

EPA INTERIM EVALUATION OF THE DISTRICT OF COLUMBIA'S 2014-2015 MILESTONES

The U.S. Environmental Protection Agency (EPA) is providing this interim evaluation of the District of Columbia's progress towards meeting its 2014-2015 sector-specific milestones and Watershed Implementation Plan (WIP). The Chesapeake Bay restoration operates through a measurable accountability framework. This framework includes the WIPs, annual progress reviews, and two-year milestones. Jurisdictions have the opportunity to adaptively manage their plans and make necessary adjustments to stay on track within this framework and at the midpoint assessment. In 2016, EPA will evaluate whether the District achieved its 2014-2015 milestones and has commitments to achieve the Chesapeake Bay Program (CBP) partnership goal of practices in place by 2017 that would achieve 60% of the nitrogen, phosphorus and sediment reductions necessary to achieve water quality standards in the Bay compared to 2009.

Load Reduction Review

When evaluating 2014-2015 milestone implementation, EPA is comparing progress to expected pollutant reduction targets to assess whether statewide and sector load reductions are on track to have practices in place by 2017 that will achieve 60% of necessary reductions compared to 2009. According to the data provided by the District of Columbia for the 2014 progress run, the District is on track to meet the 2017 targets for nutrients and sediment. Among source sectors, the District of Columbia is on track to meet nutrient and sediment targets for wastewater. The urban sector missed source targets for nutrients and sediment. EPA expects new information as appropriate will be used in the development of future milestones, which is consistent with the adaptive management framework.

2014-2015 Milestone Achievements

Urban/Suburban Stormwater – Ongoing Oversight

- The District of Columbia Stormwater Management Plan Tracking Database is currently in and use and continues to be enhanced to include additional functions.
- The District continues to make steady progress implementing RiverSmart Program.
- The District met and exceeded its estimated square feet of green roof installation.
- The District is using and reporting data on best management practices (BMPs) installed by homeowners based upon the Chesapeake Bay Program (CBP)-approved protocol.
- The District made significant progress toward stream restoration its milestone.
- The District met and exceeded its target for urban tree planting in 2014.
- The District has made great progress in getting BMP reporting data from federal agencies.

Wastewater Treatment Plants and Onsite Systems – Ongoing Oversight

- The District met its milestone for construction of Enhanced Nutrient Removal (ENR) facilities at Blue Plains.
- The District appears to be on schedule to begin compliance with the total nitrogen effluent limit.

Offsets and Trading – Ongoing Oversight

- The District did not provide any specific milestones related to its offsets program. Various elements of the offsets and fee in lieu program are included in other milestones. (See stormwater accomplishments above)

Improvements to Meet 2014-2015 Milestones and Maintain WIP Progress

Urban/Suburban Stormwater – Ongoing Oversight

- Pollutant reductions from the urban sector are not on track to meet the 2017 and 2025 goals. EPA expects future implementation levels to increase and get the urban sector back on track based on compliance with the District's Stormwater Regulations and additional efforts by the District and Federal Agencies.
- EPA recommends that the District report its progress for implementing stormwater BMPs associated with the new construction, redevelopment and retrofits in accordance with the methods approved by the CBP partnership in 2012.
- EPA expects the District to enter into discussions with EPA related to the life cycle of credits as part of its efforts to renew its municipal separate storm sewer system permit in 2016.

Wastewater Treatment Plants and Onsite Systems – Ongoing Oversight

- None

Offsets and Trading – Ongoing Oversight

- None

Tracking and Verification

- EPA expects all Chesapeake Bay watershed jurisdictions, including the District, to submit a draft best management practice (BMP) verification program quality assurance project plan by June 30, 2015, consistent with the schedule and guidelines adopted by the Chesapeake Bay Program Principals' Staff Committee. EPA further expects the District to begin implementing its BMP tracking, reporting and verification program in January 2016 based upon review and approval by EPA, with full implementation by 2018.
- Continue making improvements to an existing tracking and accountability system or develop a new system for tracking new or increased loads to that it is fully operational by December 31, 2015.
- EPA also expects the District to review and improve its historical BMP record for all sectors, including wastewater discharge information. Jurisdictions should submit draft historical data, along with documentation of methods and assumptions, to the Chesapeake Bay Program Office (CBPO) by June 30, 2015, and final historical data by September 30, 2015, as part of the CBP's midpoint assessment of the Chesapeake Bay TMDL.

Expectations and Recommendations for Development of the 2016-2017 Milestones

Urban/Suburban Stormwater

- None

Wastewater Treatment Plants and Onsite Systems

- EPA will coordinate directly with DC Water to track construction activities related to Blue Plains and the combined sewer separation and will incorporate into future milestones reviews as necessary.

Offsets and Trading

- EPA expects the jurisdiction to continue to identify new sector loads and offset these within the appropriate timeframe and to continue to track and account for these new loads identified in sector growth demonstrations.

Next Steps

- EPA will provide an analysis of 2013 sector load growth demonstration to the District by June 30, 2015. EPA expects the District to update the sector load growth demonstration with new information including EPA's findings during the 2016-2017 milestone period. EPA also expects the District to develop offset regulations and policies if the demonstration shows that new loads are generated and need to be offset.
- EPA will work with federal partners to provide leadership and coordinate with the jurisdictions on WIP and milestone implementation. EPA and jurisdictions are working with federal agencies in 2015 to set federal facility-specific pollution reduction targets for the 2016-2017 milestones and on methods for enhanced reporting of BMPs
- EPA recommends that the District share its milestones with Federal Stormwater Memorandum of Understanding (MOU) partners to discuss how federal agencies can assist in meeting milestones.