

## MEMORANDUM

**TO:** MVRPC Technical Advisory Committee and Board of Directors  
**FROM:** MVRPC Staff  
**DATE:** November 12, 2025 (updated November 21, 2025)  
**SUBJECT:** Water Quality Plan Amendment to Update Boundaries for Piqua and Troy FPAs

Resulting from MVRPC's contract with Ohio EPA for water quality planning assistance and from requests by MVRPC member jurisdictions, this proposed amendment to the Areawide Water Quality Management Plan (AWQMP) includes one FPA boundary update affecting two facility planning areas: Piqua and Troy.

Updates to the AWQMP are subject to review by the Water & Environment Subcommittee, the MVRPC Technical Advisory Committee, and the review and approval of the MVRPC Board of Directors.

The City of Piqua serves as the Designated Management Agency for the Piqua Facility Planning Area (FPA). This requested boundary change addresses the need for wastewater services in a location annexed from Washington and Concord Townships to the City of Piqua in 2024 and 2025. The area in question is shown in the image, below, and has been zoned for industrial development by the City of Piqua. The City of Piqua states the planned development will require sanitary sewer and treatment at a centralized waste treatment facility.

The specific area to transfer to the Piqua FPA is depicted in the compromise map included below. This area is currently in the Troy FPA, which is managed by the City of Troy and in cooperation with Miami County Sanitary Engineering. Objections by the City of Troy to the initial proposed area to be transferred to the Piqua FPA led to a meeting of interested parties in April 2025, which resulted in a compromise map agreed by all parties. Future boundary adjustments based on expected annexations are anticipated by the City of Piqua.

The timeline for review of this proposal was as follows:

- Request for FPA Boundary update received on March 4, 2025. Additional data and content requested on March 5, 2025.
- Interested Parties meeting at Miami County Engineer's Office on April 30, 2025 – development of compromise map.
- Proposal confirmed as complete with agreement to the compromise map in May 2025.
- Presentation to the MVRPC Water & Environment Subcommittee on May 14, 2025
- Public Comment period held between September 3, 2025 and October 3, 2025. The Public was invited to submit a comment through the MVRPC website or in person at the MVRPC offices.
- Virtual Public Meeting held on September 18, 2025. No comments were received during the public comment period.
- TAC recommended the proposal forward to the Board of Directors at their November 20, 2025 meeting.

At the November TAC meeting, the City of Troy entered the following prepared statement to the minutes:

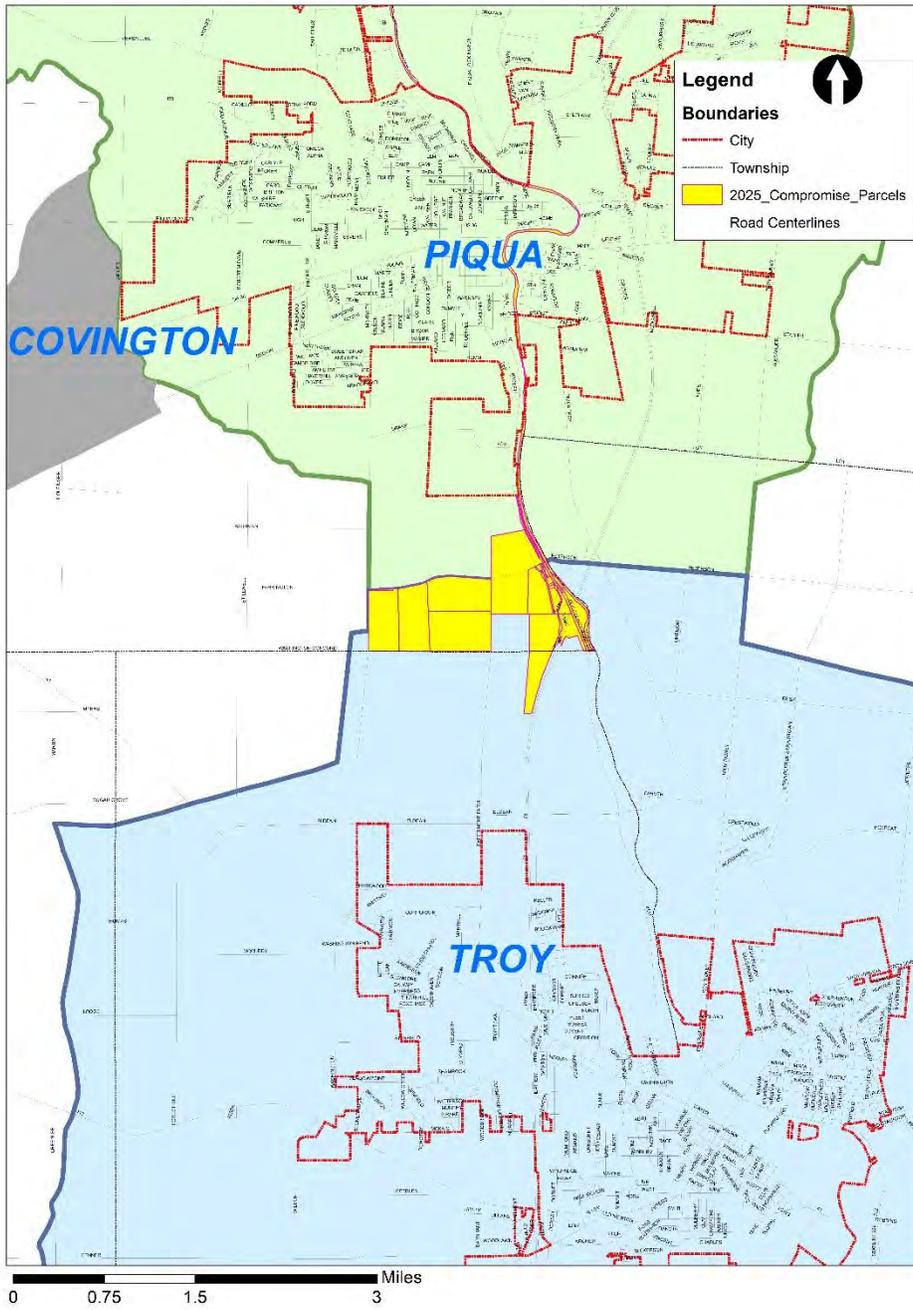
Troy is in complete agreement with the FPA boundary change proposal that is up for consideration today, but I do want to provide some clarifying comments about this recent process with Piqua, Concord Township and Miami County Sanitary. During a recent Water & Environmental Subcommittee meeting where this FPA boundary was presented, I feel that Piqua characterized Troy as being unreasonable in our request to keep the FPA boundary very similar to the existing Concord/Washington Township boundary and our opposition to any future requests beyond this line. Piqua stated several times that this FPA boundary was "arbitrary." Though, Piqua's corp limits is nearing Concord Township, we have agreements in place to allow Miami County Sanitary to provide water and sanitary services to Concord Township through our facilities. As such Miami County Sanitary has planned and sized their facilities to serve that area and currently serve the commercial development just east of 75. The County and Troy are being deliberate in our industrial growth planning without overreaching, we are as able if not more so to serve to the Concord Township boundary without excessive capital investment.

