

TO: US EPA
US DOJ

From: Highland Park Community Council, Board of Directors
Stephanie Walsh, President
Karin Manovich, Vice President

Date: November xx, 2019

Subject: Comments on ALCONSAN / EPA Consent Decree

The Highland Park Community Council (HPCC), in operation since 1945, is the oldest continually operating neighborhood organization in the City of Pittsburgh. The HPCC's mission is to take a leading role in community activities that address issues of common interest and concern and that promote a safe and healthy neighborhood for the diverse residents of Highland Park. In that spirit, the organization serves as both a forum for community conversations and engages in a wide range of initiatives and advocacy on behalf of resident priorities. We are submitting comments in our capacity as advocates for our community and its need for responsible watershed management.

The signing of the consent decree between ALCOSAN and the EPA gives the Pittsburgh region a golden opportunity to address multiple problems that plague our communities. This consent decree legally commits our region to spend \$2 billion in ratepayer dollars to get the sewage out of our rivers. As good stewards of taxpayer money, ALCOSAN should use these funds not only to clean our rivers, but also address other problems facing our communities, including flooded roads and homes, landslides, basement backups, erosion, and ground sinkages, all of which we see here in our neighborhood.

An investment that is primarily spending billions of dollars on underground tunnels cannot address these other issues, and will actually contribute large amounts of CO2 into our atmosphere, further exacerbating our already poor air quality and contributing to climate change. A more balanced plan that invests in large scale green projects has returned multiple benefits to communities like Philadelphia. ALCOSAN's meager commitment of \$100 million of the \$2 billion in total funds to these green solutions is inadequate and shortsighted. It represents a not just a missed opportunity, but misuse of public funds as a public investment of this size - our region's largest ever infrastructure undertaking, paid for by people in our community and our neighborhood – should be intentionally designed to generate as much public benefit as possible.

The Pittsburgh Water and Sewer Authority is working hard on its own stormwater plan to prove that large scale green projects can work to remove stormwater from the system. ALCOSAN should be required to invest more in these projects so that our region can show that it is truly committed to a more balanced approach. The consent decree has an "adaptive management" clause that could allow our region to switch to a more balanced approach in the coming years. ALCOSAN's investments in large

scale green now are crucial in giving our region a real shot at taking advantage of the adaptive management language in the consent decree.