation Report

Each is discussed further below.

6.2.1.1 CMOM Program Documentation

The District CMOM Program is described by this document. It will contain all of the plans that are part of the CMOM Program as separate chapters. The plans are the Management Plan (Chapter 2 of this document), the Asset Management Plan (Chapter 3 of this document), the Overflow Response Plan (Chapter 4 of this document), the System Evaluation and Capacity Assurance Plan (Chapter 5 of this document), the Communication Plan (Chapter 6 of this document), the Program Audit Plan (Chapter 7 of this document), and the Satellite CMOM Effort (Chapter 8 of this document).

The CMOM Program documentation will be made accessible from the District's internal and publicly accessible (www.mmsd.com) web sites.

6.2.1.2 CMOM Program Annual Report

The CMOM Program Annual Report will include seven sections; a summary section and one section for each of the six plans that make up the District CMOM Program. The first section will be an overview of the Program, Program highlights from the reporting year and any changes to the Program.

The second section will focus on the performance measures (see the Management Plan, Chapter 2, section 2.2.6 of this document). The values of the performance measures will be documented and trended. In addition, there will be a discussion of the trends, whether they indicate the District is meeting its goals, and any changes to the strategies or tactics the District will employ to meet its goals. Also in the second section will be a discussion

of any changes to the District organizational structure or Rules that impact the CMOM Program.

The third section will focus on the Asset Management strategies and tactics that have been added, deleted or modified, specifically as they relate to meeting asset management objectives. During the first few years of the CMOM Program, the focus will be on the near-term objectives of the asset management plan (see the Asset Management Plan, Chapter 3, section 3.2.2 of this document).

The fourth section will include discussion of the Overflow Response Plan (ORP), overflows that occurred during the reporting year, and any updates to the ORP. As the District enters a new agreement with a contract operator in 2008, the main items regarding the ORP will be the communications between the District and the contract operator and the contract operator's response procedures.

The fifth section will include discussion of the System Evaluation and Capacity Assurance Plan and any additional items that have been addressed or modified since the completion of the 2020 Facilities Plan.

The sixth section will address the Communication Plan, including changes to any of the communication products, communication methods, or targeted audiences (stakeholders) of the CMOM Program.

The final section will address any issues relating to the Audit Plan.

The CMOM Program Manager is responsible for completing and submitting the annual report to the Wisconsin Department of Natural Resources (WDNR) by the end of June each year, beginning in 2008. The Annual Report will go through the District's internal review process prior to submittal. The annual report will be made accessible from the District's internal and publicly accessible web sites.

6.2.1.3 CMOM Program Annual Highlight Report

The CMOM Program Annual Highlight Report is the executive summary for the CMOM Program Annual Report. It will list the larger issues related to the CMOM Program implementation and have short discussions on these issues.

The CMOM Program Manager is responsible for completing the highlight report by the end of June each year, beginning in 2008. The Highlight Report will be made accessible from the District's internal and publicly accessible web sites.

6.2.1.4 Audit Report

The Audit Report will begin with a focus on the performance measures that have been identified as benchmarks (can be compared to other utilities and agencies). The trending of the benchmarks, as well as their value relative to other comparable agencies will be considered and discussed. In addition to trending the benchmarks, a review will also be conducted similar to the annual review of District performance measures.

Following the trending of the District benchmarks and performance measures, a complete review of the CMOM Program will be completed. By having trended the performance measures first, the review will be able to focus on the results obtained through

implementation of District strategies and tactics. Successful strategies can continue to be employed and strategies that were not successful can be modified, replaced, or eliminated. All of the strategies must be directed towards contributing to the District's current goals and regulatory requirements. After the District has defined the strategies that will be employed to achieve its goals, the plans will be modified, as necessary, to align with the goals.

The end result will be a revised District CMOM Program. Included with the Audit Report will be a summary of the changes to the CMOM Program. For further information, see the Audit Plan (Chapter 7 of this document).

The Audit Report will be completed under the direction of the CMOM Program Manager by September 30, 2012. The Audit Report and revised CMOM Program documentation will be made available from the District's internal and publicly accessible web sites.

6.2.1.5 Input Compilation Report

The Input Compilation Report will be a listing of the suggestions, comments, and feedback that have been received from District staff, regulators, satellite system owners and the general public regarding implementation of the CMOM program. The compilation will include those submitted by the web portal, by direct communication with the CMOM program manager and any documented communication with the CMOM program manager (i.e. e-mail, memo).

The Input Compilation Report will be updated on an ongoing basis, as large blocks of comments are received. It will be made accessible from the District's internal and publicly accessible web sites.

