From: <contactform@alcosan.org>

<Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org> To:

Date: 9/21/2012 8:15 AM

Subject: WWP Comment Submission

First Name* Anne Last Name* Franks

Street 737 N. Beatty City Pittsburgh Pennsylvania State (If U.S.)

Zip Code 15206 Municipality Pittsburgh

Email* abfranks@gmail.com

Do your comments represent the interest of an organization or special

interest group?

Yes

If Yes, please state the organization or

group name

Alpha Terrace Historical District

Please consider a green solution to the storm water problem in Pittsburgh. AThe Comments* new grey infrastrucure proposal is costly, but more important, does not create a

long term solution.

Would you like to receive a response to Yes

your comments?

Captcha Image (Security Code)*

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

10/16/2012 1:59 PM Date:

Subject: WWP Comment Submission

First Name* Steve Last Name* Karas

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Forest Hills City State (If U.S.) Pennsylvania

15221 Zip Code

Forest Hills Municipality

Email* skaras@chatham.edu

Do your comments represent

the interest of an

organization or special

interest group?

If Yes, please state the

Forest Hills Council organization or group name

I am opposed to the massive cost of the planned sewer fix. I believe it is costly and does

not address the issue of run off, higher lying municipalities, and many environmental Comments* concerns. I would ask that you focus on these issues and also consider bringing in new and innovative environmental planners to evaluate the process.

Would you like to receive a response to your comments?

Captcha Image (Security

Code)*

Yes

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 10/18/2012 9:44 AM

Subject: WWP Comment Submission

First Name* Catherine

Last Name* DeLoughry

Street 11 Stanwix Street - 17th floor

City Pittsburgh

State (If U.S.) Pennsylvania

Zip Code

15222

Municipality Pittsburgh

Email* cdeloughry@alleghenyconference.org

Do your comments represent the interest of an

Yes

organization or special

interest

group?

If Yes, please

state the

or group name

organization Allegheny Conference on Community Development

October 17, 2012 Ms. Arletta Scott Williams Executive Director Allegheny County Sanitary Authority 3300 Preble Avenue Pittsburgh, PA 15233 Re: Comments on the Draft Wet Weather Plan Dear Ms. Williams, On behalf of the Allegheny Conference on Community Development, I am pleased to submit these comments on the Draft Wet Weather Plan prepared by ALCOSAN in response to the January 23, 2008, federal Consent Decree. The Allegheny Conference works collaboratively with public and private sector partners to stimulate economic growth and to improve the quality of life in the Pittsburgh region, so we appreciate the diligent and intensive effort that ALCOSAN has made in preparing the Draft Wet Weather Plan. We also welcome the opportunity to comment on this plan as it is of vital importance to our region's future. Southwestern Pennsylvania is facing the challenges of aging and antiquated sewer infrastructure that cannot accommodate the combined flow during storm events from the 83 municipalities connected to the ALCOSAN system. We are aware that these municipalities are under their own consent orders with the Pennsylvania Department of Environmental Protection (DEP) and the Allegheny County Health Department to complete feasibility studies by July 2013 on controlling stormwater and sewage flows, which eventually flow into the ALCOSAN system for treatment. It is clear that the current situation must be addressed both to meet the Consent Decree requirements and to ensure the well-being of our residents and the competitiveness of our region in order to retain and attract jobs and investment. To meet these current challenges, we must develop a long-term wet weather control plan that includes regional integration of wastewater and stormwater systems now spread across various entities, active source reduction through the use of green infrastructure and other methods, and investments in "gray infrastructure" at the appropriate scale. However, we are also in a situation in which the sequencing of the required response to the federal Consent Decree (January 2013) and the response to

the consent orders affecting municipalities (July 2013) effectively "puts the cart before the horse" by requiring ALCOSAN to develop a plan independent of what the municipalities may or may not do in compliance with their state and local consent orders. Moreover, the current effort by a high-level panel of experts and stakeholders convened through the Allegheny Conference is expected to conclude its evaluation of options to achieve regional integration of wastewater and stormwater systems by the end of this year. The work of this panel should be used to inform future decisions about our wastewater and stormwater systems. Our region should have the opportunity that other jurisdictions across the country have had in utilizing source reduction and green infrastructure to comply with federal water quality regulations. The recent regulatory environment under which other regions are coming into compliance encourages them to implement options that reduce wet weather flows into their systems. By contrast, our Consent Decree dates from a time when source reduction was considered only infrequently across the country as a strategy for addressing overflows. Our region should be on equal footing with other regions and come into compliance under Consent Decree provisions that promote source reduction, thereby reducing the need and expense of wastewater treatment. Given these facts, we encourage ALCOSAN to request that the federal Consent Decree be renegotiated to implement a plan that includes regional integration, active source reduction and an appropriate investment in additional infrastructure for management and treatment. We look forward to the opportunity to continue to work with ALCOSAN and all of the stakeholders in our region to develop a wet weather control plan that serves the long-term interests of the region, encourages intergovernmental cooperation, utilizes the best available technology and source reduction strategies and results in water quality that meets regulatory standards. Sincerely, Charles E. Bunch Chair Allegheny Conference on Community Development Cc: Harry Readshaw, Chair, ALCOSAN Mayor Luke Ravenstahl County Executive Rich Fitzgerald

Comments*

Would you like to receive a response to your comments? Captcha Image

(Security Code)*

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 10/18/2012 4:28 PM

Subject: WWP Comment Submission

First Name* Richard Last Name* Overmoyer

Street 700 River Ave, Suite 333

City Pittsburgh State (If U.S.) Pennsylvania

Zip Code 15212 Municipality Pittsburgh

Email* rovermoyer@fourtheconomy.com

Do your comments represent the interest of an organization or special

Yes

group? If Yes, please

interest

state the

or group name

organization Environmental Advocacy Collaborative

October 15, 2012 Ms. Arletta Scott Williams Executive Director Allegheny County Sanitary Authority 3300 Preble Avenue Pittsburgh, PA 15233 RE: Comments on Alcosan Draft Wet Weather Plan Dear Ms. Williams, We, members of the Environmental Advocacy Collaborative, are writing to submit comments on the Alcosan Draft Wet Weather Plan. We appreciate that Alcosan's response to the federal EPA consent decree has been constrained on a number of levels and we appreciate the Authority's diligent efforts. However, while the plan may meet a court-ordered mandate, it fails to meet issues of vital importance to our region's need to achieve water quality compliance and also reduce sewage and storm sewer overflow at their sources. We urge Alcosan to request EPA and the courts to re-open the consent decree in order to accommodate need for our region and Alcosan to address the following current shortcomings in the draft wet weather plan: • Comprehensive Regional Solutions The Alcosan Regionalization Study (guided by a panel comprised of 37 members representing various sectors, chaired by Dr. Jared Cohon, President, Carnegie Mellon University, and managed by the Allegheny Conference on Community Development) is due to be completed in December 2012. The findings and recommendations of this study deserve to be reviewed and incorporated in the Alcosan Wet Weather Plan in order to pursue regional solutions that address possible governance innovations for sewage and stormwater management within Alcosan's current service area. Clearly, bad timing has resulted in the important work of the regionalization study to not being factored into the draft plan. The backwards alignment is compounded by fact that the 83 local governments in the service area are on separate consent orders with PA DEP and Allegheny County Health Department to deliver their own feasibility studies well after Alcosan is obliged to submit its plan. More time is necessary so that Alcosan's plan will be based on a through understanding of the municipalities plans, and of the decisions made with regard to regionalization. • Green Infrastructure The plan does not incorporate green infrastructure nor did the fiveyear planning effort comprehensively model what amount of control could be achieved through the use of green solutions. Green infrastructure approaches and related innovative practices provide more sustainable solutions by managing stormwater as a resource and should be considered and incorporated in the Alcosan plan. Green infrastructure is a proven, key component of wet weather plans in other jurisdictions, including those developed under EPA consent decrees. Green infrastructure has emerged as a best practice. It has promise to make a material contribution to reducing wet weather flows, lead to job creation, be cost effective, improve air quality and reduce needs for less sustainable gray infrastructure. The plan should be re-opened to incorporate green infrastructure at a scale commensurate with prevailing practice around the nation as promoted by EPA and in step with EPA's recently introduced Integrated Municipal Stormwater and Wastewater Planning Approach Framework. • Source Reduction The plan should be re-opened in order to incorporate financial/management mechanisms (such as stormwater utilities/management district(s) in order to provide incentives for source reduction, particularly green infrastructure. Furthermore, these financial opportunities need to be explored in the context of the above referenced accommodation of comprehensive regional solutions. In sum, we urge Alcosan to join with us in requesting EPA and the courts to re-open the consent decree in order to address the above requisite enhancements to the draft Wet Weather Plan. The additional elements are essential to our region and Alcosan's responsibility and opportunity to address the wet weather challenge with a more sustainable approach that serves environmental, economic, and social imperatives. Sincerely, The Environmental Advocacy Collaborative Andrew Butcher, CEO GTECH Rachel Filippini, Executive Director Group Against Smog and Pollution Court Gould, Executive Director Sustainable Pittsburgh Jay Sukernek, Chief Financial Officer Riverlife Brenda Smith, Executive Director Nine Mile Run Watershed Association

Comments*

Would you like to receive a response to your comments? Captcha Image

(Security Code)*

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

10/18/2012 9:45 PM Date:

Subject: WWP Comment Submission

First Name* John

Last Name*

Thatcher

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400 North Lexington Street, Suite 102

City

Pittsburgh State (If U.S.) Pennsylvania

Zip Code

15208

Municipality

Pittsburgh

Email*

ihthatcher@verizon.net

Do your comments represent the

interest of an

Yes organization or special interest

group?

If Yes, please

state the

organization or Allegheny County Conservation District

group name

Draft Wet Weather Plan. The Conservation District is an urban conservation district that engages and leads through partnerships, innovation, and implementation to conserve, promote, and improve Allegheny County's natural resources. Our primary concern is for the quality of our waterways. The proposed Draft Wet Weather Plan begins the process of mitigating water quality issues from raw sewage, industrial chemicals, and other wastes. Sedimentation is the largest pollutant in our waterways. The proposed plan advocates for 15-foot tunnels and holding tanks to be dug and installed alongside the Ohio, Allegheny, Monongahela rivers, as well as other earth disturbance activities. The volume of earth disturbance this plan calls for will need to be appropriately designed, permitted, contained, monitored, and stabilized for the duration of the project in order to preserve the ecology of our watersheds and to enhance public safety. Currently, the Conservation District is delegated by the Department of Environmental Protection to review, permit, and inspect all sites requiring a NPDES permit for sedimentation control in Allegheny County. We anticipate that any solution to the regional wet weather challenges will require considerable efforts from the Conservation District in the form of increased workloads for activities such as permit reviews, field inspections, complaint investigation, and public education regarding sediment controls. Post-project completion, the Conservation District will continue to be involved with ongoing stream bank erosion and other potential complaints relating to the ALCOSAN WWP solution. In order for the Conservation District to meet the needs of the community (including ALCOSAN as well as the 83 municipalities served by ALCOSAN) and, per the additional demands mentioned above, we will become a more engaged stakeholder for ALCOSAN's ongoing WWP planning and implementation efforts. And, as an organization charged with conserving, promoting, and improving the natural resources of our county, we encourage the use of green infrastructure where appropriate. We respectfully submit these comments for your consideration. Feel

This letter serves as the official Allegheny County Conservation District comment on the ALCOSAN

Comments*

free to reach us at 412-241-7645 if you have any questions or would like to speak to a District representative. On behalf of the board of directors and staff, John H. Thatcher Chairman

Would you
like to receive
a response to Yes
your
comments?
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(Security
Code)*

From:

<contactform@alcosan.org>

To:

<Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date:

10/19/2012 9:27 AM

Subject: WWP Comment Submission

First Name*

Laura

Last Name*

Ellsworth

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City

Pittsburgh

State (If U.S.) Pennsylvania

Zip Code

15222

Yes

Municipality Pittsburgh

Email*

bjensen@alleghenyconference.org

Do your comments

represent the

interest of an

organization

or special

interest

group?

