



Attachment 3
Combined Sewer System and the Long Term Control Plan Update
Public Comments Received – April 19, 2018

The following provides a summary of public comments received as of April 19, 2018 as part of the 30-day public comment period on the Long Term Control Plan Update. This comment period concludes on Monday April 23, 2018. Any additional comments received will be shared at the City Council Legislative Meeting on April 24, 2018.

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City Web Survey Comments

The following was provided by Glenda Booth representing the Friends of Dyke Marsh:

"On behalf of the Friends of Dyke Marsh, I present these comments on the proposed long-term control plan to address Alexandria's combined sewage overflows into our waterways.

The Friends of Dyke Marsh is a non-profit, conservation organization founded in 1976. Our members live all over Northern Virginia. Many live in Alexandria. FODM's mission is to preserve, protect, and restore the Dyke Marsh Wildlife Preserve, in partnership with the National Park Service, as a thriving, native, wildlife habitat, through education, science and stewardship. Our vision is that Dyke Marsh is once again a healthy, vital, self-sustaining, biodiverse ecosystem.

Untreated sewage, trash, invasive plants and animals and pollution are among the many threats to the marsh. Many upstream activities have adverse impacts downstream and in the marsh, including the city's combined sewer overflows.

Pollution Persists

The recent 2018 Potomac Conservancy "State of the Nation's River" report card on the Potomac River gives the river a B grade, its highest grade ever. Despite that welcomed progress, challenges remain. The Conservancy gave tidal water quality a C- grade and non-tidal stream water quality a D grade. Polluted runoff from suburban and urban communities continues to grow.

As your plan briefing document notes, Hunting Creek has a TMDL for E.coli bacteria. Dr. Kim de Mutsert, George Mason University, has confirmed fecal bacteria and micropollutants in elevated levels in Hunting Creek and reports that the levels of E.coli bacteria spike after precipitation events.

Segments of the Potomac River are impaired. The Cameron Run watershed "has substantially degraded biological and habitat integrity," concluded the 2004 Fairfax County Cameron Run Watershed analysis.

Alexandria's Long-Term Control Plan

We commend the city for preparing a long-term control plan and for including the Friends of Dyke Marsh in the stakeholder group. Thank you for expediting the plan in an effort to meet the July 1, 2018, established by the 2018 state law.

The Friends of Dyke Marsh in 2013 urged the Virginia Department of Environmental Quality to strengthen the city's permit requirements to stop the discharge of untreated water. We have shared our views multiple times with the city and urged you to stop sending untreated sewage



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City Web Survey Comments

and water into our waterways.

We are pleased that a long-term control plan is in its final stages and hope you will implement it. We also urge you to include and expand more green infrastructure projects in the plan to curb stormwater runoff that enters the system. We urge you to incorporate more green infrastructure approaches in your redevelopment projects and to establish land use and building permit practices that retain more stormwater onsite. As development and impervious surfaces continue to grow across the region, so does pollution of all kinds.

Conclusion

The Clean Water Act became law in 1972, 46 years ago. The city's combined sewer overflow system dates at least to the 19th century. It is long past time to update the city's sewer system and for the city to stop polluting our streams and rivers. A healthy river – at times called "the nation's river" – and healthy streams are assets to the entire Washington, D.C., region.

Dyke Marsh will be totally gone by 2035 without action, concluded the U.S. Geological Survey in 2013. Fortunately, with our support, the National Park Service has completed a restoration plan and work will begin soon. It would be very disappointing, in fact ecologically contradictory, to restore the marsh's health and have that restoration spoiled by the city's pollution.

We urge you to submit the plan to the state and to implement it."

The following was provided anonymously:

"I hope the city will work fast to get this done and in the most economical way possible. I also hope that the city will continue to ask and advocate for funding from Richmond. They forced the city to move this fast and other cities got funding. Why can't we? In the plan, it was mentioned that the city could implement ways to slow runoff. I hope that the city aggressively uses this approach. Run education programs to get residents and businesses to use less water. Plant more trees and use some of the landscaping ideas that stop runoff like gardens. I'd also love to see the city install and give incentives for green roofs in the city. Not only would they help slow runoff, they'd beautify the city and cut down on energy use."

Erin Bevis-Carver

From: Emily Baker
Sent: Wednesday, April 11, 2018 12:59 PM
To: karen.pallansch@alexrenew.com; William Skrabak; Erin Bevis-Carver; Lalit Sharma
Subject: FW: Combined Sewer System Long Term Control Plan

fyi

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From: d straub [mailto:dnstraub@gmail.com]
Sent: Wednesday, April 11, 2018 6:46 AM
To: Skip Maginniss <smaginniss@mdnarch.com>
Cc: Emily Baker <Emily.Baker@alexandriava.gov>
Subject: Combined Sewer System Long Term Control Plan

Skip,

Thank you for chairing the stakeholders group for the Combined Sewer System Long Term Control Plan (LTCP) and for helping to shepherd the group to a consensus recommendation on the "B plus" plan option. Congratulations to you and all who worked so diligently to understand, evaluate and make recommendations for the improvement and adoption of the plan. It is exciting to observe the well-deserved attention that this critical infrastructure (and environmental improvement) element has received - water quality is a key element of the future of our historic community.

