

Section 2

Public Engagement and Participation

"We all share this earth together. So we have to look at the environment and how we're going to work to heal it together."

– RAFIYQA MUHAMMAD, CAPITAL REGION WATER COMMUNITY AMBASSADOR

2.1 Overview of Public Engagement and Participation

Capital Region Water's (CRW) challenge is not unlike those of the nearly 800 other combined sewer overflow (CSO) cities across the United States. It must finance an expensive, long-lasting and disruptive project via ratepayers who already have serious affordability concerns. CRW's constituents will not be able to influence the overall direction of the wet weather control plan or the nature and timing of the rate changes needed to pay for it. But their acceptance of, and advocacy for, the project is critical to its success after the initial planning ends.

The solution is a thorough public engagement strategy involving CRW's City Beautiful H₂O brand and the use of partnerships with community and environmental organizations. *City Beautiful H₂O Program Plan* (Program Plan) was selected as the name for CRW's wet weather program. CRW's public participation activities for the draft Program Plan were built upon previous efforts and were designed to engage the public by bringing the information to a number of different audiences through various communication methods and outreach events. The following goals were established for CRW's public engagement strategy.

- Provide a public participation process that actively involves ratepayers and stakeholders in the development and refinement of the draft Program Plan.
- Provide an opportunity for ratepayers and stakeholders to examine the draft plan and provide public forums for having the draft plan presented and explained.
- Provide an opportunity for public comment and input on the draft plan.

CRW identified the following central themes for public involvement for the Draft Program Plan:

- City Beautiful H₂O is a shared responsibility among the entire community;
- CRW will develop an affordable, cost effective Program Plan, consisting of projects to:
 - Renew the structural and operational integrity of CRW's wastewater/stormwater assets, enhance the environment, and protect public health and safety by alleviating local flooding and backups; and
 - Provide additional environmental, social, and economic benefits through green infrastructure.

2.2 Public Involvement Prior to the Draft Program Plan

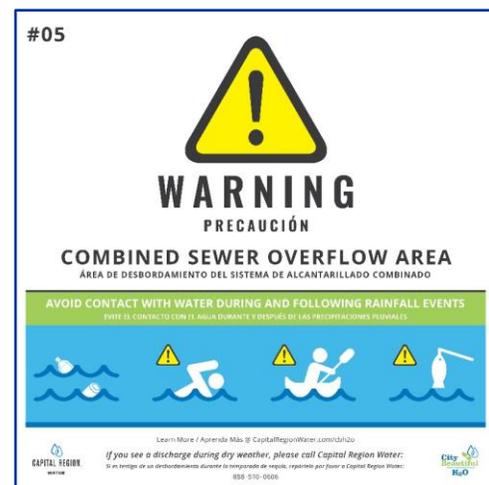
The initial focus and activities for CRW’s public involvement program, prior to the development of the draft Program Plan, centered around implementing its Nine Minimum Control (NMC) Plan¹ for CSO control. NMC 7 requires the development and implementation of pollution prevention and public education programs, and NMC 8 requires the development and implementation of public notification Programs. These NMC’s also achieve the following PA-DEP minimum control measures (MCMs) under MS4 stormwater permitting requirements for public education and outreach (MCM 1) and public participation/involvement (MCM 2). Another initial focus was the public development and launching of the CRW Community Greening Plan.

2.2.1 NMC and MCM Activities

Public notification programs are intended to ensure the public receives adequate information about CSOs, their potential health and environmental impacts, and precautions concerning recreational activities, such as swimming, during and immediately after CSOs. The CRW public notification program was intended to inform persons using the Susquehanna River or Paxton Creek for recreation about the potential associated health risks.

CRW implemented the following NMC public notification measures and activities:

- Incorporated signage at all combined sewer outfall locations,
- Developed and installed three pilot CSO advisory signs, and
- Advanced a signage implementation plan within their overall communications plan.