Again, we fully support the request before us today but at this time would be opposed to a future change that allows Piqua to serve Concord Township. The City is always willing to discuss collaboratively for the good of our County and region.

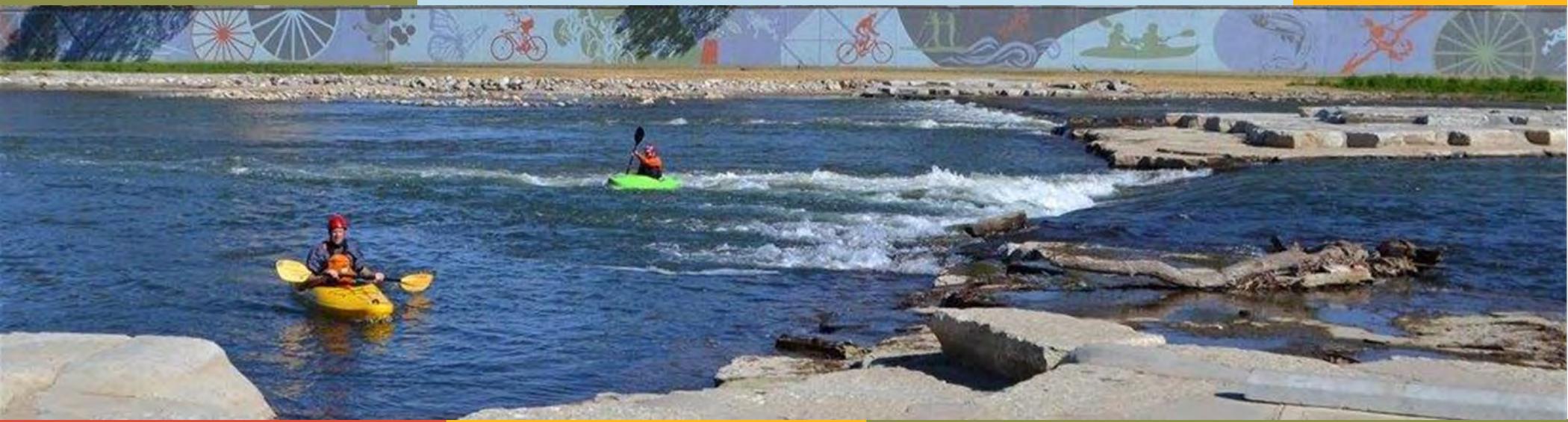
## **RECOMMENDATION**

MVRPC staff recommends the amendment be approved as presented for the protection of water resources.