After observing the process from a distance and the summary presentation to Council last evening, my only concern is the lack of a unanimous and strong recommendation for the implementation of green infrastructure (GI) as an element of the plan. I recognize that there were very strong voices in the stakeholders group for GI, and it was reported that there were also strong voices that GI should not be included in the plan. As a trained civil engineer, urban planner and licensed professional Landscape Architect it is disappointing and discouraging that the stakeholders group did not strongly adopt and promote GI as an important element of the plan.

As you know, the District of Columbia (DC) has also done significant planning and engineering work to reduce combined sewer outfall releases to the Potomac and Anacostia Rivers. The DC plan also includes significant underground tunnel construction; however, it also includes GI as an important component element of the plan and the implementation process. Essentially, the DC plan adopts GI as a tool to both reduce stormwater quantities and improve water quality. Moreover, DC has extended their planning focus beyond the typical "engineering" band of public street rights of way and resulting underground collection and treatment infrastructure elements to an additional compatible overlay Green Area Ratio (GAR) planning system that addresses stormwater management within land areas adjacent to public lands and to new land development and building proposals. As someone who is currently working on several GAR projects, and after many years serving as the professional representative to the Urban Design Advisory Committee for OldTownNorth and observing how weak our current planning and engineering processes are in accommodating environmental issues, I suggest that Alexandria is certainly missing an important opportunity to address stormwater management in a truly comprehensive manner that could also enhance the quality of our historic community and environment. Including GI in the LTCP would be compatible with the assertion that Alexandria is an "Eco-City", and it also would help to address long-term environmental and financial sustainability issues. From this perspective, including green infrastructure in the LTCP appears to be a "no-brainer" and "win-win" planning and engineering approach that any responsible citizen or local decision-maker would recognize as important and necessary.

Again, thanks to you and the entire stakeholders group for taking the time to become more knowledgeable and fluent with this complex infrastructure and environmental issue.

Respectfully,

Daniel Straub ASLA APA PLA LEED

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Erin Bevis-Carver

From: Stephen Milone <milonesteve@gmail.com>
Sent: Friday, April 13, 2018 10:29 AM
To: Emily Baker; Erin Bevis-Carver; karen.pallansch@alexrenew.com
Subject: CSO discussion at Old Town Civic 4/11 meeting

Emily, Erin (and Karen),

Wednesday night's CSO discussion at Old Town Civic Association meeting did not reveal any surprises, and no new questions that you have not already heard and addressed. Everyone was very interested and engaged in a lively discussion that lasted for over an hour. There were a lot of general questions that I or other knowledgeable people at the meeting addressed. FYI, here are some highlights of issues that are repeat questions and concerns that I think will continue to be raised into the future.

People asked a lot of questions and expressed concern about:

- vibrations damaging houses?

(I said that there would be monitoring throughout construction and possibly surveys, in addition to monitoring, in the close proximity of deep surface excavation such as for shafts, points of connection from existing sewers to the tunnels.)

- Will the tunnels go under houses?

(I said no - under public ROW and possibly under NPS, Potomac River, and other locations not under full City control only with proper approvals.)

- Questions about tunneling itself - material and water expected?

(Said that preliminary indications are that the material where tunnels will be bored is soft and that the tunneling system is designed to deal with expected water. Advised that only preliminary engineering has been completed, that more information will be developed with more engineering design and that the City is benefiting from the knowledge of DC experience with similar terrain.)

- Will fees be ramped up steeply or gradually and over what period of time? Member recommended longer term given the great expense and longevity of the infrastructure, and so as not to be too crippling for rate payers.

(Advised yet to be determined, that Renew and/or or with City will have meetings and hearings. Term of additional fees may be attached to bonds which may be 20, 30, 40 years TBD.)

- Has the plan considered climate change and increase frequency and intensity of events

(Said yes. Shared the graphic charts showing possible effect of increased rain events at varying rates and that only on the outside (90%) would the system fail to meet max 4-6 overflow events. Added that some of us believe and advocated that planting trees, vegetating roofs, greening alleys and installing other green infrastructure going forward may be useful to diminish the effects of increased rainfall due to climate change or to help us meet more stringent requirements that could possibly be levied in the future.)

Karen, I copied you since some questions were related to Renew operations including:

- if Renew is not using all of its capacity, can we sell the excess capacity to others (Fairfax County) to make some money to offset LTCP costs?

(I said that the facility is already shared with FFX Cty and that there was no realistic way or need to sell to DC or other neighboring jurisdiction, and that we do use our capacity at times and that the CSO infrastructure is built to address stormwater and built just to our capacity needs. I added that it is possible that future requirements may get more stringent as well.)

- Is chlorination for Wet Weather treatment a proven technology

(Advised that I believe chlorination is one of the most common forms of final effluent treatment to kill bacteria and is used in many treatment facilities as Renew at this time uses UV.)

Regards,
Steve Milone