Pollution prevention programs can help reduce the amount of contaminants and floatable materials that enter the Susquehanna River and Paxton Creek via CSO/MS4 discharges. The CRW pollution prevention program is being implemented through the respective legal authorities of and collaborative operational protocol between CRW and the City of Harrisburg, which continue to be developed and refined. However, CRW has no restrictions on the development of its public education programs. An informed and knowledgeable community is crucial to the success of CRW’s pollution prevention programs because it is believed it will inspire greater support and participation. CRW’s



¹ Capital Region Water Nine Minimum Control Plan, Version 3.0, August 2017, available at <https://capitalregionwater.com/cbh2o/>

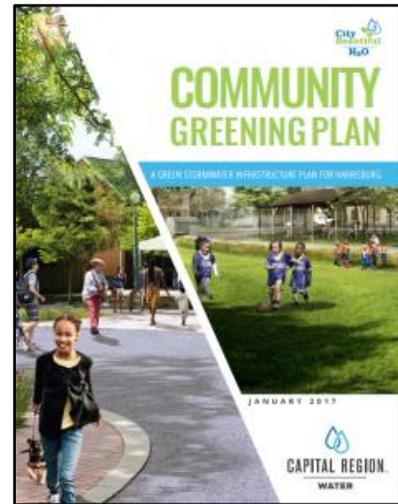
public education programs included active communication with the public via social media, email, flyers, and mailing.

CRW was successful in developing and implementing the following aspects of its pollution prevention and public education programs, including but not limited to: monthly trash clean-ups, annual city-wide clean-up event, water and wastewater facility tours, annual conservation carnival outreach event, multiple forms of social media, press releases, and monthly community stakeholder meetings. In 2015 and 2016, CRW participated in funding City of Harrisburg street sweeping operations. In Spring 2017, CRW also implemented a street cleaning program with an outside vendor that utilizes regenerative air technology.

2.2.2 CRW's Community Greening Plan

Community engagement was an essential component in the development of Capital Region Water's Community Greening Plan², the green stormwater infrastructure (GSI) masterplan for Harrisburg that was released in January 2017. Stakeholder involvement in the Greening Plan is an essential part of stakeholder involvement for the Program Plan since the entire rationale for the Greening Plan is to achieve wet weather control in a way that supports multi-objective community needs.

Two large public engagement phases, one in the winter of 2016 and one in the summer of 2016, were held including several large events and more than thirty smaller engagement opportunities throughout the process. The process engaged over 1,000 residents from all areas of the city.



The first public phase included two large meetings. The first was held in Uptown at the Camp Curtin YMCA, and the second was held in North Allison Hill at the Lincoln School. The meetings focused on educating Harrisburg residents about stormwater and potential solutions to alleviate flooding and environmental issues. Residents learned about stormwater runoff and impervious surfaces with demonstration projects provided by the Penn State Extension. After learning about stormwater and runoff, residents looked at potential green stormwater infrastructure strategies and provided input on how to prioritize program funding – whether investment should be focused on building GSI in public space, providing grants or incentives to community groups to build GSI, providing grants or incentives to homeowners to build GSI, or building larger sewers.

Residents also provided input on how the community should pay for investments in stormwater infrastructure. Based on models used in other cities, options included fees integrated in sewer fees, flat fees per parcel, fees based on the size of the parcel, and fees based on the amount of stormwater generated. An impact station provided residents with information about potential employment opportunities that may result from a green stormwater management program in Harrisburg. The results from this initial set of public meetings provided CRW with guidance on where to focus program dollars, how to pay for green stormwater infrastructure, how residents

² Capital Region Water Community Greening Plan, January 2017, available at <https://capitalregionwater.com/cbh2o/>

would like to be involved in the program, and what areas need investment or community greening. The majority of people felt that investment should be focused on greening streets, parks, vacant lots, and schools. CRW continued to engage with residents between public meetings by hosting small focus groups, attending community events, holding Community Ambassador Workgroup meetings, and hosting community clean-ups.

2.3 Public Involvement and Comments during the Release of the Draft Program Plan

The National Combined Sewer Overflow (CSO) policy presents a comprehensive national strategy to ensure that sewer and water authorities, municipalities, regulatory authorities and the public engage in a comprehensive and coordinated planning effort. This effort is intended to achieve cost effective CSO controls that ultimately meet appropriate health and environmental objectives. Further, Element 3 of EPA’s 2012 Integrated Municipal Stormwater and Wastewater Planning Approach Framework suggests “a process which opens and maintains channels of communication with relevant community stakeholders in order to give full consideration of the views of others in the planning process and during implementation of the plan.” CRW provided several avenues for public involvement in the refinement and finalization of the draft City Beautiful H₂O Program Plan. The official public review and comment period for the Program Plan commenced on February 12, 2018 and extended through March 12, 2018.

