

Comment Number	Comment	CRW Response
1	Overall, the plan is well thought out, based on data and provides funding for stormwater management. It was unclear if sidewalks are assigned to parcels, or just the tax mapping boundaries. Also noted in the credit portion of the plan, that the only residential option is downspout disconnection. It could be potentially useful if residential rain gardens, could be counted/constructed. i.e., direct roof runoff into infiltration strips or pits. Perhaps an additional %10. I strongly support this method of calculating and implementing the stormwater fee. It provides an equitable, and uniform method for assessment, while providing due process for appeals, and allowing users to construct their own projects to reduce their fee. The long term benefits of cleaner water, and less localized flooding are a steal at only \$7/month.	<p><b>Sidewalks and Roads:</b> Sidewalks and roads are not assigned to customer assessments. The impervious area mapping will be revised if sidewalks and roads have been inadvertently included within a parcel boundary. Customers should notify Capital Region Water if sidewalks and/or roads are included in their stormwater assessment. The associated impervious area is the responsibility of CRW under its permit obligations.</p> <p><b>Credit Program:</b> The credit program will be revised with additional opportunity for stormwater credits, including structural best management practice (BMP) credits, non-structural credits, and institutional credits for all customers. A maximum credit that can be obtained will be capped at 50% of the total. CRW will require property owners to employ stormwater BMPs that are identified in the Pennsylvania Stormwater BMP Manual to be eligible to receive stormwater credits. CRW will prepare and adopt a formal stormwater credit policy document.</p>
2	We already give over 300\$ a year to stormwater fee thru penbrook boro as a resident there. adding this to our water bill just because harrisburg doesn't have one is a slap in penbrook residents face. please reconsider this to not be across the board for all customers.	<p><b>Service Area Fee Clarification/Communities Impacted:</b> The stormwater fee is proposed only for properties within the City of Harrisburg due to CRW's ownership of the sewer collection and stormwater system. Surrounding municipalities have adopted their own stormwater fee structures to fund projects to reduce stormwater runoff.</p> <p>CRW staff reached out to clarify on 7/8/2019</p>
3	Citizens of Harrisburg are already overtaxed and underserved. Too much waste in government and to add to the tax burden for something that occurs naturally (storms) is ludicrous	Comment received
4	Do not agree with fee. Federal and state funds should go to these programs. THAT is where the money is!. Thank you.	Comment received
5	No one wants to pay more money but we have to keep up on our infrastructure. The Feds will no longer help, we are on our own to fix. So keep to the plan.	Comment received

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6	<p>I work for the public library. I see the impact that poverty has on the community. Harrisburg is a city in dire straits and the last thing these hard-working people need is an even higher water bill. It's not the fault of Harrisburg residents that stormwater has an impact on your operations. This is not an act of community improvement, it's greed. You want more money and you're willing to hurt the citizens of Harrisburg to do it. Shame.</p>	<p><b>Affordability/Equity:</b></p> <p>The practice of funding stormwater expenses based on water consumption is not equitable. Without a stormwater fee, residential customers would be responsible for a greater proportion of programmatic costs through wastewater rates compared to implementation of a stormwater fee.</p> <p>A financial capability and affordability analysis was completed in accordance with the U.S. Environmental Protection Agency (US-EPA) requirements to assess the financial capability of CRW and its customers within the City of Harrisburg to pay for stormwater program costs. The results of the analysis revealed that there is significant financial stress and economic hardship for customers located within the City of Harrisburg.</p> <p>A high financial burden level, according to Federal affordability guidelines, is expected to occur in Harrisburg when approximately \$225 million (escalated with inflation over 20 years), or \$185 million (in 2017 dollars), of additional capital costs are incurred by CRW over the next 10 years. This would require more than doubling of CRW's residential wastewater bills to generate sufficient revenue, from approximately \$336 per year to \$787 per year over the next 10 years. However, some customers in Harrisburg are already experiencing economic hardship and affordability issues, and these conditions may worsen as capital spending continues and rates increase in the future.</p> <p>CRW determined that approximately \$113 million (escalated), or \$102 million (in 2017 dollars) is required to fund high-priority projects to rehabilitate the Advanced Wastewater Treatment Facility and the conveyance system. This leaves only approximately \$112 million (escalated), or \$83 million (in 2017 dollars) of additional capital funding capacity over the next 10 years before the level of high financial burden is reached according to Federal guidelines. This is why CRW is pursuing the maximum amount of schedule relief possible from the US-EPA for program plan implementation and why an implementation plan of longer than 20 years is justified.</p> <p>A 20-year financial analysis concluded that a total of approximately \$315 million in capital projects (\$253 million in 2017 dollars) could be funded by Capital Region Water over a 20-year period (\$225 million in the first 10 years and \$90 million in the next 10 years) while keeping the affordability threshold at or just below the high financial burden threshold. A portion of this total 20-year investment will be needed to continue to address decades of deferred maintenance and to preserve system reliability (\$214 million), whereas the remaining portion of this capital funding capacity (\$101 million) will be available for local, neighborhood, green stormwater infrastructure (GSI) projects.</p>

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7	A good majority of people are on fixed incomes weather there disabled or seniors and we are being priced out of our homes and that includes me! I struggle to pay my water bill as is and you just increase the fees for what 10 years I can't take another increase so if this goes through I will be walking away from my home bad enough that I have to endure taxes being raised school taxes being raised I'm disabled I'm 49 years old been disabled for 14 years. Four of those I was bedridden with live-in caretakers after almost dying I'm tired of fighting! I'm tired of worrying I'm tired of paying my bills I'm done	See Response to Comment #6 <b>Affordability/Equity</b>
8	(1/2) Another blanket tax does nothing to help the claim that we are hurting the environment. Until you can prove that my property alone contributes to devistation I am whole heartly against this. (2/2) I have installed an underground infiltration system already. Calculations have been done and i meet the exceed the 100 yr storm for runoff. How do I become except from this fee.	See Response to Comment #2 <b>Service Area Fee Clarification/Communities Impacted</b>  CRW staff reached out to clarify on 8/5/2019
9	This fee won't be different than any other - much of the anticipated income won't be received because many will simply not pay. Which means that what is anticipated to be covered by the fees is not likely to be. While it's nice to dangle green space development as a reason for residents to support, I can only support if the planned funding for such green space would be funded first, before anything else, with receipts from any stormwater management fees.	<b>Stormwater Budget/Project Funding:</b> Revenue raised from the stormwater fee will go into a dedicated account to fund stormwater program costs. Program needs include both operational and maintenance costs as well as capital projects designed to reduce stormwater runoff. Capital projects budgeted and scheduled for 2020 include green stormwater infrastructure in the South Allison Hill and Camp Curtin neighborhoods of Harrisburg as well as city park improvements at Fourth and Dauphin streets. A portion of 2020 street sweeping costs will also be covered by stormwater fee revenues.
10	How are these fees going to be assessed? I don't live in the city and with a large yard add little to the runoff problem.	See Response to Comment #2 <b>Service Area Fee Clarification/Communities Impacted</b>  CRW staff reached out to clarify on 7/8/2019
11	I think its a great plan. Very excited to learn more about what I can implement at home for rain water mitigation. I live on third and love the corner rain gardens. Could the designer come and give a talk to the community about how they function? Is there a possibility to adopt them as a block? I would love to plant fruit trees. Thank you!	<b>Adopt-A-Raingarden Initiative:</b> CRW is planning to rollout Adopt-A-Raingarden programming in 2020. Multiple community groups have volunteered to partner with CRW in piloting how volunteers can enhance green stormwater infrastructure installations by performing minor maintenance and upkeep outside of CRW's operation and maintenance schedule.  Partnership Opportunity
12	I am concerned that my dry-laid permeable stone patio and flower beds are identified as impermeable surface on your interactive map	<b>Appeals and Exemptions:</b> CRW will prepare and adopt a formal appeals and exemptions policy document per CRW's Wastewater-Stormwater Rules and Regulations, which will outline the appeals process. There are several reasons why a customer's appeal for a change to their stormwater assessment may be warranted. An appeal is likely to be limited to the impervious area calculation, a customer's tier assignment, and calculation of a stormwater credit. The basis for an appeal may include incorrect parcel information, inaccurate property classification, inaccurate impervious area, inaccurate tier assignment, mathematical error, or reallocation of stormwater charge among multiple water accounts on a single parcel.  CRW staff to follow-up