If Yes, please

state the

or group

organization PA Economy League of Greater Pittsburgh

name

October 19, 2012 Ms. Arletta Scott Williams Executive Director Allegheny County Sanitary Authority 3300 Preble Avenue Pittsburgh, PA 15233 RE: Comments on the Draft Wet Weather Plan Dear Ms. Williams, On behalf of the Pennsylvania Economy League of Greater Pittsburgh, I am pleased to submit the attached comments on ALCOSAN's Draft Wet Weather Plan (WWP) that it prepared in response to the January 23, 2008, federal consent decree. For over 75 years, the Pennsylvania Economy League of Greater Pittsburgh (PELGP) has been the region's trusted resource to provide the building blocks of sound public policy through thorough and documented research, analysis and recommendations on the pressing issues impacting our regional and statewide competitiveness. PELGP works collaboratively within the civic sector, so we welcome the opportunity to comment on ALCOSAN's WWP as it is an important regional public policy issue. ALCOSAN and its 83 contributing municipalities face water quality improvement challenges that will necessitate changes to the way they interact. If ALCOSAN and the municipalities were operating under a different governmental environment and deadlines, our region would be more likely to develop a long-term wet weather control plan that would integrate and unify sewer systems now spread across numerous municipal jurisdictions. Additionally, such a plan would be able to incorporate BMPs that maximize source reduction and green infrastructure and reduce the need for expensive and disruptive "gray infrastructure". However, the fragmentation of our wastewater collection, conveyance and treatment infrastructure and the sequencing of regulatory mandates hinder our ability to plan and implement these smart long-term solutions. The mandated January 2013 submission of the WWP before the July 2013 municipal consent orders puts the cart before the horse: ALCOSAN has had to develop a plan that will accommodate full wet weather flows from the municipalities in its service area, unmitigated by source reduction or green infrastructure. PELGP commends ALCOSAN for the

inception of and its active, ongoing participation in the current review of sewer regionalization options convened through the Allegheny Conference and chaired by Dr. Jared Cohon of Carnegie Mellon University. The evaluation of options is expected by the end of the year. The findings should inform our region's actions towards a long-term strategy to deal effectively with wastewater. System integration and unification would likely reduce costs, increase compliance and rectify the system fragmentation that hinders source reduction and green infrastructure. PELGP would support the renegotiation of the consent decree in order to incorporate the findings of the regionalization study. Given the existing system fragmentation, ALCOSAN correctly states that it does not directly control upstream wastewater volume. ALCOSAN is not without tools to promote source reduction, however. ALCOSAN's current rate structure bears little relation to the cost of conveyance and treatment of wastewater and does not correlate source reduction with reduced user cost. A billing structure that directly rewards reduction of the volume of wastewater conveyed would help incentivize desired behavior. PELGP would welcome the opportunity to work with ALCOSAN to assess alternative rate structure models. Finally, ultimate system integration and unification may require changes in the selection process of ALCOSAN board members. In the 1950s, when the ALCOSAN system came into being, three-fourths of Allegheny County's population lived in the City of Pittsburgh, and as such, few would question the Pittsburgh Mayor's selection of half of ALCOSAN's board. Today, however, when only one-quarter of the County's population lives in the City, that board selection provision is unpopular with the other 82 contributing municipalities. PELGP would welcome the opportunity to work with ALCOSAN to assess alternative governance models that would foster suburban trust in a newly unified system. PELGP commends ALCOSAN for the appropriate and progressive steps it has taken to date. PELGP further supports renegotiation of the consent decree to include regional sewer integration and unification and stands ready to provide ALCOSAN its professional analytical capacity in the pursuit of sustainable regional solutions. Sincerely, Laura Ellsworth Chairperson Pennsylvania Economy League of Greater Pittsburgh

Comments*

Would you like to receive a response to your comments? Captcha **Image**

(Security Code)*

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 10/19/2012 9:05 AM

Subject: WWP Comment Submission

First Name* Davitt
Last Name* Woodwell

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Municipality City of Pittsburgh

Email* dwoodwell@pecpa.org

Do your comments represent the interest of an organization or special

interest group? If Yes, please state the

organization Pennsylvania Environmental Council

or group name

> The Pennsylvania Environmental Council ("PEC") respectfully submits these comments to the Allegheny County Sanitary Authority ("ALCOSAN") as part of the public comment period on ALCOSAN's Draft Wet Weather Plan (dated July 31, 2012). PEC is a statewide nonprofit organization committed to sensible and sustainable solutions to environmental issues, and has been deeply involved in water quality and stormwater issues for much of its 42-year history. For Western Pennsylvania, the problem of controlling sanitary sewer overflow and combined sewer overflow ("SSO" and "CSO", respectively) is among the most complex environmental challenges of this era. The cost, magnitude and complexity of this problem, together with the fragmented local government structure that exists in this region, make this a particularly formidable problem technically, economically and politically. PEC has been a leader in promoting comprehensive, integrated solutions for addressing this challenge throughout Pennsylvania. Our work in a number of Pennsylvania communities, including Philadelphia, has led to demonstration projects, municipal planning code changes, information exchange programs, and public planning recommendations aimed at creating a foundation for widespread green infrastructure as a significant component of costeffective wet weather pollution abatement strategy. We commend ALCOSAN for a thorough response to the specific requirements of the federal consent decree. The technical merits of its data collection, flow monitoring and system engineering are of great value for stormwater management planning in this region. In fact, we believe that the expansion of the primary treatment facility as designed in the selected plan should move forward as proposed in order to maximize its capacity. However, this plan is constrained by the parameters of the federal consent decree, the sequencing of the municipal consent orders and required feasibility studies, the composition of local governments in this region, and the pending regionalization

required ALCOSAN to develop an engineered solution without regard for what the municipal feasibility studies might conclude. Beyond that, we take exception to the conclusions reached in ALCOSAN's analysis and to the recommendations called for in the selected plan. ALCOSAN acknowledges that its selected wet weather plan will not meet the water quality guidelines called for in the consent decree, and that to achieve such a standard would pose an excessive economic burden on ratepayers. The selected plan fails to address a number of fundamental issues critical to successfully achieving compliance with the necessary water quality regulations by failing to promote an integrated, comprehensive regional solution that will result in reduced sewage and storm sewer overflow at the source. Consequently, the selected plan falls well short of providing an effective solution for our region given the available resources and opportunities. Consequently, we believe there are at least four structural deficiencies with the federal consent decree and the wet weather plan that ALCOSAN will submit on January 31, 2013. Source Reduction - The fundamental cause of our region's CSO/stormwater problem is the volume of wet weather-related flow created throughout the region that overwhelms the system's collection, conveyance and treatment capacity. The gray infrastructure solution proposed by ALCOSAN does nothing to address this root cause and consequently reduce the scale of a required constructed system. First and foremost, sanitary sewer overflow is an illegal discharge and therefore poses both an environmental and public health imperative that must be addressed. By coordinating municipal and ALCOSAN operations in a way not currently envisioned and instituting a financial model which incentivizes source reduction, CSO and stormwater flowing into the sewage treatment system can be reduced and the required conveyance system can be developed at a more appropriate scale. A number of organizations in this region have been looking at various source reduction strategies for some time now, but the process prescribed by the consent decree and municipal consent orders places acceptance of the ALCOSAN wet weather plan ahead of source reduction at the municipal level. The ability to integrate source reduction in a comprehensive regional strategy will enable Allegheny County to achieve the greatest reduction possible of CSO and stormwater discharges for the lowest possible cost. Inconsistent Process – We are concerned that the process imposed by the consent decree that has guided the development of the ALCOSAN wet weather plan is inconsistent with the process driving the municipal feasibility studies. These 83 municipalities send their stormwater and many send their sanitary sewer flow to the ALCOSAN system, a circumstance that would most certainly be affected through source reduction and green infrastructure. To be most effective, the municipalities would design source reductions strategies at the community level to reduce the total volume of flow entering the ALCOSAN system. This would then enable ALCOSAN to design a collection, storage and treatment solution at a scale and cost that would meet the needs of the region. Unfortunately, the prescribed process for compliance is reversed and consequently does nothing to reduce water pollution at its source or minimize load on ALCOSAN's required treatment capacity. As a result, the consent decree has the force and effect of dictating an outdated and costly solution that does not serve the long-term interests of this region, particularly at a time when better technology and green infrastructure strategies are readily available. Service Fee Revenue Model – In 1949, ALCOSAN began entering into individual agreements with the 83 municipalities that now comprise its collection system. These agreements are binding contracts that specify the terms and conditions for ALCOSAN's acceptance of sanitary and storm sewer flow from each municipality. As such, ALCOSAN charges its municipal customers on the basis of water consumption, not how much water is put back into the collection system for treatment. This financial model does nothing to incentivize source reduction, nor does it provide an accurate basis for covering ALCOSAN's true costs for the service it provides. Hence, given the circumstances, we assert that now is the proper time to review these agreements in a manner that is more consistent with the regional priorities of stormwater and water quality management. Other metropolitan areas, such as Philadelphia and Minneapolis, have reversed this revenue model to place the burden-and thus, the opportunity-on commercial and industrial property owners for achieving the highest possible source reduction, including grants and tax incentives for adopting green infrastructure measures. These strategies, while admittedly enacted under a single user agreement and not 83 separate agreements, have been very effective at reducing storm sewer overflow entering the traditional "gray" collection infrastructure. We are mindful of the fact that unlike Philadelphia and many other urban jurisdictions, ALCOSAN does not own the

evaluation. Moreover, this sequencing has rendered this process out of a logical and proper order and has

Comments*

collection system infrastructure at the municipal level, and under the terms of its agreements is obligated

to accept whatever flow its customers send. However, the ALCOSAN wet weather plan makes no effort whatsoever to address this fundamental flaw in our region's ability to control its sanitary and storm sewer overflow. The magnitude of the benefits derived from incentivizing source reduction, as evidenced in other jurisdictions, is most compelling and is sufficient cause for addressing how this condition can be rectified. Green Infrastructure - Green infrastructure as a CSO/stormwater control measure is not addressed at all in the ALCOSAN wet weather plan, despite the fact that much planning and development work on such strategies has been underway in Western Pennsylvania, collectively representing important progress toward bringing this larger problem under control. A number of well-established groups have been leading the way in identifying green infrastructure opportunities throughout this region and have made great strides in advancing collective understanding and support. The Pennsylvania Environmental Council and a number of organizations such as the Green Infrastructure Network, 3 Rivers Wet Weather, and many others continue to demonstrate the efficacy of green infrastructure as a strategy for significantly alleviating our region's stormwater management problem. A number of high profile demonstration projects collectively represent a significant investment in resources and capabilities in this field. An important purpose of these projects has always been to establish a baseline of results that could be scaled up and included as a meaningful element in any regional stormwater management plan. In fact, green infrastructure has been successfully utilized in other jurisdictions and should be a significant element in the ALCOSAN wet weather plan. For the reasons outlined above, we maintain that the ALCOSAN wet weather plan as currently written constitutes an outdated and ineffective solution to a problem for which newer, more effective source-based solutions currently exist. The Pennsylvania Environmental Council cannot support this plan as written, and therefore joins ALCOSAN in urging that the federal consent decree be reopened and revised and that specific attention be given to the following changes: • Authorize the expansion of the treatment capacity of the Woods Run Treatment facility as planned • Adjust the sequence of the completion of the municipal feasibility studies to occur prior to the development of a revised ALCOSAN wet weather plan. • Require that green infrastructure be a significant element in any wet weather plan for Allegheny County. • Require that source reduction be required as the first step in the stormwater collection process at the municipal level. • Provide ALCOSAN with additional time to complete a revised wet weather plan incorporating these and other changes. The 2026 deadline for completion of all gray infrastructure construction should remain unchanged. Given the cost and impact of this proposed project on the region, it is essential to "get it right" at this critical juncture and ensure that all of the resources being brought to bear on addressing this problem are used prudently and efficiently. For the reasons stated above, we maintain that ALCOSAN's selected plan represents a lost opportunity that will have lasting consequences for generations to come, and urge ALCOSAN to adopt these recommendations in a revised wet weather plan. Respectfully submitted, Davitt B. Woodwell Executive Vice President Western Pennsylvania Region Pennsylvania Environmental Council 22 Terminal Way Pittsburgh, Pennsylvania 15219 (412) 481-9400

Would you like to receive a response to your comments? Captcha Image (Security

Code)*

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 10/19/2012 4:29 PM

Subject: WWP Comment Submission

First Name* The Penn State Center -

Last Name* Engaging Pittsburgh

Street 1001 Liberty Avenue

City Pittsburgh

State (If

U.S.) Pennsylvania

Zip Code 15222

Municipality City of Pittsburgh

Email* lkv10@psu.edu

Do your comments represent the interest of an organization or special

Yes

or special interest group?