2.3.1 Public Educational Activities

Engaging the Harrisburg community is a key component of Capital Region Water’s Program Plan. Not only does public involvement improve the plan itself, but CRW has a responsibility to inform its customers of what they will be investing in over the next several decades. CRW’s engagement for the Program Plan was a multifaceted approach including advisory committees, individual stakeholder meetings, media outreach, public meetings, neighborhood and community meetings, digital outreach, and printed communications. This campaign was informed by a customer survey and communication plan developed in 2017.



Advisory Committees

Community Ambassador Committee

Engaging every community in Harrisburg was one of the most important components of Capital Region Water’s Community Greening Plan. CRW created a Community Ambassador Committee to empower interested residents with knowledge about stormwater issues and encourage them to reach out to their neighbors to share this information and get feedback through face-to-face interactions. They act as advocates for their neighborhood, provide information about upcoming events, and help educate their community about green stormwater infrastructure and community greening measures. CRW continues to meet monthly with the ambassadors to build capacity and advocate for their neighborhoods and their city.

City Beautiful H₂O Stakeholder Committee

Capital Region Water established an additional stakeholder committee for the City Beautiful H₂O Program Plan in 2017. Invitations were sent to representatives of property owners with a large amount of impervious surface, faith-based organizations, residents, government agencies (local and state), and community / social organizations. Three meetings were held in 2017 and a fourth was held in 2018.

Moving forward, Capital Region Water may reconvene this stakeholder group to discuss rate restructuring and other aspects of the City Beautiful H₂O Program.

- The Stakeholder Meetings section in Appendix C provides supporting information on these meetings, including copies of the presentations that were made.

Individual Stakeholder Meetings

Capital Region Water identified the largest 50 properties by impervious surface and sent a letter inviting them to discuss the Program Plan and possible rate restructuring in November 2017. In addition to letters, CRW contacted property owners by phone and email if that information could be found. Out of the original list of 50 properties, there were 36 different property owners, with some property owners owning more than one property. Capital Region Water connected with 20 of these owners through in-person meetings, phone meetings, or Stakeholder Committee Meetings.

Some property owners declined to meet and some were unresponsive. CRW will continue efforts to keep these organizations informed about the City Beautiful H₂O Program.

- The Impervious Surface Meetings section in Appendix C provides supporting information identifying the 50 properties and a copy of the letter of invitation to the meetings.

Neighborhood / Community Meetings

Capital Region Water maintains a list of about 50 neighborhood, community, environmental, and faith-based organizations in Harrisburg. Organizations on this list were invited to meet with CRW staff to discuss the Program Plan or to have CRW present at one of their meetings. Many of the organizations were also invited to participate in the City Beautiful H₂O Stakeholder Committee or attend public meetings. CRW connected with 21 of these organizations as part of its public involvement for the City Beautiful H₂O Program Plan.

Some organizations declined to meet and some were unresponsive. CRW will continue efforts to keep these organizations informed about the City Beautiful H₂O Program moving forward. Capital Region Water will annually review this list of community organizations and add additional organizations as needed.

- The Community Group Meetings section in Appendix C provides a listing of the associations, organizations, and groups that were contacted and the corresponding meeting dates.

2.3.2 Outreach to the Public

Capital Region Water also made efforts to involve the general public in addition to its targeted outreach to community organizations and large property owners. Capital Region Water accepted public comments for four weeks between February 12 and March 12, 2018. Information was provided by mail, door to door, through the media, online, and in person at three public meetings.

Bill Inserts

Customers that receive a bill from Capital Region Water received information about the City Beautiful H₂O Program Plan in their February and March bills. These bill inserts provided information about the Program Plan, where it could be accessed for review, the time and location of three public meetings and how they could provide public comment.

- The Bill Inserts section in Appendix C provides copies of the bill inserts that were distributed.