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13	<p>(1/2) Thank you for finally implementing this fee. Please stand strong in the face of any resistance. As people who are intimate with water quality issues, we understand this is the best solution for the citizens of Hbg. Thank you!</p> <p>(2/2) We support the stormwater fee as proposed. We've seen the impacts of unmanaged runoff and CSO, and understand it is important to take immediate steps to protect our streams, the river and the bay. We just can't wait another minute to get started on solutions, and fee is the most affordable and equitable way to make progress.</p>	Comment received
14	I can live with \$6.15/month. It's important to report not only on the balance sheet; but project specifics on how and where the money is being spent, its environmental benefits, community impacts, and how equity was considered in the decision-making process. Any properties that are exempt and why should also be public information. All of this should be public facing (no user ids or passwords) on a website with annual reports through the USPS and/or email.	<p><b>Annual Reporting:</b> Annual budgets and rates, audited financial statements, consulting engineer's annual reports, and rate studies are all publicly available. Please see <a href="https://capitalregionwater.com/financialreports/">https://capitalregionwater.com/financialreports/</a>. Regulatory reports, including semi-annual reports on Consent Decree Implementation and MS4 Program reports, are available at <a href="https://capitalregionwater.com/full-plan/">https://capitalregionwater.com/full-plan/</a>. CRW has also committed to annual reporting to Harrisburg City Council.</p>
15	<p>I LOVE the idea of focusing on green infrastructure. It's the best, most cost-effective way to prevent flooding and clean up our waterways. I fully support the proposal to meet these needs with a stormwater fee! One thing I would suggest for helping "sell" this idea to the public and people who may be skeptical: possibly come up with another term besides "stormwater fee" to help brand the initiative in a more positive light. You could say you are establishing a "Clean Water Fund" or "Flood Reduction Fund" or "Protecting Our Community from Flooding Fund." Also, make sure to define "green infrastructure" for people at public meetings. A lot of folks don't know what it means. It may be more helpful to just say the specific features, like rain gardens and street trees. Polling from The Nature Conservancy has found that the term "Nature-Based Solutions" does better than "green infrastructure." Also, it would be wonderful to incorporate green infrastructure into the 2nd Street project that Harrisburg is embarking on...would be great for the new roundabouts/medians to feature rain gardens. Thanks so much for your efforts!</p>	Comment received/Suggestion noted
16	I,m a resident of Harrisburg. I'm a caseworker with Harrisburg center for being who assists families with utilities cris. My church has a fund that I utilize for utilizes. There are no orgs that assist with water shut offs. Last nigh one of the headlines cut off food stamps and school lunches. This is an example of a continuing a cutting of support for low income, disabled and elderly who are home owners and renters. For many years I have used our personal funds to assist family and individuals with shut offs: this year, we've spent 10,000 (2019) People can't pay now, adding is hard	See Response to Comment #6 <b>Affordability/Equity</b>
17	I am absolutely in favor of the proposed fee that would force businesses to pay their fair share.	Comment received
18	1. On board with this. I recommend you publicize your commitment that 100% of the newly raised funds will go to storm water infrastructure improvements (as opposed to, for example, executive pay raises).	Comment received/Suggestion noted

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19	I wholeheartedly approve of the rain catchment, permeable surfaces and more public green space. The tiered rates should be featured in your materials as it has appeared that your uncharge was a flat seven dollars.	Comment received/Suggestion noted
20	My concern is going to start at \$6 but will continue to go up. I am on a fixed income. Will be worth it IF it solves the problems.	<p><b>Rate Increases/Rate Stability:</b> The proposed stormwater fee is fixed at the 2020 rate for three years. However, CRW has proposed a three-year phased-in approach to the stormwater fee --- 40% in the first year, 70% in the second year, and 100% in the final year.</p>
21	The public forum on the proposed stormwater fee contained information that the public needs to read. It does a pretty good job of explaining why and the metrics that went into the setting of the fee. However as a homeowner, I would like to see the greater burden placed on the most generators of storm water runoff (businesses). They have been getting an almost free ride at the expense of the single homeowners. I support this fee and would hope that the mayor and city council get behind it too. Our infrastructure needs work due to past city administrations not paying attention to its condition. We can no longer just kick the can down the road. Its time to face the music and start acting responsible. I know that this may be a burden on people with fixed incomes but in order to improve our system, it must be paid for. Again, I would place a greater burden on the businesses. I know that property taxes and school taxes have increased this year and may in the future but CRW has been a good custodian of the funds we pay them and they have a very good accounting of where these funds are distributed (Open board meetings, where they explain, review and account for all projects and that status of the system). City residents and property owners should attend at least one of these meetings. There is always time allotted for public input regarding concerns and issues. This information can be found on the CRW website. We also should attend city council meetings to voice our concerns, and/or support for this fee. Again the time has come for us to step up if we are to progress as a city. We have to take the medicine to get well.	Comment received/Suggestion noted
22	Let me clear about one thing: I don't agree with Capital Region Water on everything it does, including some of its billing practices. But I support the board's effort to impose an equitable stormwater fee to finally fix our failing infrastructure and continue cleaning up the Susquehanna River and local streams. No one likes paying more. But what ratepayers like me dislike even more is paying more when that payment represents more than our fair share. I've had the opportunity to attend some of the public briefings about the plan. As I understand it, residential customers currently fund half of wastewater and stormwater costs but create only a quarter of the stormwater. That's not how it should work. It's unfair. The proposed stormwater fee is connected to the cause of the pollution --- hard surfaces that create the runoff. That's how it should be. That's fair. We're all in this together in Harrisburg, but we need to be sure ratepayers are paying their fair share and only their fair share, and that those who are causing the problem are doing their part to help us solve this problem.	Comment received

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23	<p>I had no intention of commenting on Capital Region Water's stormwater fee until the mayor began his saber-rattling and then threatened to try to sell the authority, an action he cannot make unilaterally. Selling city assets --- or turning them over to private interests, as was done with parking (how is that working out for us all?) --- is not a solution, especially when we are talking about water, a vital resource that affects public health and serves as the foundation for economic development. Doing so simply transfers ownership from a board that is transparent and accountable to ratepayers and taxpayers to a private driven more by bottom lines than in ensuring our city grows. The reality is that Capital Region Water's proposed stormwater fee is a reasonable, fair and equitable plan. As a multi-property owner in this city, I will see my rates rise. But that modest increase is fixed and predictable, which is more than I can say for any plan that does not include the fee, let alone privatization of this vital regional asset. What Capital Region Water is by no means out of the ordinary. Several communities all around have already done this. A good example is Lancaster. The fee didn't drive away business there; the city is one of central Pennsylvania's economic success stories, and continues to be even with the fee in place. It's not just an aging infrastructure; decades of deferred maintenance brought us to this point. Capital Region Water has a plan to finally close the gap and it deserves support.</p>	Comment received
24	<p>I've learned a lot about the storm water and how it affects us and what we as a community needs to do to help out with it. It was very interesting. Thanks</p>	Comment received
25	<p>Very nice and helpful thank u</p>	Comment received
26	<p>Enjoyed the info</p>	Comment received
27	<p>I feel that it's unfair to pay an extra fee of any, amount for clean water</p>	Comment received
28	<p>It's a great idea for the water</p>	Comment received
29	<p>I think the rain gardens are a great idea!</p>	Comment received
30	<p>Fee is a necessary implementation that is being utilized in communities nationwide.</p>	Comment received
31	<p>I support the water program</p>	Comment received
32	<p>I really got a lot from the explanations and knowledge of how everything works,</p>	Comment received
33	<p>I like the plan!</p>	Comment received
34	<p>If you create the problem own it and help fix it</p>	Comment received
35	<p>I love what capital region is doing to make are water better. I am for all of it</p>	Comment received
36	<p>Thanks! This will help out good</p>	Comment received
37	<p>I would like more done or the issue</p>	Comment received
38	<p>I think the idea of storm water management is awesome and definitely necessary for Harrisburg</p>	Comment received
39	<p>I believe fair and equitable pricing for all property owners is fair, and not for the Mayor to sell the property</p>	Comment received
40	<p>Harrisburg School Board official: Vital to the future of our community. This is a must happen!</p>	Comment received
41	<p>Interested in possible projects. Alternative contact: [REDACTED]</p>	<p>Comment received</p> <p>Partnership Opportunity</p>

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42	<p>Will fees go up every year? Guarantee new systems work? How other similar problems handled by other cities?</p> <p>Water Testing results needed now, during after</p>	<p>See Response to Comment #20 <b>Rate Increases/Rate Stability</b></p> <p>See Response to Comment #14 <b>Annual Reporting</b></p>
43	<p>I've been a Harrisburg resident and homeowner since 2004, and appreciate the work that Capital Region Water has undertaken to improve infrastructure throughout the city. I also applaud CRW's process to engage citizens across Harrisburg in identifying solutions to the stormwater challenges. Like 86% of survey respondents, I prefer a fee based on the amount of stormwater generated, as this method most equitably distributes the costs the properties with the most impervious surfaces pay the highest fee. The stormwater fees will allow Harrisburg to correct decades of deferred maintenance on its antiquated system that leads to unsafe streets due to deep water in heavy rains, property damage from flooded basements, and most importantly, the disgusting sights and smells of raw sewage in the Susquehanna River and Paxton Creek. When stormwater flows exceed capacity, a mix of raw sewage and stormwater to enter these waters, as it did 150 days last year. Without correction, these problems will only be exacerbated with more and more heavy precipitation events as our climate crisis develops. I also welcome the focus on green infrastructure as a much more cost-effective solution than simply increasing capacity of pipes and treatment facilities. This also provides additional benefits, such as city beautification and carbon sequestration with more trees and rain gardens. The availability of stormwater management credits will allow for reductions in stormwater fees while promoting various practices to reduce stormwater runoff, such as downspout disconnection from storm sewers, rain barrels or cisterns, tree canopy expansion, rain gardens or bioretention, porous pavement, infiltration basins, trenches, green roofs, wet basins, and many other measures. I hope that CRW and other organizations will provide outreach and education to promote these practices. If the fee presents too much of a burden for low-income households, perhaps a portion of their fees could be offset by higher costs for new development of impervious surfaces, or people could earn reductions by planting trees or other work to reduce stormwater in public areas. With CRW's improvements, I look forward to improved recreational opportunities along the Susquehanna River. Harrisburg's future economy and public health depend on stormwater management and a clean Susquehanna River. I strongly oppose sale of CRW to private business. I see CRW working hard to improve Harrisburg's future economic opportunities and quality of life. A private business whose primary focus is profits would not serve the interest of citizens.</p>	<p>Comment received/Suggestion noted</p>
44	<p>No me llegó el.resivo de agua</p>	<p>Comment received</p>

