DISTRICT OF COLUMBIA
WATER AND SEWER AUTHORITY

DC CLEAN RIVERS PROJECT
GREEN INFRASTRUCTURE PROGRAM

ROCK CREEK GI PROJECT C (RC-C) PROJECT DESCRIPTION

June 10, 2024

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Appendices

Appendix A – Joint Stipulation of Non-Material Modification to the Consent Decree

Appendix B – Responses to Public Comments

1 Introduction

1.1 Purpose

The District of Columbia Water and Sewer Authority (DC Water) is implementing a Long-Term Control Plan (LTCP), also referred to as the DC Clean Rivers Project (DCCR), to control combined sewer overflows (CSOs) to the District of Columbia's (District) waterways. DCCR is comprised of a variety of projects to control CSOs, including targeted sewer separation, Green Infrastructure (GI), and a system of underground storage/conveyance tunnels. DCCR is being implemented in accordance with the second amendment to the Consent Decree (Amended Consent Decree), entered on December 22, 2020, which amends and supersedes the 2005 and 2016 First Amended Consent Decree (Consent Decree)

On June 12, 2020, DC Water submitted the Rock Creek Practicability Report to EPA for review and comment. The report determined that it would be impracticable to utilize green infrastructure alone in the Rock Creek sewershed (CSO 049). Instead, it proposed a hybrid gray/green approach to achieve the required storage volume (9.5 million gallons) in the CSO 049 sewershed by the March 23, 2030 deadline with a combination of GI and a storage facility. This "Hybrid" Approach consists of: (1) a 4.2-million-gallon storage facility; (2) GI, which may include targeted sewer separation and downspout disconnection controlling at least 92 acres to the 1.2" retention standard (3.0 million gallons); and (3) credit for other GI-controlled acres from implementation of the District's MS4 Permit and Stormwater Regulations in the CSO 049 sewershed. In 2020, EPA approved the Hybrid Approach and a Joint Stipulation of Non-Material Modification to Consent Decree (Non-Material Modification) was agreed upon between the parties, amending Appendix F to the Decree to allow for the hybrid green-gray solution to control CSO 049. Construction of the remaining GI identified in the Non-Material Modification in the Rock Creek sewershed occurs under three separate projects: Rock Creek Project B (RC-B), Rock Creek Project C (RC-C), and Rock Creek Project D (RC-D). The Amended Consent Decree requirements are outlined in Section 1.2. A copy of the 2020 Joint Stipulation of Non-Material Modification to the Consent Decree is included in Appendix A.

The Amended Consent Decree requires submittal of a Project Description for EPA review and comment at least six months prior to the award of construction contract. This is the project description for the next Rock Creek GI project to be constructed, which is Rock Creek Project C.

This document includes the proposed GI control measures and their locations, estimated acreage that will be controlled to a 1.2" retention standard, schedule for GI implementation, estimated cost of each type of GI controls, total project cost, and the post-construction monitoring and modeling program, as required by the Amended Consent Decree.

1.2 Non-Material Modification Consent Decree Requirements

The Non-Material Modification to the Consent Decree, as filed on December 22, 2020, specifies the required volume of runoff to be managed by GI, and the schedule for implementation of the DCCR GI projects. DC Water is required to place in operation GI, which may include targeted sewer separation and downspout disconnection in the CSO 049 sewershed area, which discharges during overflow conditions to Piney Branch, a tributary to Rock Creek, to manage 92 impervious acres to the

1.2” retention standard. The 1.2” retention standard is defined as the volume of runoff equivalent to 1.2” of rain falling on an impervious surface. The GI implementation area within the Rock Creek sewershed is known as the Rock Creek GI Area, which is broken down into several projects, which will be phased for planning and construction. Table 1-1 lists the four projects planned to satisfy the requirements of the Amended Consent Decree within the Rock Creek GI Area.

Table 1-1. Rock Creek Sewershed Project Requirements

Project No.	Consent Decree Deadlines		Place in Operation	Status
	Impervious Acres to be Managed to 1.2”	Award Contract for Construction		
1[1]	20	March 30, 2017	March 30, 2019	Placed in operation March 15, 2019
B	22	January 23, 2022	January 23, 2024	Placed in operation October 20, 2023
C	25	March 23, 2025	December 31, 2027	Future project
D	25	March 23, 2028	March 23, 2030	Future project

[1] Rock Creek Project 1 is also referred to as Rock Creek Project A. (RC-A)

2 Rock Creek GI Project C (RC-C)

This section includes details on the following items, as required by the Appendix F of the Amended Consent Decree:

- Identification of sewershed (CSO) area where Rock Creek GI Project C will be implemented.
- Types of GI controls to be employed and the rationale for their use.
- Approximate locations of GI controls.
- Estimated acreage to be managed to a 1.2" retention standard.
- Schedule for implementation of GI control measures for Rock Creek GI Project C.
- Estimated cost for each type of GI control to be employed.
- Total costs of Rock Creek GI Project C.
- Post construction monitoring and modeling program for Rock Creek GI Project C to demonstrate the capture efficacy of the GI controls to be implemented.

2.1 Rock Creek GI Area

Figure 2-1 shows the various CSO sewersheds in the District. CSO 049, within the Rock Creek sewershed, is in the northwest quadrant of Washington DC.

The Rock Creek sewershed is comprised of approximately 2,329 total acres, of which about 52% is impervious (1,215 impervious acres). The CSO 049 outfall structure, which is located north of Piney Branch Parkway and 17th Street NW, discharges combined sewage to Rock Creek when the capacity of the system is exceeded during rainfall events.

As part of the Non-Material Modification, DC Water GI implemented in the CSO 049 drainage area in Rock Creek, must manage the equivalent volume of runoff produced by 1.2" of rain falling on 92 impervious acres in the sewershed. DC Water GI controls will be constructed to manage the stormwater volume required in the Non-Material Modification primarily in the public right-of way (ROW), allowing for some implementation on District and private property.

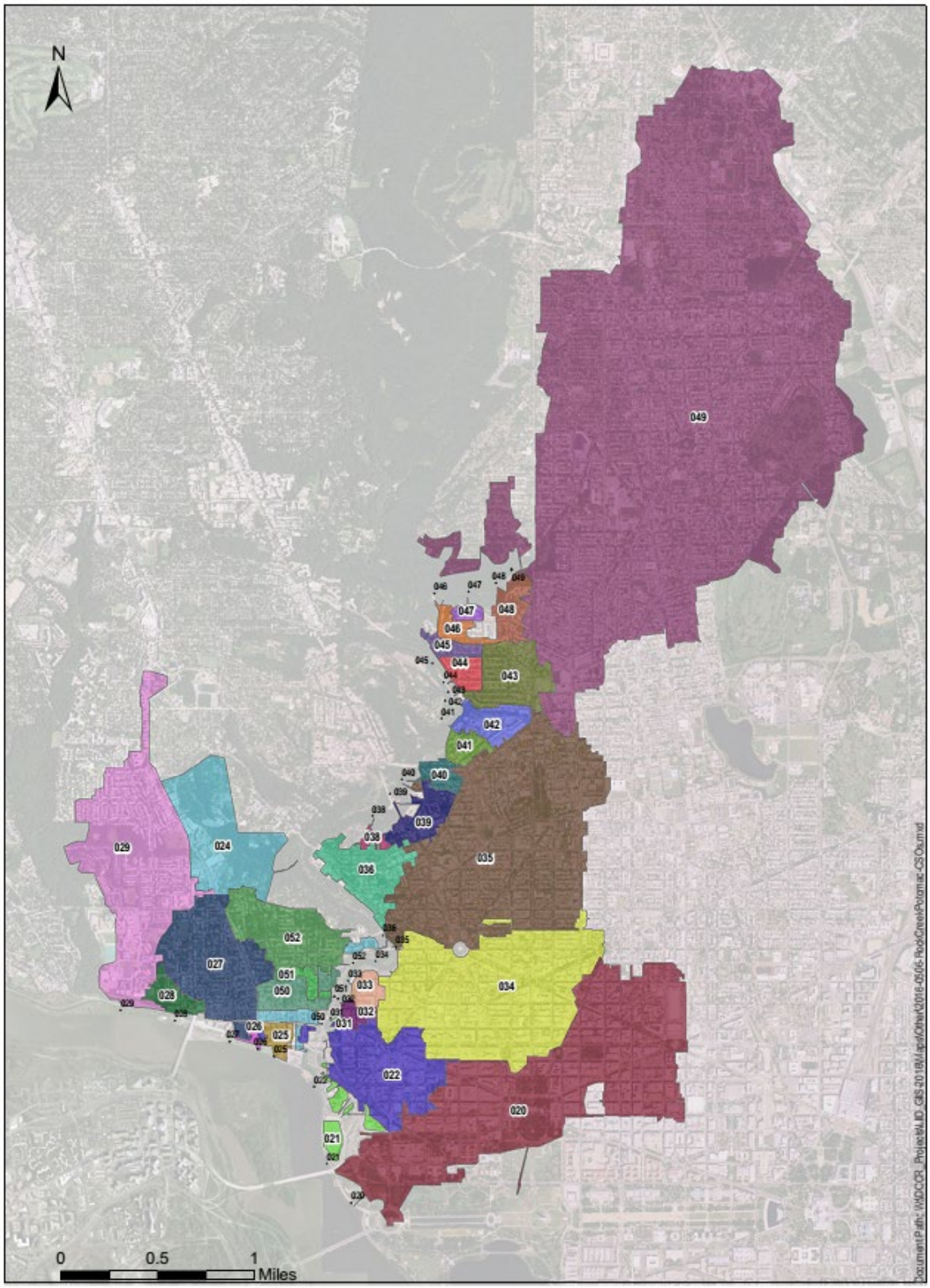


Figure 2-1. Rock Creek and Potomac River Sewersheds and CSO Outfalls

Source: DC Water (2015)

2.2 Rock Creek GI Project C Location

GI facilities constructed under Rock Creek Project C (RC-C) will be located throughout the sewershed in the public rights-of-way as shown in Figures 2-3 thru 2-10. The boundaries for RC-C (Figure 2-2) were selected for their feasibility of design and construction, cost-effective implementation, and ability to meet the required stormwater volume capture. The specific GI technology to be implemented under the Project will be permeable pavements in alleys.

The GI facilities in this project will not be located on Federal properties. Sensitive historical or archeological sites will be avoided, as necessary.

2.2.1 RC-C Project Area 4B-1

The project area is located entirely in the Takoma neighborhood of northwest Washington, DC and within the limits of the Advisory Neighborhood Commission (ANC) 4B. The project area consists of residential zoning. The project area is bounded by Aspen Street NW and Tuckerman Street NW to the north and south, respectively, and 5th Street NW and Georgia Avenue NW to the east and west, respectively (refer to Rock Creek Project C: Area 4B-1 as shown in Figure 2-3). This area is northwest of the large 39-acre Takoma Community Center and is uniform with single family detached and semi-detached homes. This area experiences low pedestrian traffic while vehicular traffic is mostly residential.

2.2.2 RC-C Project Area 4B-2

The project area is located entirely in the Brightwood neighborhood of northwest Washington, DC and within the limits of the ANC 4B. The project area consists of residential zoning. The project area is bounded by Tuckerman Street NW and Missouri Avenue NW to the north and south, respectively, and 4th Street NW and 9th Street NW to the east and west, respectively (refer to Rock Creek Project C: Area 4B-2 as shown in Figure 2-4). This area is directly southwest of the large 39-acre Takoma Community Center and west of NPS Fort Circle Parks; the area is uniform with single family detached and semi-detached homes. This area experiences low pedestrian traffic while vehicular traffic is mostly residential.

2.2.3 RC-C Project Area 4B-3

The project area is located entirely in the Manor Park neighborhood of northwest Washington, DC and within the limits of the ANC 4B. The project area consists of residential zoning. The project area is bounded by Quackenbos Street NW and Longfellow Street NW to the north and south, respectively, and Blair Road NW and 4th Street NW to the east and west, respectively (refer to Rock Creek Project C: Area 4B-3 as shown in Figure 2-5). This area surrounds NPS Fort Slocum Park and includes single-family detached and semi-detached homes and some sections of row houses mixed with institutional/school buildings. This area experiences low pedestrian traffic while vehicular traffic is mostly residential.

2.2.4 RC-C Project Area 4B-4

The project area is located within the Manor Park neighborhood of northwest Washington, DC and within the limits of ANC 4B. The project area consists of residential zoning. The project area within the northern area of Manor Park is bounded by Van Buren Street NW and Tuckerman Street NW to the north and south, respectively, and Blair Road NW and 3rd Street NW to the east and west, respectively (refer to Rock Creek Project C: Area 4B-4 as shown in Figure 2-6). This area is east of Takoma Recreation Fields and includes single-family detached and semi-detached homes and some sections of row houses mixed with institutional/school buildings. This area experiences low pedestrian traffic while vehicular traffic is mostly residential.

2.2.5 RC-C Project Area 4C-1

The project area is located entirely in the Petworth neighborhood of northwest Washington, DC. Project Area 4C-1 is within the limits of the ANC 4C. The project area consists of primarily residential zoning with some commercial properties along the western boundary along the 14th Street NW corridor. The project area is south of Upshur Park and east of Piney Branch Park and is bounded by Taylor Street NW and Quincy Street NW to the north and south, respectively, and Kansas Avenue NW and 14th Street NW to the east and west, respectively (refer to Rock Creek Project C: Area 4C-1 as shown in Figure 2-7). The project area is uniform, consisting almost entirely of residential row homes with small yards and medium-sized blocks. The commercial properties are located almost exclusively along the 14th Street corridor, which is where the higher volume of vehicular traffic exists.

2.2.6 RC-C Project Area 4D-1

The project area is located entirely in the Brightwood Park neighborhood of northwest Washington, DC and within the limits of the ANC 4D. The project area consists of primarily residential zoning with some institutional/school and open space areas. The project area is bounded by Jefferson Street NW and Farragut Street NW to the north and south, respectively, and North Capitol Street NW and 9th Street NW to the east and west, respectively (refer to Rock Creek Project C: Area 4D-1 as shown in Figure 2-8). The area is uniform consisting almost entirely of residential row homes with medium yards and long blocks. Washington Latin Public Charter School and various triangle parks are located within this project area. The pedestrian traffic in this area is low while most of the vehicular traffic is contained to Illinois Avenue NW and Kansas Avenue NW.

2.2.7 RC-C Project Area 4E-1

The project area is located entirely in the 16th Street Heights neighborhood of northwest Washington, DC and within the limits of the ANC 4E. The project area consists of primarily residential zoning with some commercial properties along the eastern boundary along Georgia Avenue NW. The project area is bounded by Ingraham Street NW and Hamilton Street NW to the north and south, respectively, and Georgia Avenue NW and 16th Street NW to the east and west, respectively (refer to Rock Creek Project C: Area 4E-1 as shown in Figure 2-9). The southeast portion contains long blocks with single-family properties and row homes with large front and backyards. The streets are lined with mature trees in the planting strips adjacent to the sidewalk with wide alleys between streets. The north and east portions of this project area contain mostly single-family detached homes with some apartment

buildings. Most vehicular and pedestrian traffic in this area is residential in nature apart from the portions along the 14th Street NW and Georgia Avenue corridors.

2.2.8 RC-C Project Area 4E-2

The project area is located within the 16th Street Heights and Petworth neighborhoods of northwest Washington, DC and within the limits of the ANC 4E. The project area consists of primarily residential zoning with some institutional/religious, and commercial properties. The project area is north of Upshur Park and is bounded by Crittenden Street NW and Webster Street NW to the north and south, respectively, and Georgia Avenue NW and 16th Street NW to the east and west, respectively (refer to Rock Creek Project C: Area 4E-2 as shown in Figure 2-10). This area contains mostly single-family semi-detached and row homes with some churches and commercial buildings. The streets are lined with mature trees in the planting strips adjacent to the sidewalk. This area experiences moderate pedestrian traffic while vehicular traffic is high given its location near the 16th Street NW, 14th Street NW and Georgia Avenue corridors.

