



BUFFALO NIAGARA RIVERKEEPER®

2012 Board of Directors

Greg Stevens, President

Megan Toohey, Vice
President

John Reinhold, Treasurer

Chip Grieco, Secretary

Anne Wadsworth

Gina Fedele

Nancy Brock

Doug Hopkins

Mary Ann Kedron

Jock Mitchell

Anne Perry

Randal Snyder

Board Emeritus

Barry Boyer

Tom DeSantis

Lynda Schneekloth

Support from

RIVERKEEPER®
Members and Donors

U.S. EPA Great Lakes
National Program Office

National Fish and Wildlife
Foundation

New York State Council
on the Arts

NYS Department of
Environmental
Conservation

NYS Department of State
Coastal Management
Program

New York Power Authority
Relicensing Fund

Community Foundation for
Greater Buffalo

HSBC Bank, USA, N.A

M&T Bank

John R. Oishei Foundation

Margaret L. Wendt
Foundation

Mr. David Comerford, Commissioner
Buffalo Sewer Authority
Buffalo City Hall, 10th Floor
Buffalo, New York 14201

May 15, 2012

Re: Updated Long Term Control Plan

Dear Mr. Comerford,

Please accept these as our initial comments on the April 2012 Updated Long Term Control Plan. These comments are based on our preliminary reading of the updated document and rely heavily on our meeting with you on Monday, May 13th. Depending on answers or comments made at the public meetings this week or changes that the BSA may make after the public comment period, we may revise our comments and re-issue this letter.

Riverkeeper would like to take this opportunity to commend the Buffalo Sewer Authority on revising the proposed Long Term Control Plan to include a substantial investment in green infrastructure (GI) as well as moving away from its reliance on sewer separations.

Riverkeeper supports the BSA's decision to use Alternative UA2 as the preferred alternative. In addition, we support the 19 year time period for implementation with the understanding that the BSA will invest nearly \$10,000,000 in GI demonstration projects within the first five years of implementation and a total of at least \$92,000,000 in green projects overall.

Riverkeeper understands the need to include some gray infrastructure in the LTCP and supports the new Northern Relief Sewer as well as the Real Time Control and sewer patrol point optimizations.

However, the Updated Plan still includes over \$70,000,000 in offline storage facilities. Riverkeeper believes that these projects could and should be replaced with green infrastructure solutions wherever and as much as feasible. From our meeting on May 13th, it is our understanding that the BSA is willing to work with Riverkeeper to determine the feasibility of replacing these projects with alternative green infrastructure projects once the metrics from the demonstration projects have been realized. The storage projects we have identified to replace with green projects are:

- CSO 55, 7.5 MG offline storage, \$18,500,000
- CSO 13, .3MG offline storage, \$3,000,000
- SPP 337 - .7MG offline storage, \$4,000,000
- Jefferson & Florida – 2.6MG offline storage, \$9,500,000
- SPP 336a & b – 4.2MG offline storage, \$11,500,000
- CSOs 28, 44, 47 – 2.3MG offline storage, \$12,200,000
- CSO 52 - .6MG offline storage, \$3,900,000
- CSO 64 - .1MG offline storage, \$2,000,000
- CSOs 14 & 15 – 6.7MG offline storage, \$6,700,000



Replacing these storage projects with green projects would not only save rate payers money, but would bring a host of additional benefits.

While we understand that BSA is only required to meet Water Quality Standards for bacteria (fecal coliform), keeping stormwater out of the system will have additional benefits to water quality especially as related to Total Suspended Solids (TSS) and Total Kjeldahl Nitrogen (TKN) as well as aesthetic concerns such as floatables and odors. Additionally, green projects bring a high level of residual value to the communities in which they are located in the way of beautification and air quality improvements among others. Green infrastructure also adds value to habitat and ecological projects when integrated with other shoreline planning.

For these reasons, we strongly advocate that the BSA study replacing these storage facilities with green projects where feasible and request that these storage projects are phased in such a way that time is given to conduct the demonstration projects and work with Riverkeeper, the City of Buffalo, and community representatives to identify green project alternatives to these underground storage projects.

It is our understanding that the Consent Order may require a higher degree of specificity regarding the green projects than the BSA is able to provide at this time. Riverkeeper is prepared to work with the BSA and community groups to help identify green projects and storage alternatives so that they may be included in the Updated LTCP if necessary.

Additionally, the BSA should be working closely with other community planning efforts (such as the BOA projects, Green Code, etc.) to ensure that future development projects include on-site stormwater management and thereby stop the cycle of CSOs.

Once again, Riverkeeper would like to recognize the BSA for their work to include Green Infrastructure in the Long Term Control Plan and feels that the BSA's investment in water quality in Western New York is an investment in the quality of life and future economic viability of our region.

Sincerely,

Jessie Fisher
Director of Greenway Programs and Projects

CC: Congressman Brian Higgins
Congresswoman Louise Slaughter
Senator Kristin Gilibrand
Senator Charles Schumer