If Yes, please state the

organization The Penn State Center - Pittsburgh

or group

On January 23, 2008 the Allegheny County Sanitary Authority (ALCOSAN), the Unites States Environmental Protection Agency (EPA) and the Allegheny County Health Department (ACHD) agreed in a legal, binding document known as a Consent Decree, that ALCOSAN would achieve compliance with the Clean Water Act during periods of wet weather. In order for ALCOSAN to comply with the Consent Decree a series of requirements for planning, design, construction, operation and permitting must be met. The primary requirement of the consent decree is the elimination of Sanitary Sewer Overflows (SSOs) and control Combined sewer overflows (CSOs) being discharged into the Ohio, Monongahela, Allegheny Rivers and their tributaries of Chartiers Creek, Saw Mill Run, and Turtle Creek. More specifically, ALCOSAN must employ two steps to meet compliance with the Consent Decree: • Sanitary Sewer System Overflow (SSO) Elimination: ALCOSAN is required to design and construct conveyance, storage, and treatment facilities that eliminate all sanitary sewer overflows while collecting and treating sanitary flow generated through the regional collection system. • Combined Sewer System Overflow (CSO) Mitigation: ALCOSAN has two design and construction options. The first option requires the design and construction of conveyance, storage, and treatment facilities that capture and treat all peak dry-weather flow in the regional collection system and all wet-weather flow in the regional combined sewer system. The second option permits ALCOSAN to treat all peak dry-weather flow while capturing at least 85 percent of all combined sewer system flow and treating all wet-weather flow with the "best practicable technology." This Consent Decree led to seven years of negotiations and compromise. On July 31, 2012 ALCOSAN released its draft wet weather plan for public comment and review. The plan identifies wastewater infrastructure needs through 2046, while providing a schedule of all improvements,

public works project ever attempted in Allegheny County. The plan proposes \$2.8 billion of improvements, focusing exclusively on "grey infrastructure" - multiple miles of 12-14 feet diameter tunnels constructed underneath the rivers, new collector pipes and expanded treatment facilities to capture and treat most of all stormwater flow. "Green infrastructure" - strategies such as permeable pavements, bioswales, green roofs, rain gardens, rain barrels or tree plantings - was not included in ALCOSAN's plan. Many cities with CSO problems similar to Pittsburgh's have included green infrastructure components in their own federally-mandated sewer system improvement plans. Philadelphia, Syracuse, Cleveland, Chicago, Milwaukee, Kansas City and even Washington D.C., all cities with old infrastructure similar to Pittsburgh's, have incorporated elements of green infrastructure into their wet weather plans. ALCOSAN, however, seems to have developed its wet weather plan in a vacuum, completely ignoring the most current knowledge about stormwater mitigation and water treatment. Employing green infrastructure would reduce ALCOSAN's need for expansive and very expensive grey infrastructure. Many green infrastructure strategies have been implemented by various cities that have a consent decree from the U.S. Environmental Protection Agency. Although not all green infrastructure approaches have been rigorously evaluated, many are proven. For example, an 180 square foot rain garden traps 8,000+ gallons of water per year – water that will not contribute to a sewer overflow. We recognize that ALCOSAN does not hold the property required to implement green infrastructure. However, the 83 municipalities serviced by ALCOSAN could be incentivized to install green systems with an outcome of source reduction, limiting the amount of flow into ALCOSAN's treatment system. Implementing such an incentive system would require that ALCOSAN install flow monitoring at each municipality point of entry into their conveyance/treatment system, so that individual municipalities' interventions are counted correctly and equitably towards the overall flow into the ALCOSAN system. Such strategies will require investment. However, ALCOSAN's current wet weather plan will cause huge disruptions to Pittsburgh's riverfronts and the regional environment in addition to imposing a high financial burden. Our sister city of Philadelphia, while by no means perfect, should serve as an instructive case study for the Pittsburgh region. The city's "Green Cities, Clean Waters" plan received a perfect score for planned implementation of green infrastructure assessed by the Natural Resources Defense Council (NRDC) using the Emerald City criteria. Literature from the Philadelphia Water Department illustrates their commitment to green: "Green infrastructure—which includes rain gardens, green roofs, porous paving and stormwater tree trenches that help manage runoff and mitigate sewage overflows into rivers and streams—is the backbone of the Philadelphia Water Department's Green City, Clean Waters plan. The Rooftops To Rivers II report highlights the long-term plan's extensive environmental and economic benefits that earned Philly its perfect score: Over the next 25 years, Philadelphia is committed to deploying the most comprehensive urban network of green infrastructure in the United States. Philadelphia's Green City, Clean Waters plan, recently approved by state regulators, requires the retrofit of nearly 10,000 acres ... to manage runoff onsite; relies on green infrastructure for a majority of the required [combined sewer overflow] reductions; calls for the investment of more public funds in green infrastructure (at least \$1.67 billion) than in traditional gray approaches; and leverages substantial investments from the private sector." Even at \$1.67 billion, Philadelphia's green infrastructure plan is considerably less costly than ALCOSAN's grey infrastructure wet weather plan. Philadelphia is using multiple strategies to defray this cost. First, Philadelphia's individual rate increases (which commenced October 1, 2012) will serve to maintain the City's top-quality water, alleviate flooding, meet regulatory requirements, and improve the quality of local rivers and streams. The proposed new rates, phased in over a four-year period, will fund capital improvements to protect residents from stormwater flooding and prevent water main leaks and breaks which can damage property. Rate changes, according to a March 6, 2012 press release, are projected to be: Fiscal year Percent Increase of Monthly Bill Additional Monthly Water and Sewer Charge Total Monthly Bill 2013 6.1 \$3.52 \$60.95 2014 6.2 \$3.76 \$64.71 2015 6.7 \$4.36 \$69.07 2016 6.9 \$4.75 \$73.82 In addition, the Water Department is implementing multiple cost-cutting measures including debt refinancing, upgrades of the Water Department's bond credit ratings, automatic meter readers, and improved operating efficiencies at each of Philadelphia Water Department's (PWD) seven major plants and facilities. "We have initiated numerous programs to reduce operating costs and to improve service, while ensuring that we continue to provide top quality drinking water and environmental restoration

completed and operated by September 30, 2026. ALCOSAN's draft Wet Weather Plan may be the largest

Comments*

programs that meet regulatory requirements in cost effective ways," noted Deputy Water Commissioner

of Finance Joseph Clare. "We are also expanding our wholesale services to generate additional revenues from marketing our high-quality drinking water to Philadelphia's neighbors." Even with the higher rates, PWD's water and sewer charges will continue to be among the lowest in the region. Philadelphia is the 5th largest city in the U.S. but ranks 14th in monthly water/sewer cost among the top 25 American cities, and 10th in total water/sewer/stormwater monthly fees. Over the past 10 years, rate increases in the water/sewer utility sector over the last 10 years have consistently been double the rate of inflation, largely due to environmental regulatory requirements and capital needs related to aging infrastructure. Among the top 25 cities, rate increases in 2011 and 2012 ranged from 3% to 25%, making the 6-7% increases in Philadelphia quite modest in comparison. Water rates do not tell the whole story. Philadelphia projects through its triple bottom line analysis that every dollar invested in system improvements will return two dollars. In addition, every "green acre" that is installed will remove 400,000 gallons of combined sewer overflow from the city's wet weather system. According to Deputy Commissioner Clare, "Water rates fund the day-to-day operation of our 6,000 mile water and sewer pipe network, pumping stations, water and wastewater treatment facilities. They support a host of programs that ensure that our product ranks among the top in the nation. They also ensure that the system will work for decades to come. The proposed new rates will allow PWD to meet all of our operating expenses and fund extensive capital improvements to protect the infrastructure and in turn, protect residents from flooding during increasingly intense rainstorms." The Philadelphia Water Department has also led the way in developing programs to help citizens, business, and municipalities work together to address the wet weather issue. These programs include Stormwater Fee Assistance Programs, Residential Green Practices Rebate Program; Stormwater Management Incentives Program Loan; Stormwater Management Incentives Program Grant; Stormwater Design Assistance; Stormwater Assistance Phase in Program/CAP; Stream and Backyard Buffer Program; Rebuilding Together Philadelphia Green Practices on Low Income Homes; Residential Rain Barrels; and Residential Stormwater Practices Innovative Design. Based on the example of Philadelphia and other research findings, we submit the following recommendations for inclusion into the proposed ALCOSAN Wet Weather Plan: 1) Expressly reinforce the highly recommended use of green infrastructure by all 83 municipalities as a means of reducing stormwater flow into the ALCOSAN treatment system. 2) Indicate that a Major Incentive Plan to minimize flow into the ALCOSAN system will be employed and that it will be among the most aggressive in the nation. In order to level the playing field, this incentive plan would include assistance programs for economically challenged municipalities within the ALCOSAN system. 3) Include the establishment of a network of individual municipal flow meter installation in order to equitably assess individual source amounts. 4) Indicate that through various partnerships, green infrastructure technology will be available to all municipalities utilizing this source reduction methodology including but not limited to: • Public education and availability of information; • Implementation of rain garden and rain barrel initiatives; • Installation of bioretention within rights-ofway; • Utilization of permeable pavements where deemed possible; • Subsidization of green roof installation; • Land trust acquisition of large tracts of vacant land transforming to a green use. ALCOSAN can and should propose a more cost-effective wet weather plan by combining essential grey infrastructure with green infrastructure for a successful integrated plan that will comply with environmental standards while also benefiting the regional community socially and economically. Deno De Ciantis, Ed.D. Director Lisa Kunst Vavro, RLA, ASLA Sustainable Landscape Coordinator The Penn State Center

Would you like to receive a response to your comments? Captcha Image (Security

Code)*





Deno De Ciantis Director The Penn State Center Pittsburgh Liberty Center, Sune R14-A 1001 Liberty Avenuc Pittsburgh, PA 15222 Office: 412-263-1000 Fax: 412-471-0198 Email: dwd5@psn.edu

The Penn State Center's Position on ALCOSAN's Wet Weather Plan

On January 23, 2008 the Allegheny County Sanitary Authority (ALCOSAN), the Unites States Environmental Protection Agency (EPA) and the Allegheny County Health Department (ACHD) agreed in a legal, binding document known as a Consent Decree, that ALCOSAN would achieve compliance with the Clean Water Act during periods of wet weather. In order for ALCOSAN to comply with the Consent Decree a series of requirements for planning, design, construction, operation and permitting must be met. The primary requirement of the consent decree is the elimination of Sanitary Sewer Overflows (SSOs) and control Combined sewer overflows (CSOs) being discharged into the Ohio, Monongahela, Allegheny Rivers and their tributaries of Chartiers Creek, Saw Mill Run, and Turtle Creek.

More specifically, ALCOSAN must employ two steps to meet compliance with the Consent Decree:

- Sanitary Sewer System Overflow (SSO) Elimination: ALCOSAN is required to design and construct conveyance, storage, and treatment facilities that eliminate all sanitary sewer overflows while collecting and treating sanitary flow generated through the regional collection system.
- Combined Sewer System Overflow (CSO)Mitigation: ALCOSAN has two design and construction
 options. The first option requires the design and construction of conveyance, storage, and
 treatment facilities that capture and treat all peak dry-weather flow in the regional collection
 system and all wet-weather flow in the regional combined sewer system. The second option
 permits ALCOSAN to treat all peak dry-weather flow while capturing at least 85 percent of all
 combined sewer system flow and treating all wet-weather flow with the "best practicable
 technology."