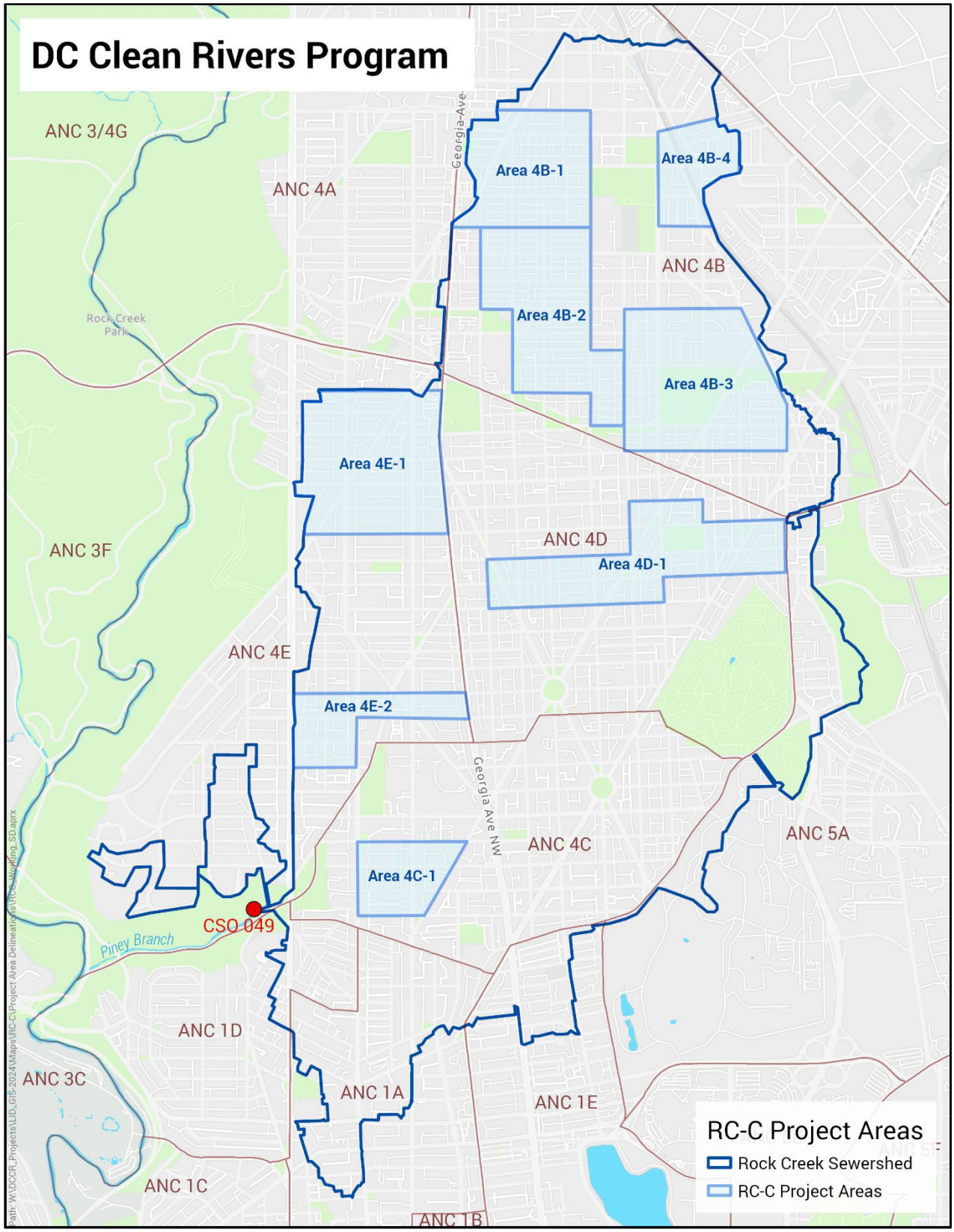


Figure 2-2. Rock Creek GI Area and Rock Creek GI Project C

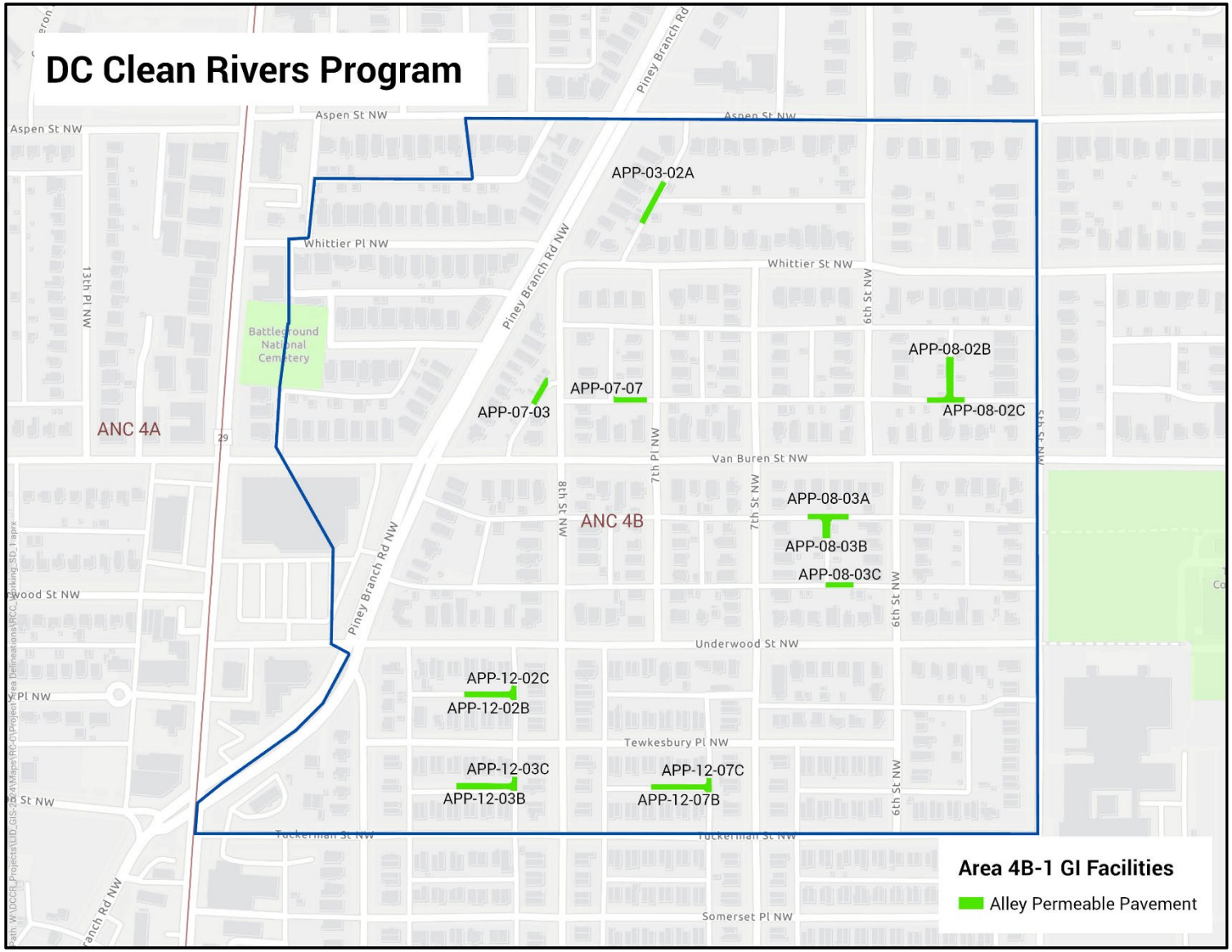


Figure 2-3. Rock Creek Project C: Area 4B-1

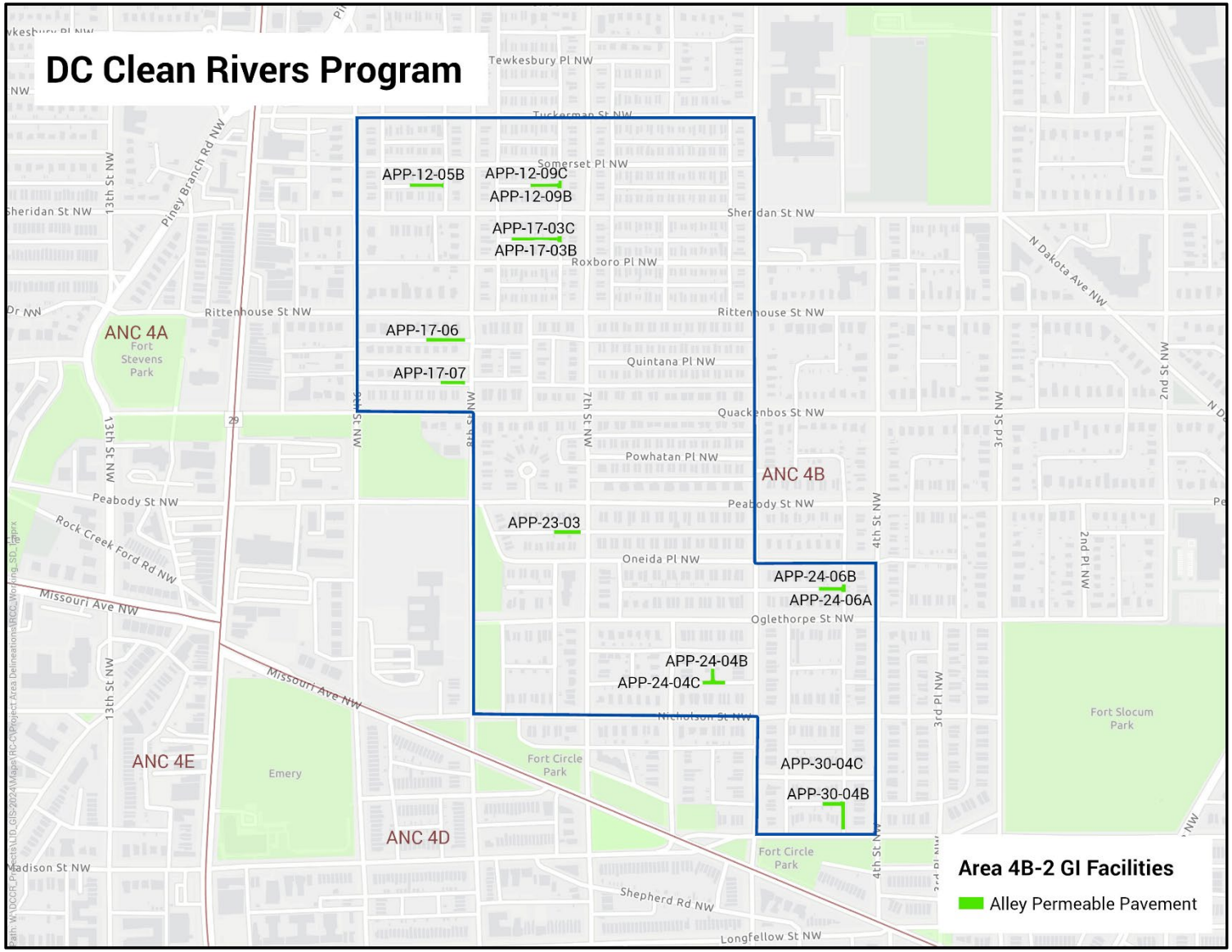


Figure 2-4. Rock Creek Project C: Area 4B-2

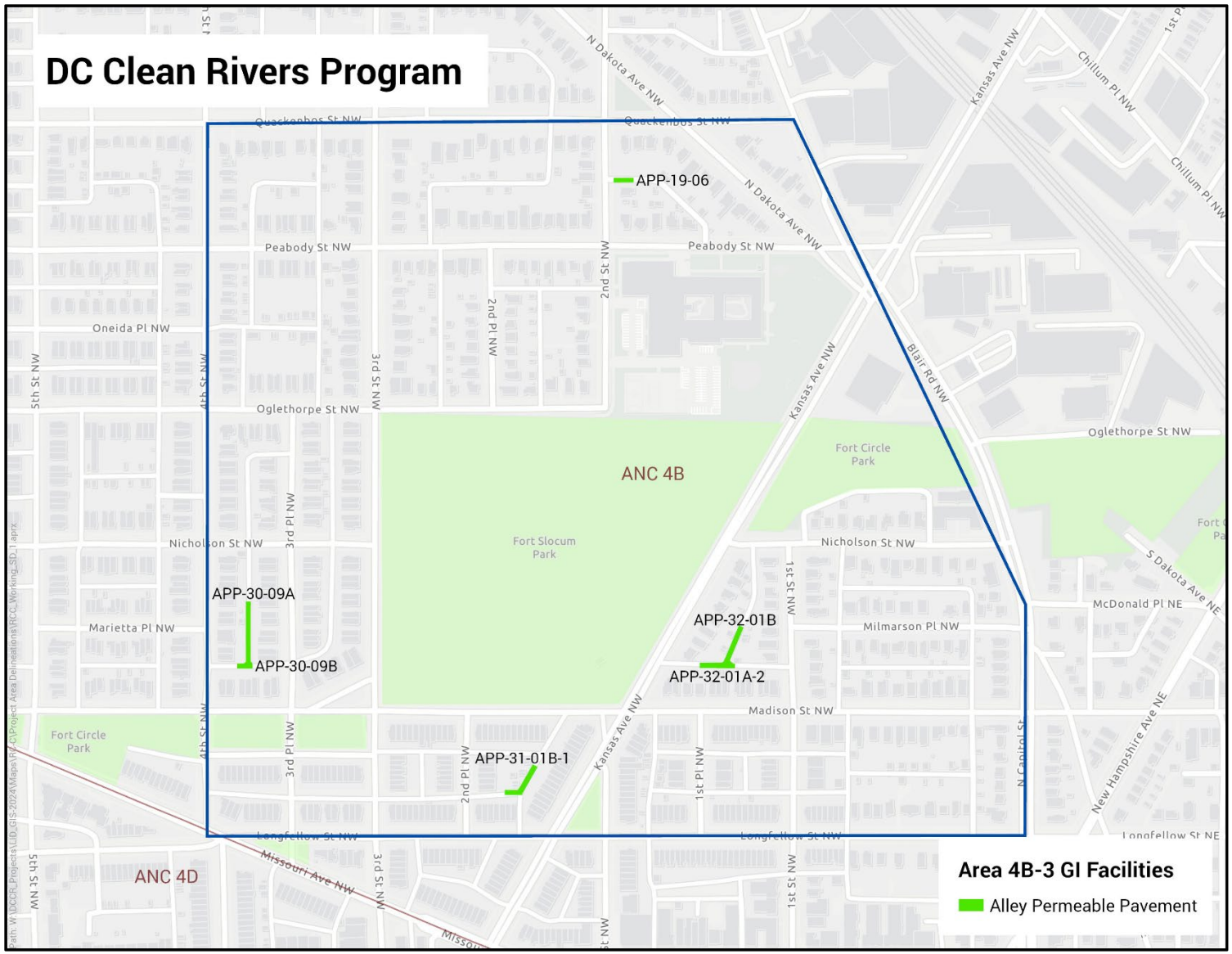


Figure 2-5. Rock Creek Project C: Area 4B-3

Figure 2-6. Rock Creek Project C: Area 4B-4

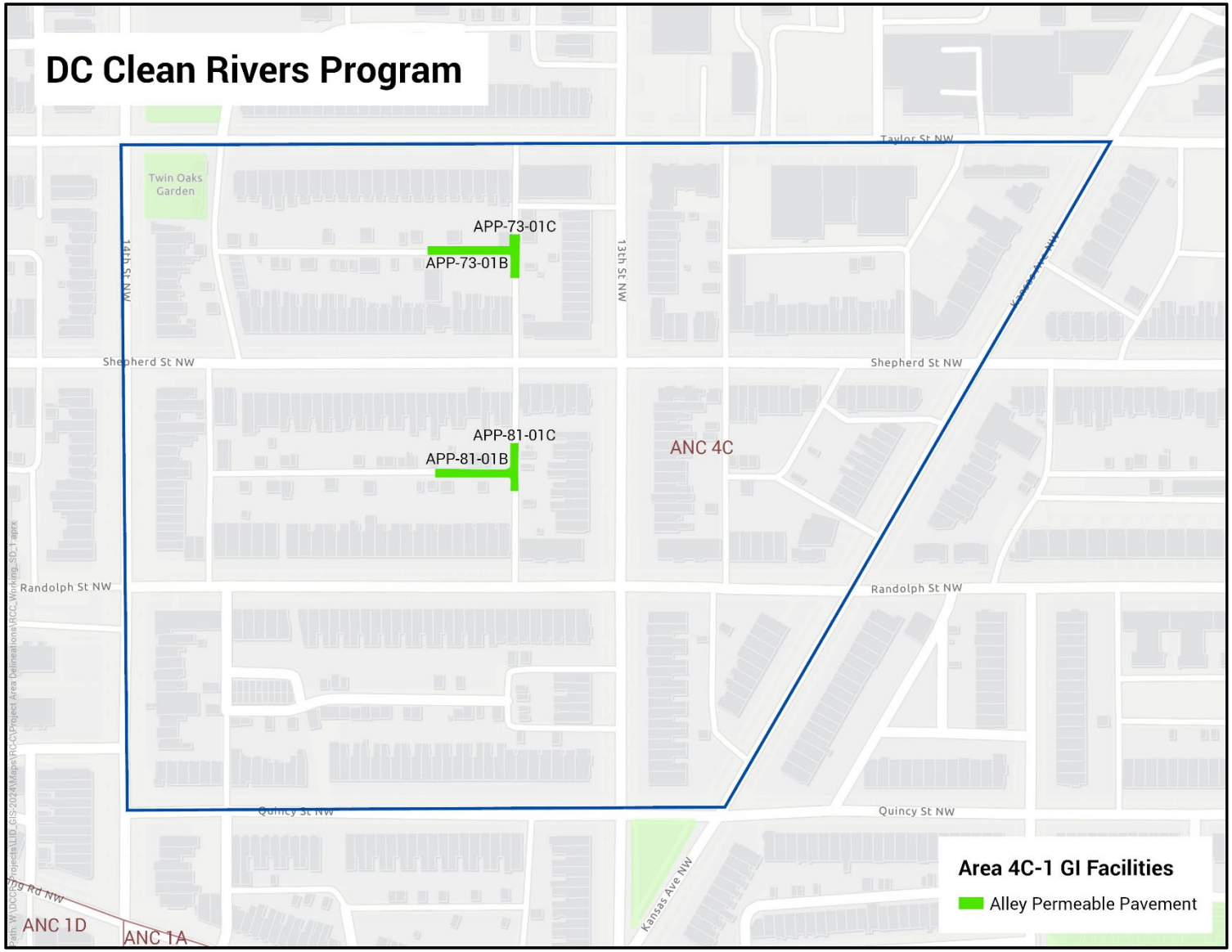


Figure 2-7. Rock Creek Project C: Area 4C-1

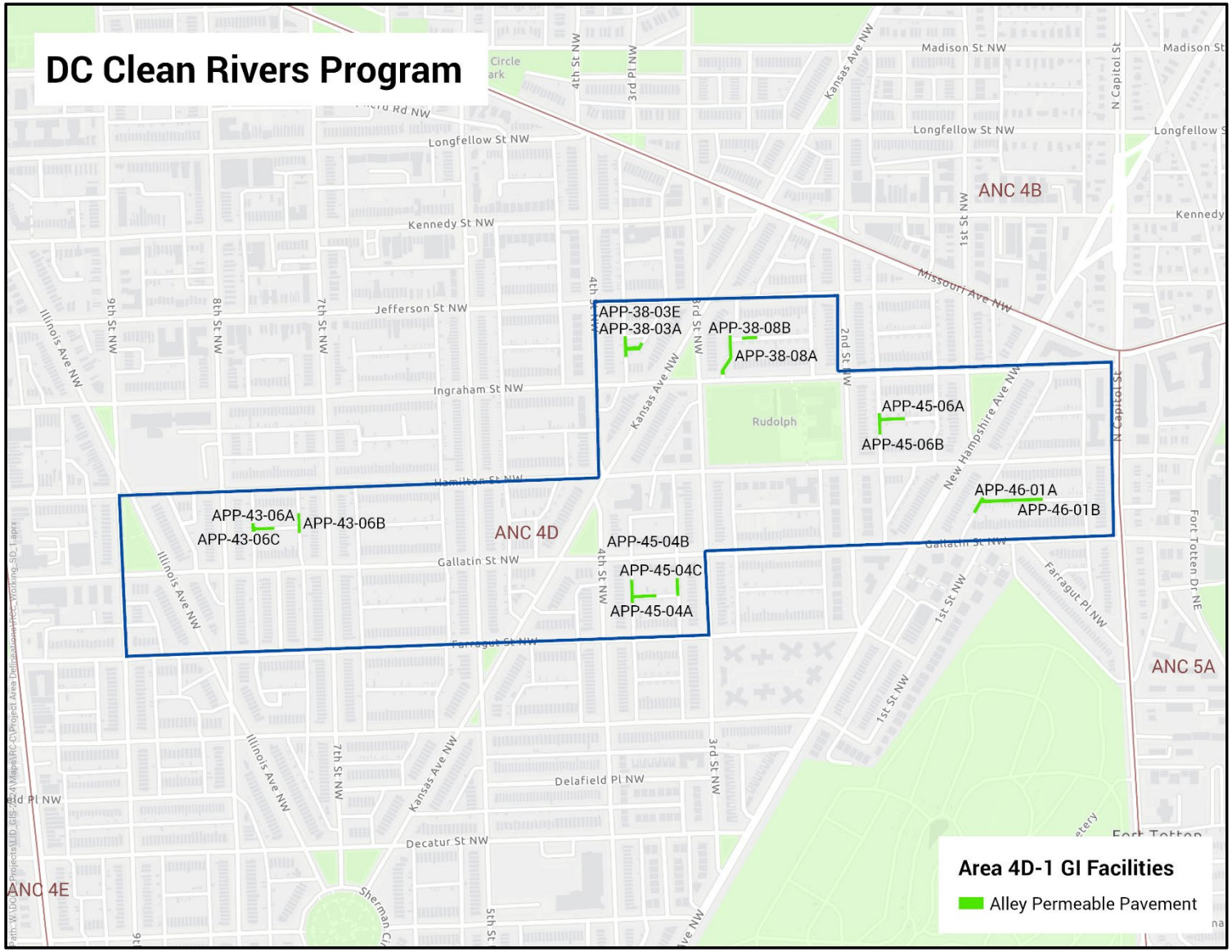


Figure 2-8. Rock Creek Project C: Area 4D-1

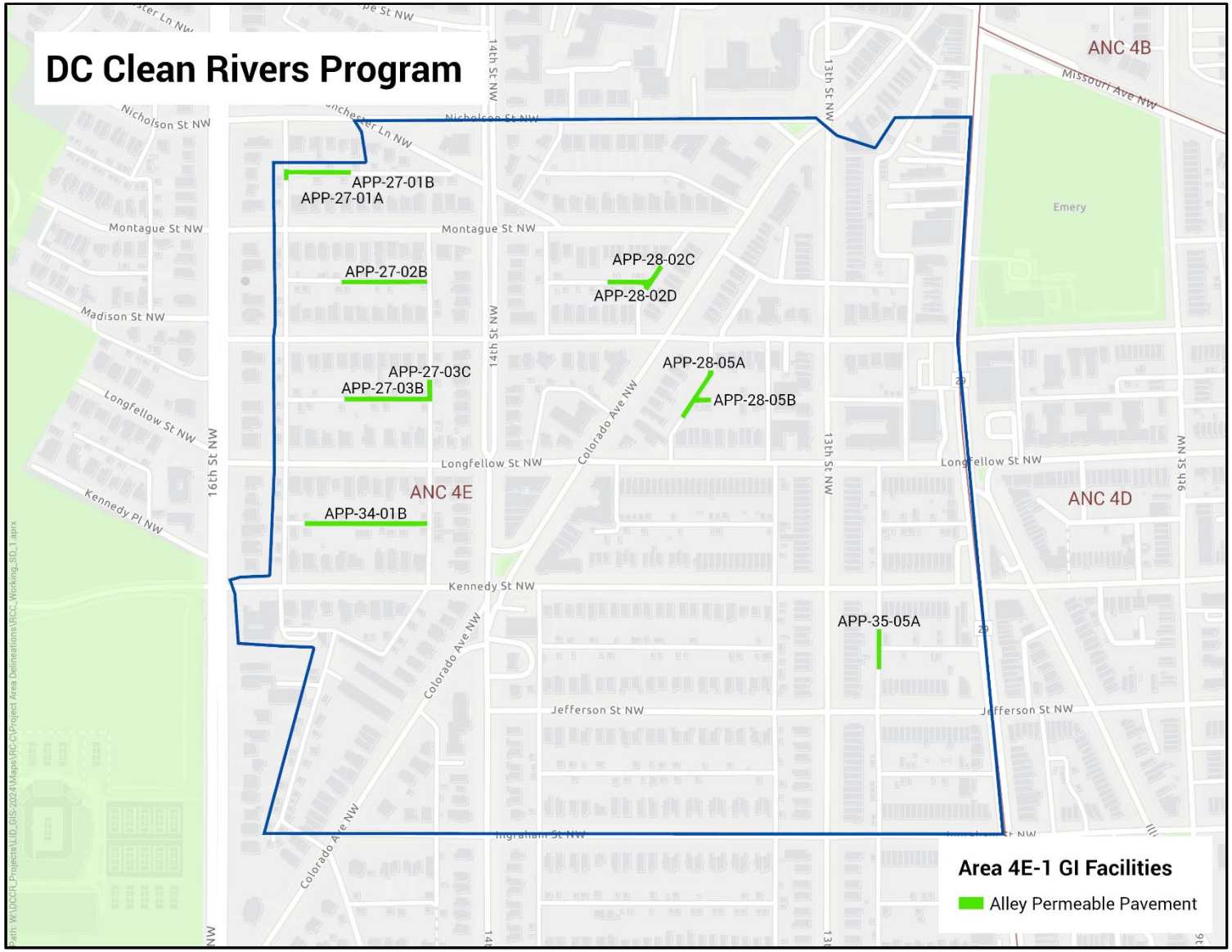


Figure 2-9. Rock Creek Project C: Area 4E-1

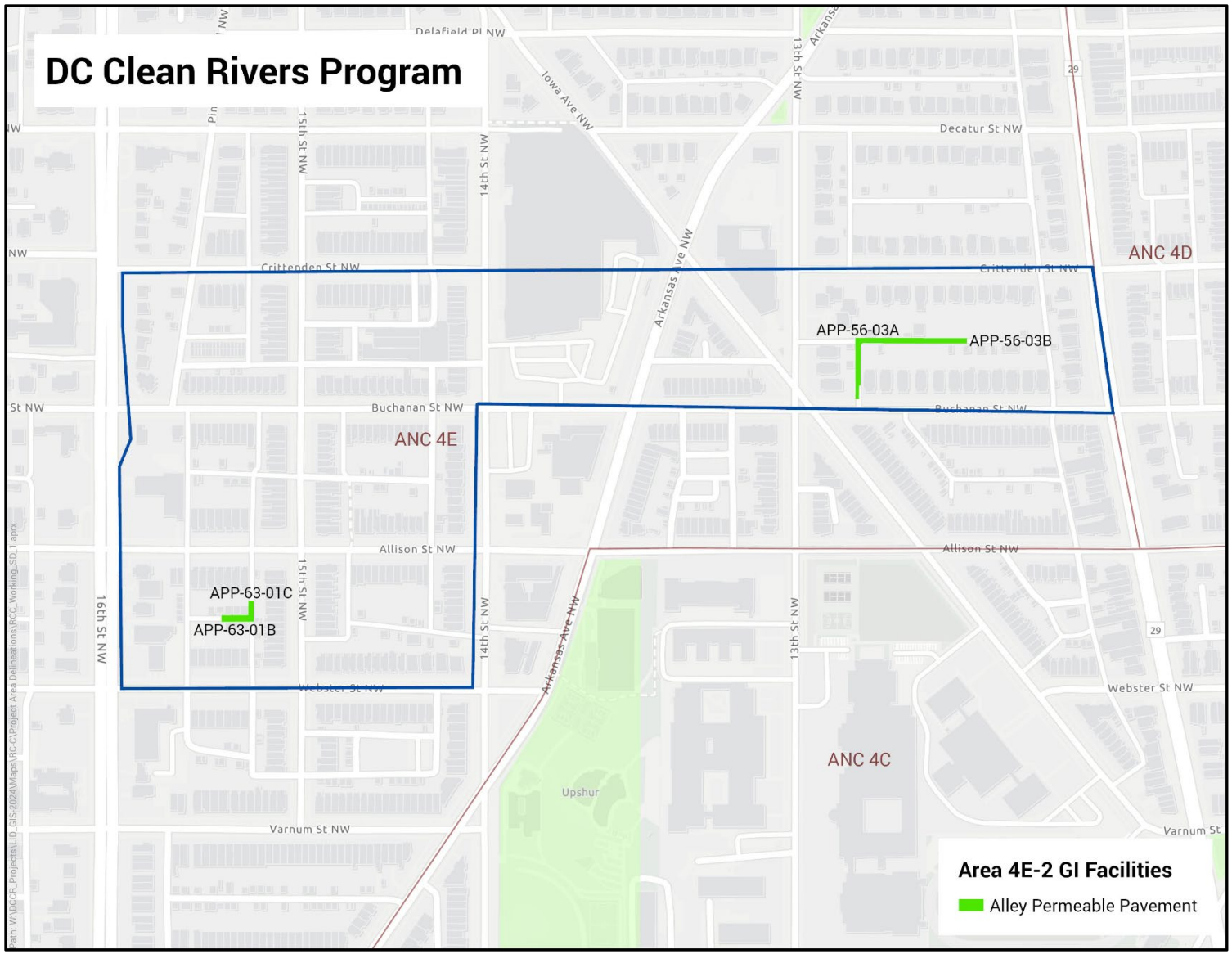
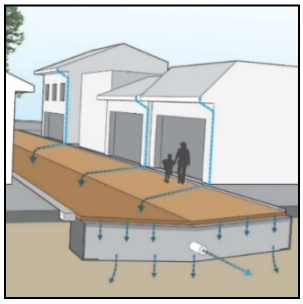


Figure 2-10. Rock Creek Project C: Area 4E-2

2.3 GI Control Measures

The GI control measures proposed within Rock Creek Project C consist of alley permeable pavement (APP) facilities in the public ROW. Constructing exclusively APP facilities in a single contract was selected to maximize contractor efficiency, achieve economies of scale, provide repeatability for field crews and optimize cost effectiveness.

Permeable pavement will be used to replace (or in lieu of) traditional impervious pavements in alleys as they offer similar functionality with respect to vehicle and pedestrian traffic. Permeable pavement control measures will include perforated underdrains tied to the existing underground sewer infrastructure. Permeable pavement installations in alleys include permeable interlocking unit pavers.



Alley Permeable Pavement

2.4 Impervious Area Managed

Rock Creek GI Project C is designed to meet the Non-Material Modification requirement to manage 1.2" of stormwater runoff from at least 25 impervious acres, as outlined in Table 1-1. Table 2-1 shows the estimated range of volume capture for the proposed alley permeable pavement (APP).

