

Borough of Fox Chapel

Office Of The Manager

October 19, 2012

Ms. Arletta Scott Williams, Executive Director
Allegheny County Sanitary Authority
3300 Preble Ave
Pittsburgh, PA 15233

RE: ALCOSAN Draft Wet Weather Plan

Dear Ms. Williams:

The Borough of Fox Chapel respectively submits the following official comments and questions regarding the ALCOSAN Draft Wet Weather Plan (DWWP).

- The Borough submitted a draft feasibility study to ALCOSAN for A-74A (Guyasuta), A-78 (Delafield) and A-78-02 (Squaw Run) points of connection. This draft feasibility study included an alternatives analysis that assumed free discharge to the ALCOSAN system. Under the ALCOSAN recommended plan, it is not proposed to extend any ALCOSAN facilities to the points of connection that the Borough is tributary. What restrictions will exist at these points if no facilities are being proposed by ALCOSAN? Any restrictions to Fox Chapel Borough, a SSO community, would be inequitable. The current leading alternative for Squaw Run is upsized conveyance to ALCOSAN. Will ALCOSAN provide sufficient capacity for all flows conveyed by the Borough up to and including the 10-year design storm? If capacity isn't provided by ALCOSAN at the point of connection and the Borough moves forward with a convey all alternative, will ALCOSAN accept responsibility for any overflows that occur at the point of connection or along the Borough's sewer system?
- The ALCOSAN DWWP assigns a value of \$530 million dollars for municipal improvements and then spreads these costs evenly among all of the municipalities within the ALCOSAN service area. It was not clear where this \$530 million dollar value came from. There is a figure provided that shows the proposed municipal projects, however a corresponding table that lists the projects along with the costs for the individual projects would be helpful. With the information provided, it cannot be verified if the value used by

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ALCOSAN for work in Squaw Run matches what the Borough submitted. Based upon the information presented in the DWWP, the Borough's share of capital improvements would equal approximately \$3.3 million dollars. The current leading alternative for the Borough has a projected capital cost of \$10.5 million dollars. Would ALCOSAN and/or other communities provide money to the Borough to cover the difference, essentially subsidizing work that needs done in Fox Chapel by other communities that don't have to do work to get flow to ALCOSAN? Or is it ALCOSAN's intent to take over the trunk sewers that need work done and spread those costs among all ALCOSAN customers?

- Appendix B of the DWWP presents Average Dry and Wet Weather Flow in gallons per day for each of ALCOSAN's points of connection. Based upon information presented in the DWWP, it is our understanding that this value was obtained by simulating the typical year for each point of connection assuming free discharge and either the assumed or preferred municipal alternative and then dividing the total flow at the point of connection by 365 days. It is suggested that the heading in the table of Appendix B be changed from "Average Dry and Wet Weather Flow (gpd)" to "Average Daily Flow (gpd)". Is it ALCOSAN's intent to hold the communities tributary to each point of connection to that flow rate? It should be noted that the Borough has provided ALCOSAN with peak flow rates and total volumes for various design storms. It is suggested that a column be added to this table or a separate table be added to the DWWP that shows the peak wet weather rate for each POC that ALCOSAN has designed its facilities.
- For the A-78 point of connection, the DWWP shows that stream inflow removal as part of the baseline conditions. It should be noted that the Borough does not contribute any storm and/or stream inflow to the A-78 point of connection.
- The DWWP identifies the Borough as tributary to A-72. The Borough has no connections to A-72.
- The DWWP identifies A-74A, A-75 and A-78 as combined sewer overflows. It should be noted that the Borough does not convey combined sewage flow to these points of connection.
- The DWWP identifies the Borough tributary to A-75. It should be noted that the Borough has about 9 houses along Guyasuta Road that are tributary to the Aspinwall sewer system that connects to A-75.

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We find it odd that the plan does not promote green infrastructure which is the prominent element in the Philadelphia Wet Weather Plan. Will ALCOSAN's final Wet Weather plan use more green infrastructure elements to decrease the overall flow which is conveyed to the treatment plant and thereby promote local jobs?

As I have stated at several ALCOSAN regional meetings, ALCOSAN needs to allocate costs based on wet weather flows versus tap water usage. The SSO communities with active lateral replacement programs that contribute minimal wet weather flow should not be assessed for CSO communities.

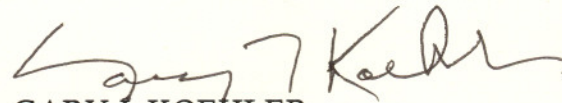
We are concerned over the excessive cost due to delayed maintenance and upgrades to the existing ALCOSAN system and the CSO communities systems and the need for an extended implementation phase which in the end will likely not save the residents any dollars and potentially dramatically impact the residents in the future when the cost of money is considered.

ALCOSAN or the regulators need to set and enforce wet weather flow limits now for all communities or the DWWP will fail.

In summary, the Borough is not in support of a plan that transfers liability for the problems to all communities caused by the CSO communities, does not propose infrastructure to convey flows from the Borough and that does not assess costs based on the flow into the ALCOSAN system.

Very truly yours,

FOX CHAPEL BOROUGH



GARY J. KOEHLER
Borough Manager

GJK/daa

c: Kevin A. Brett, P.E.