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45	<p>I've been a Harrisburg homeowner since 2001, and appreciate the work that Capital Region Water has undertaken to improve infrastructure throughout the city. I also applaud CRW's process to engage citizens across Harrisburg in identifying solutions to the stormwater challenges. Like 86% of survey respondents, I prefer a fee based on the amount of stormwater generated, as this method most equitably distributes the costs the properties with the most impervious surfaces pay the highest fee. The stormwater fees will allow Harrisburg to correct decades of deferred maintenance on its antiquated system that leads to unsafe streets due to deep water in heavy rains, property damage from flooded basements, and most importantly, the disgusting sights and smells of raw sewage in the Susquehanna River and Paxton Creek. When stormwater flows exceed capacity, a mix of raw sewage and stormwater to enter these waters, as it did 150 days last year. Without correction, these problems will only be exacerbated with more and more heavy precipitation events as our climate crisis develops. I also welcome the focus on green infrastructure as a much more cost-effective solution than simply increasing capacity of pipes and treatment facilities. This also provides additional benefits, such as city beautification and carbon sequestration with more trees and rain gardens. The availability of stormwater management credits will allow for reductions in stormwater fees while promoting various practices to reduce stormwater runoff, such as downspout disconnection from storm sewers, rain barrels or cisterns, tree canopy expansion, rain gardens or bioretention, porous pavement, infiltration basins, trenches, green roofs, wet basins, and many other measures.</p> <p>I hope that CRW and other organizations will provide outreach and education to promote these practices. If the fee presents too much of a burden for low-income households, perhaps a portion of their fees could be offset by higher costs for new development of impervious surfaces, or people could earn reductions by planting trees or other work to reduce stormwater in public areas. With CRW's improvements, I look forward to improved recreational opportunities along the Susquehanna River. Harrisburg's future economy and public health depend on stormwater management and a clean Susquehanna River. I strongly oppose sale of CRW to private business. I see CRW working hard to improve Harrisburg's future economic opportunities and quality of life. A private business whose primary focus is profits would not serve the interest of citizens.</p>	Comment received/Suggestion noted
46	I think the storm water improvement is an investment to reduce costs of processing storm water. It's a plan that will benefit the overall health of the city. I think the providing grants opportunity should be open to help homeowners that see the vision that is an Necessary decision Siri	Comment received
47	I oppose privatization and support CRW and the storm water fee.	Comment received

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48	<p>Every central Pennsylvania resident served by Capital Region Water now has a stake in Harrisburg's proposed stormwater fee. That's because Harrisburg Mayor Eric Papenfuse has floated the idea of trying to sell off the city's drinking water and wastewater systems simply because he opposes the fee, which currently is subject to public comment. Rather than attacking Capital Region Water, which has been recognized for its work since being formed as part of the city recovery plan and Harrisburg Authority restructuring in 2013, the mayor should be working in harmony with CRW to adopt green infrastructure that cleans waterways and enhances neighborhoods. That's what a true Progressive leader, as the mayor bills himself, would do. Capital Region Water operates in a transparent, open manner. That's something that would not happen if a private interest gained ownership and operation of our water and wastewater system. This isn't something that affects just Harrisburg. Capital Region Water provides drinking water, wastewater and stormwater services for portions of several surrounding municipalities. That means any attempt to sell the authority would have repercussions far beyond just the city itself. More than 1,700 jurisdictions across the country impose a similar fee, including several communities surrounding Harrisburg. It's an equitable approach to a difficult problem, which is why it has gained so much favor with everyone except this mayor. Now, the entire region is a stakeholder in this decision-making process, and we need to make our voices heard to protect this regional asset.</p>	Comment received
49	<p>I had the opportunity to attend one of the presentations that Capital Region Water put on for residents and community groups to explain the proposed stormwater fee. I was glad I went, because I learned a bit more about the bump outs and construction taking place right outside my front door!!! Over the last few years, I have seen Capital Region Water teams in my neighborhood more and more, not just on construction projects like these, but also on basic maintenance projects, street improvements and drain cleaning to reduce ponding and flooding. It's refreshing. A lot of this work is needed to address years of deferred maintenance that allowed our infrastructure to fall into disrepair in the first place. So, progress is being made, finally, but more needs to be done. And getting it done requires money. That's why I support the stormwater fee. It would generate about \$5 million annually dedicated solely to projects like this --- those that will reduce polluted runoff, build out green infrastructure and repair our aging infrastructure. It's also the most equitable plan, which is why so many communities around Harrisburg and across the country have adopted similar proposal. Like our elected officials, I worry about added costs on our poorer residents. But without the stormwater fee, residents who aren't contributing to the stormwater problem would be the ones who end up paying the most for it. That's not fair to them. I also worry about what happens if we don't fix these problems, both in terms of penalties from federal mandates to make repairs and the continue pollution into our rivers and streams. This is something that needs to be done. Our city cannot continue to build out its 21st century economy on an infrastructure system that itself is nearly 100 years old and well past its operational life. Thank you.</p>	Comment received

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50	<p>I have to give Capital Region Water credit. There aren't a lot of government agencies or authorities that do a road show to tell you they're going to charge you more money for a service you're already providing. I appreciate the way CRW has been open and transparent about its proposed stormwater fee, which I support. When I first heard about the fee, I thought it was going to be exorbitant. Instead, the fee is modest, fair and appropriate, because homeowners are only being asked to pay their share of the problem of runoff from impervious surfaces, just like businesses are being asked to pay their fair share and only their fair share. That's how it should be. Residents have been covering the difference for too long. And let me be clear: As much as I support the fee, I don't like paying more. No one likes paying more. But we need to recognize what happened to this city after years of paying nothing and paying no attention to our infrastructure. We need a new direction. I count myself fortunate to have a home just a block from the river. But all of that is meaningless if the river is an open sewer. The quality of our water has improved drastically over the years. I want to see those improvements continue. The stormwater fee, with dedicated funding for project improvements, is one tool to help us achieve these goals.</p>	<p>Comment received</p>
51	<p>I have lived in the city for over five years, and while I am a renter, I can see no good reason why Harrisburg should sell its water system to a private company. The benefits that would be derived from implementing fixes to the city's outdated stormwater system would be a boon to all city residents and frankly the upgrades are long overdue. The proposed fee seems fair and equitable, and frankly is a no-brainer. As a renter rather than a property owner, I really didn't think I had a voice in the fee proposal --- until the mayor made me a stakeholder by threatening to sell off these vital city assets in his opposition to the fee. Now, every resident --- renter, homeowner, business owner, and even neighboring communities served by Capital Region Water --- have an interest in how this all plays out. I am deeply skeptical of the notion of privatizing public goods and services. Selling off the parking has been a disaster, and the city is getting cheated out of payments by an unscrupulous operator. At least with the parking there was a compelling reason to sell it off as the city was in dire financial straits, but there is no compelling reason to sell the water system. Fixing the stormwater system is a mandate from the federal government that a private operator would still have to meet, and throwing a profit motive into the mix all but guarantees a more expensive and less effective system.</p>	<p>Comment received</p>
52	<p>I looked at the Fee Finder Map and noticed it is based on an old GIS map. It shows a structure in my yard that was removed five or six years ago. This would affect my Sq-footage. I'm surprised you didn't use the latest GIS product. It could be off for other properties who made changes in the fast few years. I'll be watching for the appeal period. Thank-you</p>	<p><b>Mapping:</b>  CRW contracted with T3 Global Strategies, a multi-disciplined photogrammetric/geomatics/engineering firm, for the development of its impervious area mapping for Harrisburg based on both high-resolution aerial photography and photometric datasets that can determine the classification of impervious surfaces, such as buildings, concrete, driveways, etc. Impervious area was measured for each property using technology that meets National Accuracy Standards for a 1-inch-to-50-foot scale mapping ratio. While relying on the best available data, errors may still have occurred. Customers will be encouraged to utilize the appeals process for review of an assessment. Mapping revisions will also be incorporated as CRW reviews development plans and/or as CRW revises the dataset. Comprehensive update of City-wide aerial imaging and mapping will occur no less than every five years.</p>

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53	I do not see another viable option. Of course, we'd all prefer if the costs were not hoisted on members of the community, but we owe it to ourselves and our future to ensure that our waterways are clean.	Comment received
54	Yes please.	Comment received
55	Will lead to clean water. But hate to spend money.	Comment received
56	I support the fee because it is an equitable solution to a significant environmental problem. This is a fair way to help address the issues arising from our aging infrastructure.	Comment received
57	A more equitable way to handle a problem we all face! Definitely support!	Comment received
58	I just reviewed my address for the stormwater fee. Your map is outdated by YEARS. 14-006-009 is shown on your map as green space and rated at \$22 per month. 3 years ago a Re-cycling company bought that property and converted this open lot into a PARKING LOT for trucks and a weigh station. This is just one instance of how using an out-dated map will end up losing money on the stormwater fee, and I didn't even really try to find discrepancies.	<p>See Response to Comment #52 <b>Mapping</b></p> <p>CRW staff reached out to discuss on 9/23/2019</p>
59	Love stormwater fee, hate bump outs. Everyone was very knowledgeable or pleasant.	Comment received
60	I would like someone to come to my property and assess my property measurements and see grass vs. concrete	<p>See Response to Comment #2 <b>Mapping</b></p> <p><b>Grass/Lawns:</b>            The stormwater fee is based on the impervious area of a property because it is that impervious area that generates the stormwater CRW is managing. Rain may be absorbed by residential lawns during a light rain event, but generally, properties will discharge stormwater off the property during heavier events. A typical lawn or planting area will not be able to manage stormwater runoff from impervious area like your roof or driveway. If a lawn or planting area is designed specifically to function as a stormwater BMP that promotes infiltration to stabilize water flows, such as filter strips or rain gardens, this may be eligible for a stormwater credit.</p> <p>CRW staff reached out discuss 10/25/2019</p>
61	Great idea. Very fair fee that will save everyone money and protect the environment. I'm dissapointed in the mayor for trying to sell such an important regional asset.	Comment received
62	I am not angry about the new plant things. They make turning into the street difficult for the fire trucks.	Comment received