Table 2-1. Volume Capture by GI Control Measures

Minimum Impervious Acres Managed	Equivalent Volume Required by Amended Consent Decree at 1.2" (MG)	Approximate Location [1]	Approximate Mix of GI Technologies [1,2] (% of Impervious Acres Managed) – all values ± 20%				
			Bioretention	Permeable Pavement	Subsurface Storage in ROW (Parking Lane, Sidewalk, etc.)	Targeted Sewer Separation	Downspout Disconnections
25.0	0.81	Figures 2-3 to 2-10	-	100%	-	-	-

[1] Approximate project location area is identified, and approximate GI technologies and application rates are shown. Other GI technologies may be evaluated during design and construction and application rates will be adjusted accordingly.

[2] Per Consent Decree Appendix F, Sections II.E. and V, DC Water will track and report on additional stormwater controls constructed in Piney Branch pursuant to the District's stormwater regulations to determine if crediting of additional acres is warranted.

To achieve the required impervious acres managed, the RC-C project is proposing to work within 43 alleys, to install 69 APP facilities (Table 2-2) within the project boundaries as shown in Figures 2-3 to 2-10. The 43 alleys refer to the total number of systems, which can include multiple permeable alley facilities in series that share a single underdrain. For the purposes of planning, design, construction, and maintenance, each APP segment is assigned a Facility ID.

Table 2-2. Proposed Number of Facilities per Project Area

Project Area	Alleys (#)	APP Facilities (#)
4B-1	9	14
4B-2	9	14
4B-3	4	6
4B-4	2	2
4C-1	2	4
4D-1	8	14
4E-1	7	11
4E-2	2	4
Total	**43**	**69**

After considering public comment, the 69 APP facilities selected to meet the required minimum 25 impervious acres are listed in Table 2-3 below.

Table 2-3. Facility ID List

Facility ID	Project Area
APP-03-02A	4B-1
APP-07-03	4B-1
APP-07-07	4B-1
APP-08-02B	4B-1
APP-08-02C	4B-1
APP-08-03A	4B-1
APP-08-03B	4B-1
APP-08-03C	4B-1
APP-12-02B	4B-1
APP-12-02C	4B-1
APP-12-03B	4B-1
APP-12-03C	4B-1
APP-12-07B	4B-1
APP-12-07C	4B-1
APP-12-05B	4B-2
APP-12-09B	4B-2
APP-12-09C	4B-2

Facility ID	Project Area
APP-14-01	4B-4
APP-73-01B	4C-1
APP-73-01C	4C-1
APP-81-01B	4C-1
APP-81-01C	4C-1
APP-38-03A	4D-1
APP-38-03E	4D-1
APP-38-08A	4D-1
APP-38-08B	4D-1
APP-43-06A	4D-1
APP-43-06B	4D-1
APP-43-06C	4D-1
APP-45-04A	4D-1
APP-45-04B	4D-1
APP-45-04C	4D-1
APP-45-06A	4D-1
APP-45-06B	4D-1

Facility ID	Project Area
APP-17-03B	4B-2
APP-17-03C	4B-2
APP-17-06	4B-2
APP-17-07	4B-2
APP-23-03	4B-2
APP-24-04B	4B-2
APP-24-04C	4B-2
APP-24-06A	4B-2
APP-24-06B	4B-2
APP-30-04B	4B-2
APP-30-04C	4B-2
APP-19-06	4B-3
APP-30-09A	4B-3
APP-30-09B	4B-3
APP-31-01B	4B-3
APP-32-01A	4B-3
APP-32-01B	4B-3
APP-09-02A	4B-4

Facility ID	Project Area
APP-46-01A	4D-1
APP-46-01B	4D-1
APP-27-01A	4E-1
APP-27-01B	4E-1
APP-27-02B	4E-1
APP-27-03B	4E-1
APP-27-03C	4E-1
APP-28-02C	4E-1
APP-28-02D	4E-1
APP-28-05A	4E-1
APP-28-05B	4E-1
APP-34-01B	4E-1
APP-35-05A	4E-1
APP-56-03A	4E-2
APP-56-03B	4E-2
APP-63-01B	4E-2
APP-63-01C	4E-2

The selected alleys may change while working with the selected contractor based on items encountered in the field, such as high groundwater, unidentified utilities, geotechnical conditions, etc. If removed, replacement alleys will be included to achieve the minimum 25 acres managed.

2.5 Implementation Schedule

Rock Creek GI Project C will meet the project implementation schedule as set forth in the Non-Material Modification:

- Award Contract for Construction: March 23, 2025
- Place in Operation: December 31, 2027

2.6 Estimated Cost

2.6.1 Cost of GI Controls

Table 2-4 summarizes the construction cost in dollars per impervious acre treated at 1.2" for APPs included in the above project designs. These costs include labor using prevailing wage rates in Washington, DC, all contractor mark-ups (overhead, permitting, general conditions, bonding, insurance), and contractor's contingency. The costs do not include ongoing maintenance.

Table 2-4. Estimated Costs for Types of GI Controls

GI Control Measure	GI Control Measure Location	Construction Cost
Permeable Pavement	Alley	$600K/acre - $825K/acre

2.6.2 Total Project Cost

The total construction cost for Rock Creek GI Project C is currently estimated to be in the range of $15 – $21 million (in 2024 dollars).

2.7 Post-Construction Monitoring and Modeling Approach

The monitoring and modeling approach for RC-C has been developed based on the lessons learned in a previous Rock Creek GI Project, RC-A. The following are the key lessons learned associated with monitoring and modeling:

- EPA suggested increasing the number of rain gages considering the CIWEM *Code of Practice for the Hydraulic Modelling of Sewer Systems* (2002). One rain gage was used in RC-A monitoring.
- The use of sewer flow meters to assess GI was challenging. Temporal rainfall and sewage variability can mask the effect of GI. The RC-C project will construct GI over a relatively large area. The intensity of the application of GI will be lower, making it impractical to use flow meters in sewers to assess GI performance. In addition, upstream sheds in Piney Branch flow through downstream sheds, further making it impractical to use sewer meters.
- In RC-A, the analysis of level-sensor data proved to be an effective way of evaluating GI performance, since many of the same assumptions of practice performance (especially related to underdrain and infiltration rates) applied for both flow- and level-based data analysis.

2.7.1 RC-C Post-Construction Monitoring and Modeling Approach

The approach for RC-C monitoring and modeling is the same approach used for RC-B and incorporates the lessons learned from the RC-A project described above. This includes the type and quantity of monitoring as well as the type of modeling being conducted to assess the GI effectivity and compare it to the facility design. In detail, this includes the following:

- Three (3) rain gages will be installed and operated for approximately 12 months with a 5-minute logging interval. The rain gages will be installed in Project Area 4C-1 (the southernmost area), Project Area 4B-1 (the northernmost area), and Project Area 4D-1 (the middle of all planned facility installation areas). This leads to a maximum aerial distance between a rain gage and every APP practice of approximately 1 mile.
- Water level sensors will be installed in 10% of all APP practices. Water level loggers will be operated for approximately 12 months with a 5-minute logging interval.
- Sewer metering data will not be collected or used due to the lessons learned during the RC-A project as described above.
- A Storm Water Management Model (SWMM) will be used to evaluate the performance of monitored practices. This model will consist of the runoff area for each practice (the contributing drainage area (CDA)) as well as the practice itself. The modeling process will include the following steps:
    1. Setup of SWMM for planned practice drainage areas based on CDA drawing sets (pre-construction scenario).
    2. Setup and parameterization of GI in SWMM based on facility drawing sets (design scenario).

3. Calibration of the GI facility parameters using observed rainfall, water level logger data as well as information from the facility testing (calibrated scenario).
4. Application and comparison of the pre-construction scenario, the design scenario, and the calibrated scenario. For this evaluation, the model will be run for the LTCP average years 1988 – 1990. Runoff differences between the pre-construction scenario and the design scenario will be compared with the differences between the pre-construction scenario and the calibrated scenario to compare the performance of the installed practices with the design performance.

2.8 Public Comment Period

DC Water held a robust public comment period to ensure the public was aware of the planning for Rock Creek Project C and had the opportunity to comment on the Project Description document. The focus of this outreach effort was to provide ample opportunities for the public to provide comments on the proposed permeable alley locations identified in the Draft Project Description document and for DC Water to make any changes to the project if necessary.

The public comment period occurred from April 5, 2024, to May 10, 2024. During that time, DC Water advertised the Draft Project Description document and the public comment period through a variety of channels and methods. These included:

- Mailers to residents in the proposed project areas,
- Postings on the DC Water Green Infrastructure and Rock Creek Project C websites,
- Providing an interactive map of all proposed facilities on the DC Water – DC Clean Rivers Green Infrastructure website,
- Distributing a press release,
- Hosting two DC Water Community Meetings,
- Presenting at the Advisory Neighborhood Commissions (ANC) monthly meetings associated with the various project areas, and
- Door-to-door canvassing to residents adjacent to proposed facilities.

Table 2-5 below provides a detailed list of the RC-C outreach efforts throughout the public comment period.

Table 2-5. Timeline of Outreach Efforts for Rock Creek Project C

Date	Outreach Effort
3/14/24	Project announcement and meeting requests to ANC Commissioners
3/19/24	Project announcement and meeting request email to the Mayor's Office of Community Relations and Services (MOCRS) Ward 4
3/26/24	Reminder emails to Ward 4 MOCRS and Councilmember's office for meeting request and to inform of upcoming public comment period
3/18/24 & 3/26/24	Reminder and follow-up meeting request emails to ANC Commissioners on project and upcoming public comment period
3/29/24	RC-C mailer to residents in project areas informing of project, meeting, and public comment period

Date	Outreach Effort
3/29/24	Door-to-door outreach to 2,230 homes begins
4/5/24	Meeting dates posted to DC Water's meeting website and to GI website
4/5/24	Meeting dates posted to DC Water's meeting website Calendar
4/5/24	Meeting dates posted to DC Water's social media (Twitter/Facebook/Instagram)
4/5/24	Press release distributed
4/5/24	Project Description posted to GI website. Public comment period open from 4/5/21-5/10/24
4/8/24	RC-C Public Webinar 1 at 6:30 pm
4/9/24	RC-C Public Webinar 1 presentation posted to website
4/10/24	DC Water RC-C GI Briefing for Mayor's Office (Ward 4 MOCRS)
4/10/24	ANC 4C Monthly Meeting
4/13/24	Door-to-door outreach to 2,230 homes completed
4/15/24	DC Water RC-C GI Briefing for Ward 4 Councilmember Lewis George's Office
4/17/24	ANC 4D Monthly Meeting
4/25/24	ANC Commissioner Public Meeting Reminder and ask to distribute to Contact lists
4/26/24	Media Alert Final RC-C Public Webinar
4/26/24	Ward 4 Council Newsletter
4/29/24	ANC 4B Monthly Meeting
4/30/24	May 6 meeting announcement on DC Water social media (Twitter/Facebook/Instagram)
5/6/24	May 6 reminder meeting announcement on DC Water social media (Twitter/Facebook/Instagram)
5/6/24	RC-C Public Webinar 2 at 6:30 pm
5/7/24	RC-C Public Webinar 2 presentation posted to website
5/10/24	End of public comment period
5/28/24[1]	ANC 4E Monthly Meeting

[1]DC Water reached out to ANC 4E commissioners in March 2024 to be included in their April monthly meeting as indicated in the table above. DC Water was asked to present at the May meeting.

2.8.1 Summary of Public Comments Received

Through the in-person canvassing and virtual meetings as well as phone calls and emails, DC Water received a variety of feedback including appreciation for the outreach efforts, support of the project, additional facility and location requests, location selection process, construction plan inquiries, and flooding issue identifications. DC Water received comments from 24 residents via the public comment submittal process, as well as additional comments and questions during the various public meetings. DC Water responded to all submitters by confirming that the comment was received and acknowledging that it would be considered when finalizing the Rock Creek Project C Description document and when evaluating future green infrastructure projects.

Comments and questions from District residents fell into five general categories.

1. Many of the comments expressed general support for the project and requested that the facilities be extended the entire length of the alley.
2. Other residents had questions or concerns regarding how access to their alley would be impacted by construction.
3. A few commenters expressed a desire for additional facilities within and/or outside of the proposed project areas. Many of these comments noted that green infrastructure could help with flooding.
4. A few residents had questions about the general maintenance of the permeable alleys after construction.
5. A couple of commenters expressed hesitation for the project due to flooding or damage concerns.

Overall, the comments were positive with over 90% in favor of the proposed locations as well as additional facilities. Several residents were enthusiastic about green infrastructure being installed in their neighborhoods. Such as a few residents who live in Project Area 4B-2:

> *"We are residents living in an area impacted by Rock Creek Project C (area 4B-2). I believe permeable pavers will be installed in the alley behind our house. We're writing to express our support of the project—it will beautify the alley and help keep Rock Creek clean. We routinely enjoy walking, commuting, and exercising through Rock Creek Park and are proud to live in a city committed to keeping it clean for people and wildlife to enjoy."*

In addition to the support of residents throughout the project areas, the commissioners for ANC 4B also expressed strong support of Rock Creek Project C, as well as their continued support for future green infrastructure projects in their District community:

> *"I continue to express strong support for the installations proposed as part of the Rock Creek green infrastructure projects, including Rock Creek Project C. This support reflects longstanding advocacy for more green infrastructure in our neighborhood…In sum, the Takoma community strongly supports these installations and welcomes more of them… where such installations could serve multiple beneficial purposes for the community. Thank you for your time and consideration. I look forward to installation of permeable alleys throughout Advisory Neighborhood Commission 4B, as well as future stormwater management green infrastructure installations throughout Takoma."*
>
> *ANC Commissioner 4B02*

The Design team evaluated each comment to assess concerns and evaluate if requests met the overall design and program criteria. Based on public comments, the design team evaluated additional alleys for their viability to be added to the project where residents expressed an interest in including additional facilities. DC Water intends to coordinate the construction sequence with the contractor in alleys with multiple facilities to ensure residents have the least continuous disruption as possible. A

detailed compilation of all comments received, as well as a summary of all comment responses is included in Appendix B.

2.8.2 Frequently Asked Questions

In response to the frequently asked questions as described in the previous section, answers to these FAQs are included below:

1. Question: Why do the permeable pavers not extend the entire length of the alley?

   Answer: DCCR is a volume-based program and per the Amended Consent Decree, a 1.2" retention standard is used for green infrastructure. As such, the alley permeable pavement (APP) facilities are only sized for the volume needed to be managed. APP facilities are located downstream of the contributing drainage area (CDA) to capture runoff within the alley. Although the permeable portion of the alley will not be constructed the entire alley length, the stormwater generated in the alley will be controlled by the downstream facility for the 1.2" storm event. This also ensures that the alleys are being constructed in a cost-effective manner.

2. Question: Why was my alley not chosen?

   Answer: In 2023, DC Water's engineers walked each of the alleys within the Rock Creek sewershed, assessing their viability to be converted into a green alleyway. Alleys whose contributing drainage area (CDA) created a stormwater volume of at least 0.25 acres with limited to no utility conflicts were prioritized for consideration within this project. Additional factors including sediment transport, tree litter, alley width, adjacent structure proximity and condition, connecting sewer size, and alley conditions were also made part of the selection criteria.

3. Question: Why was my alley removed from the list of facilities?

   Answer: To keep the project cost effective, DC Water intends to construct enough permeable alleys to manage the minimum 25 impervious acres within Rock Creek Project C. DC Water seeks to minimize construction obstacles when selecting alleys. An alley may be removed from consideration based on a variety of factors (see response to Question 2) or may simply have been removed from consideration due to the project reaching the 25-acre threshold, in which case an alley may be reconsidered under a future project or as a back-up alley within this project.