This Consent Decree led to seven years of negotiations and compromise. On July 31, 2012 ALCOSAN released its draft wet weather plan for public comment and review. The plan identifies wastewater infrastructure needs through 2046, while providing a schedule of all improvements, completed and operated by September 30, 2026.

ALCOSAN's draft Wet Weather Plan may be the largest public works project ever attempted in Allegheny County. The plan proposes \$2.8 billion of improvements, focusing exclusively on "grey infrastructure" - multiple miles of 12-14 feet diameter tunnels constructed underneath the rivers, new collector pipes and expanded treatment facilities to capture and treat most of all stormwater flow. "Green infrastructure" - strategies such as permeable pavements, bioswales, green roofs, rain gardens, rain barrels or tree plantings - was not included in ALCOSAN's plan.

Many cities with CSO problems similar to Pittsburgh's have included green infrastructure components in their own federally-mandated sewer system improvement plans. Philadelphia, Syracuse, Cleveland, Chicago, Milwaukee, Kansas City and even Washington D.C., all cities with old infrastructure similar to Pittsburgh's, have incorporated elements of green infrastructure into their wet weather plans. ALCOSAN, however, seems to have developed its wet weather plan in a vacuum, completely ignoring the most current knowledge about stormwater mitigation and water treatment.

Employing green infrastructure would reduce ALCOSAN's need for expansive and very expensive grey infrastructure. Many green infrastructure strategies have been implemented by various cities that have a consent decree from the U.S. Environmental Protection Agency. Although not all green infrastructure approaches have been rigorously evaluated, many are proven. For example, an 180 square foot rain garden traps 8,000+ gallons of water per year — water that will not contribute to a sewer overflow.

We recognize that ALCOSAN does not hold the property required to implement green infrastructure. However, the 83 municipalities serviced by ALCOSAN could be incentivized to install green systems with an outcome of source reduction, limiting the amount of flow into ALCOSAN's treatment system. Implementing such an incentive system would require that ALCOSAN install flow monitoring at each municipality point of entry into their conveyance/treatment system, so that individual municipalities' interventions are counted correctly and equitably towards the overall flow into the ALCOSAN system.

Such strategies will require investment. However, ALCOSAN's current wet weather plan will cause huge disruptions to Pittsburgh's riverfronts and the regional environment in addition to imposing a high financial burden.

Our sister city of Philadelphia, while by no means perfect, should serve as an instructive case study for the Pittsburgh region. The city's "Green Cities, Clean Waters" plan received a perfect score for planned implementation of green infrastructure assessed by the Natural Resources Defense Council (NRDC) using the Emerald City criteria. Literature from the Philadelphia Water Department illustrates their commitment to green:

"Green infrastructure—which includes rain gardens, green roofs, porous paving and stormwater tree trenches that help manage runoff and mitigate sewage overflows into rivers and streams—is the backbone of the Philadelphia Water Department's Green City, Clean Waters plan. The Rooftops To Rivers II report highlights the long-term plan's extensive environmental and economic benefits that earned Philly its perfect score:

Over the next 25 years, Philadelphia is committed to deploying the most comprehensive urban network of green infrastructure in the United States. Philadelphia's Green City, Clean Waters plan, recently approved by state regulators, requires the retrofit of nearly 10,000 acres ... to manage runoff on-site; relies on green infrastructure for a majority of the required [combined sewer overflow] reductions; calls for the investment of more public funds in green infrastructure (at least \$1.67 billion) than in traditional gray approaches; and leverages substantial investments from the private sector."

Even at \$1.67 billion, Philadelphia's green infrastructure plan is considerably less costly than ALCOSAN's grey infrastructure wet weather plan. Philadelphia is using multiple strategies to defray this cost. First, Philadelphia's individual rate increases (which commenced October 1, 2012) will serve to maintain the City's top-quality water, alleviate flooding, meet regulatory requirements, and improve the quality of local rivers and streams. The proposed new rates, phased in over a four-year period, will fund capital improvements to protect residents from stormwater flooding and prevent water main leaks and breaks which can damage property.

Rate changes, according to a March 6, 2012 press release, are projected to be:

Fiscal year	Percent Increase of Monthly Bill	Additional Monthly Water and Sewer	Total Monthly Bill	
		Charge		
2013	6.1	\$3.52	\$60.95	
2014	6.2	\$3.76	\$64.71	
2015	6.7	\$4.36	\$69.07	
2016	6.9	\$4.75	\$73.82	

In addition, the Water Department is implementing multiple cost-cutting measures including debt refinancing, upgrades of the Water Department's bond credit ratings, automatic meter readers, and improved operating efficiencies at each of Philadelphia Water Department's (PWD) seven major plants and facilities. "We have initiated numerous programs to reduce operating costs and to improve service, while ensuring that we continue to provide top quality drinking water and environmental restoration programs that meet regulatory requirements in cost effective ways," noted Deputy Water Commissioner of Finance Joseph Clare. "We are also expanding our wholesale services to generate additional revenues from marketing our high-quality drinking water to Philadelphia's neighbors."

Even with the higher rates, PWD's water and sewer charges will continue to be among the lowest in the region. Philadelphia is the 5th largest city in the U.S. but ranks 14th in monthly water/sewer cost among the top 25 American cities, and 10th in total water/sewer/stormwater monthly fees. Over the past 10 years, rate increases in the water/sewer utility sector over the last 10 years have consistently been double the rate of inflation, largely due to environmental regulatory requirements and capital needs related to aging infrastructure. Among the top 25 cities, rate increases in 2011 and 2012 ranged from 3% to 25%, making the 6-7% increases in Philadelphia quite modest in comparison.

Water rates do not tell the whole story. Philadelphia projects through its triple bottom line analysis that every dollar invested in system improvements will return two dollars. In addition, every "green acre" that is installed will remove 400,000 gallons of combined sewer overflow from the city's wet weather system. According to Deputy Commissioner Clare,

"Water rates fund the day-to-day operation of our 6,000 mile water and sewer pipe network, pumping stations, water and wastewater treatment facilities. They support a host of programs that ensure that our product ranks among the top in the nation. They also ensure that the system will work for decades to come. The proposed new rates will allow PWD to meet all of our

operating expenses and fund extensive capital improvements to protect the infrastructure and in turn, protect residents from flooding during increasingly intense rainstorms."

The Philadelphia Water Department has also led the way in developing programs to help citizens, business, and municipalities work together to address the wet weather issue. These programs include Stormwater Fee Assistance Programs, Residential Green Practices Rebate Program; Stormwater Management Incentives Program Loan; Stormwater Management Incentives Program Grant; Stormwater Design Assistance; Stormwater Assistance Phase in Program/CAP; Stream and Backyard Buffer Program; Rebuilding Together Philadelphia Green Practices on Low Income Homes; Residential Rain Barrels; and Residential Stormwater Practices Innovative Design.

Based on the example of Philadelphia and other research findings, we submit the following recommendations for inclusion into the proposed ALCOSAN Wet Weather Plan:

- 1) Expressly reinforce the highly recommended use of green infrastructure by all 83 municipalities as a means of reducing stormwater flow into the ALCOSAN treatment system.
- 2) Indicate that a Major Incentive Plan to minimize flow into the ALCOSAN system will be employed and that it will be among the most aggressive in the nation. In order to level the playing field, this incentive plan would include assistance programs for economically challenged municipalities within the ALCOSAN system.
- 3) Include the establishment of a network of individual municipal flow meter installation in order to equitably assess individual source amounts.
- 4) Indicate that through various partnerships, green infrastructure technology will be available to all municipalities utilizing this source reduction methodology including but not limited to:
 - Public education and availability of information;
 - Implementation of rain garden and rain barrel initiatives;
 - Installation of bioretention within rights-of-way;
 - Utilization of permeable pavements where deemed possible;
 - Subsidization of green roof installation;
 - Land trust acquisition of large tracts of vacant land transforming to a green use.

ALCOSAN can and should propose a more cost-effective wet weather plan by combining essential grey infrastructure with green infrastructure for a successful integrated plan that will comply with environmental standards while also benefiting the regional community socially and economically.

Deno De Ciantis, Ed.D

Director

The Penn State Center: Engaging Pittsburgh

Lisa Kunst Vavro, RLA, ASLA

Sustainable Landscape Coordinator

The Penn State Center: Engaging Pittsburgh

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 10/19/2012 11:03 PM **Subject:** WWP Comment Submission

First Name* Barton Last Name* Kirk

Street 826 Chislett St.

City Pittsburgh State (If U.S.) Pennsylvania

15206 Zip Code

Municipality City of Pittsburgh

Email* barton@ecoseeds.org

Do your comments represent the interest of an organization or special

Yes

interest group? If Yes, please

state the

organization SEEDS, Inc.

or group name

> Dear ALCOSAN, We appreciate this and the many opportunities you have offered for public comment on ALCOSAN's development of a Wet Weather Plan. I am an ecological engineer with the non-profit organization SEEDS. I have been studying, designing, building, and researching green infrastructure systems for stormwater and wastewater management, treatment, and reuse since 1998 and have become intimately familiar with how green infrastructure can, should, and should not be applied here locally as well in communities across the Northeast. Since moving to Pittsburgh in 2008, I have designed, built, or advised on the construction of 15 rain gardens or bioretention systems in public, private, residential and commercial applications in the City of Pittsburgh and Borough of Millvale and provided intensive rain garden design/build trainings to dozens of landscape and design contractors and professionals. In the past five years I have encountered very few situations to which some form of green infrastructure or stormwater source control could not be easily and appropriately adapted to effectively mitigate the first 1 inch of stormwater runoff while also providing additional benefits to the site owner and surrounding community in the form of local flood mitigation, landscape/streetscape beautification, reduced urban heat island effect etc. This past summer I volunteered my time with a high school and college intern to begin to document whether or not the now dozens of green infrastructure demonstrations across the region were in fact performing as designed. The results of this citizen's monitoring effort demonstrated that 10 of the 12 systems monitored this summer have the capacity to completely retain at least the first 1 inch of stormwater from their contributing impervious areas 3 to 10 times the size and only 1 of the 12 had either an observed or documented overflow event in the last 12 months. It is important to note that the majority of systems being monitored were constructed using the existing urban fill or native clay, silt, or shale soils typical of this region with just a simple compost amendment and without underdrains. This is only

an anecdotal snapshot of green infrastructure functioning to provide a real solution to our region's wet weather problem, but my observations and experience lead me to implore you to reconsider your selected strategy. Your proposal to pursue a phased, adaptive management approach that will allow you to adjust your course of action in response to changes in municipal wet weather plans, water quality regulations, climate change, and public and political will is prudent and leaves the door open for future incorporation of GI and source control into your plan. However, your selected strategy still commits our region to a massive capital investment in buried infrastructure that offers no opportunity for ancillary human health, water quality, ecological habitat, and economic development benefits associated with green infrastructure. We have the opportunity to do as many other CSO communities under consent decree are choosing to do which is to commit to investing in cost-effective green infrastructure and source control as the first step in a green/grey solution. It is clear that our region is uniquely challenged by the fact that ALCOSAN is responsible for addressing the CSO and SSOs resulting from the contributions of 83 individual municipalities, yet with no direct jurisdiction over the sewer facilities, land use planning, or codes within those municipalities. However, I have not been convinced that ALCOSAN has come close to exhausting it's capacity to take regional leadership in assisting municipalities in evaluating and financing green infrastructure and source control solutions that would directly affect ALCOSAN's ability to meet the Consent Decree. To explore such a strategy rigorously in even one municipality if not one planning basin could be the catalyst for convincing our region that infrastructure matters because it shapes and sustains us as a community. At a time when our region and our city is attempting to transition from a community of mining and industrial prosperity to one of green technology and health-based prosperity, we need to embrace and purse water infrastructure that nurtures our communities' vision and aspirations of sustainability, resiliency, vibrancy from the ground up. ALCOSAN has the unique opportunity lead this charge; request the EPA to give us the time, latitude, and technical support to fully assess the extent to which green infrastructure can offer a real and durable solution in each municipality and our region as a whole. Thank you.