Door to Door Outreach

1,000 door hangers were printed and delivered to homes surrounding each of the three public meeting locations. This served as a notice for homes that did not receive information through other communication channels and a reminder for those that did.

- The Door Hanger section in Appendix C provides a copy of the doorhanger that was distributed.

Media Outreach

Local media outlets were notified of the Program Plan and public meetings beginning on February 12, 2018 through a press release distributed by email. Seven news stories including one television, one podcast, and five online news stories were captured during the public comment period.

- The Media Outreach section in Appendix C provides copies of the information communicated through various local media outreach.

Digital Outreach

Capital Region Water created a page on its website dedicated to the City Beautiful H₂O Program Plan: capitalregionwater.com/cbh2o. This page contained a draft of the Program Plan in its full form but also in summary formats easier for readers to gather information quickly. All materials, digital or printed, directed the public to this website for more information.

- The Website section of Appendix C provides a screen shot of the City Beautiful H₂O home page.

Capital Region Water maintains an email list of over 2,000 people to regularly send emails with information related to CRW's service. Three emails were sent to this email list directing the public to the website or to one of CRW's public meetings on February 12, 15, and 28.

- The Emails section of Appendix C provides copies of the email information that was distributed and associated circulation statistics for each email distribution.

Capital Region Water maintains an active presence on Facebook, Twitter, and Nextdoor. In concert with its other outreach efforts, CRW made four Facebook posts, eight Twitter posts, and three NextDoor posts related to the Program Plan and public meetings. In addition, CRW purchased targeted Facebook advertisements to increase its reach in Harrisburg, PA.

- The Social Media section of Appendix C provides copies of these social media posts.

Companion Document

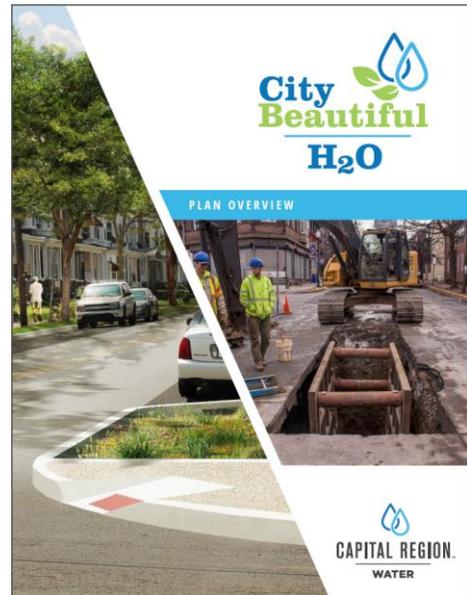
A companion document was produced and distributed to provide a brief overview of the Program Plan. This document is intended to make the contents of the Program Plan more accessible to the general public through the use of infographics and non-technical summaries. This companion document was provided at all meetings during the public comment period.

- The Companion Document section of Appendix C provides a copy of the Companion Document.

Summary of Public Meetings

CRW conducted three large public involvement meetings for the Program Plan in February/March 2018. The meeting facilities were well known community centers or schools selected with guidance from CRW's Community Ambassadors spaced out to be convenient for residents in different parts of the city. These meetings were organized in an open house format with several stations to explain the Program Plan and gather input from the public.

At each meeting, there were five stations: (1) An introduction to CRW, the Consent Decree, and the Program Plan, (2) an overview of the infrastructure and pollution challenges CRW is facing, (3) an overview of the technologies and strategies evaluated in the Program Plan and how CRW evaluated the alternative strategies, (4) a summary of the strategies selected, the cost of the program, and future rate increases, and (5) a summary of next steps including future negotiations, projects, and possible rate restructuring. Each station was led by a subject matter expert with assistance from community volunteers.



Food and activities for kids were made available for free at each meeting to make it more convenient for families with children to attend. Attendees were asked to sign in when they entered the meeting and received a companion document, comment form, and pen. Attendees were then free to visit all five stations, listen to each speaker, and ask questions.