Compromise FPA Boundaries For Review, May 12, 2025



*Area subject to this proposed update is highlighted in yellow.*



## Regional Environment & Economic Development



## Piqua FPA Amendment

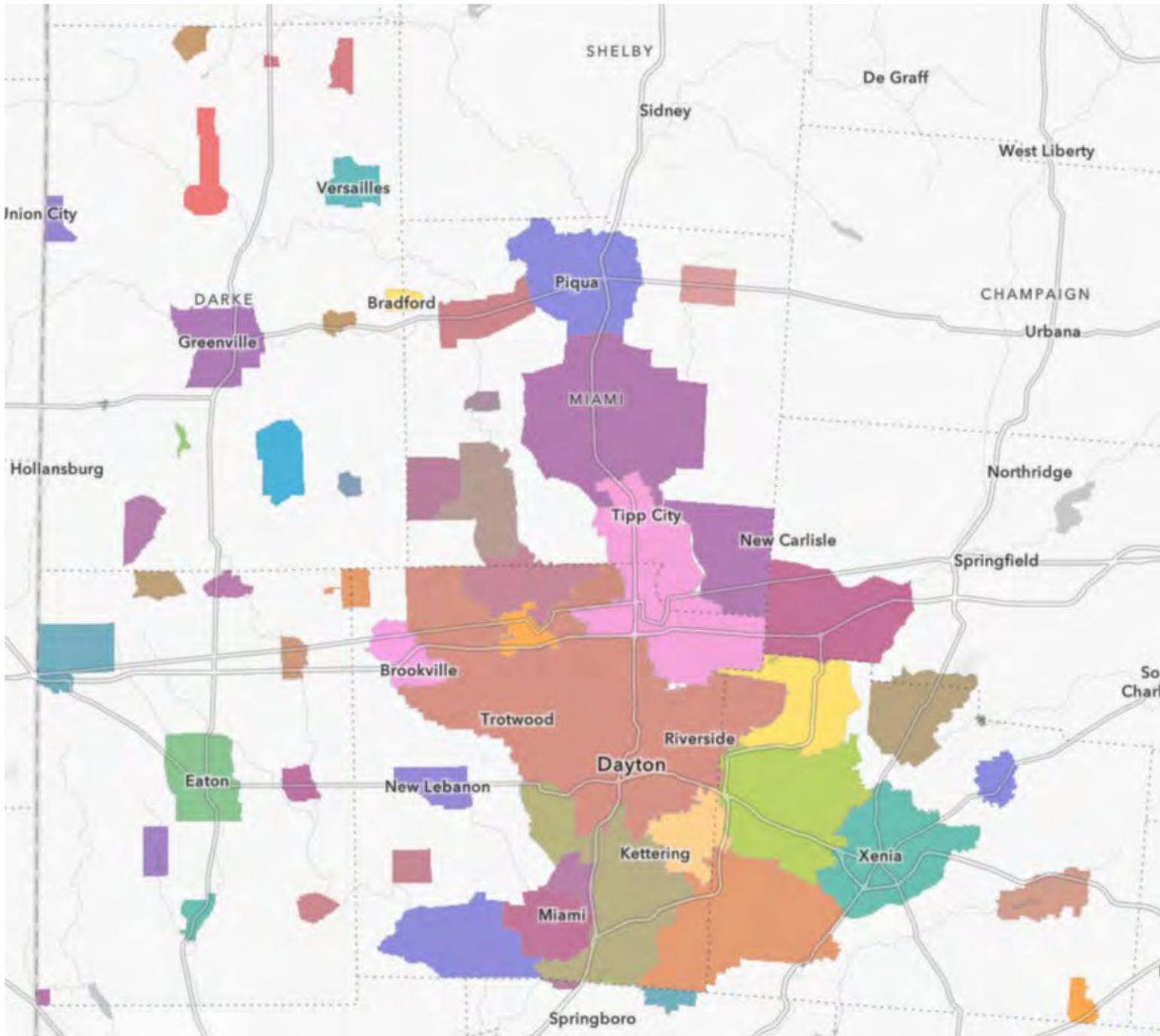


# FPA Basics





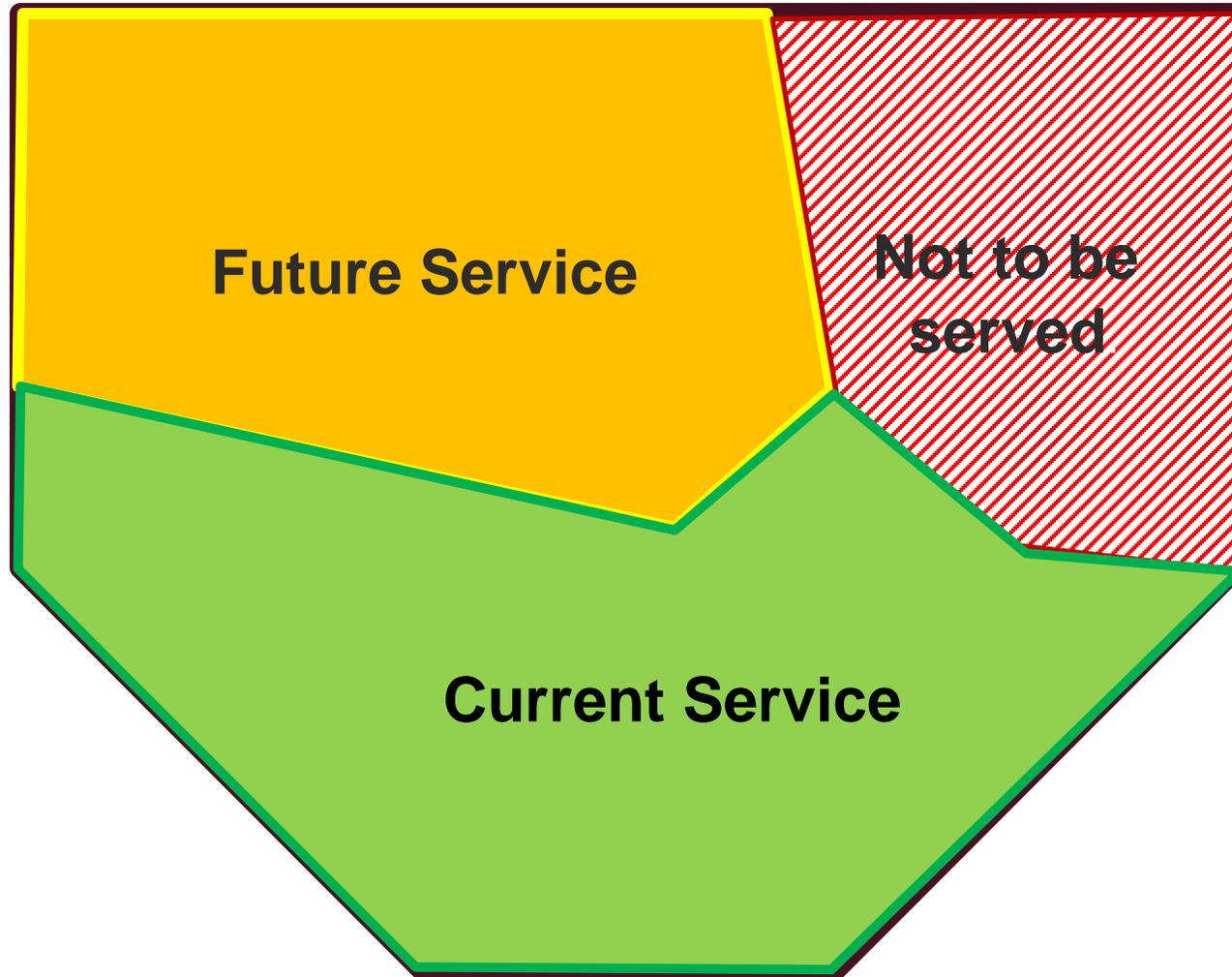
# Big Picture



The FPA is the area within which the Designated Management Agency is responsible for the **planning, financing, construction, maintenance, and operation** of wastewater collection and treatment systems.



# Can Be More Than a Line on a Map



- Based on existing planning
  - Comprehensive Plan
  - Land Use Plan
  - Zoning
- Topographical Lines
  - Gravity sewers
  - Now, greater comfort with force mains, lift stations, pump stations
- Parcel Lines