Comments*

Would you like to receive a response to Yes your comments? Captcha Image (Security Code)*

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 10/19/2012 6:40 PM

Subject: WWP Comment Submission

First Name* Erin

Last Name* Copeland

Street 2000 Technology Drive Suite 300

City Pittsburgh State (If U.S.) Pennsylvania

Zip Code 15219

Municipality City of Pittsburgh

Yes

Email* ecopeland@pittsburghparks.org

Do your comments represent the

interest of an organization or special interest

group?
If Yes, please

state the organization or group name

Pittsburgh Parks Conservancy

The Pittsburgh Parks Conservancy has embarked on an effort to restore the hydrologic and ecological health of the panther hollow watershed, located within Schenley Park and the neighborhood of Squirrel Hill, Pittsburgh, PA. Through this effort ALCOSAN has been a great partner. They have sat on the Advisory Committee and shared insights related to wet weather problems. They have also provided us with discharge data, allowing for a better understanding of Panther Hollow's watershed hydrology. In the panther hollow watershed, each square foot of roof, sidewalks, and streets generates an average of 18 gallons of runoff annually. By capturing the first inch of runoff from these impervious areas, that number is reduced to 5 gallons, a reduction of 72%. Similarly, each square foot of lawn/turf in the watershed produces an average of 4 gallons of runoff annually. Capturing the first inch of runoff from these semi-impervious areas would result in a reduction of 2 gallons, or 50%. Given the high percentage of runoff reduction achieved by capturing the first inch, if implemented, these interventions would contribute significantly to the reduction of combined sewer overflow events at the outfall along the Monongahela River. By evaluating at the watershed scale and focusing on infiltrating rain where it first hits the ground using green infrastructure, large amounts of runoff reduction can occur. Creating a wet weather plan that purely and primarily focuses on bottom of the watershed approaches such as enormous underground tunnels is not a long term sustainable solution to a complex problem; the wet weather plan should include decentralized green infrastructure. This approach will add to our community by providing more and longer employment and also ecosystem services one of which is stormwater mitigation.

Comments*

Would you like to receive a

response to your

Yes

comments?

Captcha Image (Security Code)

*

From:

<contactform@alcosan.org>

To:

<Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date:

10/19/2012 4:45 PM

Subject: WWP Comment Submission

First Name*

Matthew

Last Name*

Smuts

Street

200 Ross Street

City

Pittsburgh

State (If U.S.) Pennsylvania

Zip Code

15219

Municipality

Pittsburgh

Email*

msmuts@ura.org

Do your comments represent the interest of an

Yes

organization or special interest group?

If Yes, please

state the

organization or group name

Urban Redevelopment Authority of Pittsburgh

Group and as an attendee at the Main Rivers Planning Basin meetings and a number of community meetings. We appreciate all of the hard work that your organization has invested in this process and the professionalism, openness, and hospitality that you have shown us throughout this process. We have reviewed the Draft Wet Weather Plan and have the following comments. While we acknowledge that the

Director Williams, As you know the Urban Redevelopment Authority (URA) has participated

throughout the development of the Draft Wet Weather Plan as a member of the Regional Stakeholder

Comments*

primary responsibility of ALCOSAN is to treat the wastewater that is delivered to it by the customer municipalities we would encourage you to think more creatively about how you can support investment in upstream "green infrastructure" solutions to reduce the amount of stormwater that ultimately finds its way to your regional collection system and treatment facility. The URA sees value in the green infrastructure approach from an economic development perspective for a variety of reasons. It has been shown that urban green spaces increase property values and retail traffic while reducing crime and improving sense of place. Making our city our more attractive place to live, work, and play helps to support our goal of increasing the tax base and attracting a creative and talented workforce that increases our economic competitiveness as a region. Green infrastructure also has the potential to increase jobs in our region. Construction and maintenance of green infrastructure could potentially create more jobs over a longer period than construction and maintenance of conventional grey infrastructure. It also has the ability to strengthen communities and raise awareness about the importance of effective stormwater management by getting residents involved in the installation and maintenance of green infrastructure facilities from rain barrels and rain gardens to stream restoration and tree planting activities. In addition to the above benefits, green infrastructure can help to improve regional water quality which also makes our region more attractive by making our rivers and streams more usable for a variety of recreation

activities. Finally we believe that green infrastructure has the potential to reduce the amount of interruption and potentially the cost of installing grey infrastructure. While there is certainly more study that needs to be done on the extent to which green infrastructure can be used to help solve wet weather issues in our region, the URA feels that these approaches should be prioritized because of the many benefits outlined above. We also feel that the best way to see how well these facilities can work in our region is to install and monitor a variety of stormwater best management practices throughout the region to determine which approaches can be applied here most effectively. In addition to green infrastructure the URA supports the consolidation of storm and wastewater collection, conveyance, and treatment systems in the region to make for a more cost effective and unified system. The URA also supports the creation of local and/or regional stormwater utilities which will provide an economic incentive for developers to reduce the amount of stormwater that leaves their sites and which provides early stage economic incentives for developers to install cost effective site based solutions to stormwater runoff. Thank you for your consideration of these comments.

Would you like to receive a response to Yes your comments? Captcha Image (Security Code)*

Nancy Barylak - WWP Comment Submission

From: <contactform@alcosan.org>

<Michael.Anthony@alcosan.org>. <nancy.barylak@alcosan.org> To:

10/19/2012 4:45 PM Date:

Subject: WWP Comment Submission

First Name* Matthew Last Name* Smuts

Street 200 Ross Street City Pittsburgh State (If U.S.) Pennsylvania

Zip Code 15219 Municipality Pittsburgh

Email* msmuts@ura.org

Do your comments represent the interest of an organization or special

Yes

interest group? If Yes, please

state the

organization Urban Redevelopment Authority of Pittsburgh

or group name

> Director Williams, As you know the Urban Redevelopment Authority (URA) has participated throughout the development of the Draft Wet Weather Plan as a member of the Regional Stakeholder Group and as an attendee at the Main Rivers Planning Basin meetings and a number of community meetings. We appreciate all of the hard work that your organization has invested in this process and the professionalism, openness, and hospitality that you have shown us throughout this process. We have reviewed the Draft Wet Weather Plan and have the following comments. While we acknowledge that the primary responsibility of ALCOSAN is to treat the wastewater that is delivered to it by the customer municipalities we would encourage you to think more creatively about how you can support investment in upstream "green infrastructure" solutions to reduce the amount of stormwater that ultimately finds its way to your regional collection system and treatment facility. The URA sees value in the green infrastructure approach from an economic development perspective for a variety of reasons. It has been shown that urban green spaces increase property values and retail traffic while reducing crime and improving sense of place. Making our city our more attractive place to live, work, and play helps to support our goal of increasing the tax base and attracting a creative and talented workforce that increases our economic competitiveness as a region. Green infrastructure also has the potential to increase jobs in our region. Construction and

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Comments*

Would you like to receive a response to Yes your comments? Captcha lmage (Security Code)*

From: <contactform@alcosan.org> To: <Michael.Anthony@alcosan.org>

8/1/2012 2:14 PM Date:

Subject: WWP Comment Submission

First Name* Michael Last Name* Colwes

P O Box 854 Street City Pittsburgh State (If U.S.) Pennsylvania

Zip Code 15230 Municipality Pittsburgh

Email* mc55@yahoo.com

No

Do your comments represent the interest of an organization or special interest group?

If Yes, please state the organization or group None

name

I do hope the EPA does not agree, for a revision. The sewer infrastructure problems are identifed fifty years ago. The ball is continually passed. Mc Clelland, Mc Gready and Hunt, functioning as county commissioners accepted "inducements" from the big money land holders and buried the sewer rebuilding matter. This above noted deceptive behavior is occurring during the sixth decade of the twentieth century. If, the problem is corrected during the 1960s; the update costs are less, and less damage does propogate through the years. Do the project, now; do the project

Comments*

Would you like to receive a response to your comments? Captcha Image

(Security Code)*

No

correctly

Michael Anthony - ALCOSAN Contact Us - event question

From: <contactform@alcosan.org>
To: <Michael.Anthony@alcosan.org>

Date: 8/1/2012 9:38 PM

Subject: ALCOSAN Contact Us - event question

CC: <nancy.barylak@alcosan.org>

First Name* albert Last Name* kovacik

Street City

State (If U.S.) Pennsylvania

Zip Code 15120

County (If not

U.S.)

Daytime Phone

Email albert.kovacik@gmail.com

Reason For

Comments*

Contacting*

event question

Dave Borneman did good job on Essential Pgh today (1 Aug 12). I know him from City-DEC. But please encourage 'green' recommendations in water course before entering ALCOSAN sewer system.

Pgh has opportunity to be on cutting edge for green water quality, as well as already established to

green building practices. Thank you.

Captcha Image (Security Code)*

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 8/16/2012 12:41 PM

Subject: WWP Comment Submission

First Name* Lynn
Last Name* Ruck

Street PO BOX 10589

City Raleigh

State (If U.S.) North Carolina

Zip Code 27605

Municipality

Email* lynn@rainwatersolutions.com

Do your comments represent the

interest of an No

organization or special interest

group?

If Yes, please state the organization or group name

Comments*

Regards to the article, "...Alcosan to use gardens, rain barrels to cut sewer flow", I wanted to introduce our product for consideration. http://www.rainwatersolutions.com/ivy-rain-barrel We designed our 50 gallon rain barrel for the masses. We've met the EPA recommendations for health and safety and incorporated the needed features along with price point to make Ivy the best municipal rain barrel on the market. Solid waste gives you a trashcan and recycling bucket it is now time they give out rain barrels! One Ivy will not solve any water issue, but 10,000 x 50 gallons will make an impact for each rain event. We are happy to meet in person and show off our best in class rain barrel- made in the USA! Sincerely, Lynn Ruck/ Co-Owner Rain Water Solutions

Would you like to receive a response to your

Yes

comments?

Captcha Image (Security Code)*

Michael Anthony - ALCOSAN Contact Us - sewer line question

From: <contactform@alcosan.org> To: <Michael.Anthony@alcosan.org>

9/3/2012 4:27 PM Date:

Subject: ALCOSAN Contact Us - sewer line question

<nancy.barylak@alcosan.org> CC:

First Name* Mark Last Name* Wiener

Street 21 Ridgewood City McDonald State (If U.S.) Pennsylvania

Zip Code 15057

County (If not

U.S.)

Daytime Phone 724-745-3518

Email swpv@comcast.net

Reason For

sewer line question Contacting*

Please put in as many green roofs, park lakes and community greenbelts as possible to minimize the

Comments* storm run off load on combined sewers so as to lessen the load and keep SOAK green longer. 3

Clean Rivers better than 3 Scenic Sewers.

Captcha Image (Security Code)*

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 9/8/2012 1:48 PM

Subject: WWP Comment Submission

First Name* Will
Last Name* Zavala

Street 159 Roup Ave
City Pittsburgh
State (If U.S.) Pennsylvania

Zip Code 15206 Municipality Pittsburgh

Email* morselpix@comcast.net

Do your comments

represent the interest of an organization or special

interest group?

If Yes, please state the organization or group name

Comments*

Would you like to receive a response to your

comments?

Captcha Image (Security Code)*

Yes

I am very interested in the development of the Wet Weather Plan. However, your spokeswoman stated that you foresee "adjustments" but "not any wholesale changes" to the plan. Can you confirm this? I don't want to attend the public meetings if the plan will remain essentially the same. I don't believe it's a very forward-thinking plan.

Yes

From: <contactform@alcosan.org>

<Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org> To:

9/15/2012 6:32 PM Date:

Subject: WWP Comment Submission

First Name*

Melissa

Last Name*

McSwigan

Street

617 Bellefonte St.

City

Pittsburgh

State (If U.S.)

