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April 23, 2018

Ms. Erin Bevis-Carver  
City of Alexandria  
Department of Transportation and Environmental Services  
City Hall, Room 3000 (Box 66)  
301 King Street Alexandria, Virginia 22314  
[Erin.BevisCarver@alexandriava.gov](mailto:Erin.BevisCarver@alexandriava.gov)

**Re: Potomac Riverkeeper Network Comments on Alexandria Long Term Control Plan**

Dear Ms. Carver,

Please accept the following comments on behalf of Potomac Riverkeeper Network (PRKN) regarding the City of Alexandria's revised Long Term Control Plan submission to the Virginia Department of Environmental Quality (DEQ). Consistent with our statements at recent public meetings, PRKN supports the City's Option B+ plan for significantly reducing discharges of untreated sewage and polluted stormwater from the city's combined sewer system (CSO). PRKN commends the City's Transportation and Environmental Services staff and the staff of Alexandria Renew for their hard work on this initiative, and we extend our thanks to the members of the City's Advisory Committee for carefully considering the plan and offering a valuable independent perspective to city planners on how to best address this legacy water pollution issue. PRKN looks forward to working with City officials to ensure that the Plan is fully implemented by July 2025, so that the public can enjoy a cleaner Potomac River to paddle, swim and fish in.

While PRKN supports the City's Plan, we offer the following specific comments and recommendations for consideration by the City and DEQ.

In the Executive Summary, the City indicates that discharges to the CSO system occur when sewer system reaches capacity. For the sake of accuracy, PRK recommends that the final LTCP state that the system discharges when the combined capacity of the wastewater treatment plant and conveyance system reach capacity.

PRKN supports the City's plan, outlined in ES6.1, to engage in citywide planning to implement Green Infrastructure (GI) in both the CSO and non-CSO areas of Alexandria, and to integrate this planning into its MS4 permit compliance strategy. GI can play a valuable role in further reducing stormwater flows into the combined system to provide additional capture in addition to the storage tunnels, and provides ancillary benefits (cooling and greening the city) that will improve quality of life for Alexandria residents. PRKN



Potomac Riverkeeper Network is trade name of Potomac Riverkeeper, Inc., a 501(c)3 tax-exempt nonprofit organization.  
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recommends that the City formally engage a citizen advisory committee to participate and provide input on the citywide GI planning process going forward.

PRKN supports the City's requirement that sewer separation be conducted on sites being redeveloped as a cost to be borne by the private developer. However, we believe the public would benefit from additional information as to how much of a benefit this will provide over the next 25 years – for example, what rate of redevelopment is the City relying on to estimate future sewer separations? And has the City considered long term financial planning to fund sewer separation directly, using state and federal funds whenever possible? PRKN acknowledges the significant cost to city water users posed by the LTCP implementation between now and 2025. Nonetheless, we encourage City planners to begin planning for long term infrastructure upgrades to the city's sewer systems as a whole, apart from the required LTCP. PRKN stands ready to support the City's efforts to obtain funding support from Virginia and the federal government for both the LTCP and citywide water infrastructure needs.

Figure 7-1 of the LTCPU Report appears to show effluent from the primary settling tanks (treated only by disinfection) being combined with the fully treated effluent from the WRRF and discharged from the same outfall into Hunting Creek. Please confirm whether this is accurate, or will the effluent from primary settling tanks be discharged from a separate outfall? If the former, PRKN has concerns about how this mixed effluent could affect NPDES permitting requirements for the WRRF.

Thank you for providing PRKN with the opportunity to comment on the LTCP Update. Please contact me by phone at 202-888-4929, or e-mail at [phillip@prknetwork.org](mailto:phillip@prknetwork.org) if you have any questions regarding our comments.

Respectfully,

A handwritten signature in cursive script that reads "Phillip Musegaas".

Phillip Musegaas  
Vice President of Programs and Litigation

CC via electronic mail:

Tom Faha, Virginia Department of Environmental Quality