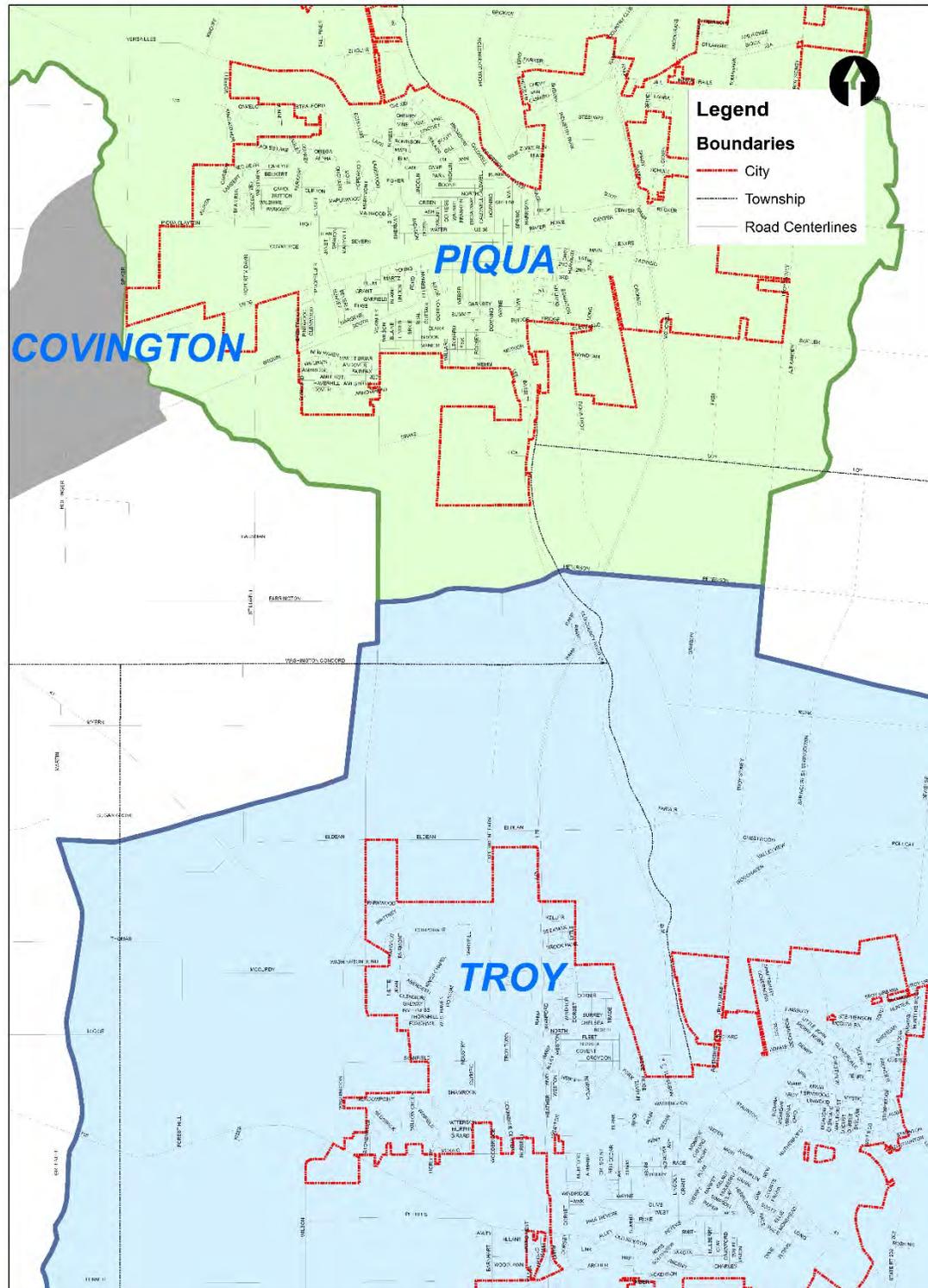




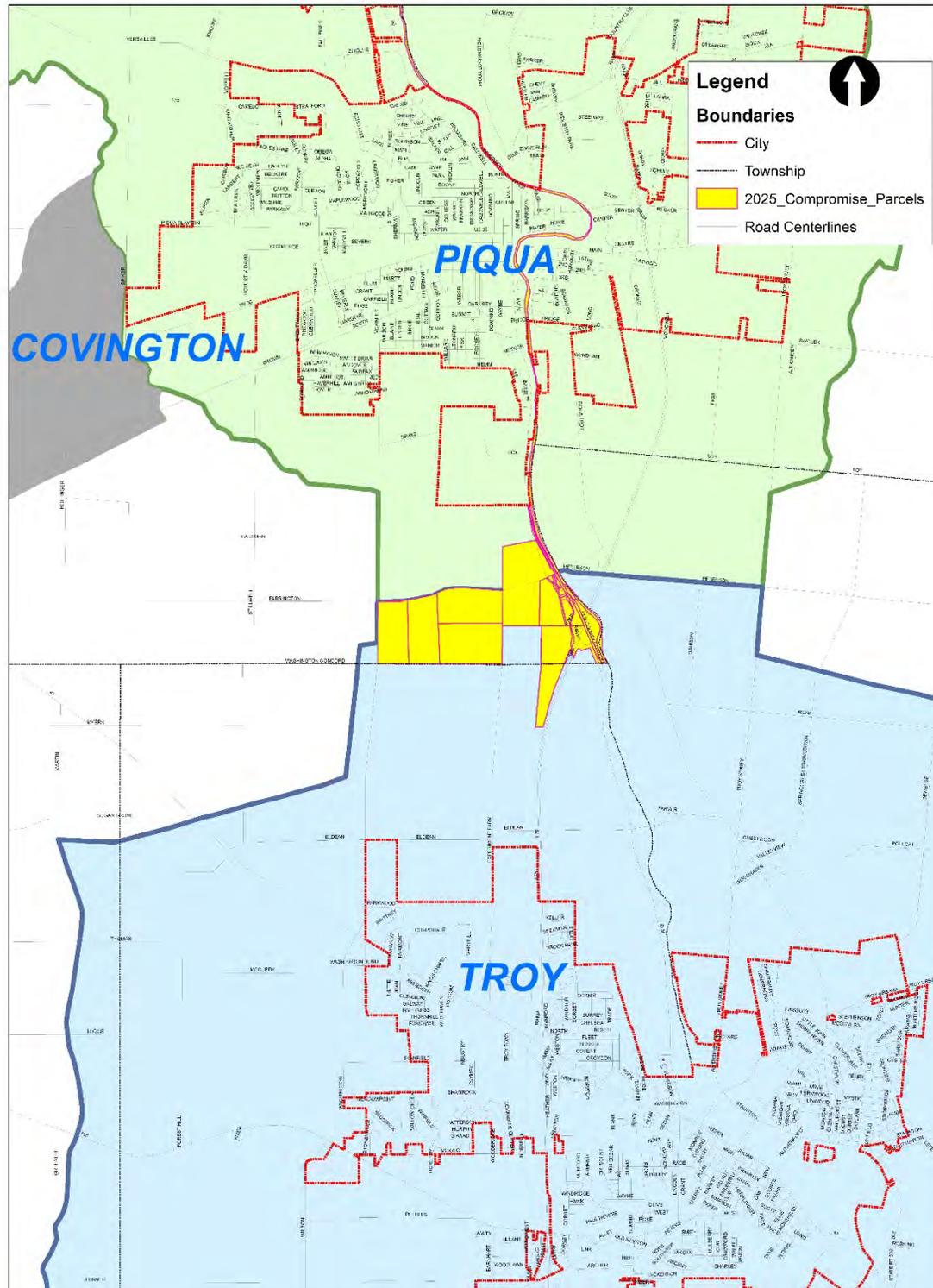
# Piqua Update