

## D Kelly O'Day

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**From:** "D Kelly O'Day" <dkod@comcast.net>  
**Date:** Wednesday, April 02, 2014 9:34 AM  
**To:** "Mayor Nutter" <Michael.Nutter@phila.gov>; "Rina Cutler" <rina.cutler@phila.gov>; "Richard Negrin" <Richard.Negrin@Phila.gov>; "Howard Neukrug" <Howard.Neukrug@phila.gov>; "David Perri" <David.Perri@phila.gov>; "Michael DiBerardinis" <Michael.Diberardinis@Phila.gov>; "Donald Carlton" <Donald.Carlton@phila.gov>; "Chris Crockett" <Chris.Crockett@phila.gov>; "Joanne Dahme" <joanne.dahme@phila.gov>  
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**Attach:** T-14 Building Litter.pdf  
**Subject:** Example of Inadequate Litter/Floatables Control at a Philadelphia Facility

Philadelphia's stormwater NPDES permits require the City to control stormwater related litter/floatables discharges for both CSO and MS4 areas. I have advised you previously about street litter- trash in Tacony's Frankford Creek creek. While Philadelphia has embarked on an ambitious and laudable green stormwater infrastructure program, I am very concerned that the most basic litter/floatables controls are not being properly addressed by the City.

I have conducted a simple photo survey of the City's T-14 control Building to demonstrate my concern. This Philadelphia owned building, located at I & Ramona in the TTF watershed, is surrounded by litter, as shown in this photo. The attached PDF includes additional photos and a map of the vicinity.



This next photo shows an unscreened drainage channel to the left of the building when facing the front doors.



This channel carries stormwater as well as litter/floatables from the street directly to Tacony â€™ Frankford Creek, as shown in these next 2 photos.





This is an example of inadequate litter/floatables control. Street litter directly flows to the Tacony-Frankford Creek.

City agencies must take the lead in designing and building floatables free stormwater facilities by either trapping/ netting the material or implementing effective street cleaning. Philadelphia's Water, Streets and Parks & Recreation Departments have joint responsibilities in this situation: PWD as the building owner, Parks & Recreation as the adjacent land owner and Street Department as the responsible litter control agency.

Philadelphia's litter/ floatables program can seem overwhelming to all of us. I would like to propose that Philadelphia begin a renewed litter/floatables control program by focusing on City properties to ensure that the areas around these properties reflect what we would expect "good neighbors" to maintain in the City. It is hard to criticize busy, financially strapped homeowners and businesses for not keeping their areas litter free when the City lets its properties be littered. While only a small step, getting City properties up to an acceptable level of litter/floatables control will demonstrate the City's commitment to a Clean, Green City.

Philadelphia will be submitting the FY 2014 Wet Weather Program Report for the year ending June 30, 2014 later this summer. I request that Philadelphia, EPA III and PaDEP meet to develop a phased approach to getting Philadelphia's City-owned properties litter/floatables under control. This phased plan could be included in the FY 2014 report. I would appreciate the opportunity to attend such a meeting as a Philadelphia citizen.

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