Comment Number	Comment	CRW Response
63	<p>Provided letter: Thank you for this opportunity to comment on Capital Region Water's (CRW) Stormwater Fee Proposal and Implementation Plan. A City of Harrisburg resident since 1976, I have experienced the impacts of stormwater flooding in Uptown and on Allison Hill. Uptown, combined stormwater and wastewater backed up into my basement. On Allison Hill, cascades of stormwater run down Market Street and over the sidewalk curb. My capable bus driver pulled the front of her bus over the curb to discharge passengers onto the safer sidewalk, and would not allow them to exit through the rear door to the flooded street. These events can be attributed in part to serious disinvestment in the City's stormwater infrastructure over many years. I support CRW's efforts to generate the revenue necessary to properly manage water quantity and quality in the City of Harrisburg. A stormwater utility fee is the fairest way across the board to generate that revenue.</p> <p>Prior to my retirement from the PA Department of Environmental Protection, I coordinated Pennsylvania's participation in the Environmental Protection Agency's Chesapeake Bay Program. I had the opportunity to travel to communities across Pennsylvania, Maryland and Virginia to observe best practices in managing urban stormwater. Stormwater utilities fees are new to many of these communities, but are increasingly recognized as the most equitable approach to address state and federal water quality/quantity regulatory requirements. The PA General Assembly recently recognized this by approving legislation which extends this authority to municipalities in the Commonwealth that did not previously have it.</p> <p>CRW's proposed average annual stormwater fee is comparable to four municipalities under consent orders for combined sewer overflows (Alexandria VA, Baltimore MD, Wilmington DE, Lancaster PA), and significantly less than those of two others (Allentown PA, DC Water). I believe that CRW's tiered fee structure recognizes the financial hardship experienced by Harrisburg's lower income residents, and seeks to balance that with the fiscal realities of restoring the City's inadequate water infrastructure system.</p> <p>Continued:            In summary, I believe that adoption of the Stormwater Fee proposal is necessary to generate the revenues required to implement CRW's City Beautiful H2O Program Plan. Implementation of that Plan is necessary to meet state and federal regulatory requirements, but more importantly to provide a safe and healthy environment for Harrisburg residents and a modern water infrastructure system to support business growth.</p>	<p>Comment received</p>

Comment Number	Comment	CRW Response
64	<p>Provided letter: [REDACTED] has reviewed the City Beautiful H2O Plan that was sent to us. We are requesting that the implementation of the plan be delayed until July 2020. The reason for this request for delayed implementation is that [REDACTED] fiscal year operates on a July 1 through June 30 calendar. The budget for FY19-20 was developed several months ago and money had not been budgeted for a new storm water fee. The [REDACTED], following both national and regional trends in higher education, has experienced declines in enrollment over the past decade that challenge our operating budget. It is due to these challenges that we request the delayed implementation.</p> <p>Although the current Storm Water Fee Proposal does not have the guidelines established for the Storm Water Credit Policy, we are confident that many of the best management practices that the [REDACTED] already has in place would qualify us to apply for credits. It is our hope that the credits will be significant enough to minimize the storm water fee.</p>	<p><b>Delayed Implementation/Fiscal Year Billing:</b> CRW is proposing a three-year phased-in approach to the stormwater fee --- 40% in the first year, 70% in the second year, and 100% in the final year. Ensuring all customers are appropriately charged this service charge or user fee ensures compliance with the Municipality Authorities Act (MAA), specifically the MAA provision to charge "reasonable and uniform rates."</p> <p>See Response to Comment #1 <b>Credit Program</b></p>
65	<p>I am in support of raising needed funds for water quality improvement / storm water retention via a progressive tax that places the burden on landowners with more impervious surface. To the degree that landowners without the means to pay can be afforded assistance or subsidization, I am also in favor of that. I am also categorically opposed to privatization of the water supply.</p>	<p>Comment received/Suggestion noted</p>
66	<p>Increase the incentives from 10% credit to 50% credit, along with annual reporting from the property owner of their actual mitigation and diversion efforts.s Begin strict enforcement against property owners whose grass clippings are left at curbside, particularly against the large landowners like School District, local governmentl, state government and U.S. Defense Department Reserve Center in uptown Harrisburg and large institutions, just to name a few.</p>	<p>See Response to Comment #1 <b>Credit Program</b></p> <p><b>Enforcement:</b> CRW is adopting revised Wastewater-Stormwater Rules and Regulations, which will include enforcement provisions. CRW does have authority to enforce wastewater-stormwater compliance issues through an Intergovernmental Cooperation Agreement between the City of Harrisburg and CRW.</p>

Comment Number	Comment	CRW Response
67	<p>██████████ intends to submit a letter with comments directly to Charlotte Katzenmoyer, CRW's CEO, in response to her meeting request and inquiries. The online format for submitting comments in a text box is not ideal for submitting detailed comments, so please consult ██████████ forthcoming letter to Ms. Katzenmoyer for additional details. In the meantime, ██████████ briefly comments as follows: Based on the information available to date, including the Stormwater Fee Proposal and Implementation Plan dated June 19, 2019, the Stormwater Charge is, in reality, an unauthorized and unconstitutional tax. As presently structured, the Stormwater Charge will operate in the same manner as a school or property tax, rather than a charge for services actually rendered by CRW. On its face, it appears that CRW is opportunistically implementing the Stormwater Charge to subsidize its program for addressing wastewater and its combined sewer overflows ("CSOs"), primarily in response to enforcement actions and the Partial Consent Decree with the federal government and Commonwealth ("Consent Decree"). CRW will apparently commingle funding between its wastewater and stormwater programs, and between its combined storm sewer ("CSS") costs and its municipal separate storm sewer system ("MS4") costs. This demonstrates that the proposed Stormwater Charge is not reasonably proportional to the value of stormwater service rendered. Furthermore, the method of calculating the Stormwater Charge via impervious surface is not appropriate in all circumstances.</p> <p>As applied to ██████████'s parcels are unique when compared to others in the City, such that the impervious calculation is inaccurate and not a good indicator of actual use of the system by ██████████ CRW has not done enough due diligence to ensure the Stormwater Charge reflects actual use. When these issues are considered with the information available to date, it becomes clear that the proposed Stormwater Charge is not reasonably proportional to the value of stormwater service rendered; meaning that it is, in effect, an unconstitutional tax.</p>	<p>CRW will be providing further response to this commenter independent of the public comment period.</p> <p><b>Combined Sewer System vs. MS4 Area Obligations:</b> CRW has regulatory clean water commitments throughout the City of Harrisburg regardless of whether a specific property lies within the combined or separate portion of the wastewater-stormwater system. CRW is creating a separate and dedicated stormwater fund to devote revenue derived from the stormwater fee to improve the stormwater system.</p> <p><b>Stormwater Fee Authorization:</b> The Municipality Authorities Act ("MAA") was amended to expressly authorize municipal authorities to perform stormwater planning, management, and implementation. 53 Pa.C.S.A. § 5607(a)(18). The MAA was also amended to further authorize municipal authorities to charge "reasonable and uniform rates . . . based in whole or in part on property characteristics." 53 Pa.C.S.A. § 5607(d)(34). The fee is based upon the amount of impervious area on individual properties. The stormwater fee is not a tax. The fee is a service charge designed to reimburse CRW for costs incurred in providing stormwater management services. Furthermore, the fee is reasonably proportional to the cost of services rendered because it is based upon the demand the user places on the system. Finally, the revenue collected from the stormwater fee will be deposited into a segregated fund and used only for that purpose of operating and maintaining the stormwater management system.</p>

Comment Number	Comment	CRW Response
68	<p>I am one of the Ambassadors for Capital Region Water (“CRW”). I am making these comments not only for myself, but also for some of the other ambassadors. I am not suggesting that I have been appointed as a spokesperson for all of the other ambassadors. Rather, I am attempting to restate others’ concerns made at the most recent Ambassadors meeting last week. The first and fundamental comment is that a stormwater fee is appropriate. It is appropriate because the sources of pollution that CRW is dealing with come not only from sewage, but also from stormwater runoff. Thus, all of the contributors to the pollutional problem should contribute to the solution to the problem. For far too long, only homeowners and other consumers of water have borne all of the expenses for sewage and stormwater pollution. The concept of a stormwater fee is a logical and necessary step to fairly address this pollution. There are several concerns, however, with the details of the proposed fee. My primary concern is with pollution from public streets and roads (“public roads.”) The proposed fee does not apply to public roads. Nor, as far as I could tell, was there any explanation for this omission. Surely, the impervious surfaces of public roads must be as major a contributor of pollution as other impervious surfaces. Therefore, CRW should explain why it is not proposing any stormwater fee for such surfaces. Equally important, if there is a sound reason for not assessing a fee on the public roads, CRW should propose other steps that the owners of the public roads could and should be required to take to minimize or eliminate the pollution caused by the runoff from these roads. Another concern is with the amount of the credit that owners of large impervious surfaces can obtain.</p> <p>While it seems equitable that some credit be afforded when warranted, it seems like the amount of the credit should be limited to something like 20 - 25%, at least initially. While incentivizing those landowners to reduce pollution seems warranted, other factors ought to be considered. First, it should be recognized that run-off pollution has been allowed by those landowners for decades. The landowners have borne no past expense for that pollution; rather, in the past, only homeowners and other water consumers have paid those expenses. So, CRW should consider further limiting the credit (as suggested) to owners of large impervious surfaces for perhaps the first 10 years of the stormwater fee. Another concern was that CRW could increase homeowners’ stormwater fee very soon. Rather than an increase come as soon as in 3 years, as proposed, CRW should consider keeping the proposed stormwater fee stable for 5 - 10 years. Thank you for your attention to and consideration of these comments.</p>	<p>Suggestions noted</p> <p>See Response to Comment #1 <b>Sidewalks and Roads</b></p> <p>See Response to Comment #1 <b>Credit Program</b></p> <p>See Response to Comment #20 <b>Rate Increases/Rate Stability</b></p>
69	<p>Your action plan is unacceptable. 20 years to fix 60% (or 80% depending on what’s believable from CRW) of the problem. Fix 100% of the problem in 10 years or turn this over to a company that will. If homeowners can’t afford \$70 or \$140 a year to fix this, than shame on Harrisburg.</p>	<p>Comment received/Suggestion noted</p>