Request



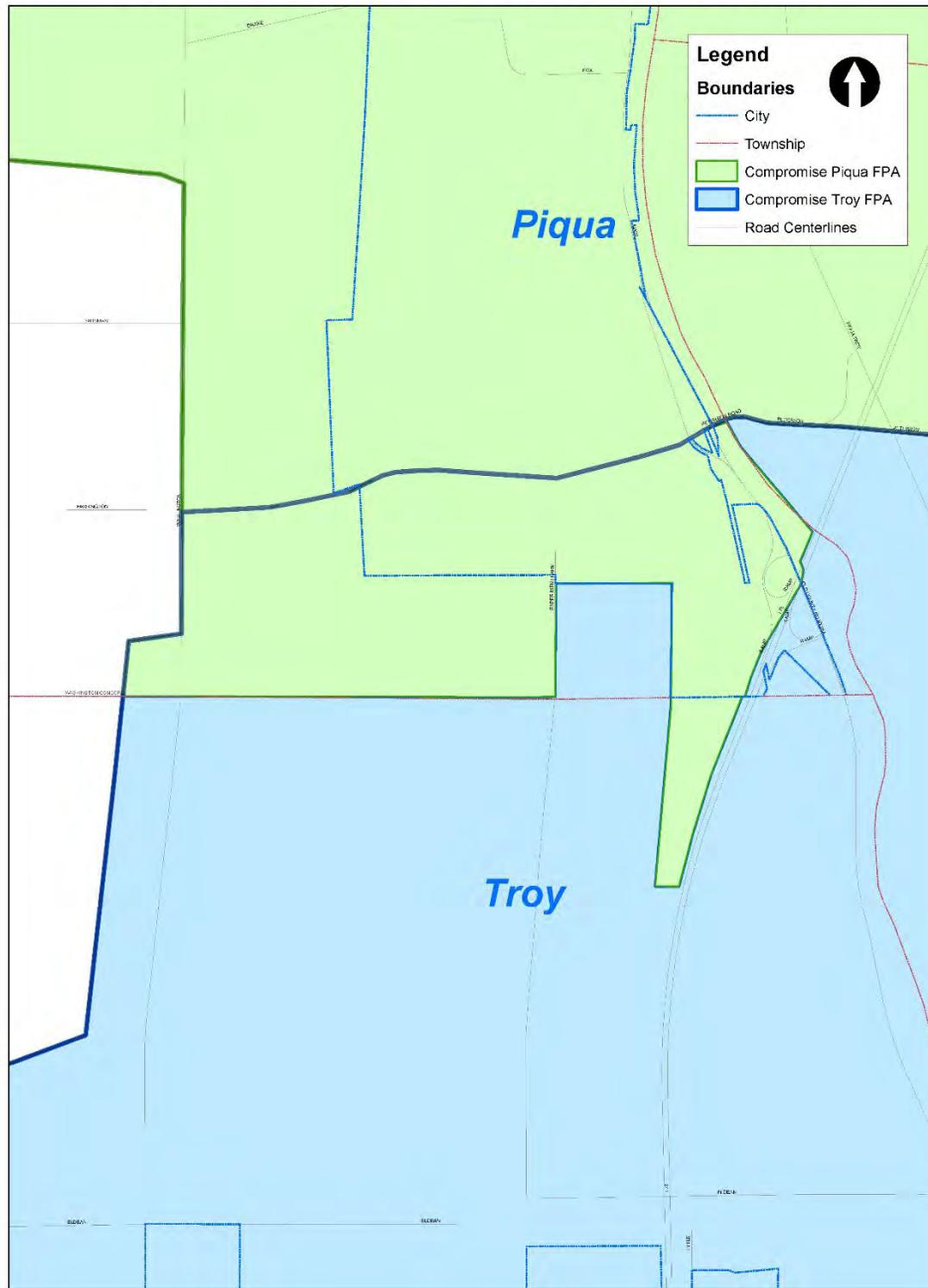
# Compromise FPA Boundaries For Review, May 12, 2025



