

**SHALER TOWNSHIP RESPONSE COMMENTS
TO
ALCOSAN'S DRAFT WET WEATHER PLAN
OCTOBER 2012**

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Shaler Township has reviewed the ALCOSAN Draft Wet Weather Plan (DWWP) and would like to commend ALCOSAN on their efforts to produce such a robust document. The amount of engineering and pre-planning that went into this document is impressive.

However, the end result of the study is rather unimaginative and makes a customer municipality wonder where all of the tens of millions of consulting fees were spent. The end result, boiled down to its basics in the \$2 billion plan (Alternative 3f-Mod 10), is treatment plant expansion/tunnel dewatering/massive tunnels on the three rivers. These tunnels will act as holding facilities for wet weather events up to the 2 year storm level (with a certain amount of permitted overflows for CSO communities).

Why tunnels instead of regional treatment facilities or regional wet weather facilities? There are large swathes of land either currently available or available with little disruption in the Upper Allegheny watershed to install wet weather facilities. The large grassed area along Washington Boulevard at the intersection with Allegheny River Boulevard would be a good location. This could also help to address the surface water flooding problem along Washington Boulevard, as well. Additionally, there is an area adjacent to the 62nd Street Bridge that has been torn down; this could also serve as a pre-tunnel treatment area.

The plan also is an inelegant solution that does not address the root cause of the problem. It is the morphine to treat the cancer patient's pain, rather than the chemotherapy to eliminate the cancer itself. Just willfully accepting the sewage, both separate and combined, into these tunnels does nothing to address source control. ALCOSAN is attempting to foist the source control responsibility on to the municipalities through their own Administrative Consent Orders/Consent Order of Agreements, but at the same time have been encouraging municipalities to convey the flows to ALCOSAN through parallel interceptors and upsized pipes. The end result is that rather than putting the region on a flow "diet", the region will continue to be an obese person that is just encouraged to buy bigger sized clothes in the form of larger pipes.

ALCOSAN has chosen to hide behind their service agreement that limits their ability to "mandate or implement the reduction of wet weather flows from the municipal collection systems through green infrastructure or other source reduction strategies". This is the perfect example of why the current, outdated ALCOSAN convey/treat model does not work in the modern environment.

Shaler Township has proposed through previously-submitted white papers, presentations, and our presence on the Allegheny Conference Regionalization Study committee that a new model for ALCOSAN must be developed. Our model has ALCOSAN taking over possession of multi-municipal trunk lines and any proposed upstream wet weather facilities. Through the use of modeling and SCADA systems, ALCOSAN can control their own fate when it comes to treatment by regulating what flows come from where and when. Under this scenario, municipalities would commit to expending their current level of sanitary sewer funding on rehabilitating their own municipal collection systems, while leaving the larger ticket items to ALCOSAN and their greater ability to spread financial outlays. The customers would remain the responsibility of the municipalities, in addition to first response in the event of a sewer emergency.

Shaler Township is happy to see that a "batting order" has finally been developed for the implementation of improvements to the region. Through the examination of the document, it appears as if the Allegheny tunnels will be installed from January 2021 to December 2024. As a result of this, communities that drain to A-68 do not see the need to start our proposed improvements under our Feasibility Study until January 2025. There is no practical sense in rushing to expend tens of millions of dollars on parallel sewers and upsizing pipes only for the flow to more efficiently backwater at the point-of-connection at A-68. The A-68 point-of-connection is currently a low point in the system that causes flow to reverse through Etna during high flow periods. It would not be good stewardship to exacerbate this problem until ALCOSAN provides an improved receiving area first.

Although these comments may seem overtly critical of ALCOSAN, please remember that Shaler Township does appreciate all the work that ALCOSAN has done to get to this point. Rather, we hope these comments help spur additional considerations on how to improve the plan that has been developed and presented. The ultimate end goal may be the presentation to EPA for an extended construction schedule in order to justify spending more than the \$2 billion proposed, as per the affordability index figures, but it will at least be for a solution that will not cause future generations to feel that the leaders of the day took the easy way out of a problem.

I do not think the options presented are going to solve the problems the Consent Decree is mandating that we correct. I think SSO's or CSO's will continue to occur as long as the Allegheny County continues to build and develop areas with minimal concern for storm water management. I am not an engineer so I cannot determine whether their plans will actually work. I do not think giant tunnels will solve the problem. I believe the costs will far exceed what has been estimated, and I am doubtful that the system will be able to handle the load as consumption increases in the future.

I think ratepayers will be paying exorbitant bills for something that may not meet the requirements of the Consent Decree or may need to be modified as population and climate change. I would prefer a regional plan that groups municipalities together to perform some of the treatment locally before sending it to the Woods Run Treatment facility. Also, I would be in favor of municipalities implementing green programs (such as our rain garden and the Green Streetscape project in Etna) to reduce storm water before it enters the system. I realize that ALCOSAN does not control storm water before it enters the system, but from what I have read in the newspaper the EPA does endorse green infrastructure.

When all municipalities are forced into one giant plan, everyone is paying for a plan that does not benefit each community equally. Some of the basins appear to have more problems than others, so I am not sure if it is fair that everyone pays the same. It seems we have no choice but to accept the "Recommended Plan" because it is the so-called affordable option; however, I do not consider \$2 billion to be affordable.