Comment Number	Comment	CRW Response
70	<p>Dear Sir and/or Madam: On behalf of the [REDACTED] we respectfully submit the following comments on Capital Region Water's (CRW) proposed stormwater fees. [REDACTED] is a 501(c)(3) non-profit organization, founded in 1967. The organization's mission --carried out from offices in Maryland, Virginia, Pennsylvania and the District of Columbia -- is to restore and protect the ecological health of the Chesapeake Bay, the nation's largest and one of its most vital estuaries. As such, and on behalf of our over 300,000 members and e-subscribers across the United States, we are very interested in matters that will impact the health of the Chesapeake Bay, the waters that feed into it, and the health of those who live and work within the Bay watershed. [REDACTED] commends CRW for the process to address the stormwater and combined sewer overflow (CSO) challenges within CRW's service area. This process, which has included significant public engagement, has been transparent, thoughtful, diligent, and comprehensive. In short, we fully support CRW's proposed stormwater fee as an equitable, legal, and localized approach to investing in wastewater infrastructure for the benefit of area residents, economy, environment, and quality of life. Specifically, the proposed CRW stormwater fee is: Commonly used, equitable tool. Across the United States, at least 1,600 local governments across 40 states have enacted stormwater fees since the mid-1960s. In recent years, there has been increases in the number of local governments adopting fees as a locally controlled, equitable, and stable approach to the challenge of upgrading and maintaining vital stormwater infrastructure. The alternative, increasing sewer rates, would disproportionately impact homeowners since residential properties do not generate most of the runoff.</p> <p>70 Continued,            The benefits to communities from addressing polluted runoff far outweigh the speculative concern that businesses will relocate, a frequent criticism of such efforts. Further, [REDACTED] opposes the sale of CRW to private business. CRW is working hard to improve Harrisburg's future economic opportunities and quality of life. A private business whose primary focus is profits would not serve the interest of citizens or improve water quality in the Susquehanna River. Further, the availability of stormwater management credits will allow for reductions in stormwater fees while promoting various practices to reduce stormwater runoff, such as downspout disconnection from storm sewers, rain barrels or cisterns, tree canopy expansion, rain gardens or bioretention, porous pavement, infiltration basins, trenches, green roofs, wet basins, and many other measures. Supported by the community. In a recent survey, 86% of respondents preferred a fee based on the amount of stormwater generated, as this method most equitably distributes the costs in that the properties with the most impervious surfaces pay the highest fee. We are encouraged that CRW and other organizations will continue to provide outreach and education to promote these practices and provide the opportunity for credits for private property owners. However, if the fee presents too much of a burden for low-income households, [REDACTED] suggests that a portion of their fees could be offset by higher costs for new development of impervious surfaces, or rate payers could earn reductions by planting trees, rain gardens, or other practices that to reduce stormwater in public spaces throughout CRW's service area. Locally derived and directed tool towards investing in water quality improvements. With roughly 86,000 miles of rivers and streams, Pennsylvania is a water rich state.</p>	<p>Comment received/Suggestion noted</p>

Comment Number	Comment	CRW Response
	<p>70, Continued,            And the Susquehanna River, the largest source of freshwater to the Chesapeake Bay, is a significant natural feature supporting the economy, health, and quality of life for the over 4 million residents that reside within the river basin and the many river towns alongside it. Improperly managed stormwater is not only laden with nutrients, sediment, and other pollutants, but fundamentally alters the physical, chemical, and biological conditions of streams, accelerates stream bend and bank erosion, increases nuisance flooding and sewer backups into basements, and degrades the overall quality of life for areas residents. When combined with human sewage, bacteria, viruses, and other pathogens, pharmaceuticals and personal care products, and anything else that goes down the drain can be mixed with the stormwater. According to the Pennsylvania Department of Environmental Protection, stormwater runoff is one of the largest sources of pollution to Pennsylvania rivers and streams, including Paxton Creek. It is also a significant—and growing—source of pollution impacting the Chesapeake Bay resulting in National Pollutant Discharge Elimination System (NPDES) and the Municipal Separate Storm Sewer System (MS4) permits that include plans to reduce stormwater pollution for local water quality improvement as well as Chesapeake Bay Total Maximum Daily Load (TMDL) requirements. CRW, along with roughly 350 other entities, are required to meet these obligations. Pennsylvania’s annual precipitation has increased 5 to 10 percent in the last century, and precipitation from extremely heavy storms has increased 70 percent in the Northeast since 1958. Today, the Susquehanna River basin is one of the most flood prone in the nation.</p> <p>70 Continued,            Due to aging, undermaintained, and undersized storm and wastewater infrastructure, the river basin is also home to over 400 identified CSO outfalls, including 59 within CRW’s service area. These CSOs discharge between 577-796 million gallons a year directly to the Susquehanna River or Paxton Creek, compared to the over 8 billion gallons of treated wastewater discharged by CWR’s advanced sewage treatment plant, or roughly 7 to 10 percent of the total annual discharge. Last year, however, precipitation events resulted in 150 CSO events. In next decades, Pennsylvania’s total annual precipitation and its intensity is anticipated to continue to rise. Without the correction the fee will provide, these problems will only be exacerbated with more heavy precipitation events as our climate crisis evolves. Provides a myriad of other services that benefit the health, welfare, and quality of life of area residents. CRW’s focus on “green infrastructure” as a cost-effective solution rather than simply increasing capacity of pipes and treatment facilities offers a myriad of ancillary benefits. These include, but are not limited to: greater cost-effectiveness over many “gray infrastructure” techniques; minimizing the volume and peak rate of stormwater runoff that enters into the system; increased pollutant removal through vegetative techniques that maximize the physical, chemical, and biological interactions; reduction in the urban heat island effect; substantially contributing to the beautification and renewal efforts, and even helps with the mitigation of the impacts of the climate crisis. Finally, we have a vested interest in CRW’s success. Since █████ established the Pennsylvania office in 1987, we have been in Harrisburg.</p>	

Comment Number	Comment	CRW Response
	<p>70 Continued,            Currently, we are in the heart of the midtown section. And several of our staff live within CRW's service area. As a Harrisburg city-based office, we appreciate the extensive work that CRW has undertaken to improve infrastructure throughout the city, including substantial upgrades to the sewage treatment plant, that are addressing decades, and in certain areas even centuries, of deferred maintenance. We are committed to assisting CRW and its partners continue this vital work. A 21st century economy requires 21st century infrastructure. The proposed stormwater fee, as part of the City Beautiful H2O program, will create a legacy of clean water and a vibrant community for future generations. Thank you for the opportunity to comment. If you have any questions or would like to discuss these comments further, please feel free to contact us. Respectfully Submitted, [REDACTED]</p>	
71	<p>I've been a Harrisburg-city homeowner since 2007 and appreciate the work that Capital Region Water (CRW) has undertaken to improve infrastructure throughout the city. I also applaud CRW's process to engage citizens across Harrisburg in identifying solutions to the stormwater challenges. Like 86% of survey respondents, I prefer a fee based on the amount of stormwater generated, as this method most equitably distributes the costs the properties with the most impervious surfaces pay the highest fee. The stormwater fees will allow Harrisburg to correct decades of deferred maintenance on its antiquated system that leads to unsafe streets due to deep water in heavy rains, property damage from flooded basements, and most importantly, the disgusting sights and smells of raw sewage in the Susquehanna River and Paxton Creek. When stormwater flows exceed capacity, a mix of raw sewage and stormwater to enter these waters, as it did 150 days last year. Without correction, these problems will only be exacerbated with more and more heavy precipitation events as our climate crisis develops. I also welcome the focus on green infrastructure as a much more cost-effective solution than simply increasing capacity of pipes and treatment facilities. This also provides additional benefits, such as city beautification and carbon sequestration with more trees and rain gardens. The availability of stormwater management credits will allow for reductions in stormwater fees while promoting various practices to reduce stormwater runoff, such as downspout disconnection from storm sewers, rain barrels or cisterns, tree canopy expansion, rain gardens or bioretention, porous pavement, infiltration basins, trenches, green roofs, wet basins, and many other measures.</p>	Comment received/Suggestion noted

Comment Number	Comment	CRW Response
	<p>71 Continued, I hope that CRW and other organizations will provide outreach and education to promote these practices. If the fee presents too much of a burden for low-income households, perhaps a portion of their fees could be offset by higher costs for new development of impervious surfaces, or people could earn reductions by planting trees or other work to reduce stormwater in public areas. With CRW's improvements, I look forward to improved recreational opportunities along the Susquehanna River. Harrisburg's future economy and public health depend on stormwater management and a clean Susquehanna River. Finally, I strongly oppose the sale of CRW to private business. I see CRW working hard to improve Harrisburg's future economic opportunities and quality of life. A private business whose primary focus is profits would not serve the interest of citizens.</p>	
72	Provided letter - see attached	Discussion with the City of Harrisburg continues independent of this public comment period, including but not limited to a meeting with the Mayor's Office on 11/4/2019 to discuss the larger City Beautiful H2O Program Plan, associated hydrologic and hydraulic modeling, financial capability assessment, and proposed capital projects.
73	The proposed fees seem reasonable, considering this century-long problem.	Comment received
74	Fees/funding should be based on water usage	Comment received/Suggestion noted
75	(If you drive a car, car) I'll tax the street (If you try to sit, sit) I'll tax your seat (If you get too cold, cold) I'll tax the heat (If you take a walk, walk) I'll tax your feet Taxman! What's next? The air that we breath?? WTF is wrong with you people?	Comment received
76	Preventing combined sewer overflow is an environmental imperative. I know it will be costly and trust CRW as the agency best able to devise compliance plans.	Comment received
77	Thank you for taking action to make our community greener and to reduce pollution into the Susquehanna River.	Comment received
78	No no more fees no more taxes. Every time families start to get ahead there is some new fee or tax pushing them back.	Comment received
79	<p>I am writing in support of Capital Region Water's proposed stormwater fee, which will help to improve critical stormwater infrastructure and reduce pollution to the Susquehanna River. Most of the city's pipes, sewers, and water infrastructure was installed before 1940, and needs to be repaired or replaced. During periods of heavy rainfall, Harrisburg's sewer and rainwater systems discharge raw sewage, trash, and other pollutants such as oil, grease, and excess fertilizer, directly into the Susquehanna River and other local waters. In 2018 alone, there were approximately 150 days of rainfall that caused untreated raw sewage to discharge directly into local waterways and the Susquehanna River. Implementing this stormwater fee will help raise the funds necessary to address this problem. I also encourage Capital Region Water to prioritize green solutions - like rain gardens, tree trenches, and green roofs. Green stormwater infrastructure helps to reduce localized flooding, increase property values, and provide job opportunities for local businesses while simultaneously treating stormwater closer to its source. Thank you for considering my comments and recommendations. Ensuring the health of our local waterways is more important than ever, and we must continue making investments to update and properly maintain our aging infrastructure.</p>	Comment received/Suggestion noted