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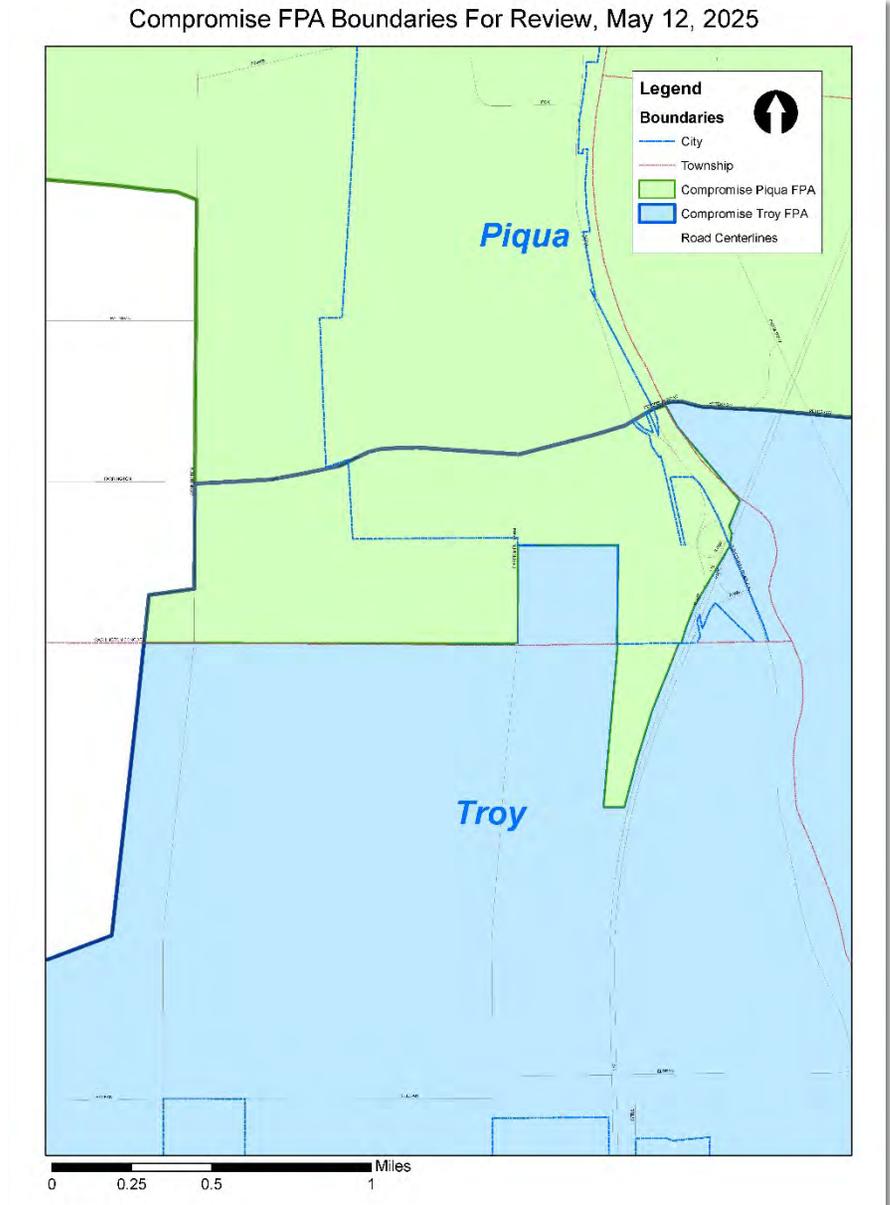


# Compromise FPA Boundaries For Review, May 12, 2025



# Review Process

- Initial request received from City of Piqua: March 2025
- Stakeholder meeting held on April 30, 2025
  - Compromise map developed
- Presentation to the WESC on May 14, 2025
- Public comment period: September 2025

