

EPA INTERIM EVALUATION OF DISTRICT OF COLUMBIA's 2016-2017 MILESTONES

As part of its role in the accountability framework described in the Chesapeake Bay Total Maximum Daily Load (Bay TMDL) for nitrogen, phosphorus, and sediment, the U.S. Environmental Protection Agency (EPA) is providing this interim evaluation of the District of Columbia's progress toward meeting its statewide and sector-specific two-year milestones for the 2016-2017 milestone period. In 2018, EPA will evaluate whether each Bay jurisdiction achieved the Chesapeake Bay Program (CBP) partnership goal of practices in place by 2017 that would achieve 60 percent of the nitrogen, phosphorus, and sediment reductions necessary to achieve applicable water quality standards in the Chesapeake Bay compared to 2009.

Load Reduction Review

When evaluating 2016-2017 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 percent of necessary reductions compared to 2009. Loads in this evaluation are simulated using version 5.3.2 of the CBP partnership Watershed Model and wastewater discharge data reported by the Bay jurisdictions.

According to the data provided by the District of Columbia for the 2016 progress run, the District is on track to achieve its jurisdiction-wide 2017 targets for nitrogen, phosphorus, and sediment.

The data also show that, at the sector scale, the District is off track for the Urban/Suburban Stormwater sector to meet its 2017 nitrogen and sediment targets. The District is on track to meet its 2017 Urban/Suburban Stormwater target for phosphorus. However, data that are being gathered for the Bay TMDL midpoint assessment could show that changes in levels of effort may be necessary in order to achieve the 2025 targets for all three pollutants. The Phase III Watershed Implementation Plan (WIP), combined with supporting two-year milestones, will address reductions needed from 2018 to 2025.

Urban/Suburban Stormwater – Maintain Ongoing Oversight

2016-2017 Milestone Achievements

- Awarded over \$12 million to develop the Stormwater Retention Credit Purchase Agreement program to mobilize private investment in green infrastructure.
- Provided rebate subsidies for 22,425 square feet of green rooftop, and directly invested in green roofs on several District properties.
- Developed and is utilizing the Riversmart Homes auditing and tracking tool.
- Developed new materials as part of the community outreach efforts for its Riversmart Homes program.
- Completed a stream restoration project for Pope Branch and has begun restoration projects for Springhouse Run and Alger Park.
- Hosted multiple trainings related to various stormwater topics for District employees in 2016.
- Completed the consolidated TMDL Implementation Plan and Revised Monitoring Program Plan in conjunction with its Municipal Separate Storm Sewer Systems (MS4) permit requirements.

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- Planted approximately 14,500 trees in Fiscal Year 2015 and 2016 according to its latest MS4 annual reports.
- Inspected all MS4 outfalls within the 5-year MS4 permit cycle.

Key Areas to Address to meet 2016-2017 Milestones

- EPA expects the District to report milestone progress on developing a fertilizer management demonstration project to document reductions.
- EPA expects the District to report milestone progress for training relevant staff and partners on new verification protocols.
- EPA expects the District to work with EPA to finalize the MS4 Permit in 2017.

Wastewater Treatment Plants and Onsite Systems – Maintain Ongoing Oversight

2016-2017 Milestone Achievements

- District of Columbia Water (DC Water) continued to reduce its overall wastewater volume through improving wastewater collection systems and other efforts.

Key Areas to Address to meet 2016-2017 Milestones

- The District Department of the Environment (DDOEE) will coordinate more closely with DC Water to track and report on wastewater, Combined Sewer Overflow (CSO) annual progress and milestones consistent with the revised language in the draft 2017 Blue Plains Permit.

Offsets and Trading - Maintain Ongoing Oversight

2016-2017 Milestone Achievements

- Stormwater Retention Credit Program operates within the District's Phase I MS4 Permit.

Key Areas to Address to meet 2016-2017 Milestones

- Blue Plains wastewater treatment plan Permit is being reissued. EPA and DDOEE need to coordinate and develop specific and clear permit language regarding the DC Water requirement to provide flow capacity estimates to DDOEE in relation to projecting growth for the District's Phase III WIP.

Potential Federal Actions and Assistance

- EPA will facilitate an annual coordination call to ensure that progress data for wastewater is on track and will be reported to EPA on a timely basis.

Suggested Considerations for Development of the Phase III WIP and 2018-2019 Milestones

Any recommendations in this section for the Phase III WIP and 2018-2019 milestones are in addition to the Interim Phase III WIP Expectations.

- EPA expects the District to continue to work with EPA to ensure that all stormwater BMPs are being reported, so that estimates of progress for the Urban/Suburban Stormwater sector are accurate.
- EPA expects the District to include milestones to reflect the reissued MS4 permit requirements.
- EPA recommends that the District designate a lead point of contact for coordination on issues related to federal facilities, for participation on the Federal Facilities Workgroup (FFW), and

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the District of Columbia Stormwater Memorandum of Understanding (MOU). Continued efforts to reconcile the historical BMP data submitted by the federal agencies in DDOEE's stormwater management database is needed. The FFW will also rely on the District's input to ensure that federal facility targets, the use of the Phase 6 watershed model, and federal facility-content in the Phase III WIPs are fully supportive of the District's WIP implementation. Continued coordination with federal agencies is necessary to allow full credit to be available to the jurisdiction and federal agencies for BMP implementation on federal land.

- EPA expects DDOEE to coordinate with DC Water to make sure all data reports are complete. EPA expects DDOEE to conduct Quality Assurance and Quality Control (QA/QC) on the data before submitting it to EPA by the agreed upon due dates. On an annual basis, EPA will facilitate a discussion with DC Water and DDOEE in the late November/early December timeframe to assure that progress data is being assembled and will be submitted to EPA on time per the Blue Plains permit and the DC WIP.
- EPA expects the District to report the CSO Long Term Control Plan (LTCP) implementation progress in 1) separation acres and location; 2) equivalent acres retrofitted with green infrastructure.