Comment Number	Comment	CRW Response
80	I am in favor of the plan to fix our outdated infrastructure to better manage and mitigate sewer overflow and storm water run off into the Susquehanna River and impacting the Chesapeake Bay. This is not a healthy or acceptable situation. I believe a fee of \$75.00 per year is not a hardship. Many people in the areas served by Capital Region Water spend that much in a day on ordinary things including things that are not necessities. Our health and welfare are worth at least that much. It would also be important to speed up the process if feasible. We can't put off our health and welfare because some people think \$75.00 is too high a price. At this point, I don't believe private companies would be more cost effective or even dependable as we have seen in the past here and in other cities and townships.	Comment received/Suggestion noted
81	I feel it that homeowners should not be paying a storm water fee as we are already paying for water and sewage. I would like to know why this is even being considered.	Comment received
82	I find the annual \$75 storm water not unreasonable, and certainly no reason to sell off a public utility.	Comment received
83	I feel like a storm water fee could have some benefits but the drawback and effects that would occur to low income familys can be big i feel like the decision should be based on the best interest of low income family	See Response to Comment #6 <b>Affordability/Equity</b>
84	No more taxes. If you want to,stop pollution if tbe Susquehanna River go to Binghamton NY. STOP New York from dumping pollutants into the river.	Comment received
85	I have already written to CRW with a copy to Mayor Papenfuse, in support of CRW and its work. No one likes to pay more, but the storm water fee is a necessity.	Comment received
86	I live in Penbrook. The stormwater fee is a waste of money. Let us keep our money and require us to sweep the street outside our home. The street sweeper came by and the road did not look any cleaner. now the leaves are falling so the street is not clean anymore.	See Response to Comment #2 <b>Service Area Fee Clarification/Communities Impacted</b>

Comment Number	Comment	CRW Response
87	<p>I am 100% supportive of the stormwater fee. However, I feel that property owners in this city cannot afford to pay anything beyond the proposed fee. I also feel the fixes -- under the CRW plan that has these fees as the only source of funding for fixing our infrastructure -- are not enough and not fast enough. The one thing I wish CRW would do, or do more transparently if you are already on this, is to collaborate with the various local organizations that would leverage their supporter network to get the state to pay (not lend!) for more/better/faster fixes and/or to obtain grant funds. Sixty-five years to 95% compliance, all on the backs of the city dweller and property owners, is just not good enough. The EIP report published in the summer was not an attack on CRW ... yet from your official response, and in-person response I have gotten during a public meeting, I sense that CRW is interpreting it as such. EIP acknowledged that CRW is doing what it can with the resources it is able to leverage. The whole point of the report is that the state should pitch in a big chunk of what is needed. Finally, I have heard zero about CRW working with Harrisburg city planners to craft runoff-management building code for new development (preferably retroactive also, such as any time a parking lot needs to be resurfaced). Why not? Why do I continue to read about huge buildings being built, or new tenants on commercial properties with large parking lots, with absolutely no requirements for green roofs, graywater systems, or other green infrastructure to prevent or at least offset runoff. I feel CRW should be pushing the city pretty hard on this point. The city wants to grow its tax base = more buildings = more parking ... do your projections for CSO events contemplate that? Is the city planning ahead by means of building codes and any other legislative action?</p> <p>Continued: All that now said ... I am a big fan of CRW. I love you guys for the beautiful water that runs out of my tap. I think you do a great job within the resources you have to work with. You might find me as a concerned citizen and Lower Susquehanna Riverkeeper Assoc volunteer pushing hard for bigger and faster solutions, for increased advocacy to obtain funding on the state level, and for sane city planning -- because somebody has to ... but that is not a critique of CRW per se. And I wish it wouldn't be interpreted as such.</p>	<p><b>Coordination with the City of Harrisburg:</b> CRW has a vested interest in coordinating with the City of Harrisburg, specifically to ensure stormwater management is considered in (re)development planning. Coordination of related roles, responsibilities, and enforcement authority will be codified as CRW adopts revised Wastewater-Stormwater Rules and Regulations. CRW remains committed to collaboration to ensure the City Code is amended to reflect best practices for wet weather management. CRW has compiled a comprehensive list of nearly 30 recommendations to amend the City Code.</p> <p>Partnership Opportunity</p>
88	<p>There is a definite need for a stormwater fee in Harrisburg. Unfortunately I missed all of the public meetings so I am not familiar with the specifics. I assume that there will be a way for residents to reduce their fee by installing green infrastructure. And it would be nice if CRW would provide some sort of technical support to residents who wish to go that route.</p>	<p>See Response to Comment #1 <b>Credit Program</b></p>
89	<p>Provided letter from [REDACTED] - See attached</p>	<p>See Response to Comment #1 <b>Credit Program</b></p> <p><b>Billing/Application of Payment:</b> The stormwater fee will be billed monthly and will appear on the CRW bill as a separate service charge apart from water and wastewater charges. Customer payments will be applied proportionally to the CRW services charged. For example, if a CRW customer who receives water, wastewater, and stormwater services renders a partial payment, that payment will be applied proportionally to the services provided, but no one service will have been paid in full.</p>

Comment Number	Comment	CRW Response
90	<p>First the initial plan (H2O Beautiful) is quite complex and beyond the comprehension of the general public. It is an engineering document and quite repetitive. This plan was already presented to the USEPA. It is not adequately explained. It would take days figure out what was is contained in it, what is needed and what Harrisburg needs to pay for. One thing noted was CSO 48 had an excessive discharge and the reason was not fully investigated. Based on historical records, inflow from Mish Run and Hamilton run is the likely culprit. In fact it was briefly mentioned as an inflow from the railway. Historical records point out that this was a MS4 from Bellevue Park pond area and not a sanitary sewer that was connected later. A thorough investigation and separation of that flow could significantly reduce Harrisburg's total CSO discharges. In reviewing the plan, rather than encouraging the reducing inflow, the plan concentrates on building out the stormwater system to accommodate the inflow. This is the wrong initial approach. Reduction of inflow should be Phase I of the plan. For example, disconnection of roof leaders and sump pumps should be first priority, along with pressure testing house leaders as was done by the Lower Paxton Township Sewer Authority. It is well documented that these actions pay great dividends. Finally, the plan should incentivize the removal of roof leaders by crediting the homeowner by the square footage removed and not by a simple percentage. The stormwater flow could be to the pervious areas in the yard. It does not necessarily have to be discharged to a rain garden. This method of redirecting flow should be acceptable provided it does not run off the property and into a swale or street.</p>	<p>See Response to Comment #1 <b>Credit Program</b></p> <p>See Response to Comment # 60 <b>Grass/Lawns</b></p>
91	<p>Provided letter: Thank you for this opportunity to comment on Capital Region Water's (CRW) Stormwater Fee Proposal and Implementation Plan.</p> <p>██████████ was chartered in 1914, now consisting of about 270 property owners. The Bellevue Park neighborhood is located along the east end of Market Street, and bordered by 21st Street, Hale Avenue and Swatara Street.</p> <p>██████████ has supported CRW in its efforts to address Harrisburg's inadequate stormwater and sewer management system through the development of the City Beautiful H2O Program Plan. Improvements to this system will result in improved water quality within our neighborhoods, streams and the Susquehanna River. ██████████ members participated in the plan development through attendance to city-wide meetings on proposed concepts and neighborhood meetings focusing on green infrastructure opportunities in Bellevue Park.</p> <p>In correspondence dated February 21, 2018 to CRW, ██████████ expressed its support for CRW to implement in the Lower Paxton Creek Planning Area the "Baseline Level of Control" in conjunction with "Local Control Strategy 1: Decentralized Green Stormwater and/or Grey Infrastructure Controls." ██████████ further expressed its support for designating the Bellevue Park ponds as a Strategic Implementation Area, including retrofit of the existing Bellevue Park ponds. ██████████ additionally supported implementation of Green Stormwater Infrastructure (GSI) within the ██████████ neighborhood.</p>	<p>Comment received/Suggestion noted</p>

Comment Number	Comment	CRW Response
	<p>Continued</p> <p>█ supports CRW's efforts to generate the revenue necessary to properly manage water quantity and quality in the City of Harrisburg through implementation of the City Beautiful H2O Program Plan. Stormwater utilities fees are increasingly recognized as the most equitable approach to address state and federal water quality/quantity regulatory requirements. Unlike the current water billing system, the fee will be applied to all property owners that have impervious surfaces which generate stormwater. CRW's tiered fee structure recognizes the financial hardship experienced by Harrisburg's lower income residents, and seeks to balance that with the fiscal realities of restoring the City's inadequate water infrastructure system.</p> <p>In summary, █ supports the adoption of the Stormwater Fee proposal to generate the revenues required to implement CRW's City Beautiful H2O Program Plan. Implementation of that Plan is necessary to meet state and federal regulatory requirements. But more importantly, it is necessary to provide a safe and healthy environment for Harrisburg residents and a modern water infrastructure system to support business growth.</p>	

