



GOVERNMENT OF THE DISTRICT OF COLUMBIA

Advisory Neighborhood Commission 2E

Representing the communities of Burleith, Georgetown, and Hillandale

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December 4, 2018

Ms. Lisa Mendelson-Ielmini
Acting Regional Director, National Capital Region
National Park Service
1100 Ohio Drive SW
Washington, DC 20242
Lisa_Mendelson-Ielmini@nps.gov

Mr. David Gadis
CEO and President
DC Water
5000 Overlook Avenue SW
Washington, DC 20032
dccleanrivers@dcwater.com

RE: The Potomac River Tunnel Environmental Assessment Prepared by the National Park Service in Cooperation with DC Water

Dear Ms. Mendelson-Ielmini and Mr. Gadis,

On December 3, 2018 ANC 2E held its regularly scheduled public meeting, which was properly noticed and attended by seven commissioners, constituting a quorum. At this meeting the Commission adopted the following resolution by a vote of (6-0-1) with regard to the above-referenced matter:

ANC 2E has reviewed the DC Clean Rivers Project Potomac River Tunnel Environmental Assessment dated October 2018 (the "EA"), which was prepared by the National Park Service in cooperation with the District of Columbia Water and Sewer Authority ("DC Water").

ANC 2E notes that the EA reflects DC Water's plan to install so-called Green Infrastructure ("GI") to control combined sewer overflows from three sewersheds in ANC 2E (CSOs 27, 28, and 29) if DC Water determines that use of GI for this purpose is "practicable."

The EA describes the proposed GI measures in very cursory fashion and says only that, "[d]etailed facility siting and design have not been performed for the level of GI implementation required . . . should GI be determined practicable."

The EA fails to disclose what, if any, objective criteria DC Water would use to determine whether the installation of GI in the identified sewersheds would be practicable.

ANC 2E notes, however, that the Amended Consent Decree mandates that DC Water consider, among other things, the public acceptability of GI when determining the practicability of the use of GI in the sewersheds connected to CSOs 27, 28, and 29.

COMMISSIONERS:

Ed Solomon, District 1 Joe Gibbons, District 2 Rick Murphy, District 3
Lisa Palmer, District 5 Jim Wilcox, District 6
Monica Roaché, District 7 Zac Schroepfer, District 8

Subject to comments from Georgetown University and a determination of the constructability, operability, efficacy, and cost per impervious acre of the GI proposed for CSO 29, ANC 2E does not object to further consideration of the use of GI in the sewershed that flows into CSO 29.

The sewershed connected to CSO 28 is relatively small. ANC 2E opposes the installation of GI in this sewershed and requests that DC Water consider other alternatives for controlling overflows from CSO 28, including sending overflows to the Upper Potomac Interceptor sewer.

The EA indicates that if GI is determined to be practicable, DC Water proposes to use GI to abate storm water runoff from 31 acres of impervious acres in the sewershed connected to CSO 27. As previously noted, the EA does not disclose exactly what facilities would be constructed and where those facilities would be sited, but it is indisputable that the installation of GI in the CSO 27 sewershed would, among other things, have a severely negative impact on the Georgetown National Historic Landmark District.

ANC 2E firmly opposes the use of so-called Green Infrastructure to control overflows in the CSO 27 sewershed and notes again that public acceptability is a critical factor in the practicability analysis mandated by the Amended Consent Decree.

According to the EA, the only alternative approach to addressing overflows in CSO 27 would be connecting CSO 27 to an extended Potomac River Tunnel, which would require construction of "gray infrastructure" facilities in or near the Georgetown Waterfront Park and along Water Street NW. ANC 2E applauds DC Water's efforts to reduce the intrusiveness of the proposed facilities, and supports the preferred construction options described in the EA. To be clear, however, ANC 2E opposes the construction of any "gray infrastructure" facilities on park land and would oppose any construction plan that contemplates the closing of Water Street and does not adequately address the impact that major construction would have on the residents of the area of Georgetown south of the C&O Canal and west of Wisconsin Avenue NW.

ANC 2E requests that DC Water consider alternatives that would eliminate the need for the construction of any structures in the park or along Water Street NW. In that connection, ANC 2E supports the location of the proposed Emergency Surge Relief Pipe west of the Aqueduct Bridge and asks DC Water to consider alternatives to the "gray infrastructure" facilities described in the EA. In particular, ANC 2E requests that DC Water give serious consideration to the possibility of sewer separation in the areas of the CSO 27 sewershed that lie south of M Street NW. Separating sewers in this area could render it unnecessary to connect the CSO 27 sewershed to the Potomac River Tunnel.

ANC 2E requests DC Water to give consideration to other alternative measures proposed by the Citizens Association of Georgetown, the Friends of Georgetown Waterfront Park, and the Georgetown Business Improvement District with the goal of eliminating the need for either GI in the CSO 27 and CSO 28 sewersheds or permanent structures in or near the waterfront park.

ANC 2E contends that the discussion in the EA of DC Water's plans for the siting and construction of structures associated with CSO 24 is woefully inadequate in light of the fact that any construction in or near K Street east of 30th Street NW would have a profoundly negative impact on the entire Georgetown community. As has been suggested by the Citizens Association of Georgetown, the EA should include a discussion that is glaringly absent: a thorough assessment of the potential impact on traffic flows in lower Georgetown if major construction in this area were to be undertaken.

To summarize, ANC 2E is firmly opposed to the installation of Green Infrastructure in CSOs 27 and 28, and is equally opposed to construction in K Street and Water Street NW as currently described in the EA. Therefore, ANC 2E requests that DC Water rethink the plans for major construction in lower Georgetown to identify ways to minimize impacts on the Georgetown Waterfront Park and the entire historic district, its businesses, and its residents.

Commissioners Rick Murphy (2E03@anc.dc.gov) and Joe Gibbons (2E02@anc.dc.gov) are the Commission's representatives in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joe R. Gibbons", with a long horizontal flourish extending to the right.

Joe Gibbons
Chair, ANC 2E