4. Question: Will the permeable pavement eliminate flooding?

   Answer: DC Water's green infrastructure project manages stormwater to the 1.2" retention standard. This project's goal is to minimize CSOs to the Rock Creek sewershed and does not directly address flooding concerns.

Appendix A

Joint Stipulation of Non-Material Modification to the Consent Decree

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ANACOSTIA WATERSHED SOCIETY, et al.,	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY, and THE DISTRICT OF COLUMBIA,	)	**Consolidated Civil Action No. 1:00CV00183TFH**
Defendants,	)	
	)	
and	)	
	)	
THE UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
	)	
v.	)	
	)	
DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY, et al., and THE DISTRICT OF COLUMBIA,	)	
Defendants.	)	
_____	)	

JOINT STIPULATION OF NON-MATERIAL MODIFICATION
TO THE CONSENT DECREE

WHEREAS, the United States of America (hereinafter "the United States"), the District of Columbia, and D.C. Water (hereinafter "Parties") are parties to a Consent Decree entered by the United States District Court for the District of Columbia, Civil Action No. 1:00CV00183TFH, on October 10, 2003 and as subsequently amended on January 14, 2016 (hereinafter the "Consent Decree");

WHEREAS, pursuant to Section II.D of Appendix F to the Decree, DC Water has constructed Green Infrastructure ("GI") Project No. 1 in the CSO 049 sewershed of Rock Creek, performed post construction monitoring and submitted to U.S. Environmental Protection Agency

("EPA") and the District "Post Construction Monitoring Report No. 1" for the Rock Creek sewershed projects ("Rock Creek Report No.1");

WHEREAS, DC Water determined in Post Construction Monitoring Report No. 1 that the All GI Approach was impracticable. However, DC Water also determined that it would be practicable to achieve the required storage volume (9.5 million gallons) in the CSO 049 sewershed by the March 23, 2030 deadline with a combination of GI and a storage facility (the "Hybrid Approach") consisting of (1) a 4.2 million gallon storage facility, (2) GI, targeted sewer separation, and downspout disconnection controlling at least 92 acres to the 1.2" Retention Standard (3.0 million gallons), and (3) credit for other GI-controlled acres in the CSO 049 sewershed as permitted by Section II.E of Appendix F (2.3 million gallons). The Report requested that EPA approve the Hybrid Approach;

WHEREAS, EPA has approved the Hybrid Approach;

WHEREAS, the Hybrid Approach represents a modification to the non-material terms of Appendix F to the Consent Decree because it changes only the means and methods for achieving the required level of control for CSO 049 sewershed, not the level of control nor the deadline for achieving it;

WHEREAS, the non-material terms of the Decree may be modified by a subsequent written agreement signed by all the Parties;

WHEREAS, the Parties have provided an opportunity beyond the requirements of the Decree for interested non-governmental groups, including representatives from Citizen Plaintiffs in this action, to provide written comments on the DC Water Green Infrastructure Practicability Assessment, and meet and discuss those comments with the Parties;

WHEREAS, in accordance with Paragraph 102 of the Decree, the Parties agree that the proposed amendments to Appendix F of the Decree constitute a modification to the non-material terms of the Decree;

NOW THEREFORE,

1. The Parties agree upon and stipulate to the terms and conditions in the First Amended Appendix F to the Decree, which is Attachment A to this Joint Stipulation of Non-Material Modification to Consent Decree ("Joint Stipulation").

2. The undersigned representatives are fully authorized to enter into the terms and conditions of this joint Stipulation. This Joint Stipulation may be executed in several counterparts, each of which will be considered an original.

3. This Joint Stipulation shall be effective after the Joint Stipulation is signed by the Deputy Section Chief for the Environmental Enforcement Section.

WE HEREBY CONSENT to the foregoing Joint Stipulation of Non-material Modification to the Consent Decree entered in United States of America v. District of Columbia Water and Sewer Authority et al. and the District of Columbia, Civil Action No. 1:00CV00183TFH, on October 10, 2003.

FOR PLAINTIFF THE UNITED STATES OF AMERICA:

Respectfully submitted,

12/22/20
DATE

Nathaniel Douglas
NATHANIEL DOUGLAS
Deputy Section Chief
Environmental Enforcement Section
Environment & Natural Resources Division

12/22/20
DATE

/s/ Bradley L. Levine
BRADLEY L. LEVINE (DC Bar No. 974925)
Senior Attorney
Environmental Enforcement Section
Environment & Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, DC 20044
Phone: 202-514-1513

WE HEREBY CONSENT to the foregoing Joint Stipulation of Non-material Modification to the Consent Decree entered in United States of America v. District of Columbia Water and Sewer Authority et al. and the District of Columbia, Civil Action No. 1:00CV00183TFH, on October 10, 2003.

FOR PLAINTIFF THE U.S. ENVIRONMENTAL PROTECTION AGENCY:

12/3/2020
DATE

MARK POLLINS
Director, Water Enforcement Division

SUSHILA NANDA
Attorney-Advisor
Water Enforcement Division
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

WE HEREBY CONSENT to the foregoing Joint Stipulation of Non-material Modification to the Consent Decree entered in United States of America v. District of Columbia Water and Sewer Authority et al. and the District of Columbia, Civil Action No. 1:00CV00183TFH, on October 10, 2003.

FOR DEFENDANT DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY:

12.4.2020
DATE

Kishia L. Powell, PE
Chief Operating Officer
District of Columbia Water and Sewer Authority

DAVID L. GADIS
CEO and General Manager
District of Columbia Water and Sewer Authority
1385 Canal Street, SE
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12-04-20
DATE

MARC K. BATTLE, ESQ.
Chief Legal Officer & EVP, Government and Legal Affairs
District of Columbia Water and Sewer Authority
1385 Canal Street, SE
Washington, D.C. 20003

12/03/2020
DATE

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Counsel to District of Columbia Water and Sewer Authority

WE HEREBY CONSENT to the foregoing Joint Stipulation of Non-material Modification to The Consent Decree entered in United States of America v. District of Columbia Water and Sewer Authority et al. and the District of Columbia, Civil Action No. 1:00CV00183TFH, on October 10, 2003.

FOR DEFENDANT DISTRICT OF COLUMBIA:

KARL A. RACINE
Attorney General for the District of Columbia

12/22/2020
_____
DATE

/s/ Toni Michelle Jackson
TONI MICHELLE JACKSON
Deputy Attorney General
Public Interest Division

/s/ Fernando Amarillas
FERNANDO AMARILLAS [974858]
Chief, Equity Section

/s/ Andrew J. Saindon
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Attachment A to Stipulation of Non-Material Modification to Consent Decree

FIRST AMENDED APPENDIX F

GREEN INFRASTRUCTURE PROGRAM FOR THE POTOMAC AND ROCK CREEK SEWERSHEDS

I. Green Infrastructure Program Plan

Within 12 months after the Effective Date of the First Amendment to the Consent Decree, DC Water shall submit to EPA for approval pursuant to Section X (EPA Approval of Plans and Submissions) of this Consent Decree a Green Infrastructure Program Plan (the "GI Program Plan"). The GI Program Plan shall include the elements described in subsections A, B, and C below. DC Water submitted and EPA approved the Program Plan on July 29, 2016 and February 3, 2017, respectively.

A. **Green Infrastructure Control Measures**.

1. Identification and description of the GI control measures (including any targeted sewer separation projects) that DC Water intends to install (or have the District or other entities install on its behalf), the approximate locations of the sites for the measures, and the estimated cost to implement the measures.

2. The conceptual project location identifications and descriptions, and cost estimates for the measures that DC Water intends to install (or have the District or other entities install on its behalf), which shall correspond to the individual GI Projects set forth in the schedule in Section II of this Appendix F.

3. An estimate of the number of acres of land projected to be effectively retrofitted with GI in the Potomac and Rock Creek sewersheds prior to 2030 pursuant to the District's MS4 permit and storm water regulations.

B. **Preservation and Maintenance of Constructed Green Infrastructure Projects**. A plan to (1) preserve and maintain the GI control measures installed pursuant to the GI Program Plan and (2) ensure that future site or land use changes do not result in the loss of the runoff reduction benefits of the GI control measures installed pursuant to the GI Program Plan, unless that loss is compensated for by other controls in the same CSO drainage area.

C. **Public Outreach**. A plan to engage property owners in the Potomac and Rock Creek sewersheds and interested stakeholders to promote and facilitate installation of GI on private property and to ensure public input into the site

selection process and concept design for the control measures that DC Water proposes to install as part of the GI Program Plan.

(a) Public Outreach shall include:

1. During GI Project Planning:

(i) Develop a draft Project Description report, place it on DC Water's website and solicit comments for 30 calendar days;

(ii) Advertise and hold at least one public meeting (virtual or in person) regarding the project described in the Project Description;

(iii) Consider public comments received during comment period and at public meeting and revise the Project Description report as appropriate prior to submittal to EPA; and

(iv) Post the final Project Description as submitted to EPA on DC Water's website;

2. During GI Project Design:

(i) Meet with Advisory Neighborhood Commission ("ANC") in the area to present the proposed project, obtain comments on the facility locations, configuration and construction limitations and incorporate comments as appropriate;

(ii) Use multiple media which may include door hangers, emails, in person visits or other means to advise adjacent property owners of planned projects;

(iii) Maintain a website with information on the project, frequently asked questions and provide contact information for citizens to reach project staff with comments or questions; and

(iv) Maintain a contact list of interested parties to distribute project information and notices about the project.

3. During GI Project Construction:

(i) Meet with ANC in the area to prior to construction to provide an update on anticipated construction plans and timeframes;

(ii) Maintain a hotline for construction questions and issues;

(iii) Use multiple media which may include door hangers, emails, in person visits or other means to advise adjacent property owners of planned construction;

(iv) Maintain a website with information on the project, frequently asked questions and provide contact information for citizens to reach project staff with comments or questions; and

(v) Respond to neighborhood questions and requests during construction as appropriate.

4. After Project Construction:

(i) Post the Post Construction Report on DC Water's website; and

(ii) Solicit feedback on the implemented project from nearby property owners and incorporate feedback into subsequent designs as appropriate.

II. DC Water Implementation Schedule

DC Water shall construct and Place in Operation the GI control measures assigned to it in accordance with the following schedule:

A. Six months prior to the award contract for construction for each of the projects listed in this section, DC Water shall submit a Project Description to EPA for review and comment. The Project Description shall contain:

1. An identification of the CSO areas where the projects are to be implemented

2. The types of GI control that are to be employed and the rational for their use

3. The approximate location of the controls

4. The estimated acreage that will be controlled to a 1.2" retention standard

5. A schedule for implementation of the controls

6. The estimated cost for each type of control to be employed

7. The total cost for the Project

8. Post Construction Monitoring and Modeling Program for this project to demonstrate the capture efficiency of the controls to be implemented

B. Six months following the completion of a project's post construction monitoring program, DC Water shall submit a Post Construction report for EPA review and comment. The Post Construction Report shall contain:

1. A comparison of planned projects under the Project Description and actual implemented projects:

   (a) Costs

   (b) Acreage treated to 1.2" retention standard

   (c) Estimate of run-off control.

2. Identification of barriers to implementation of projects and steps taken by DC Water and the District to address any identified barriers for this and future projects

3. Post Construction Monitoring and Modeling Program results assessing the efficiency of the controls implemented

4. Changes proposed for future projects

C. Potomac Sewershed Projects: In accordance with the following schedule, construct GI, including targeted sewer separation, in the CSO 027, 028 and 029 sewersheds designed to:

1. Project No. 1: Control 44 acres to the 1.2" Retention Standard

   (a) Award Contract for Construction: June 23, 2017

   (b) Place in Operation: June 23, 2019

2. Project No. 2: Control 46 acres to the 1.2" Retention Standard

   (a) Award Contract for Construction: June 23, 2022

   (b) Place in Operation: June 23, 2024

3. Project No. 3: Control 43 acres to the 1.2" Retention Standard

   (a) Award Contract for Construction: June 23, 2025

   (b) Place in Operation: June 23, 2027

4. Controlled acres placed in operation in excess of those specified for a given project in this paragraph II.C may be credited against the acres required to be controlled on subsequent projects.

5. No later than 15 months following the Place in Operation date for Project No. 1 above, DC Water shall submit to EPA and the District Post Construction Monitoring Report No. 1 for the Potomac Sewershed Projects (Potomac Report No. 1). In addition to the information required in Subsection II.B above, the report shall contain DC Water's determination of the practicability of controlling at least 133 acres to the 1.2" Retention Standard in the CSO 027, 028 and 029 sewersheds by the Place in Operation deadline for Project No. 3 above based on its experience with implementing Project No. 1. Such determination shall consider the constructability, operability, efficacy, public acceptability and cost per impervious acre treated of the controls.

6. EPA shall either approve or disapprove of the determination required by Paragraph 5 above. If EPA fails to either approve or disapprove the determination within 180-days following receipt of Potomac Report No. 1, any subsequent deadline that is dependent upon such approval or disapproval shall be extended by the number of calendar days beyond the 180-day period that EPA uses to approve or disapprove the determination. The process for approving or disapproving the determination shall be governed by Paragraph 39 of the Consent Decree.

7. In the event DC Water determines that it is not practicable to control at least 133 acres to the 1.2" Retention Standard in the CSO 027, 028 and 029 sewersheds by the Place in Operation deadline for Project No. 3 above and such determination is approved by EPA, DC Water shall:

   (a) Plan, design, and construct the Potomac River Storage/Conveyance Tunnel with a total storage volume of not less than 40 million gallons, at any time up to, but no later than the following schedule

      (i) Award Contract for Detailed Design: Three (3) months after EPA approval

      (ii) Award Contract for Construction: Two (2) years and six (6) months after EPA approval

      (iii) Place in Operation: Nine (9) years after EPA approval

   (b) Be relieved of its obligation to implement Project Nos. 2 and 3 above; and

   (c) Operate and maintain the GI constructed in Project No. 1 in accordance with its NPDES Permit.

D. Rock Creek Sewershed Projects: In accordance with the following schedule, construct GI, including targeted sewer separation, in the CSO 049 (Piney Branch) sewershed designed to:

1. Project No. 1: Control 20 acres to the 1.2" Retention Standard

   (a) Award Contract for Construction: March 30, 2017

   (b) Place in Operation: March 30, 2019

2. Project No. 2: Control 75 acres to the 1.2" Retention Standard

   (a) Award Contract for Construction: January 23, 2022

   (b) Place in Operation: January 23, 2024

3. Project No. 3: Control 90 acres to the 1.2" Retention Standard

   (a) Award Contract for Construction: March 23, 2025

   (b) Place in Operation: March 23, 2027

4. Project No. 4: Control 90 acres to the 1.2" Retention Standard

   (a) Award Contract for Construction: September 30, 2027

   (b) Place in Operation: September 30, 2029

5. Project No. 5: Control 90 acres to the 1.2" Retention Standard

   (a) Award Contract for Construction: March 23, 2028

   (b) Place in Operation: March 23, 2030

6. Controlled acres placed in operation in excess of those specified for a given project in this paragraph II.D. may be credited against the acres required to be controlled on subsequent projects.

7. No later than 15 months following the Place in Operation date for Project No. 1 above, DC Water shall submit to EPA and the District Post Construction Monitoring Report No. 1 for the Rock Creek Sewershed Projects (Rock Creek Report No. 1). In addition to the information required in Subsection II.B above, the report shall contain DC Water's determination of the practicability of controlling at least 365 acres to the 1.2" Retention Standard in the CSO 049 sewershed by the Place in Operation deadline for Project No. 5 above based on its experience with implementing Project No. 1. Such determination shall consider the

constructability, operability, efficacy, public acceptability and cost per impervious acre treated of the controls.

