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June 13, 2019

Via email: klrowles@gmail.com

City of Decatur
Attn: Kristin Rowles, Policy Works, LLC
509 N. McDonough St.
Decatur, GA 30031

Re: Comments on Decatur Stormwater Master Plan Update

Dear Ms. Rowles:

Friends of Shoal Creek (FoSC) is a coalition of neighbors in the Oakhurst and Winnona Park neighborhoods in Decatur. Our coalition has formed to protect the natural and ecological resources in the Shoal Creek watershed. FoSC appreciates the opportunity to comment on the City of Decatur's ongoing update to its Stormwater Master Plan (SMP).

FoSC is concerned with the various well-known impacts of stormwater that result after heavier rainfall events, including flooding that may damage private property and ecological resources, and water quality concerns (e.g., washing of roadway and related contaminants directly into waterways, as well as turbidity and suspended sediment from flooding events). FoSC is supportive of all reasonable efforts the City can take, with public input and support, to reduce these impacts to the City's waterways, including Shoal Creek.

However, FoSC's primary and overriding concern at this time is the significant overflows from the sanitary sewer system which results after heavier rainfalls. Yellow signs documenting sewage spills are a commonplace sight down near the Green Street PATH along Shoal Creek, and have been for years. Raw sewage is regularly being spilled into public waterways, and this issue continues to recur with heavy rainfalls. This ongoing discharge of contamination into public waters is, of course, unacceptable, and the City should use all measures within its power to

mitigate this ongoing source of pollution. The continued contamination from sewer overflows is of far greater concern than the “typical” issues presented by stormwater runoff (e.g., typical flooding events, roadway contamination and yard runoff). Reducing sewer system overflows should be a primary priority in the revisions to the SMP, until this issue is resolved by efforts from both the City and DeKalb County.

FoSC is aware that DeKalb County is primarily responsible for the maintenance and upkeep of sanitary sewer system. Accordingly, it is our understanding that direct repairs to the sewer system by the City are not possible. However, the City does have direct jurisdiction and control over stormwater, which is a primary cause of sewage overflows. Infiltration of stormwater into cracked and pervious sewer pipes is a direct contributor to the recurrent overflows. When the City’s stormwater runoff causes flooding or infiltration into sewage pipes, it causes sewage to spill into public waterways. The City is not able to look for a resolution of this issue solely from the County, because absent flooding and stormwater infiltration (over which the City has jurisdiction), the sewage overflows would not occur. Accordingly, the City should bear responsibility for addressing its share of this collective problem.

FoSC therefore requests the City make reducing sewage overflows a primary priority in the SMP. Specifically, locations where there is documented sanitary sewer overflow or leakage should be made a primary criteria to identify top priority actions to reduce flooding, runoff, and stormwater infiltration. Particular priority should be given to areas of spillage into public waterways, as occurs frequently into Shoal Creek at Green and S. McDonough Streets.

Fortunately, addressing sewage overflows is consistent with the overall goals of the SMP, including improving water quality and reducing flooding. However, if the City does not deliberately prioritize areas of sewer overflow, limited City resources will not be used to greatest effect.

In fact, by targeting areas of sanitary system overflow, the City can achieve an advantageous multiplier effect in deployment of limited stormwater funds. Expenditures prioritized to address sewer overflow will address three problems at once: 1. flooding reduction, 2. reduction in contamination from “typical” runoff sources, and 3. reduction in sewer overflows.

FoSC appreciates the extensive time and effort the City is devoting to the issue of stormwater. We thank you for your attention to our comments, and look forward to continuing to work with the City to improve the quality of life and environmental conditions in our community.

Best regards,

Friends of Shoal Creek