Pennsylvania

Zip Code

15232

Municipality

Pittsburgh

Email*

melissamiller28@yahoo.com

Do your comments represent the

interest of an organization or

special interest

group?

If Yes, please

state the

organization or group name

Comments*

No

I attended your annual open house today and found it very interesting. Thank you! I appreciate this chance to comment on your Wet Weather Plan. overflow problem, but we need to think it through given the huge I live in Pittsburgh and also own a rental property, so I will be affected at both of my

properties by the proposed Plan. Of course, we definitely need to fix out sewer investment and impact that it will have on your customers like me and our environment that we all enjoy and depend on for health and recreation. I think Alcosan could set a wonderful example by incorporating the latest green initiatives. This would involve a partnership with the EPA, environmental groups, and rate payers. A

new timeline needs to be created (with the EPA) to fully incorporate green initiatives. I'm afraid the existing draft plan is more "spend a lot business as usual." In working with these various partners a more affordable AND sustainable solution can be attained for the long-run. Green initiatives like rain

barrels, green roofs, porous pavement, more trees, etc. would have various long-term benefits. (These benefits would not only be for storm water management, but it would beautify our surroundings and let everyone take an active part). There is a lot of talk these days about being "green" - it sounds nice, but

this is not just an empty slogan. Rate payers will be deeply impacted by this new plan and we have a

real opportunity to do more with our money than less by incorporating green initiatives.

Would you like to receive a response to your No

comments?

Captcha Image (Security Code)

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 9/16/2012 5:07 PM

Subject: WWP Comment Submission

First Name* Robert
Last Name* Raczka

Street 135 W Lyndhurst Dr

City Pittsburgh State (If U.S.) Pennsylvania

Zip Code 15206 Municipality Pittsburgh

Email* robertraczka@ymail.com

Do your comments represent the interest of an organization or special interest

No

group?
If Yes, please state the organization or

group name

I am submitting my public comment for Alcosan's Wet Weather Plan. I am an Alcosan customer and welcome this opportunity to comment. I am also one of the many (and ever growing) people to make use of our bike trails and rivers to kayak. We have known for years that we need to fix our drain water system to prevent sewer overflows. This major public works project will financially impact customers as well as the environment. Rather than the current plan that relies on "gray" initiatives, Alcosan should incorporate the latest green initiatives and be a real national leader. The end result would not only save money, but it would have other lasting benefits. This would involve a partnership with the EPA, environmental groups, and rate payers. A new timeline needs to be created with the EPA to fully incorporate green initiatives, which the plan currently lacks. Green initiatives include rain barrels, green roofs, porous pavement, more trees, etc. These initiatives would not only be for storm water management, but it would beautify our surroundings, let everyone take an active part and save us further money. For example, if everyone had a rain barrel(s), they would be able to use the water collected to water their gardens and grass further reducing their water consumption (and water bill). These costs savings can be used to offset the new costs associated with this project. There is a lot of talk these days about being "green" - it sounds nice, but this is not just an empty slogan. Rate payers will be deeply impacted by this new plan and we have a real opportunity to do more with our money rather than less.

Comments*

Would you like to receive a response to your comments?

No

Captcha Image (Security Code)

*

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

9/17/2012 8:59 AM Date:

Subject: WWP Comment Submission

First Name* William Last Name* Kilgour

Street 301 Avenue F City Pittsburgh State (If U.S.) Pennsylvania

Zip Code 15221

Forest Hills Municipality

Email* wkilgour@choruscall.com

Do your comments represent the interest of No an organization or special interest group?

If Yes, please state the organization or group name

Comments*

Would you like to receive a response to your comments?

Captcha Image (Security Code)*

Thank you for another great open house. Regarding wet weather, I applaud the goals. I think the methods should involve a lot more green technologies. Removing downspouts, using rain barrels and rain gardens are important. Porous pavement materials and green roofs would be less expensive than major construction. Plus it would set our region as a leader in this important technology. This is good for everyone. A balanced approach to these important goals is essential. Thank you.

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

9/17/2012 12:23 PM Date:

Subject: WWP Comment Submission

First Name* Andy

Last Name* McSwigan

Street 4131 Bigelow Blvd

City Pittsburgh State (If U.S.) Pennsylvania

Zip Code 15213 Municipality Pittsburgh

Email* melissamiller28@yahoo.com

Do your comments

represent the interest of an organization or special interest

No

group?

If Yes, please state the organization or

group name

The draft Wet Weather Plan is not a long term solution to our storm drainage problems - though it is requiring a huge amount of money to implement. We need to find more lasting solutions especially to justify such a large sum of money that will be passed on to the consumer. From what I have read, we will not even know the actual costs that Alcosan customers will have to pay - the estimates range wildly. Let's look to other cities like Philly who have similar issues to see what they have done. Implementing more stringent green initiatives where every Alcosan customer participates is a good idea. I read your brochure that gives tips to homeowners to do their part - but a more systematic green approach is in order.

Comments*

receive a response to your comments?

Would you like to

Captcha Image (Security Code)*

From: <contactform@alcosan.org>

<Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org> To:

Date: 9/18/2012 9:23 AM

Subject: WWP Comment Submission

First Name* Greg Last Name* Null

Street 145 Labelle St City Pittsburgh State (If U.S.) Pennsylvania

Zip Code 15211 Municipality Pittsburgh

Email* gregory.nulL@gmail.com

Do your comments represent the interest of an organization or special interest group?

If Yes, please state the organization or group

name

Comments*

Would you like to receive a response to

your comments?

Captcha Image (Security

Code)*

No

While the infrastructure improvements are needed, I would like to see incentives for permeable pavement, rain barrels, and cisterns. While ALCONSAN cannot make people use these things, I would like to think that incentives in the form of money, supplies, or plans would allow residents to 1: become active in the storm water plan and 2: take a small step in narrowing the amount of runoff from their property.

From: <contactform@alcosan.org>

<Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org> To:

Date: 9/20/2012 4:28 PM

Subject: WWP Comment Submission

First Name* Sandy Last Name* Feather

6747 Shore Avenue Street

City Verona

State (If U.S.) Pennsylvania

Zip Code 15147

Municipality Penn Hills Email* slf9@psu.edu

Do your comments represent the

interest of an organization or

special interest group? If Yes, please state the

organization or group name

Please consider green efforts such as rain gardens, green roofs and rain barrels as part of the solution. Homeowners who invest in such infrastructure to keep Comments*

stormwater on their property and out of our rivers should get a reduction in sewage

fees.

No

Would you like to receive a

response to your comments?

Captcha Image (Security Code)*

From: <contactform@alcosan.org>

<Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org> To:

Date: 9/20/2012 4:59 PM

Subject: WWP Comment Submission

First Name* Seth Last Name* Davis

Street 2966 Crosby Avenue

City Pittsburgh State (If U.S.) Pennsylvania

Zip Code 15216 Municipality Dormont

Email* sed183@gmail.com

No

Do your comments represent

the interest of an

organization or special

interest group?

If Yes, please state the organization or group name

Comments*

weather infrastructure. The overall investment in gray infrastructure construction does not bring any aesthetic or environmental benefit to this project. Would you like to receive a No

I stand with the Clean Rivers Campaign and hope that Alcosan will postpone a decision in order to investigate fully the impact of a green solution to our stormwater and wet

response to your comments?

Captcha Image (Security Code)*

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 9/21/2012 11:17 AM

Subject: WWP Comment Submission

First Name*

Dave

Last Name*

Coogan

Street

5742 Pierce St

City

Pittsburgh

State (If U.S.)

Pennsylvania

Zip Code

15232

Municipality

Pittsburgh

Email*

coogan.dave@gmail.com

Do your comments

represent the interest of an

organization or special

No

interest group?

If Yes, please state the organization or group name

Comments*

ALCOSAN's plan to spend \$2 billion for additional infrastructure for water runoff is short sighted. Green solutions are the only long-term solution. We should be following what other cities are doing to solve this problem. Cities like Philadelphia and Cincinnati are a great example of how the region can solve this through green solutions.

Would you like to receive a

response to your

Yes

comments?

Captcha Image (Security

Code)*

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

9/21/2012 3:04 PM Date:

Subject: WWP Comment Submission

First Name* joan Last Name* adibi

Street 1154 wightman st

City pittsburgh State (If U.S.) Pennsylvania

15217 Zip Code

Municipality city of Pittsburgh Email* jonadibi@verizon.net

Do your comments

represent the interest of an

organization or special

interest group?

If Yes, please state the organization or group name

Comments*

Would you like to receive a response to your

comments?

Captcha Image (Security

Code)*

No

I am in favor of using green infrastructure to reduce the amount of storm water and overflowing sewage flowing untreated into our rivers. Infrastructure, such as sidewalk plantings, rain barrels and green roofs would help the uptake. Also wetlands planted before the water gets to the river are desirable. It is NOT a good idea to spend billions on storage under the river.

Yes

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 9/24/2012 12:35 PM

Subject: WWP Comment Submission

First Name* Marisa Last Name* Manheim

Street 219 Edmond St City Pittsburgh State (If U.S.) Pennsylvania

Zip Code 15224 Municipality Pittsburgh

Email* mmanheim@growpittsburgh.org

No

Do your comments represent the interest of an organization

or special interest group? If Yes, please state the organization or group name

Comments*

I would like to see more money and policy to promote green infrastructure solutions to our stormwater management issues in SW PA. I would also like to see a reduction in

fresh water consumption take a more prominent place in this dialog.

Would you like to receive a response to your comments?

Captcha Image (Security Code)

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 9/24/2012 3:04 PM

Subject: WWP Comment Submission

First Name* Amanda
Last Name* Virbitsky

Street 4406 Butler St Apt 2

City Pittsburgh
State (If U.S.) Pennsylvania
Zip Code 15201

Zip Code 15201 Municipality Pittsburgh

Email* amanda.virbitsky@gmail.com

Do your comments represent the interest of an organization or special No

interest group?

If Yes, please state the organization

or group name

Comments*

I feel very strongly that the Wet Weather Plan should be focused on green stormwater infrastructure to treat stormwater where it falls, save money, and

increase aesthetic appeal of the region.

Would you like to receive a response to your comments?

Captcha Image (Security Code)*

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 9/25/2012 9:13 AM

Subject: WWP Comment Submission

First Name* James
Last Name* Craig

Street 5707 Walnut St

City Pittsburgh
State (If U.S.) Pennsylvania

Zip Code 15232

Municipality Pittsburgh
Email* irc61@pitt.e

Email* jrc6l@pitt.edu

Do your comments represent the interest of an organization

or special interest group?

If Yes, please state the organization or group name

Comments*

Clearly the right thing to do is to use green technologies to solve this problem.

No

Would you like to receive a response to your comments?

No

Captcha Image (Security Code)*

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 9/25/2012 1:47 PM

Subject: WWP Comment Submission

First Name* Leigh
Last Name* Argentieri

Street 71 Longuevue Drive

City Pittsburgh State (If U.S.) Pennsylvania

Zip Code 15228

Municipality Mt. Lebanon

Email* lhargentieri@gmail.com

Do your comments represent

the interest of an

organization or special

interest group?

If Yes, please state the organization or group name

Comments*

Would you like to receive a response to your comments?

Captcha Image (Security

Code)*

No

A better long term solution is reducing the waster water put into the system through green solutions. The county should implement a less expensive and more effective way to reduce waste water. Pittsburgh has a strong culture of building a green and sustainable

future. This proposal runs counter to these efforts.

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 9/25/2012 6:34 PM

Subject: WWP Comment Submission

First Name* Stephanie Last Name* Ulmer

Street 427 Elmer St.
City Pittsburgh
State (If U.S.) Pennsylvania
Zip Code 15218-1413
Municipality Edgewood

Email* stephanie.ulmer@verizon.net

No

Do your comments represent the interest of an organization or special interest group?