8. EPA shall either approve or disapprove of the determination required by Paragraph 7 above. If EPA fails to either approve or disapprove the determination within 180-days following receipt of Rock Creek Report No. 1, any subsequent deadline that is dependent upon such approval or disapproval shall be extended by the number of calendar days beyond the 180-day period that EPA uses to approve or disapprove the determination. The process for approving or disapproving the determination shall be governed by Paragraph 39 of the Consent Decree.

9. DC Water has determined that it is not practicable to control at least 365 acres to the 1.2" Retention Standard in the CSO 049 sewershed by March 23, 2030 using solely green infrastructure projects, and such determination has been approved by EPA. DC Water has determined that a hybrid approach of green and gray infrastructure projects will achieve control equivalent to managing at least 365 acres to the 1.2" Retention Standard in the CSO 049 watershed by March 23, 2030, and such determination has been approved by EPA. DC Water shall achieve a minimum of 9.5 million gallons of control in the CSO 049 sewershed by March 23, 2030 as follows:

   (a) DC Water shall construct a Rock Creek Storage Facility (the "Facility"), which shall store combined sewer flow from the Piney Branch Outfall, CSO 049, in accordance with DC Water's NPDES Permit. The storage capacity of the Facility will be at least four million two hundred thousand gallons (4.2 million gallons). After the Facility is Placed in Operation, in the event of wet weather causing the facility to be used for storage, DC Water shall dewater the Facility to the CSS as soon as practicable, but in no event longer than 59 hours, and shall convey the contents of the Facility to Blue Plains for treatment in accordance with DC Water's NPDES permit. The location of the Facility will be finalized during Facility Planning and design, but it will be between CSO 049 and Rock Creek and its approximate location is depicted in Page ES-9 of Appendix A to this Decree.

   (b) DC Water shall plan, design, construct and Place in Operation the Facility at any time up to, but no later than the following schedule:

      (i) Award Contract for Detailed Design: Three (3) years six (6) months after EPA approval

      (ii) Award Contract for Construction: Five (5) years six (6) months after EPA approval

(iii) Place in Operation: Nine (9) years after EPA Approval

(c) The Rock Creek Storage Facility shall be subject to the terms and requirements of Section VIII. (Control System Compliance and Post-Construction Monitoring) of this Decree.

(d) DC Water shall place in operation GI which may include targeted sewer separation and downspout disconnection in the CSO 049 in accordance with the following schedule:

(i) DC Water certifies that it has placed in operation Rock Creek Project 1 controlling at least 20 acres to the 1.2" retention standard (652,000 gallons)

(ii) Project B: Control 22 acres to the 1.2" Retention Standard (717,000 gallons)

a. Award Contract for Construction: January 23, 2022

b. Place in Operation: January 23, 2024

(iii) Project C: Control 25 acres to the 1.2" Retention Standard (815,500 gallons)

a. Award Contract for Construction: March 23, 2025

b. Place in Operation: December 31, 2027

(iv) Project D: Control 25 acres to the 1.2" Retention Standard (815,500 gallons)

a. Award Contract for Construction: March 23, 2028

b. Place in Operation: March 23, 2030

(e) As provided in Section II.E of Appendix F, DC Water has demonstrated that it is entitled to take credit for at least 2.3 million gallons (70.5 acres controlled to the 1.2" Retention Standard) from the implementation of the District's MS4 Permit and Stormwater Regulations in the CSO 049 sewershed as of March 31, 2020.

(f) DC Water is relieved of its obligation to implement Project Nos. 2, 3, 4, and 5 from this Section II.D.; and

(g) DC Water shall operate and maintain the GI constructed in Project No. 1 in accordance with its NPDES Permit.

E. **Credit for Other Controlled Acres**. Controlled acres from the implementation of the District's MS4 Permit and Stormwater Regulations will be credited against DC Water's obligations to control acres in paragraphs II.C. and II.D. if:

1. They are located in the CSO areas targeted for GI implementation by DC Water; and

2. The design of the control measures and their level of control has been verified by DC Water to achieve the 1.2" retention standard or any portion thereof. Where green infrastructure installations by any party do not meet the full 1.2" design criterion and are counted towards meeting the requirements of this consent decree, DC Water may proportionally credit the control achieved; and

3. DC Water, the District or a private party has assumed operation and maintenance responsibilities in a legally binding document or as part of its statutory or regulatory authority.

F. **DC Water Commitments to Coordinate with the District.** The commitments of DC Water in coordinating with the District are:

1. DC Water shall consult with the District's Program Coordinator and relevant District agencies in selecting planned GI projects proposed for District property or rights of way to ensure coordination with District infrastructure policies and priorities;

2. DC Water shall submit draft GI construction staging packages identifying facilities to be constructed, including preliminary engineering plans and specifications, staging areas, estimated construction durations, work hours and traffic management plans for review by the District and shall do so sufficiently in advance of construction of the various GI contract divisions in order to allow adequate time for the District to review the packages, for the District and DC Water to resolve any issues, and for the District to issue the permits before the expected start date of construction;

3. DC Water shall prepare 30%, 60%, 90% and 100% documents each for RFP and design for District review and comment prepared in accordance with terms agreed to by the District and DC Water;

4. DC Water shall submit a maintenance and monitoring plan, including the funding methodology, for each GI Project to the District agencies having jurisdiction.

5. DC Water shall submit applications for public space, construction, and any other necessary permits for each project or facility;

6. DC Water shall submit the documents required by this section sufficiently in advance of construction in order to allow adequate time for the District to review the document, for the District and DC Water to resolve any issues, and for the District to issue the permits or other legal authority before the expected start date of construction of the project.

7. DC Water shall work with the District to coordinate and align capital projects and expenditures, where feasible and practical, to allow implementation of the GI projects in a manner that enables the efficient use of resources and minimizes costs to the taxpayers and rate-payers.

8. DC Water shall assure that GI credited towards meeting DC Water's obligations to control acres in paragraphs II.C. and II.D is inspected no less than once every three years and that any deficiencies are corrected.

III. District of Columbia Government Commitments

A. The commitments of the District in support of the GI Projects are:

1. The District agrees to provide the public space necessary for DC Water to construct GI to control 92 acres to the 1.2" Retention Standard in the CSO 049 sewershed. The District and DC Water will establish procedures for identifying GI locations, technologies, and issuance of permits for construction, operation and maintenance and other matters.

2. The District will appoint an executive-level District official as the District's Program Coordinator within 6 months of Effective Date of the First Amendment to the Consent Decree. The Coordinator will be charged with coordinating and expediting the work of the relevant District offices, departments and agencies;

3. After submission by DC Water of each construction staging package, the District shall review the proposed construction staging areas, construction durations, maintenance of traffic, parking mitigation, work hours and facilities to be constructed, and work with DC Water to resolve any concerns and issue approval letters identifying the conditions that must be met in order to obtain permits for construction;

4. The District shall issue permits for construction within thirty (30) business days of submittal of a complete application package prepared in accordance with an approval letter;

5. After submission and review of the maintenance and monitoring plan for a GI Project submitted by DC Water, the District shall issue permits or other legal authority to DC Water in advance of the completion of construction of the GI Projects allowing access for the maintenance and monitoring of the project; unless, as part of the maintenance and monitoring plan

submitted by DC Water and approved by the District, the District or private party will be responsible for the maintenance and monitoring of the project.

6. The District shall revise its storm water policies regarding in-lieu fees to include the following:

   (a) In-lieu fees paid by regulated projects in the 049 sewershed will be used to fund construction of GI in those sewershed; and

   (b) In-lieu fees paid by regulated projects in combined sewersheds will not be used to fund projects in combined sewersheds controlled by the Gray CSO Controls required by this Consent Decree.

7. The District shall submit a report to EPA for review and comment no later than March 1, 2016 identifying impediments to implementation of the GI Projects and identifying proposed changes to the regulations, codes, standards, guidelines and policies by reviewing the following items at a minimum:

   (a) Storm water regulations and policies; including a review of the practicability of incentivizing storm water retention credits (SRCs) to maximize water quality benefits;

   (b) District Department of Transportation ("DDOT") Design and Engineering Manual;

   (c) Zoning regulations;

   (d) Plumbing and Building Codes;

   (e) DDOT Urban Forestry Guidelines;

   (f) DDOT Green Infrastructure Standards; and

   (g) DC Water Utility Protection Guidelines.

8. The District shall take the following actions with respect to the proposed amendments to the regulations, codes, standards and guidelines included in the reports described in paragraphs above:

   (a) For statutory amendments, the District shall submit to the Council by no later than March 1, 2017, proposed legislation to enact the statutory amendments;

   (b) For regulatory amendments that require Council approval, the District shall publish a notice of proposed rulemaking by March 1,

2017, and shall submit to the Council by no later than January 1, 2018, a proposed resolution to approve the final rules;

(c) For regulatory amendments that require Zoning Commission approval, the District shall submit proposed zoning language to the Zoning Commission for its approval by no later than March 1, 2017;

(d) For regulatory amendments that do not require Council or Zoning Commission approval, the District shall issue a notice of proposed rulemaking by March 1, 2017;

(e) For statutory amendments and for regulatory amendments that require Council approval, the District shall take such actions as are necessary to obtain the Council's approval of the proposed legislation by March 1, 2018;

(f) For regulatory amendments that require Zoning Commission approval, the District shall take such actions as are necessary to obtain the Zoning Commission's adoption of the regulatory amendments by March 1, 2018; and

(g) For regulatory amendments that do not require Council or Zoning Commission approval, the District shall issue a notice of final rulemaking no later than March 1, 2018.

B. Anti-Deficiency Act Events: Nothing in this Decree shall be construed to require an expenditure, obligation or contract in violation of the Anti-Deficiency Act, 31 U.S.C. §§ 1341 et seq. Where an expenditure, obligation or contract is subject to the Anti-Deficiency Act, the District's obligations shall be subject to the availability of appropriated funds.

IV. Additional Coordination between DC Water and District

DC Water and the District will work together to coordinate and align capital projects and expenditures, where feasible and practical, to allow implementation of the GI Projects in a manner that enables the efficient use of resources and minimizes costs to the taxpayers and rate-payers. As part of this process, the District and DC Water will identify capital projects in the sewershed for CSO 049 that are projected to be completed during the subsequent three (3) years and that provide an opportunity to include more than $200,000 of green infrastructure in excess of that required by District law. DC Water may request the District to incorporate in one or more of these projects GI in excess of that required by District law. The District agrees to grant such requests if DC Water agrees to fund the incremental design, construction, monitoring and maintenance costs of GI implemented by the District in excess of GI required by District law, the amount of such funding is agreed to by the District and DC Water, and the proposed GI is consistent with the District's current and potential future

program for the project. Such excess GI will be credited to the acres required to be controlled in Subsections II.C and II.D of this Appendix F.

V. Reporting

A. Following EPA's approval of the GI Program Plan, DC Water shall report on the status of implementation of the GI Program Plan in each Quarterly Report required by Section XI (Reporting) of this Decree. With respect to the hybrid approach for the 049 sewershed, DC Water shall report on the status of implementation of the Rock Creek Storage Facility in accordance with the terms and requirements of Section XI (Reporting) of this Decree. The reports shall describe the status (i.e., in design, in procurement, under construction, or completed) of the control measure projects identified in the GI Program Plan and the Rock Creek Storage Facility. As part of the First Quarterly Report of each calendar year, DC Water shall include the following information for the prior calendar year:

1. Total acres of impervious area treated by GI installed and by sewer separation since the Effective Date of the First Amendment to the Consent Decree in the sewershed for CSO 049 (Piney Branch);

2. Acres of impervious area treated by GI pursuant to the District's MS4 permit and Stormwater Regulations installed since the Effective Date of the First Amendment to the Consent Decree in the sewershed for CSO 049 (Piney Branch); and the numbers of such acres credited in accordance with Section II.C of this Appendix F;

3. The activities the District and DC Water have taken to coordinate and align capital projects to minimize costs associated with implementation of the GI Projects by DC Water; and

4. After completion of the Rock Creek Storage Facility, DC Water shall provide reports in the first applicable quarter and annual reports which includes the total acres of impervious area treated by GI and the storage volume of the Rock Creek Storage Facility in the sewershed for CSO 049 (Piney Branch).

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Appendix B

Responses to Public Comments

ABBREVIATED COMMENTS AND RESPONSES

REDACTED EMAILS

LETTER OF SUPPORT AND COMMENTS FROM COMMISSIONER 4B02

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1. INTRODUCTION

This Appendix presents responses to comments received on the Draft Project Description for Rock Creek Project C that was released on April 5, 2024. In the following text, each comment is described, and a response is provided.

Section 2 below includes comments 1 – 23 that were received through email at our cleanriversgi@dcwater.com account. The corresponding emails received (redacted) are numbered similarly and provided at the end of this Appendix.

Section 3 below contains comments 24 – 36 received verbally during public meetings and presentations.

Section 4 includes a Letter of Support and Comments from ANC Commissioner Erin Palmer (4B02) and is provided at the end of this Appendix.

2. EMAILED COMMENTS AND RESPONSES

1-12. Comments from various residents in the project area:

Comments: Commentors expressed overall support for the project and requested that the permeable pavers be extended the entire length of the alley.

Response: Alley permeable pavement facilities are located downstream of the contributing drainage area to capture the runoff within the alley. Although the permeable portion of the alley will not be constructed in the entire alley length, the stormwater generated in the alley will be controlled by the downstream facility.

13. Comments from Lucas Goodman and Cormac Early:

a) Comment: Commentor believes it is pointless that the project requires a month of public comment before design begins. Commentors trust DC Water that this project is necessary and wish the project success.

Response: Comment noted.

14. Comments from Katie Dyer:

a) Comment: Commentor pointed out the following:

1. Gallatin Street will have significant disruptions with the alley closure(s), including impact to school buses. DC Water may want to plan what alleys they are doing as it relates to the school closures (summer holiday, etc.).

2. Gallatin St / Hamilton St Alley has significant flooding during large precipitation events. Hoping this will help with the flooding as well as with the stormwater runoff.

3. Many cars park regularly in the alley 24/7, which should be considered for longevity of the permeable pavements and maintenance.

4. Some of the houses in the alley Hamilton / Gallatin are vacant, and have significant tree litter, sediment, and roots growing. Some of the trees need to be significantly cut back.

5. How long will an alley be under construction as most residents keep their vehicles in the rear of their property?

6. Commentor is excited to see this great initiative in the area. Please do public outreach when residents are not at work to try to communicate with residents better.

Response:

1. DC Water will work with its contractor to minimize impacts to residents.
2. DC Water's green infrastructure project manages stormwater to the 1.2" retention standard. This project's goal is to minimize CSOs to the Rock Creek Sewershed and does not address flooding issues.
3. DC Water follows the DDOT green infrastructure handbook, which requires the permeable alley surface to withstand vehicle traffic, including garbage trucks.
4. Comment noted.
5. The average length of a permeable alley is about 150 feet and takes roughly 3 to 5 weeks to construct, which varies with the length of the alley. Residents who are directly impacted by the construction will not have access to their garage via the alleyway during construction.
6. DC Water maintains a robust public outreach program and will reach out to residents 2 weeks prior to the start of construction.

15. Comments from Cell Ranking:

    a) Comment: Commentor received the flyer about the Rock Creek Project and would like to know when DC Water's next public meeting will occur.

    Response: DC Water hosted two public meetings. The first on April 8, 2024, and the second on May 6, 2024. Additionally, DC Water presented at each of the four ANC monthly meetings prior to finalizing the Project Description.

16. Comments from Rick Grand:

    a) Comment: Commentor supports green infrastructure and Rock Creek Project C.

    Response: Comment noted.

17. Comments from Stefanie Fabrico:

    a) Comment: Commentor stated that in addition to installing permeable paving in the alley behind their house they would also like the alley between 7th Pl and 8th St to be to be repaved.