September 25, 2019

Charlotte Katzenmoyer, Chief Executive Officer  
Capital Region Water  
212 Locust Street, Suite 500  
Harrisburg, Pennsylvania 17101

**Re: Stormwater Fee Proposal and Implementation Plan**

Dear Ms. Katzenmoyer:

We, the undersigned members of the [REDACTED] [REDACTED] [REDACTED] thank Capital Region Water (CRW) for the opportunity to provide comment on the Stormwater Fee Proposal and Implementation Plan.<sup>1-2</sup> Workgroup members support federal, state, and local policies that protect and restore Pennsylvania's water resources, especially the many miles of waterways impacted by polluted runoff from storm events. Several Workgroup representatives have been involved throughout CRW's stakeholder process, have membership served by CRW and/ or have offices in Harrisburg that will be assessed a fee. The proposed stormwater fee can provide CRW with a dedicated and reliable funding source to implement the City Beautiful H2O Program Plan (Program),<sup>3</sup> to comply with regulatory requirements established in the Partial Consent Decree for the Combined Sewer Overflows (CSO), the Municipal Separate Storm Sewer System (MS4) permit, and other legal and regulatory requirements

In general, we are supportive of the proposed stormwater fee. The fee is a step consistent with CRW's commitment to address stormwater impacts to Paxton Creek and the long-neglected infrastructure of Harrisburg's combined sewer system (CSS). Managing stormwater runoff and reducing overflows into Paxton Creek and the Susquehanna River will improve water quality, public health, and community wellbeing. We applaud CRW's efforts of being inclusive of the community and stakeholders, establishing the Community Greening Plan for green stormwater infrastructure (GSI)<sup>4</sup>, and implementing early action projects to manage stormwater runoff.

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<sup>1</sup> Capital Region Water. 2019. Rate Restructuring- Stormwater Fee: Recommendations for Funding the Stormwater Management Costs of our City Beautiful H2O Program. Available at <https://capitalregionwater.com/wp-content/uploads/2019/07/2019-06-26-Rate-Restructuring-Stormwater-Fee-1.pdf>

<sup>2</sup> Raftelis. 2019. Stormwater Fee Proposal and Implementation Plan. Available at <https://capitalregionwater.com/stormwater-fee/>

<sup>3</sup> Capital Region Water. 2018. City Beautiful H2O Program Plan. Available at <https://capitalregionwater.com/full-plan/>

<sup>4</sup> Capital Region Water. 2017. Community Greening Plan: A Green Stormwater Infrastructure Plan for Harrisburg. Available at [https://capitalregionwater.com/wp-content/uploads/2017/04/Community-Greening-Plan\\_FINAL\\_smallest.pdf](https://capitalregionwater.com/wp-content/uploads/2017/04/Community-Greening-Plan_FINAL_smallest.pdf)

***There is a demonstrated need for a stormwater fee in Harrisburg.***

Harrisburg is a highly urbanized city with significant impervious land cover, representing unmanaged stormwater. In addition, much of Harrisburg's sewage is collected and conveyed with stormwater in a combined sewer system. During heavy precipitation events, the system will reach its capacity, due to excess stormwater, and then discharge untreated sewage into Paxton Creek and the Susquehanna River. Further complicating the problem, CRW inherited a system with a legacy of deferred maintenance and neglect. Without investments in wastewater and stormwater infrastructure, raw sewage discharges, polluted waters, flooded basements and streets, and sinkholes will continue to plague the city and its residents. Under recent regulatory requirements, Harrisburg must address these issues instead of continuing the business as usual approach of letting the problems and costs continue to escalate. Based on the Program's cost estimates and financial capability and affordability analysis, the Stormwater Fee Proposal and Implementation Plan calculates the price tag of implementation at \$315 million over 20 years. These investments in water infrastructure projects will improve quality of life, local waters, and reduce the mounting costs associated with letting the problems continue.

***The proposed stormwater fee is an equitable approach.***

In the Workgroup's 2018 letter on the draft City Beautiful H2O Program Plan, we recommended that CRW develop a stormwater fee based on impervious surface, and encouraged CRW to "look at fees, grants, incentives, public cooperation, and public-private partnerships to assist in reducing the stormwater overflow in the system." We believe setting stormwater fee rates based on impervious surface is an equitable approach to determine a property's fee. And, it is a proven approach for many cities across the nation. Stormwater runoff begins when precipitation cannot infiltrate into the ground due to impervious surfaces. Establishing a rate based on the amount of impervious surface is a fair way to charge, because it aligns with the amount of stormwater a ratepayer's property generates. The more impervious surface, the greater stormwater runoff generated and the higher the fee. Without a dedicated stormwater fee, the Stormwater Fee Proposal and Implementation Plan demonstrates that wastewater rates will increase, costing residents more than the proposed stormwater rate. Not only do we believe the proposed rate system to be equitable, 86% of respondents to the Community Greening Plan agreed.

***Green stormwater infrastructure provides cost savings and community benefits.***

Green stormwater infrastructure practices are effective at managing stormwater onsite and can provide a cost savings. In fact, CRW's analysis shows investing in GSI, as opposed to only gray infrastructure, can save ratepayers millions of dollars while still reducing stormwater volume. Other cities, such as Philadelphia and Lancaster, are installing GSI practices to comply with CSO requirements because they determined GSI to be an effective, cost savings approach to address stormwater while providing additional benefits to the community. The EPA acknowledges the benefits and cost savings of GSI to address CSOs and has produced guidance to assist in this approach.<sup>5</sup> In the Workgroup's 2018 letter to CRW on the draft City Beautiful H2O Program Plan, we advocated for a "green first" approach to project planning of each CSS management action to ensure the benefits of GSI are attained through GSI incentives, investment and installation whenever feasible."

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<sup>5</sup> U.S. Environmental Protection Agency. Greening CSO Plans: Planning and Modeling Green Infrastructure for Combined Sewer Overflow (CSO) Control. Available at [https://www.epa.gov/sites/production/files/2015-10/documents/greening\\_cso\\_plans\\_0.pdf](https://www.epa.gov/sites/production/files/2015-10/documents/greening_cso_plans_0.pdf)

***The rebate and credit program will incentivize GSI on private property.***

We are supportive of the proposed credit opportunities available in the proposed stormwater fee program. Credit programs allow ratepayers an opportunity to reduce their fee, which can generate more local support to fee programs. Additionally, credit programs incentivize the adoption of GSI on private land. This can assist GSI program goals by increasing the potential land available for GSI practices outside of limited publicly-owned land. We commend CRW for early outreach programs with the largest landowners of impervious surface to discuss ways they can install GSI to reduce impervious land cover and their monthly bills.

We note that the only credit available to residential ratepayers is a 10% credit for removing downspouts from storm sewers. We believe that this one measure is insufficient to encourage residential ratepayers to become stakeholders in the stormwater reduction program. We encourage CRW to consider ways additional credits and rebates may be extended to residential ratepayers. Grant or partial credit programs to help residents install practices such as rain gardens, flow-through planters and tree plantings, like those implemented in Lancaster, may help to alleviate affordability issues, particularly for low income residents. We note that the consultant report shows that Derry Township has offered additional credits to residential ratepayers. While we are aware that there are administrative costs in offering a credit programs, we believe that this extra cost is necessary to ensure a broad stakeholder community that will assist CRW in making the stormwater reduction program a success.

***Monthly bills should have an itemized description of the fee to identify the value of stormwater management to ratepayers.***

We encourage CRW to use a clear descriptor for this newly billed service. The term 'stormwater fee' is often confused as a new tax, despite its intent as a user fee for stormwater management services. A clearly defined line item descriptor may help ratepayers better understand. Furthermore, the stormwater fees collected by CRW under this new rate must only be used to fund stormwater and CSO improvements. This will ensure credibility and accountability to ratepayers.

***CRW consistently puts community first.***

Lastly, we commend CRW for putting community first. Community improvement, benefit and affordability are at center of CRW's work. Since the formation of CRW, the needs and concerns of the local community have been at the forefront of CRW's work. The Community Greening Plan, informed by the community, assesses where and how investments in GSI can benefit the community. CRW also began a robust community outreach program during this time. The Community Ambassador program engages residents across the city and, in turn, provides local voices to share information with the community. CRW is also engaged in developing ways local community members can be trained to fulfill jobs as staff retire and the City Beautiful H2O program grows. We acknowledge CRW's attention to community engagement and support further efforts to engage residents throughout the 20-year plan.

We commend CRW for its current investments already underway to update aging infrastructure and install new GSI throughout Harrisburg. These efforts demonstrate CRW's commitment to the community, innovative thinking, and represent a 'down payment' towards the future projects to come. We support CRW's efforts to expand on Green Parks, Green Streets, and Green Neighborhoods, and further encourage CRW to continue to prioritize GSI solutions.

We thank you for the opportunity to provide comment on the Stormwater Fee Proposal and Implementation Plan. We feel the proposed fee is equitable and will provide a much-needed dedicated source of revenue to upgrade failing infrastructure and benefit Harrisburg with GSI practices.