If Yes, please state the organization or group name

> Alcosan's plan is much more expensive than it needs to be. Green infrastructure could definitely lessen the cost. Some cities like Chicago and Philadelphia have found that, by starting with green solutions first, the need for gray infrastructure becomes almost unnecessary. Some possible areas for new green infrastructure: 1) Reconfiguring our parking lots with more trees and rain gardens, and directing storm runoff into these areas. 2) Permeable sidewalks and pavements. This could be done gradually as worn areas are replaced or all at once. 3) Green roofs. Although these roofs are expensive to install their expense compares favorably to the enormous cost of giant concrete tunnels. 4) Rain barrels and rain gardens. These are low tech solutions that many homeowners could avail themselves of. Big box stores could have larger versions installed. Alcosan could give rebates or discounts on sewage bills of homes and businesses that have these. 5) Planting additional street trees. Green infrastructure gives back more with each passing year while gray infrastructure starts to degrade as soon as it's installed. Green infrastructure will improve the air quality and aesthetics of Pittsburgh making it "more livable". Plans are made to be changed. That is the purpose of having public comment on Alcosan's proposal. If there are issues with getting resources to the municipalities let's put our heads together and work through them. It is imperative that Pittsburgh chooses the least expensive and most environmentally friendly solution to our sewage problems. Fortunately green infrastructure fulfills both these needs. It's a win for the consumers and a win for the environment. Thank you.

Comments*

Would you like to receive a

response to Yes

your

comments?

Captcha Image (Security Code)

*

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 9/26/2012 7:50 PM

Subject: WWP Comment Submission

First Name*

Caroline

Last Name*

Savery

Street

411 Taylor St

City

Pittsburgh

State (If U.S.)

Pennsylvania

Zip Code

15224

No

Municipality

Email*

carolinesavery@gmail.com

Do your comments

represent the

interest of an

organization or

special interest

group?

If Yes, please state the organization or

group name

I moved to Pittsburgh eight years ago, and I plan to be here for the long run. Thus I am invested in making sure that green infrastructure, which would care for the needs of future years and

generations of Pittsburghers, be implemented at any opportunity. I am extremely concerned about

Alcosan's proposal for improving the serious combined stormwater-sewage overflow problem with

gads more "grey" technology. I heard about innovative, money-saving green wastewater

management system updates being done in the Great Lakes region at the GLUE conference in Pittsburgh last September, and I strongly urge you to look into such models. Pittsburgh demands a

sustainable, healthy water management system! It's about time!

Comments*

Would you like to receive a response

to your comments?

Captcha Image (Security Code)*

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <uancy.barylak@alcosan.org>

Date: 9/26/2012 10:53 PM

Subject: WWP Comment Submission

First Name*

Charles

Last Name*

Jones

Street

76 Roycroft Avenue

City State (If U.S.) Pittsburgh Pennsylvania

Zip Code

15228

Municipality

Mt. Lebanon

Email*

ceiones@pitt.ed

Do your comments represent the

_ .

interest of an organization or

special interest

group?

If Yes, please state the

organization or group name

No

While I appreciate that ALCOSAN has no authority to make homeowners or anyone else implement 'green' infrastructure, I would think ALCOSAN would have the ability to ask the many municipalities that handle their sewers to come up with ways to encourage their citizens to reduce the speed of delivery of water to the storm sewers. Specifically, Mt. Lebanon houses located uphill from their street tend to have their downspouts drain via tiles straight to the street, where the water rushes straight to the storm sewer. Is it possible to set up some sort of incentive for residents to simply have their downspouts drain onto their lawns? It is a pretty trivial bit of engineering to convey the water away from the foundation of the house and to ensure that it does not affect the neighbor's house. People wishing to spend more money could install rain barrels and rain gardens and the like, but it should generally be effective to just let the rainwater wash across the lawn. It flows downhill, soaks into

Comments*

the lawn, and if it reaches the streets at all, it will be some time after the storm is over. I would think the impact on CSOs would be substantial: If the area of roofs along one side of the street is roughly one half the area of the street in front of the house, and only the uphill houses currently pipe their downspouts to the streets, then putting this water on the grass instead of the street could reduce storm water inputs by about 33%. Could modifying downspouts in this way be incentivized by municipalities, or could they only be encouraged? To ensure things are done properly, it should just require a visit by a municipal official to certify the home runoff is properly modified and to ensure that it doesn't impact neighbors. Is there a good reason to NOT encourage this simple idea? Sincerely, Charlie Jones

Would you like to receive a response to your comments?

Yes

Captcha Image

(Security Code)

Michael Anthony - ALCOSAN Contact Us - school projects

From: <contactform@alcosan.org> <Michael.Anthony@alcosan.org> To:

Date: 9/27/2012 11:44 AM

Subject: ALCOSAN Contact Us - school projects

CC: <nancy.barylak@alcosan.org>

First Name* Mark Last Name* Wiener

Street City

State (If U.S.) Pennsylvania

Zip Code

County (If not

U.S.)

Daytime Phone

Email swpv@comcast.net

Reason For

school projects Contacting*

It appears to me that neighborhood storm water intercepts into park ponds, green roofs, remediated

Comments* wetlands and urban greenbelts as interim steps could change ALCOSAN YELLOW status to

GREEN while we wait on the bigger, more expensive improvements. RSVP

Captcha Image (Security Code)*

From: <contactform@alcosan.org>

<Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org> To:

Date: 10/1/2012 1:01 PM

Subject: WWP Comment Submission

First Name*

Paige

Last Name*

Wiegman

Street

716 East End Avenue

City

Pittsburgh

State (If U.S.)

Pennsylvania

Zip Code

15221

Municipality

Pittsburgh

Email*

paige.wiegman@gmail.com

Do your comments represent the interest of an organization or No

special interest

group?

If Yes, please state the organization or

group name

I would like to see the wet weather plan focus more on green solutions to our sewage overflow problems. The construction of a system of underground storage and conveyance tunnels seems like an unwise and expensive solution. At Phipps Conservatory they have constructed a building which completely treats it's own wastewater. I realize this is a small scale, but technologies used in that construction, as well as rain diversions (barrels and gardens), separation of storm and sanitary sewers where possible and increases to the capacity of our existing system seem like better solutions.

Comments*

Would you like to your comments?

Captcha Image (Security Code)*

receive a response to No

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 10/10/2012 10:44 AM Subject: WWP Comment Submission

First Name*

Jan

Last Name*

Steckel

Street

2613 Mount Royal Rd

City State (If U.S.) Pittsburgh Pennsylvania

Zip Code

15217

Municipality

Email*

Pittsburgh

Do your comments

steckelj@pitt.edu

represent the interest of an organization or special

No

interest group?

If Yes, please state the

organization or group name

I would like to see a really concerted effort to separate storm water from the sanitary sewer because the idea of treating all the storm water seems inefficient to me. Additionally, I would like to see huge increases in water gardens and permeable surfaces such that the rain can soak into the ground where it lands. I'm no expert, but those are things that make sense to me, as a citizen.

Comments*

Would you like to receive a

response to your

Yes

comments?

Captcha Image (Security

Code)*

From: <contactform@alcosan.org>

<Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org> To:

Date: 10/16/2012 2:04 PM

Subject: WWP Comment Submission

First Name* Ryan Last Name*

Street 103 McKelvey Ave

City Pittsburgh State (If U.S.) Pennsylvania

Zip Code 15218

Municipality

Email* ryan.sprake@gmail.com

Do your comments represent

the interest of an

organization or special

interest group?

If Yes, please state the organization or group name

Comments*

Would you like to receive a response to your comments?

Captcha Image (Security

Code)*

No

Sprake

I feel this plan is too expensive and the complete wrong idea to mitigate flooding. I would rather see a "green" approach where we deal with the run off from our roofs, parking lots, and other non permeable surface before it gets back into the system. The nine mile run

project has shown that these concepts do work.

No

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 10/16/2012 2:20 PM

Subject: WWP Comment Submission

First Name*

daniel

Last Name*

Valentine

Street

216 East Eighth ave

City

homestead

State (If U.S.)

Pennsylvania

Zip Code

15120

Municipality

Homestead

Email*

danielinpgh@yahoo.com

Do your comments represent the interest of an organization or

No

special interest group? If Yes, please state the organization or group

name

please do not complete this expensive and ineffective plan. We already had to separate our plumbing to the street we we remodeled our building. We also put a green roof on the building. This past we thousands of dellars. Do not weste what we have been required to do by spanding.

This cost us thousands of dollars. Do not waste what we have been required to do by spending billions on a plan that is not going to stop the problem at its source. The plan will still leave us

with a combined sewer system which is old and ineffective. Make investments in our communities, do not invest in a plan that will destroy our river fronts again and cost billions.

Comments*

Would you like to receive a response to your comments?

Captcha Image (Security Code)*

Yes

From: <contactform@alcosan.org>

<Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org> To:

Date: 10/16/2012 2:24 PM

Subject: WWP Comment Submission

First Name* Sara Last Name* Lickey

Street 640 East End Ave

City Pittsburgh State (If U.S.) Pennsylvania

Zip Code 15221

Municipality City of Pittsburgh

Email* saralickey@verizon.net

Do your comments represent

the interest of an organization

or special interest group?

If Yes, please state the organization or group name

Comments*

I strongly support the use of green infrastructure solutions to the region's problems with aging sewer systems and stormwater runoff. Such solutions would include green roofs, bioswales, rain gardens, tree plantings, permeable paving, rain barrels and stormwater

planters.

No

No

Would you like to receive a

response to your comments?

Captcha Image (Security Code)

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 10/16/2012 2:53 PM

Subject: WWP Comment Submission

First Name* Last Name*

Marijke Hecht

Street

1100 Portland Street

City State (If U.S.) Pittsburgh Pennsylvania

Zip Code

15206

Municipality

Pittsburgh

Email*

marijke.hecht@gmail.com

Do your comments represent the

interest of an

organization or special interest

group?

If Yes, please state the

group name

No

organization or

Pittsburgh is known throughout the world as a city that is in the lead in green building and quality of life. Alcosan's Wet Weather Plan should build on this reputation by integrating green infrastructure solutions into their Wet Weather Plan to the greatest extent possible. Not only will this reduce the overall cost of the project, it will provide other critical values, such as improved air quality and reduced heat island effect (thanks to increased numbers of trees). We should be at the forefront of the nation's plans to address water quality and need to connect water quality to other environmental and community issues. Heavy implementation of expensive, grey-infrastructure solutions, as currently proposed in the Plan, is not an acceptable approach to solving wet weather issues in the year 2012. Please give communities the guidance and support they need to build and maintain green infrastructure wherever possible. New grey infrastructure should only be proposed after green infrastructure solutions have been thoroughly vet and are deemed unfeasible. This is an opportunity for Alcosan to take a visionary and leading role in wet weather issues. Please do so.

Comments*

Would you like to receive a response to your comments?

Yes

Captcha Image (Security Code)*

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 10/16/2012 3:10 PM

Subject: WWP Comment Submission

First Name* Llouise and James

Last Name* Altes

Street 121 South Fairmount Street

City Pittsburgh State (If U.S.) Pennsylvania

Zip Code 15206 Municipality Pittsburgh

Email* jl.altes@verizon.net

Do your comments represent the interest of an organization No

or special interest group? If Yes, please state the organization or group name

organization of group

We are using green solutions to do our part and we are calling on ALCOSAN to solve this problem using green solutions that will not only clean our water, but will create family-sustaining jobs, rebuild our neighborhoods, clean our air, and result in the most benefit for the least cost to our community!

Would you like to receive a response to your comments?

Captcha Image (Security

Code)*

Comments*

No

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 10/16/2012 11:25 PM

Subject: WWP Comment Submission

First Name* Megan
Last Name* Rooney

Street 7708 Brashear St

City Pittsburgh State (If U.S.) Pennsylvania

Zip Code 15221

Municipality City of Plttsburgh Email* yokaloca@gmail.com

Do your comments represent

the interest of an

organization or special

interest group?

If Yes, please state the organization or group name

Comments*

Would you like to receive a

response to your comments?