       Response: There are several reasons why some alleys may not work for the project. Project areas are selected for their feasibility of design and construction, cost-effective implementation, and ability to meet the required stormwater volume capture. The final selection of alleys for Rock Creek Project C (RC-C) can be found in the Final Project Description. If alleys are not included in the RC-C project that residents feel need repaving or repair, residents are encouraged to contact 311 to request repairs from DDOT.

18. Comments from David Wescott & Addie Rolnick:

    a) Comment: Commentors support the project, saying it will beautify the alley and help keep Rock Creek clean.

       Response: Comment noted.

19. Comments from Robert Morgan:

    a) Comment: Commentor asked if there is a timeline for how long this project will take for completion? The commentor is concerned about not having access to his garage that is utilized for his business.

       Response: The average length of a permeable alley is about 150 feet and takes roughly 3 to 5 weeks to construct, which varies with the length of the alley. Residents who are directly impacted by the construction will not have access to their garage via the alleyway during construction.

    b) Comment: Commentator stated that the alleyway being considered by his property has a major rat infestation and is concerned that construction will cause the rats to become more active. Has DC Water considered this, and will it be providing any pest and rodent mitigation?

       Response: DC Water's green infrastructure program places rodent bait traps prior to construction of the permeable alleys that are removed after construction concludes.

    c) Comment: Once the permeable alley is constructed, will residents be able to redirect stormwater flow from garage roofs onto the new surface?

       Response: Residents are encouraged to disconnect any downspouts on their property and direct the stormwater to a location that does not create hardship for themselves or their neighbors. Residents are encouraged to visit the DOEE website for more information on private stormwater management and their RiverSmart program.

d) Comment: Without access to garage parking during construction, what accommodations does DC Water provide to protect residents' cars during construction when access to their garages is restricted?

Response: Residents directly impacted by construction will need to find alternative parking suitable for their individual needs.

20. Comments from Mari Kimura:

a) Comment: Commentor is excited about permeable alleys coming to the district.

Response: Comment noted.

21. Comment from Zach Israel:

a) Comment: Commenter pointed out that Rock Creek Project C, Area 4D-1, includes two permeable alley pavement facilities across two segments of the public alleyway; both lead directly to the rear of his home. Can DC Water construct each of these two permeable alley pavement sections at different times, so that the alley located between the two facilities always remains accessible?

Response: DC Water will coordinate with the contractor to establish a construction sequence to ensure that the two affected areas of the alley are not under construction at the same time.

b) Comment: Will DC Water notify all of the homeowners who reside immediately surrounding these projects at least one month in advance.

Response: DC Water's standard practice is to notify residents a minimum of 2 weeks prior to the start of construction with a follow-up notification 48 hours prior to the start of construction.

22. Comments from Cell Ranking:

a) Comment: Commentor has concerns about the Rock Creek Project C, Area 4E-1. The brick pavement in the back alley has slowly become a green alley, with rubble building up between the gaps and weeds growing into them. Commentor asks if DC Water will use a long-lasting and durable solution such as concrete for the alley?

Response: Comment noted. DC Water has a routine maintenance schedule for all permeable alleys to ensure long term viability of the facility. Residents are encouraged to contact DDOT for maintenance concerns relating to non-permeable portions of the alley. DC Water will restore the portions of the alley beyond the permeable pavement to concrete only where it is disturbed during construction.

23. Comments from Ronald and Jacqueline Coleman:

a) Comment: Commentors' property is located between two facilities within the

alleyway which both lead directly to the rear of the home. Can DC Water construct the two permeable alley locations at different times so that the alley located between the two projects always remains accessible for the residents, including those requiring additional accessibility needs? Will other service companies such as the Department of Public Works (DPW) have access to the alley?

Response: DC Water will coordinate with the contractor to establish a construction sequence to ensure that the two affected areas of the alley are not under construction at the same time. DC Water's contractor and public outreach team will work with individual residents who require additional accommodations during construction including but not limited to parking, trash relocation, and other specific accessibility needs.

3. VERBAL COMMENTS AND RESPONSES

24. Comments from Martha Jewett:

    a) Comment: Commentor asked if DC Water had any advice for adding her garage driveway to the project at DC Water expense?

    Response: DC Water's green infrastructure program is contained within the public right-of way. Residents are encouraged to install green infrastructure on their private property to manage stormwater utilizing the contractor of their choice. DC Water does not maintain a list of contractors who work on private property to do this type of work.

25. Comments from Gregory Rea:

    a) Comment: Commentor asked how long it takes to build each alley? Will they have access to their garage during construction? The commenter pointed out that there is also a plumbing company that uses garages in the alley for regular business.

    Response: The average length of a permeable alley is about 150 feet and takes roughly 3 to 5 weeks to construct, which varies with the length of the alley. Residents who are directly impacted by the construction will not have access to their garage via the alleyway during construction.

26. Comments from Kelly Hunt:

    a) Comment: Commentor asked for the public meeting presentation. The commentator asked when construction will begin and how long it will take.

    Response: Copies of DC Water's presentations presented on April 8 and May 6, 2024, were posted on the DC Water website the following days. Presentations given at each of the ANC meetings were distributed to the commissioners prior to the meeting with authorization to share with their constituents. Construction is anticipated to begin Spring 2025 and conclude by June 2027. It should be noted that

each individual alley takes roughly 3 to 5 weeks to construct, which varies with the length of the alley.

27. Comments from Commissioner Chrysanthe Courniotes (4D04):

    a) Comment: Commentor asked if the same contractors are used with each permeable pavement project?

       Response: DC Water has an open procurement and will select the most qualified contractor through that process.

    b) Comment: The commentor asked what the different ways are in which DC Water assesses whether an alley will be part of the project. Commentor requested a specific alley be assessed for the project.

       Response: In 2023, DC Water's engineers walked each of the alleys within the Rock Creek Sewershed, assessing their viability to be converted into a green alleyway. Alleys whose contributing drainage area (CDA) created a stormwater volume greater than 0.25 acres and had limited-to-no utility conflicts were prioritized for consideration within this project. Additional factors including sediment transport, tree litter, alley width, connecting sewer size, and alley conditions were also made part of the selection criteria.

28. Comments from Commissioner Carson C. Lucarelli (4D03):

    a) Comment: Commentor pointed out that many alleys are mixed use, such as deliveries from trucks; emergency and work vehicles also use them. Commentor also asked about the paving loads for the permeable paved alleys.

       Response: DC Water follows the DDOT green infrastructure handbook, which requires the permeable alley surface to withstand vehicle traffic, including garbage trucks.

    b) Comment: Commentor asked about the general maintenance of the alleys, will some alleys require sweeping and will there be runoff? Who will maintain the alleys over time?

       Response: To ensure continued performance of GI and the associated reduction of combined sewer overflows, the GI facilities are maintained regularly. DC Water is responsible for maintenance of GI facilities constructed by DC Water. Facility IDs will be placed at each GI facility that DC Water constructs and residents can contact DC Water if they notice trash or other issues in the facilities.

29. Comments from Commissioner Joy A. Pinkney (4D01):

    a) Comment: Commentor asked if DC Water helps with rat and rodent problems? Does DC Water coordinate with other agencies that do rat and rodent issues?

Response: DC Water's green infrastructure program places rodent bait traps prior to construction of the permeable alleys that are removed after construction concludes.

30. Comments from Commissioner Erin Palmer (4B02):

    a) Comment: Do you coordinate with DDOT on alley re-pavement and where to install green infrastructure within the alley?

       Response: Yes, DC Water coordinates with DDOT starting at the planning stage, all through design and construction. Alleys selected under the DC Water project are permitted by DDOT to ensure compliance with District standards and best practices.

    b) Comment: The alleys shown in the Draft Project Description appear to only include a portion of the alley to be converted to green infrastructure. What is the reason behind this decision not to make the entire alley permeable?

       Response: DC Water appreciates the continued support from ANC 4B and is excited to bring additional stormwater benefits to your area. The alley permeable pavement facilities are located downstream of the contributing drainage area to capture the runoff within the alley up to the 1.2" retention standard. Although the permeable portion of the alley will not be constructed in the entire alley length, the stormwater generated in the alley will be controlled by the downstream facility.

31. Comments from Commissioner Tiffani Nichole Johnson (4B06):

    a) Comment: Commentor asked how the project will assist residents who require additional accessibility accommodations?

       Response: DC Water's contractor and public outreach team will work with individual residents who require additional accommodations during construction including but not limited to parking, trash relocation, and other specific accessibility needs.

32. Comments from Commissioner Kevin Gilligan (4B05):

    a) Comment: The commentor asked what lessons learned from past projects will be implemented in RC-C?

       Response: DC Water continues to adapt our design and construction methodology based on previous projects. One such example was the addition of upstream sediment traps ahead of the permeable section of the alley to help minimize sediment within the gaps between the pavement bricks.

33. Comment from Anonymous Caller:

    a) Comment: Commentor asked if DC Water could install permeable pavers on her parking pad as part of the construction. She understands she would be responsible for the cost.

Response: DC Water's green infrastructure program is contained within the public right-of way. Residents are encouraged to install green infrastructure on their private property to manage stormwater utilizing the contractor of their choice. DC Water does not maintain a list of contractors who work on private property to do this type of work.

34. Comments from Justin Archer:

    a) Comment: Commentor asked if work would be occurring at all sites concurrently? How many workdays the alleyway may be under construction, and would those be consecutive? Would there be a need for access to our property?

       Response: Construction is anticipated to occur from March 2025 through June 2027 with alley construction being staggered throughout this time. The average length of a permeable alley is about 150 feet and takes roughly 3 to 5 weeks to construct, which varies with the length of the alley. Residents who are directly impacted by the construction will not have access to their garage via the alleyway during construction. DC Water will not require access to private property during alley construction.

    b) Comment: Only half of our alley is currently set for this work. What does the transition between the existing road and the new installation look like?

       Response: DC Water places a concrete pad to trap sediment upstream of the permeable pavement facility (see photo below for reference). Depending on the location of the facility, DC Water crews may be required to place a new concrete alley surface downstream of the facility and replace the concrete apron.

Example of concrete pad upstream of a permeable pavement facility.

35. Comments from Anonymous Caller:

    a) Comment: The commentor asked if bricks or concrete are used for the permeable alley.

       Response: DC Water uses a precast concrete permeable paver for nearly all permeable alleys. If the existing alley material is red clay brick, a red clay permeable brick to match the existing surface is used.

    b) Comment: Commentor asked who is responsible for cleaning out the dirt and tree litter in the alleys and who is coming out to do maintenance?

       Response: To ensure continued performance of green infrastructure (GI) and the associated reduction of combined sewer overflows, the GI facilities are maintained regularly. DC Water is responsible for maintenance of GI facilities constructed by DC Water. Facility IDs will be placed at each GI facility that DC Water constructs and residents can contact DC Water if you notice trash or other issues in the facilities.

36. Comments from Zachary Israel:

a) Comment: Commentor asked when will DC Water decide which alleys are to be constructed and what will the order of construction for these alleys be? Will the alleys be constructed in sequence (not concurrently)?

Response: The final permeable alley locations are included within the Final Project Description for Rock Creek Project C. Construction is anticipated to occur from March 2025 through June 2027 with alley construction being staggered throughout this time. The average length of a permeable alley is about 150 feet and takes roughly 3 to 5 weeks to construct, which varies with the length of the alley.

b) Comment: Will DPW still conduct weekly trash pickup during construction?

Response: DC Water and the contractor will coordinate with DPW to ensure trash pick-up for all affected residents occurs during construction from the front of their homes. Contractor will assist residents who require support in relocating their trash containers.

4. Letter of Support and Comments on Rock Creek Project C from ANC Commissioner Erin Palmer (4B02)

DC Water appreciates the continued support from ANC 4B and is excited to bring additional stormwater benefits to Ward 4 under Rock Creek Project C as well as the future Rock Creek Project D, where DC Water will be expanding the program to include open space bioretention and will evaluate areas identified by the ANC commissioners.

A copy of Commissioner Palmer's letter of support is found at the end of this Appendix.

REDACTED EMAILS

From: KESHA PENDERGRAST [redacted]
Sent: Friday, March 29, 2024 12:46 PM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Subject: Rock Creek Project C - 8 proposed project areas

Good morning,

I am a resident of [redacted]. I am in receipt of the above referenced project that impacts my neighborhood.

My neighbors and I would like to ensure that this project encompasses the entire west alley way of 13th Street, NW and not just a small section of the alley, as it appears to be depicted in the flyer graphic.

To complete only partial of a short alley is counter productive to reducing drainage issues, is less aesthetically pleasing as the work will appear incomplete.

We kindly request that the entire alley length from east to west is completed with consistent permeable material throughout the alley and not just a small section.

Kindest regards,
Kesha Pendergrast

Sent from my iPhone. Please excuse any auto correct typos

From: Abby [redacted]
Sent: Friday, April 5, 2024 11:02 AM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Subject: Rock Creek - Project C - Peabody/Oneida request

Greetings!

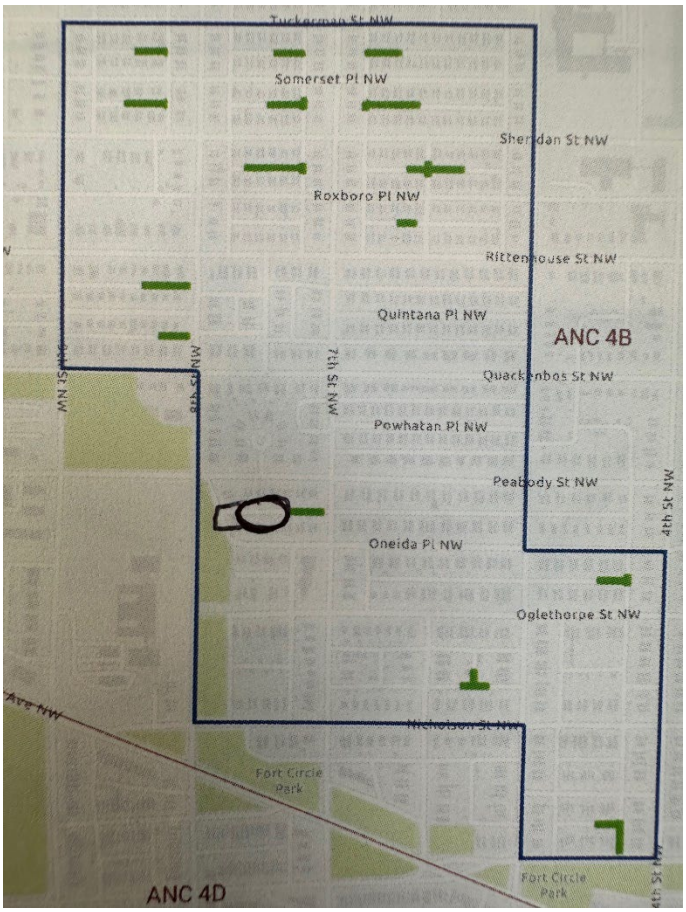
I was SO excited to receive the flyer about the Rock Creek Project C today. We live at [redacted], and our alley is between Peabody Street and Oneida Place NW. It looks like part of our alley will thankfully be getting the permeable pavement. However, it looks like it stops just short of the part of our alley behind our house.

I would like to request that the permeable pavers be extended slightly in our alley (see the attached picture - I circled it). The reason for this request is because all of our houses are at the bottom of the big hill (in between Oneida and Peabody) and we receive HUGE amounts of drain off during storms. Our house is one of the only houses on the block with a sump pump, and it literally continuously pumps water all year long. Also, in August 2020 a huge storm completely flooded our basement, causing over $20,000 in damage and needing it to be completely ripped out.

I believe that if the pavers were extended in the alley, that we would all greatly benefit.

Thank you for considering this and please feel free to call or stop by!