6.2.2 District Internal Communication

Internally at the District, there will be three methods of distributing information and receiving input regarding the CMOM Program:

- The District's internal web site
- Division meetings
- Memoranda

6.2.2.1 District Internal Web Site

The District currently has an internal web site that allows for departments to have their own web pages and share information relative to each department's mission and functions. The CMOM Program will have its own page on this internal web site. The web page will have a short description of the CMOM Program, the personnel to contact with questions, current issues and links to various items. The links will be to:

- CMOM Program documentation (this document)
- CMOM Program annual reports
- CMOM Program annual highlight reports.
- CMOM Program Input Compilation Report
- A portal for inputting suggestions and feedback regarding the CMOM Program

- The CMOM Program Audit Report

Each of these links will be established and where information is not yet available, anticipated dates will be provided.

6.2.2.2 Division Meetings

The CMOM Program Manager works in the Technical Services Division of the District. The Water Quality Protection Division is also very involved in many CMOM Program tactics. The CMOM Program Manager will make presentations to these two divisions after each annual report and the Audit Report are prepared to highlight successes, new strategies and tactics, and the CMOM Program in general. See the Management Plan, Chapter 2, section 2.2.2 of this document for the organizational structure of the District.

6.2.2.2 Commission Memoranda

The CMOM Program documentation, annual reports, and Audit Report will each be transmitted to the District Commission via a memorandum from the Executive Director. The memoranda will include a summary description of the program or report and impacts to the District.

6.2.3 Satellite Communication

On an annual basis, the CMOM Program manager will present to the TAT, which includes representatives of the satellite system owners:

- 1) The District CMOM Program highlights;
- 2) Implications of the CMOM Program to the satellite system owners;
- 3) The District's publicly accessible web site with links to the District CMOM information
- 4) Emergency contact information related to District facilities (see the Overflow Response Plan, Chapter 4, section 4.2.1.3 of this document).
- 5) The Audit Report (when it is completed).

6.2.4 Regulatory Communication

The annual report for District CMOM activities will be completed under the direction of the CMOM Program Manager and sent to the District's WDNR Permit Administrator by the end of June, each year, beginning in 2008.

The Audit Report will be completed under the direction of the CMOM Program Manager and sent to the District's WDNR Permit Administrator within 30 calendar days of its completion.

6.2.5 Other Stakeholder Communication

Other stakeholders to be included in communications related to the District CMOM Program are the consultants and contractors that perform work for the District, citizens and groups interested in water quality and the general public.

6.2.5.1 District Consultants and Contractors

The District currently holds annual meetings with its consultants and contractors. At future meetings, the CMOM Program Manager is responsible for presenting information regarding CMOM Program highlights and inviting discussion. The discussion will focus on the portions of the CMOM Program that are impacted by consultant and contractor work. The items will be centered on asset management and may include using District asset numbering schemes, preparing and submitting asset plans, submitting asset data equipment forms and updating O&M manuals.

6.2.5.2 Water Quality Interests

Groups and citizens that are particularly interested in water quality in the Milwaukee area, especially as it relates to District initiatives and overflow incidents can be included on a list maintained by the District's Public Information Manager. Being on this list, they will be provided with immediate notification of overflows via the 24-hour notification e-mail (see the Overflow Response Plan, Chapter 4, section 4.2.3.1 of this document).

Beyond the overflow notifications, these groups can access the District web site and obtain the same information regarding the CMOM Program as the general public (see section 6.2.5.3 below).

6.2.5.3 General Public

The District currently has a publicly accessible web site (www.mmsd.com) that includes information on the District's history, current District programs (including the 2020 Facilities Plan/Water Quality Initiative), District Requests for Proposals and construction contracts, etc. The CMOM Program will have a page on this web site. The web page will have a short description of the CMOM Program, the personnel to contact with questions, current issues and links to various items. The links will be to:

- CMOM Program documentation
- CMOM Program annual reports
- CMOM Program annual highlight reports
- CMOM Program Input Compilation Report
- A portal for inputting suggestions to the CMOM program
- The CMOM Program Audit Report

Each of these links will be established and where information is not yet available, anticipated dates will be provided.

6.2.6 Communication Plan Updates

The Communication Plan will receive annual updates, if required, after the annual review of the performance measures relating to communications has been completed. Any changes to the Communication Plan will be documented in the CMOM Program Annual Report.

For further information, see section 6.2.1.2 above and the Audit Plan (Chapter 7, section 7.2.1 of this document).