ANACOSTIA WATERSHED CITIZENS ADVISORY COMMITTEE

Dedicated to the protection and restoration of the Anacostia River and its tributaries

June 4, 2010

Jon M. Capacasa, Director
Water Protection Division (3WP00)
US EPA Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

RE: DCMS4 permit

Dear Mr. Capacasa:

The Anacostia Watershed Citizens Advisory Committee has reviewed the draft stormwater permit for the District of Columbia and believes it is a great improvement over the existing permit. Our comments on the draft permit are as follows:

1. DDOT – sidewalk installation and trees program

DDOT has adopted a policy of installing sidewalks for every street. This will mean the removal of trees and an increase in imperviousness.

The permit should specify that anytime that the District Department of Transportation increases the impervious area of a street that they shall provide an equal offset in infiltration capacity or detention capacity such that there is no net increase in peak storm flows to the waters of the District. This shall be above and beyond any already required installation of "water quality catch basins". All trees destroyed during sidewalk construction should be replaced in a manner that compensates for the fact that the destroyed trees will most likely be mature trees.

2. BMPS – remove trash

The permit should insure that any BMPs to be installed as a requirement of the permit are constructed such that they will also remove trash. This should include buoyant materials, high density materials, and neutrally buoyant materials. The District Department of the Environment BMP manual should be upgraded to ensure that all recommended BMP's will remove trash.

3. Percent of stream miles trash free

The permit should include a schedule by which trash free stream miles are achieved.

c/o Metropolitan Washington Council of Governments
777 North Capitol Street, NE, Suite 300
Washington DC 20002-4329
anacostia@mwcog.org

4. WASA -catch basin review

Many of the catch basins become filled with trash very quickly and others are less heavily loaded. It is very clear that the once per year cleaning is not the optimum schedule for pollution control. WASA should be required to perform a study of the optimum frequency of cleaning catch basins.

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5. DDOT-street sweeping

The Anacostia River has approved TMDL's for over twenty pollutants. Conventional street sweepers do not collect very much of the pollutants from the streets and most of the streets are seldom swept. The Department of Public Works should be required to convert to high efficiency street sweepers for the MS4 areas draining to the Anacostia River. The existing street sweeper can be used for the CSO areas and other drainages.

6. WASA-outfall repair

The Anacostia River is severely impaired by Total Suspended Solid and a TMDL has established load allocations. WASA has an unaccounted for and uncontrolled source of TSS from many of their outfalls which are in serious disrepair and are causing excessive erosion and solids transport to the Anacostia. WASA should be required to prioritize the 2006 survey of outfalls and submit for approval a schedule of repairing the damaged outfalls and eliminating the violations of the load allocations.

Below are photos of outfall # 1071 in the WASA Survey in the Fort DuPont drainage downstream from Burns and Ridge Road intersection. The note in the column "U" of the WASA Survey says "structure completely destroyed". This has been documented by Metropolitan Washington Council of Governments in their report of the Ft DuPont watershed and by the Anacostia Watershed Society in their report on trash reduction strategies for the Anacostia River. Stormwater exiting this failed outfall structure is causing massive amounts of TSS to be entrained and transported downstream contributing to the violations of water quality standards in the Anacostia River.

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7. Dead end "T"s

There are a significant number of roads and streets that end in "T"s at the boundary of parklands. Stormwater is uncontrolled and sheet flows down the street and through the T, causing severe erosion in the parkland. This erosion may contribute to the load of TSS into the Anacostia and is a part of the load allocation that needs to be controlled. The District should be required to perform a survey of such intersections and identify those with erosion problems that cause water quality degradation.

The Anacostia Watershed Citizens Advisory Committee appreciates the opportunity to comment on the draft MS4 and believes that the permit will contribute to a cleaner Anacostia River.

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Sincerely,

Mike R. Smith, 2009 - 2010 AWCAC Chair

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