Meeting 1: Southern Harrisburg

Date: Thursday, February 15, 6:00 – 8:00 PM
Location: Sylvan Heights Science Charter School
915 South 13th Street, Harrisburg, PA 17104

Number of attendees: 5
Number of comments received from attendees: 0

Meeting 2: Lincoln School

Wednesday, February 21, 6:00 – 8:00 PM
Location: Lincoln School
1601 State Street, Harrisburg, PA 17103

Number of attendees: 13
Number of comments received from attendees: 2

Meeting 3: Camp Curtin YMCA

Thursday, March 1, 6:00 – 8:00 PM
Location: Camp Curtin YMCA
2135 North 6th Street, Harrisburg, PA 17110

Number of attendees: 11
Number of comments received from attendees: 2

- The Public Meetings section of Appendix C provides images of the public meetings and copies of the sign in sheets.



2.3.3 Summary of Comments Received from Public Input

CRW accepted public comments through an online form, in person at its Customer Service Center and its Administrative Office, and in person at its public meetings. In person comments were documented using a comment form. CRW also accepted letters and emails submitted during the public comment period. All comments were scanned and archived.

Committee and meeting discussions were not documented. Rather, participants were encouraged to submit comments through the methods CRW provided during the public comment period.

A total of 15 comments were collected during the public comment period. Eight comments were submitted using CRW's online form. Four comments were received at the public meetings. One comment was collected at a neighborhood meeting. Two letters were also submitted via email.

Not including the two letters, nine commenters “liked” the plan, three “disliked” the plan, and one commenter both “liked” and disliked” the Program Plan. The two letters received were supportive of the Program Plan.

In summary, commenters were supportive of the Program Plan because it will address aging infrastructure and protect the environment by reducing CSOs. Commenters were also supportive of the Program Plan’s use of decentralized green infrastructure and the co-benefits associated with it.

Commenters were most concerned with the future rate increases outlined in the Program Plan, especially as it relates to low income residents. Commenters were also concerned about future rate structuring to charge for stormwater and the equitability of future rates and project locations.

- The Public Comments section of Appendix C provides copies of the comments forms and letters submitted by the public, and a compiled summary of the received comments.

2.4 Future Public Participation

2.4.1 Continued Public Information and Education

Moving forward, CRW will continue to perform the public education and involvement activities described in its NMC Plan, as summarized previously in Section 2.2. These activities are also intended to fulfill the public education, outreach, involvement, and participation requirements of MCMs 1 and 2 of the individual NPDES MS4 permit to be issued to CRW by PA-DEP. CRW will also update the public on the progress of the Program Plan through annual bill inserts and meetings with community organizations. CRW will also complete its CSO notification procedures and signage.

Following the submission of the Program Plan, CRW will conduct a similar campaign to gather input on rate restructuring to fund projects outlined in the Program Plan. CRW has developed outreach protocols to notify stakeholders during the construction of projects.

2.4.2 Continued Public Participation Supporting Program Plan Implementation

CRW will also continue the public participation activities initiated in association with the development and initial implementation of its Community Greening Plan, described in Sections 2.2.2 and 2.3.1. Continuous engagement of stakeholders will be instrumental for the development and implementation of decentralized green/grey stormwater control strategies within the collection system. This is anticipated to build on past/ongoing efforts such as general public engagement activities, advisory committees, neighborhood/community meetings, and direct contact with individual stakeholders. The following Program Plan implementation activities will be supported by continuous stakeholder engagement:

- **Development-Driven Project**

Opportunities: Developing regulations, policies, design/construction standards, and O&M agreements that require implementing GSI principals in development and redevelopment projects, and proactively distributing and explaining them to existing and potential stakeholders. Developing proactive partnerships with future developers and redevelopers to implement collaborative public-private partnerships for development/redevelopment projects.



- **Synergistic Opportunities for Public Works Projects:** Building partnerships with City, County, and State agencies that have jurisdiction over public works project design/construction standards so GSI principals and standards are integrated.

- **Incentive-Driven Opportunities:** Defining stormwater fee credits and other incentives to spur property owners to install decentralized stormwater controls.

- **Opportunities on Public Lands and Rights-of-Way:** Collaborating with a broad range of public and private stakeholders to determine how to best leverage their collective investments to financially support multi-objective projects, and thereby increase the level of control achieved.