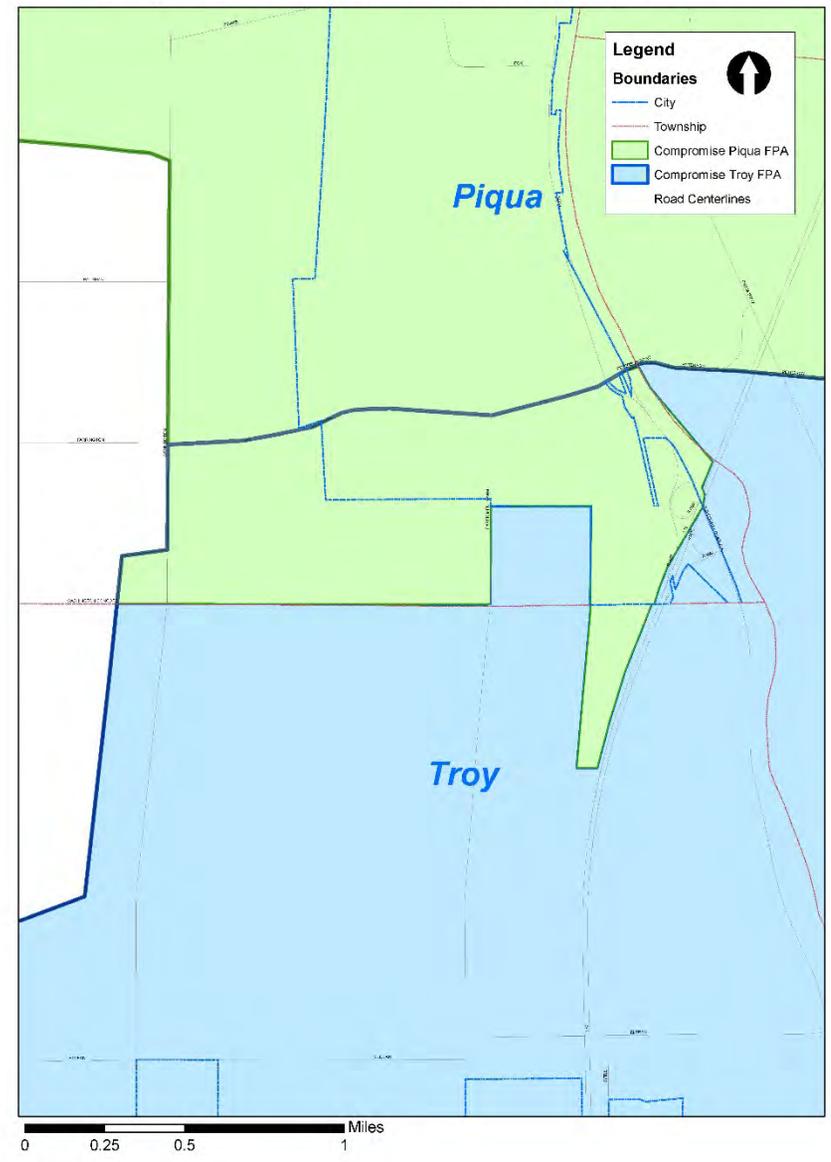


# Opportunities to Comment

The public comment period was held from **September 4 through October 3, 2025**

- Virtual Public Meeting on September 18
- E-mail to [mlindsay@mvrpc.org](mailto:mlindsay@mvrpc.org)
- Online comment form
- In writing

Compromise FPA Boundaries For Review, May 12, 2025



## Comments

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- No comments were received during the comment period.
- Public Participation Summary has been prepared.





# Thank you!

## Discussion and Comments

**Matt Lindsay**

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Miami Valley Regional Planning Commission

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**RESOLUTION 25-33  
AMENDING THE AREAWIDE WATER QUALITY MANAGEMENT PLAN TO UPDATE  
BOUNDARIES FOR THE PIQUA AND TROY FACILITY PLANNING AREAS**

**WHEREAS**, the Miami Valley Regional Planning Commission is the Designated Planning Agency (DPA) for Water Quality Management Planning within the Miami Valley Region pursuant to Section 208 of the Federal Water Pollution Control Act Amendments of 1972 (P.L. 92-500) and 1977 (P.L. 95-217); and

**WHEREAS**, in fulfillment of its responsibilities as the DPA, MVRPC has prepared the 208 Areawide Water Quality Management Plan, and administers said Plan within its designated five-county water planning jurisdiction, including Greene, Montgomery, Miami, Preble, and Darke Counties, Ohio; and

**WHEREAS**, it is periodically necessary to amend said Plan to incorporate pertinent and appropriate modifications; and

**WHEREAS**, the following amendments, hereafter known as the 2025 AWQMP Piqua Amendment, have been proposed for the Areawide Water Quality Management Plan:

1. FPA Boundary modifications for the Piqua and Troy FPAs

**NOW, THEREFORE BE IT RESOLVED** that the Commission hereby adopts the above-referenced 2025 Piqua Amendment to the Areawide Water Quality Management Plan and recommends its certification by the State of Ohio.

**BY ACTION OF THE** Miami Valley Regional Planning Commission’s Board of Directors.

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**Brian O. Martin, AICP**  
Executive Director

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**Sara Lommatzsch, Chairperson**  
Board of Directors of the  
Miami Valley Regional Planning Commission

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Date

At the December Board of Directors meeting, the City of Piqua entered the following prepared statement to the minutes:

“The City of Piqua is grateful to the representatives of the member communities within MVRPC for the approval of our FPA boundary change request.

In accordance with the Water Pollution Control Act amendments of 1972, MVRPC serves as the Designated Water Quality Planning Agency for the five-county Miami Valley Region. In this role, MVRPC prepared and continually maintains the Areawide Water Quality Management Plan (AWQMP). A major element of the plan is the individual wastewater treatment facility plans that are developed and maintained by the wastewater treatment providers in the Miami Valley Region. These plans outline protocols for providing centralized wastewater treatment in efficient manners that also protect valuable water resources.

To ensure “efficient manners that also protect valuable water resources”, MVRPC created an initial FPA map in 2005, along with guidelines to allow modification to that map. Although many areas on the initial map were well-defined with data and justification for which jurisdictions could serve the area most efficiently, there were also many areas that were assigned to jurisdictions arbitrarily based on geographical designations without justification for when or if the provider would be able to serve an area. When looking at the FPA map today, it is easy to find straight lines that use road or township boundaries instead of watersheds, even though those markers are clearly not the most efficient manner to protect water resources in an area. We know many of these lines were created to meet political desires of the time.

The City of Piqua requests that MVRPC move away from the current process which requires individual communities to negotiate agreement with neighboring jurisdictions and instead implement a fair, non-biased process utilizing clear metrics for who can most efficiently serve a property and protect water resources at the present time. Having standardized metrics for review of similar situations in the future reduces political decision-making and best meets the intent of providing wastewater treatment in an efficient manner. As development continues to occur in many communities in the Dayton area in 2025 and beyond, clear, fair, and metric-based standards should be created so FPA boundary decisions can be made that allow the most efficient, cost-effective and timely service to a property at the present time.

Thank you again for your approval of this request today. We look forward to continued discussion to build a process for future changes that is objective and metric-driven.”