Sincerely,

[Redacted signature]

[Redacted signature]

[Redacted signature]

[Redacted signature]

INITIAL PUBLIC COMMENT OF  
THE CITY OF HARRISBURG  
ON THE STORMWATER FEE PROPOSAL  
AND IMPLEMENTATION PLAN OF JUNE 19, 2019  
ISSUED BY AND ON BEHALF OF  
CAPITAL REGION WATER

SUBMITTED: SEPTEMBER 25, 2019

ERIC PAPENFUSE, MAYOR  
CITY OF HARRISBURG  
THE REV. DR. MARTIN LUTHER KING,  
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## **CITY OF HARRISBURG**

### **COMMENTS**

A Stormwater Fee Proposal and Implementation Plan (hereinafter “the RAFTELIS PROPOSAL”)<sup>1</sup> was prepared for Capital Region Water (CRW) and, thereafter, publicly issued on or about June 19, 2019. The public release of the RAFTELIS PROPOSAL triggered a comment period that CRW has scheduled to close in conjunction with their monthly public meeting on September 25, 2019. Consistent with general practices in administrative and regulatory undertakings, the following preliminary comments are now made in response thereto by the City of Harrisburg (the City), the sole initiating and appointing authority for the municipal authority.

The Comments that follow are intended as preliminary observations, as the City finds the proposal at issue to offer a hazy framework of the Authority’s plans and needs for stormwater management, be it operational, project designs, construction or financial planning for this most serious undertaking. The comments are not intended to be in order of priority, but instead provide a mix of observations, concerns, and suggestions.

1. The City recognizes and acknowledges the significant obligations that are placed on municipal authorities and various political subdivisions throughout the Commonwealth of Pennsylvania for sound environmental stewardship, including CRW and the City.
2. Compliance with the statutory and regulatory mandates established through the federal Clean Water Act and the Pennsylvania Clean Streams Law are of paramount importance, presenting monumental challenges throughout the Commonwealth of Pennsylvania for our municipal authorities and political subdivisions, including CRW and the City.
3. The City concurs that the longstanding regulatory drivers identified in Section 1.2.1 of the RAFTELIS PROPOSAL are the necessary starting point for an analysis of a stormwater management plan and any related fee proposal.

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<sup>1</sup> The proposal was prepared by RAFTELIS for the municipal authority.

4. The City concurs in substantial part with the key issue identified in Section 2.1 of the RAFTELIS PROPOSAL “that CRW will need to establish . . . how much annual revenue will need to be generated . . . to comply with . . . [applicable] regulations. . . . [and] what CRW must do to effectively manage its stormwater system and meet its regulatory obligations.”
5. Notwithstanding the initial promise of the RAFTELIS PROPOSAL’s opening framework, Section 2.1 reveals the fundamental deficiency in the consultant’s methodology in developing a Plan. They acknowledge that for purposes of their report, “program cost elements were identified based on input from CRW and from stormwater-related work completed by other consultants to CRW.” By artificially limiting the source of information for its “study” to assist in the formation of a fee implementation plan for addressing stormwater issues in all or part of CRW’s service area -- by limiting input to only its client and the client’s other paid consultants -- the informational foundation of the PROPOSAL is incomplete and thereby critically flawed.
6. The City reads the RAFTELIS PROPOSAL as failing to adequately identify the factual bases for its fee recommendations, including failing to identify the scope of CRW’s obligations to manage stormwater issues, and obviously relies upon unstated assumptions that appear to lead to pre-determined results. In other words, the report appears limited to a consultant delivering a result they perceive their customer (CRW) wants instead of independently confirming what the customer needs to satisfy its significant regulatory obligations.
7. For a fee implementation plan, it should have been understood that there would be necessary and desired input -- the advice and insight of the governing regulatory bodies and the advice and input of CRW’s significant stakeholders, including the general public, the City, the varied educational facilities now within City boundaries, public utilities functioning throughout the City, Dauphin County and the Commonwealth of Pennsylvania and its City-headquartered agencies. It appears the consultants overlooked or avoided those consultations when designing a stormwater fee implementation plan for a public body. Perhaps this public

comment period can correct that design flaw, but the public has but a single fee implementation plan upon which to comment, other options and components are not on the table for public review.

8. The RAFTELIS PROPOSAL employs the significant assumption that 8.85 acres of land per year will be added to “Green Stormwater Infrastructure” (GSI), as “capital-related costs” that will be “cash-funded capital” that are part of the “capital plan” of CRW. The PROPOSAL further assumes a related \$250,000 in capital costs per acre, with little explanation of how the governing assumptions correlate to an actual reduction in stormwater or sewer discharges into our waterways or how these improve water-quality. Nor does the report identify or explain what anticipated capital GSI expenditures are captured in these costs.
9. The RAFTELIS PROPOSAL is unclear if the “acres of GSI” that CRW will add each year represents the target of impacted watershed measures or total actual physical acreage transitioned to GSI. The difference of the two (2) approaches would be fiscally staggering. It is equally unclear if other sectors add such acreage outside of CRW’s future GSI projects whether those improvements will be considered to account for the assumed annual 8.85 acre target.
10. The RAFTELIS PROPOSAL expressly relies on the FY 2019 budget for CRW to inform its projections for future stormwater-related operations and maintenance (O&M) costs for FY 2020 to FY 2022. These are directly cited to support the proposed stormwater fees. In fact, the projections in Table 2-1 show that O&M costs represent a higher annual percentage cost than the related capital costs for which the fee would be imposed.

Presently, the very same O&M costs set to be captured by a new fee structure already gets captured in CRW’s current water and sewer rates. Those current costs are spread across the entire rate-base. All of those current O&M costs, or at least a significant portion, would be re-categorized under the proposed fee implementation plan and simply re-captured in secondary stormwater management budget. That transfer of current budgeted expenses to a narrower portion of the CRW rate-base

within City boundaries is poised to occur with no projected corresponding decrease in the current approved water and sewer rates.

CRW appears poised to continue not only to charge the current water and sewer rates to its customer-base (including those in Harrisburg), but also to increase those rates after removing current O&M expenses from the rate structure. The approach is problematic. It masks what must be an internal perception of an inadequate rate structure or some proposed immediate dramatic increase in CRW staffing and/or professional consulting expenses in January 2020.

11. The RAFTELIS PROPOSAL ignores a fundamental pillar of new governmental fee structures, in that the imposition of a new universal fee in a limited geographic boundary will be passed on to the same residential rate-base/tax-base required to pay the new fee. A homeowner or business owner in the City will not only bear the cost of the new direct fee without a corresponding decrease in their monthly water and sewer charges, but thereafter underwrite the additional expense to the other entities paying the new fee, be it the City, County, School District, university, private school, health care facility, grocer, restaurant, gas station, convenience store or daycare provider.

Each of these entities will be forced to increase revenues or reduce services to incorporate this new expense into their operations because current revenues of each are committed to existing obligations.

The City does not pretend there exists a universal fix to avoid that impact, but nonetheless, must insist that any such impact represents a plainly identifiable factor in structuring a stormwater fee plan. It is not in the plan presented for comment.

12. The RAFTELIS PROPOSAL methodology for CRW making “impervious area” calculations are not plainly identified. For instance, Figure 3-3 reports conclusions on “Impervious Areas of Other Non-Residential Property Types” (representing the largest category of holders of impervious areas), but then postulates a 100.10 % impervious area upon an examination of the sub-categories. While we assume that drafting error

will be corrected, the illustrates that the reliability of the underlying data is unknown.

Just as government-imposed weights and measure obligations have long been subject to confirmation with each entity upon whom the obligations are imposed, a verifiable measure or test of some type for impervious area must be part of any stormwater management plan relying upon fees tied to impervious area. The impervious service of each parcel of land in the service area is a knowable fact. When a governmental body undertakes to connect a fee to that factor, how the physical attributes of each parcel get assessed by the government matters. How the measures proposed were made and confirmed under this fee implementation plan is hazy at best.

13. The City recognizes and acknowledges that a stormwater management fee will be necessary to satisfy the important environmental obligations of municipal authorities and political subdivisions, including CRW and the City, but the fee structure and implementation must be better informed. It must be predicated on concrete stormwater management plans that demonstrably meet CRW's obligations.

14. Most significantly, the proposed 3-year projection of stormwater fees only reflects payment for O&M and capital expenditures for GSI. The RAFTELIS PROPOSAL does NOT make any indication that it relies on a stormwater management plan that can satisfy the "regulatory drivers" identified at the front of their report. It's limited to those assumed GSI goals. Gardens obviously don't fix the problem. The report reflects a 20-year GSI goal of 177 acres, without mention of a target to satisfy the mandated control measures, sediment control, discharge reductions or other obligations. The City finds the recommendations, as framed, to be materially disconnected from any plan to meet local environmental obligations.

15. Even an informal review of other municipal efforts to *implement a stormwater management plan* -- as opposed to implement a plan on how to impose a stormwater management fee -- reveals that intergovernmental cooperation must be a key element to stormwater management. Philadelphia Water, for example, adopted regulations that identify a wider

array of property owners with impervious areas, including governmental entities, charitable institutions, and more.

16. The Harrisburg area requires a stormwater management plan – not merely a stormwater fee implementation plan – one that has been subject to public comment and real input from the wide variety of stakeholders that live, work and play here and those who provide for the health, safety and welfare of the stakeholders.
17. The City is specifically concerned that expenditures of stormwater fees paid by the City's tax-base be focused on stormwater management projects that can be measured and, thereby, demonstrate that the use of such funds help satisfy the significant regulatory obligations that drive stormwater management planning. That essential control feature is not evident or acknowledged within the RAFTELIS PROPOSAL.
18. An opportunity for other large customers to assist CRW and the City in meeting stormwater goals through expenditures on structures, surfaces and operational modifications that provide a measurable benefit for the environmental health of our waterways and thereby reduce the governmental burden should be explored as a long-term source of improvement that rests outside a fee structure. It should be part of stormwater management plan that decreases the funds required to be captured through a stormwater management fee
19. The City reserves the right to provide additional comment on this Plan, the imposition of the stormwater fee, any capital plan to utilize the proposed fees, the necessary appeal and credit process and, ultimately, the stormwater management plan.

