



Environmental Policy Commission

April 18, 2018

The Honorable Mayor Allison Silberberg and Members of City Council
City of Alexandria
Alexandria, Virginia 22314

EPC Endorsement of the City Combined Sewer System Draft 2018 Long Term Control Plan Update (LTCPU)

Dear Mayor Silberberg and Members of Council:

On behalf of the Environmental Policy Commission (EPC), I am writing to convey EPC's support of the Draft Long Term Control Plan Update (LTCPU) for the combined sewer system and the recommended Option B+ Unified Tunnel with Dual-Use Wet Weather Treatment. Of the solutions developed, Option B+ was the most efficient, cost effective, and least disruptive to the community and to historically, culturally and environmentally sensitive land areas over both the long and short term. The plan update represents a major step forward in reducing the water pollution volume and number of combined sewer overflows (CSOs) into Hooff's Run, Hunting Creek, the Potomac River and the Chesapeake Bay. Implementation of the LTCPU is consistent with the water quality goals established in the City's Environmental Action Plan (EAP).

The Commission applauds the work of City and Alexandria Renew Enterprises (AlexRenew) staff, and their consultants, working diligently with members of the Ad Hoc Combined Sewer System Plan Stakeholder Group, including the appointed EPC representative, to devise a plan that will efficiently and effectively meet the stringent combined sewer permit requirements. The LTCPU has been developed to account for some degree of increased volume and number of severe rainfall events due to climate change. However, the EPC recommends that the City continue to consider the impacts of climate change as the plan is implemented by continuing to analyze wet weather data and trends over time and incorporate new information into the design and execution of its combined sewer strategy.

In addition to the required grey infrastructure proposed in the LTCPU, the EPC encourages the City to pursue complementary investments in green infrastructure throughout our City's combined sewer area. Cities like Philadelphia, New York, and Washington, D.C. have all made green infrastructure a core part of their combined sewer mitigation strategies. This infrastructure should include but not be limited to the installation of vegetative green roofs, rainwater storage with adaptive control technology of new and existing storage, installation of pervious sidewalks, bioswale landscape strips along City rights-of-way, greening of alleys, and full development of the urban forest street trees, in accordance with the EAP and Urban Forestry Master Plan goals. Green infrastructure should be pursued on private property through incentives and development conditions of approval, as well as on public land and structures. Green infrastructure such as

planting of street trees will diminish the amount of rainfall that AlexRenew must process with every rain event, as well as deliver other recognized co-benefits including improved livability, aesthetics and associated property value and taxes, mental and physical health, air and water quality, groundwater recharge, wildlife habitat and connectivity, reduced heat island effect and associated reduction in energy use.

Thank you for your time and consideration, and for your work and commitment to improve the natural environment in Alexandria for present and future generations.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Kapsis', is positioned above the typed name.

Jim Kapsis
Chair
Environmental Policy Commission