Captcha Image (Security Code)*

Yes

Please reconsider that the best solution to this problem is not the proposed one. I suggest looking into the GREEN plan using green solutions that will not only clean our water, but will create family-sustaining jobs, rebuild our neighborhoods, clean our air, and result in the most benefit for the least cost to our community!

No

From: <contactform@alcosan.org>

<Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org> To:

Date: 10/17/2012 1:05 PM

Subject: WWP Comment Submission

First Name* Claus

Makowka

Last Name* Street

627 Morewood Ave

City

Pittsburgh

State (If U.S.)

Pennsylvania

Zip Code

15213

No

Municipality

Email*

cmakowka@yahoo.com

Do your comments represent the

interest of an

organization or

special interest

group?

If Yes, please

state the

organization or

group name

I would like to see a greater emphasis on green infrastructure in the final solution, particularly in CSO areas like the main rivers basin where I live. My remark is aimed at the regulatory agencies that need to approve this plan since I understand that Alcosan lacks the legal authority needed to permit and enforce use of green infrastructure. I also feel that the consent decree under which Alcosan has developed this plan fails to consider adequately the potential contribution of green infrastructure and therefore failed to engage sufficiently the municipalities which have the authority to promote green infrastructure. Since replacing the CSO with separate SSO and storm drains is cost prohibitive and adding infrastructure to manage the storm water once it enters the CSO is very costly, common sense dictates minimizing the storm runoff into the CSO by using green infrastructure technology. This is also an equitable approach that shifts some of the cost of implementation and maintenance to property owners generating the storm run off that is overloading the CSO. I recognize that green infrastructure is not a panacea that fully addresses all the problems. In particular, SSO must be addressed separately. While green infrastructure is an easy solution for new construction, retrofitting it to existing buildings and infrastructure is a slower and more costly process. Finally, green infrastructure has a limited capacity to absorb precipitation, in particular in the most severe storms, and the CSO will need to deal with the excess, albeit at a reduced volume.

Comments*

Would you like to receive a response to your Yes comments?

Captcha Image (Security Code)

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 10/17/2012 5:46 PM

Subject: WWP Comment Submission

First Name* Tim Last Name* Kelly

205 Trailside Dr. Street

City Sewickley State (If U.S.) Pennsylvania

Zip Code 15143 Municipality Aleppo

Email* 1953kellys@comcast.net

Do your comments

represent the interest of an No

organization or special

interest group?

If Yes, please state the organization or group

name

Comments*

enhance quality of life and alleviate problems such as excess heat (through green roofing) in

the urban landscape.

Would you like to receive a response to your

comments?

Captcha Image (Security

Code)*

I want to register support for taking the green infrastructure approach to solving the county's sewer problems. Having looked over Phildelphia's plan, it makes more sense to do it that way. Green infrastructure, though somewhat harder to initiate, would grow with the county,

No

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

10/17/2012 8:28 PM Date:

Subject: WWP Comment Submission

First Name*

Claus

Last Name*

Makowka

Street

627 Morewood Ave

City

Pittsburgh

State (If U.S.)

Pennsylvania

Zip Code

15213

Municipality

Email*

cmakowka@yahoo.com

Do your comments represent the interest

of an organization or No

special interest

group?

If Yes, please state the organization or

group name

Currently, all Alcosan charges are based solely on water used and it appears that the same approach will be used in allocating the infrastructure costs of this plan. In CSO areas this is unfair, because it fails to allocate appropriate charges to property owners who have low water usage but large runoff during storms. Sewage charges should take this into account by factoring in property size, with adjustment for impermeable surface area on the one hand, and green infrastructure on the other. This would contribute to the development of green infrastructure by providing an appropriate incentive.

Comments*

Would you like to receive a response to Yes your comments? Captcha Image

(Security Code)*

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 10/19/2012 10:36 AM

Subject: WWP Comment Submission

First Name*

Elizabeth Lea

Last Name*

Black

Street

5718 Northumberland Street

City
State (If U.S.)

Pittsburgh Pennsylvania

Zip Code

15217

No

Municipality

Email*

melyndorf@yahoo.com

Do your comments

represent the interest of an

organization or

special interest

group?

If Yes, please state the organization or

group name

I have already submitted an endorsement form through Clean Rivers Campaign, but I want to add that I also agree with Bill Peduto's comments to this effect and belong to NMRA and a number of other environmental groups and Rodef Shalom Congregation. I have labored intensively on my own property at Northumberland and Valmont Street to plant trees and and perennial ground covers that are bird and animal friendly as well as composting and beginning to build rain gardening into the landscape, and will be turning to rain barrels in an effort to comply with Nine Mile Run efforts. ALCOSAN should make the same efforts. Rebuilding Allegheny County positively with green technology with \$2 billion utilizing the brain power and innovation of CMU & other higher education power houses of Pittsburgh and the region is the solution, not holding tanks. Let's keep working on this.

Comments*

Would you like to receive a response Yes to your comments?

Captcha Image

(Security Code)*

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 10/19/2012 11:32 AM **Subject:** WWP Comment Submission

First Name* Katherine Last Name* Camp

Street 6707 Penn Ave

City Pittsburgh State (If U.S.) Pennsylvania

Zip Code 15208 Municipality Pittsburgh

Email* katherine.camp@gmail.com

No

Do your comments represent the

interest of an organization or

special interest group?

If Yes, please state the organization or group name

Comments*

This major infrastructure project presents a critical opportunity to put dollars as well as policy towards green infrastructure. ALCOSAN must think beyond its own domain towards the benefits that incorporating green stormwater solutions will have on the entire region. Three great reasons: 1. Cost savings. 2. Less flooding, and fewer lives lost to floods. 3. More trees and rain gardens, adding value to our community through beauty, shade, and reduced crime, as well as reducing our climate change impact and the urban heat island effect. These benefits are definitely worth the challenge of working together with all the involved municipalities and political bodies that need to step up to make this happen. You can do it! And not only that, you MUST do it. Thank you.

Would you like to receive a response to your comments?

Captcha Image (Security Code)* Yes

Nancy Barylak - WWP Comment Submission

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>. <nancy.barylak@alcosan.org>

Date: 10/19/2012 5:10 PM

Subject: WWP Comment Submission

First Name* Scott
Last Name* Bricker

Street 9 Clarendon Pl
City Pittsburgh
State (If U.S.) Pennsylvania

Zip Code 15206 Municipality Pittsburgh

Email* scott.bricker@gmail.com

Do your comments represent the interest of an organization or special interest group?

If Yes, please state the

If Yes, please state the organization or group name

Comments*

It's unbelievable and almost darkly humorous to me that there was a comment made in the plan that for "sustainability reasons" Alcosan wouldn't make many print versions of the plan available, but there was no effort in the plan itself to address the real economic and environmental sustainability issues by integrating green infrastructure into the plan, not just gray infrastructure.

Would you like to receive a response to your comments?

Captcha Image (Security Code)*

Yes

From: <contactform@alcosan.org>

<Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org> To:

10/20/2012 12:01 PM Date: Subject: WWP Comment Submission

First Name* Ronald S.

Gaydos

Last Name* Street

1330 Wightman Street

City

Pittsburgh

State (If U.S.) Pennsylvania

Zip Code

15217

Municipality

City of Pittsburgh

Email*

rgaydos@city-net.com

Do your comments represent the interest of an

No organization or special interest

group?

If Yes, please

state the organization or group name

> Understandably, ALCOSAN has been shying away from - and not freely encourging - green infrastructure solutions to the region's CSO problems. This is a structural problem much like the region's development climate: sluggish and weak action due to a lack of broad regional vision for our future. ALCOSAN must comply with the EPA's mandate to reduce CSO contamination by 2026, with a plan to be filed by 2013. Again, this is understandable that ALCOSAN has concocted a plan that gets it off the hook, since no other Pittsburgh area entity faces severe Federal legal action for failure to comply. Green infrastructure is complicated, will probably cost the same at first, and forces ALCOSAN to reply on new partnerships to reach compliance with the consent order. Little wonder that ALSOSAN officials have shied away from green infrastructure solutions. Little wonder that they have done little more than post invitations for green infrastructure ideas without engaging the municipalities along the way to ensure feasible green infrastructure solutions. Regional leaders including Allegheny County Executive Rich Fitzgerald are stepping up, though, to help guide a green infrastructure solution involving sustainable land use planning, green design and construction, renewable energy, workforce training, local business development, and green space enhancement. Regional organizations with experience in building and managing diverse coalitions - including engineers groups, environmental groups, and labor groups - are ready to work with ALCOSAN, regional and state leaders, and the EPA. If an earnest desire to present a mixture of conventional and cutting-edge green infrastructure methods were expressed to the EPA, more time to develop a real workable plan would certainly be granted. Make no mistake: the current plan is the "Mon Fayette Expressway" of storm water infrastructure solutions. It is extremely expensive, unsustainable because of being built for current land use patterns, and extremely disruptive to local communities, the majority of which have historical significance and

Comments*

are economically distressed. A green infrastructure plan would employ thousands more people, get better buy-in from the public, and be less expensive to operate by using our good earth's own ecological processes to reduce storm water flow, manage the occasional overflow, and beautify our communities.

Would you like to receive a response to Yes your comments? Captcha Image (Security Code)*

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 10/19/2012 11:01 PM

Subject: WWP Comment Submission

First Name* Paul

Last Name* Heckbert

Street 104 Washington St

City Edgewood State (If U.S.) Pennsylvania

Zip Code 15218

Municipality Edgewood Borough Email* ph@cs.cmu.edu

Do your comments represent the interest of an organization or No special interest

group?

If Yes, please state the organization or group name

I hope the solution is long-term and moves us toward smarter, separate sewer system. We need to move away from mixing sewage and other polluted water (e.g. Marcellus, factory, or agricultural wastewater) in with clean storm water and simply relying on bigger pipes and dilution to solve our problems. Rather than channeling our streams (such as Turtle Creek or Girty's Run), we should gradually be restoring streambeds, unchanneling, recreating wetlands to serve as buffers to flooding. Less asphalt. More rain gardens. Smaller freeways and parking lots. More bike trails. If we spent half of our 2 billion dollars on green solutions wouldn't we be better off than just

Comments*

Would you like to receive a response to Yes your comments? Captcha Image (Security Code)*

building bigger pipes?

From: <contactform@alcosan.org>

To: <Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org>

Date: 10/19/2012 9:38 PM

Subject: WWP Comment Submission

First Name*

Marie

Last Name*

Fechik-Kirk

Street

855 n Park Rd

City

Wyomissing

State (If U.S.)

Pennsylvania

Zip Code

19610

Municipality

Spring

Email*

mariefechik@gmail.com

Do your comments

represent the interest of

an organization or

special interest group?

If Yes, please state the organization or group

organiza

name

No

Comments*

Being from Pittsburgh and looking to move back in the future, I believe the plan should be strengthened with green measures. Things like rain gardens, permeable pavement, green roofs and bioswales can help to reduce run off and are often very attractive visually. For instance Philadelphia and Chicago are implementing green measures like rain gardens and green roofs to capture run off in an attractive and cost effective manner.

Would you like to receive a response to your comments?

Yes

Captcha Image (Security

Code)*

From: <contactform@alcosan.org>

<Michael.Anthony@alcosan.org>, <nancy.barylak@alcosan.org> To:

Date: 10/19/2012 5:10 PM

Subject: WWP Comment Submission

First Name* Scott Last Name* Bricker

Street 9 Clarendon Pl City Pittsburgh State (If U.S.) Pennsylvania

Zip Code 15206 Municipality Pittsburgh

Email* scott.bricker@gmail.com

Do your comments represent the interest of an No

organization or special

interest group?

If Yes, please state the organization or group name

Comments*

Would you like to receive a response to your comments?

Captcha Image (Security

Code)*

It's unbelievable and almost darkly humorous to me that there was a comment made in the plan that for "sustainability reasons" Alcosan wouldn't make many print versions of the plan available, but there was no effort in the plan itself to address the real economic and

environmental sustainability issues by integrating green infrastructure into the plan, not just

gray infrastructure.

Yes