Abigail Cruz
[redacted]


Somerset Pl NW
Sheridan St NW
Roxboro Pl NW
Rittenhouse St NW
Quintana Pl NW
ANC 4B
Quackenbos St NW
Powhatan Pl NW
Peabody St NW
Oneida Pl NW
Oglethorpe St NW
Fort Circle Park
Fort Circle Park
ANC 4D
4th St NW
).

3

Sent: Sunday, April 7, 2024 10:47 AM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Subject: Comment/Request re: dc clean rivers program in area 4B-2

To whom it concerns:

I am the owner of [redacted] I would strongly support green infrastructure being expanded from the small segment on the map to the length of the alleyway behind the 10 row houses in that stretch [redacted] Please see attached photo. The alleyway is sloped down as you head east (towards 601). During storms, without permeable surfaces, it just forms a river. If you only partially construct the GI to a limited segment, the water could run from the impermeable concrete/asphalt and divert to backyards when you hit the GI section that is more porous.

I have concerns about the current design that looks like that starts just after my property making my backyard a potential for pooling.

I support this green initiate and formally request consideration that it be expanded at least to behind my property, but with a strong preference to do the alleyway section from [redacted] is then cut off by alleyways running north-south and that can help with drainage offshoots.

Many thanks,

Briena Strippoli

4

From: Zach P. Cress [redacted]
Sent: Wednesday, April 10, 2024 6:19 PM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Cc: Kate Kula [redacted]
Subject: Comment re: 4B-2 Rock Creek Projet C

Hello,

This email serves as a comment to commend DC Water on initiating Rock Creek Project C in Brightwood. My wife and I own property at [redacted] in project are 4B-2, and are glad to see some of the alleyway on our block will be converted to permeable pavement. Storm runoff is a big problem on our block, and our sewer line backs up after every major rain event because there is too much runoff. We are supportive of every effort to use green infrastructure to reduce runoff to prevent local flooding and to mitigate chemical pollution to the Potomac river basin.

If I could provide a recommendation, it would be to include the entire alleyway in the area between the 800 block of Sheridan St NW, the 800 block of Somerset St NW, the 600 block of 9th St NW, and the 600 block of 8th St NW, and not just a segment of it.

Kindly,
Zachary Cress

5

From: J Mcc [redacted]
Sent: Friday, April 12, 2024 2:57 PM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Cc: Ann Steiger [redacted]; Marni Harker [redacted]>; Tony Fischer [redacted]; ICE Jeff Englar [redacted]
Subject: PROJECT C Area 4E-2

I fully support the proposed permeable alleyway, to be installed between the 1500 blocks of Webster & Allison Streets NW. I would encourage DC Water to expand that as fully as possible within the alley, and behind Mosaic Church [redacted]

Joseph McCall
[redacted]
[redacted]

From: Jafari, Reza [redacted]
Sent: Friday, April 12, 2024 1:00 PM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Subject: Rock Creek Project C - Public Comment

Rock Creek Project C -Area 4E-1
Please extend the proposed infrastructure paving to the end of alleyway.

I have attached the proposed with my comments

Sincerely,
Reza Jafari, P.E.
Chief – Electrical Engineering Branch
[redacted]

From: ann steiger [redacted]
Sent: Saturday, April 13, 2024 9:22 AM
To: J Mcc [redacted]
Cc: Clean Rivers GI <cleanriversgi@dcwater.com>; Marni Harker [redacted]; Tony Fischer [redacted]>; ICE Jeff Englar [redacted]
Subject: Re: PROJECT C Area 4E-2

Sounds like a good plan…..
Sent from my iPad

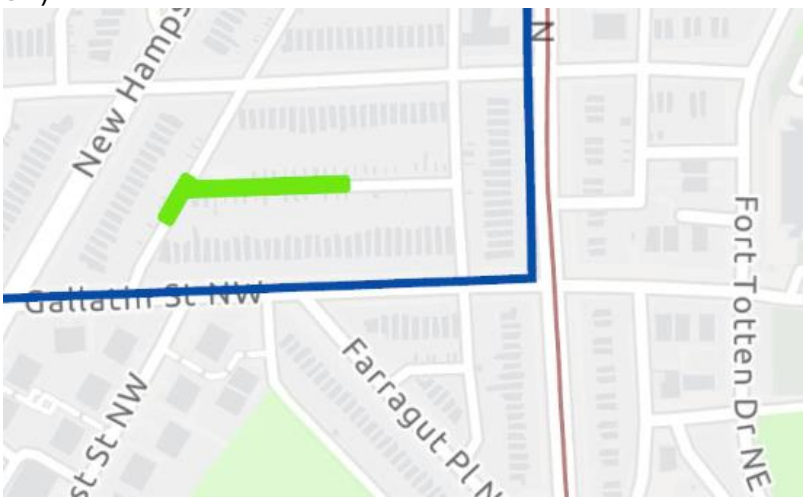
> On Apr 12, 2024, at 2:57 PM, J Mcc [redacted] wrote:
>
> I fully support the proposed permeable alleyway, to be installed between the 1500 blocks of Webster & Allison Streets NW. I would encourage DC Water to expand that as fully as possible within the alley, and behind Mosaic Church at [redacted]
>
> Joseph McCall
[redacted]

8

From: Kara Turner [redacted]
Sent: Saturday, April 27, 2024 9:43 AM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Subject: Public Comment: Rock Creek Project C (Area 4D-1)

Dear DC Water and DC Clean Rivers Project officials,

I am writing to express my support for permeable alleys to be constructed in Area 4D-1 as part of the Rock Creek Project C, most specifically this addition (*photo inserted to show alley between Gallatin St. NW and Hamilton St. NW, near New Hampshire and N. Capitol St.*).



Replacement of the existing pavement with a permeable surface will tremendously help to control runoff to better meet DC's goals surrounding controlling CSOs, beautify our neighborhood, and mitigate drainage issues, which we regularly experience during rains.

As a resident of this block, I would further request extending the new permeable surface in the alley between Hamilton St. NW and Gallatin St. to continue to the east beyond the proposed cut-off mid-alley, (behind the approximately 10 houses that are toward N. Capitol St.) until it reaches the perpendicular cross alley. Doing so will provide continuity and extend the benefits to the residents who traverse this space on a daily basis, as we walk to the Metro, bike, and take family and dog walks together.

Around our neighborhood, we have seen the similar completed permeable alleyways that were part of the Rock Creek Project's earlier stages. These projects are the right thing to do for our city's environmental future and show a commitment to the people who live among and take pride in these spaces.

Thank you for your consideration and your commitment to green infrastructure.

Sincerely,
Kara Turner

From: Aishah Ali [redacted]
Sent: Wednesday, May 8, 2024 3:37 PM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Subject: Project Area 4D-1

Hello,

As a home owner at a property adjacent to a proposed alley project that sees local flooding, I'd like to comment on Project Area 4D-1. We think pavers would make the area safer in terms of flooding - safer for pedestrians, drivers, and home owners. We would like to see the permeable pavement area extended further throughout the alley between Hamilton and Gallatin (between New Hampshire and North Capitol). Whenever there is a hard rain, there is a lot of flooding on Gallatin between the alley and New Hampshire, filling the parking spaces and bike lane making blocking the path and making it dangerous. The alley to the north of Hamilton is fully permeable pavement and we would like this for our alley too. Thank you for your consideration!

Aishah Ali
[redacted] homeowner

10

From: Katherine Longabaugh [redacted]
Sent: Wednesday, May 8, 2024 2:19 PM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Subject: Public comment on Project Area 4D-1

Hello,

As a resident and tenant at a property adjacent to a proposed alley project that sees local flooding, I'd like to comment on Project Area 4D-1. We would like to see the permeable pavement area extended further throughout the alley between Hamilton and Gallatin (between New Hampshire and North Capitol). Whenever there is a hard rain, there is a lot of flooding on Gallatin between the alley and New Hampshire, filling the parking spaces and bike lane. The alley to the north of Hamilton is fully permeable pavement and we would like this for our alley too.

Thank you for your consideration!

Best,
Katherine Longabaugh
[redacted]

11

From: Deborah Rosenstein [redacted]
Sent: Wednesday, May 8, 2024 3:36 PM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Subject: Rock Creek Project C - Area 4D-1

Hello,

As a resident and owner of a property adjacent to a proposed alley project that sees local flooding, I'd like to comment on Project Area 4D-1.

We would like to see the permeable pavement area extended further throughout the alley between Hamilton and Gallatin (between New Hampshire and North Capitol). Whenever there is a hard rain, there is a lot of flooding on Gallatin between the alley and New Hampshire, filling the parking spaces and bike lane. The alley to the north of Hamilton is fully permeable pavement and we would like this for our alley too.

Thank you for your consideration!

-----Original Message-----
From: Trisha Viecco Carrillo [redacted]
Sent: Friday, May 10, 2024 11:23 PM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Subject: Rock Creek Project C

Hello,

Our family would like to add a comment regarding the upcoming alley project C. We've lived next to this alley for 10 years and had always hoped it would be redone. Each year we have to submit requests to 311 to have the numerous potholes refilled only to have them reappear a few months later. The amount of water that flows down our alley during any amount of rainfall erodes the asphalt. Our comment would be that the whole alley needs to permeable pavement, not just part of it. This would help with the water piling up and the wear and tear of the alley.

Thank you and we are very excited about this project.

Trish Carrillo
[redacted] Sent from my iPhone

13

-----Original Message-----
From: Lucas Goodman [redacted]
Sent: Tuesday, April 9, 2024 9:16 PM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Subject: Comment re: Rock Creek Project C

Hello,

Our comment is that it is silly that this requires a month of public comment before design begins. Given the streams of rainwater that flow out of every alley onto the sidewalk during every rainstorm, we trust you that this project is necessary, and wish you success.

Best,
Lucas Goodman and Cormac Early
[redacted]

14

From: Katie Dyer [redacted]
Sent: Wednesday, April 10, 2024 12:37 PM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Subject: AREA 4D-1 Rock Creek Project

Hello,

I received a flyer in the mail regarding the project. A few thoughts:

1. Gallatin St (North Capitol and New Hampshire portion but all the way up to 5th and Gallatin) will have significant disruptions with the alley closure(s). The route down Gallatin St towards the school on 3rd from North Capitol is a route for multiple school buses. Gallatin St is always backed up during morning rush hour, when schools release, and evening rush hour. Many cars use the alleys to cut across during morning and evening traffic. Something to consider, you may want to plan what alleys you are doing as it relates to the school closures (summer holiday, etc.,).

2. Gallatin St / Hamilton St Alley has significant flooding during large precipitation events. Hoping this will help with the flooding as well with the stormwater runoff.

3. Many cars park regularly in the alley 24/7 instead of using the parking pad. Something to consider for longevity of the permeable pavements and maintenance.

4. Some of the houses in the alley Hamilton / Gallatin are vacant, and they have significant tree litter, sediment, and roots growing. Likewise some of the trees need to be significantly cut back that would assist with the litter.

5. There is no indication for an estimate how long an alley would be under construction? Many residents on the street are car dependent (work, mobility, etc. children needing to be driven to school), so it be helpful to give estimates rather than just the overall project schedule as there is limited on street parking and it is already at capacity.

6. This is a great initiative and we are excited to see it in the area. I would encourage you to try to do public outreach when residents are not at work to try to communicate with residents better.

Thanks,
Katie

From: cell ranking [redacted]
Sent: Friday, April 12, 2024 10:46 AM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Subject: Rock Creek Project

15

Good morning,

I received the flyer about the Rock Creek Project and project Location: Area 4E-1 on 16th st Heights. Do you have a virtual public meeting invitation? I love to join the call.

--

Thank you, have a nice day!

16

From: Richard Grand [redacted]
Sent: Friday, April 12, 2024 6:59 PM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Subject: Project C

I support project C

Thanks
Rick Grand

17

From: Stefanie Fabrico [redacted]
Sent: Wednesday, April 17, 2024 11:24 AM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Subject: Clean Rivers Project 4B-1 Project C

Hello,

My alley is in desperate need of repair and our block is the only one in the immediate vicinity that has not been repaved. I see on your map the alley behind my house may be paved with permeable pavers as part of this project but it's really the alley to the side of my house which needs it. My address is [redacted]. The alley that needs paving is next to my house between [redacted]

How can our alley be considered for inclusion?

Best,

Stefanie Fabrico
[redacted]

18

From: David Wescott [redacted]
Sent: Friday, April 19, 2024 4:29 PM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Subject: Public comment on DC clean rivers program

Hi,

We are residents living in an area impacted by Rock Creek Project C (area 4B-2). I believe permeable pavers will be installed in the alley behind our house. We're writing to express our support of the project—it will beautify the alley and help keep Rock Creek clean. We routinely enjoy walking, commuting, and exercising through Rock Creek Park and are proud to live in a city committed to keeping it clean for people and wildlife to enjoy.

David Wescott & Addie Rolnick
[redacted]

19

Sent: Tuesday, April 30, 2024 9:39 AM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Subject: Public Comment AREA 4E-2 Alley Construction

Hello,

Our property is located at [redacted] and the alleyway is scheduled for construction of permeable pavement. Is there a timeline for how long this project will take for completion? Access to our garage in the alley is readily used by our business, and not having rear alley access to that is a major hardship. The start and completion dates on the factsheet provided stated the construction will be between early 2025 - December 2027, Will we not be able to access our garage for over a year?

A few things to consider for the project:

• Alleyway has a major rat infestation that is not being managed by DC, despite numerous complaints from residents. What can DC Water do to help remedy this issue?

• All garage roofs on the south side of the alleyway are pitched to drain back to the home/property. With the new permeable alleyway, can homeowners now pitch the garage roofs to the alleyway?

• With the major spike in robberies and car break-ins, especially in this area, what can DC Water do to protect our property/cars during construction. If we don't have access for our garage parking we are now at risk of property damages.

ROBERT MORGAN
(Home Owner)

[redacted]

20

From: Mari Kimura [redacted]>
Sent: Friday, May 3, 2024 10:03 AM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Subject: Love the idea of permeable alleys!

So many developers are paving over what used to be back yards in the alleys when they renovate houses. I'm excited about permeable alleys coming to the district. My own back yard is too small to qualify for a rebate for permeable pavers. So I'm glad the city is doing it.
Sincerely,
Mari Kimura
[redacted]

From: Zach Israel [redacted]
Sent: Saturday, May 4, 2024 3:57 PM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Cc: Barden, Jamie [redacted] Seth Charde [redacted]>; Eric Lienhard (CTR) [redacted]
Subject: Comments on DC Water's Rock Creek GI Project C (RC-C) draft project description document

Hi DC Clean Rivers Project Team:

I wanted to offer some brief comments regarding **DC Water's Rock Creek GI Project C (RC-C)** draft project description document:

I live at [redacted] *in Washington, DC. One of DC Water's RC-C project areas**,*** ***Area 4D-1****, includes two permeable alley pavement projects across two segments of the public alleyway which both lead directly to the rear of my home. See here for specifically the two project areas I'm referring to (which are bounded by Gallatin Street NW, Hamilton Street NW, 7th Street NW, and 8th Street NW:*

My comments to DC Water would be to ***install and construct each of these two permeable alley pavement projects at completely different times, so that the public alleyway located between the two projects remains accessible at all times.*** *The rear of my home is located between these two projects, so it would be ideal if I could still get access to my driveway and property from the alleyway which would also allow the Department of Public Works (DPW) to continuously have access to pick up my household trash, recycling, and compost on a weekly basis, uninterrupted, during the actual construction period for each of these two specific projects. I use the rear of my home on a daily basis to park and lock my heavy electric cargo bicycle, so if my driveway was made unnecessarily inaccessible for several months in a row by virtue of both of these projects being constructed simultaneously, it would not be good for me and my family.*

*DC Water has indicated that the anticipated construction dates across all eight RC-C project areas in Ward 4 will occur **between March 2025 – June 2027**, a 28-month period of time. For this reason, there should not be an issue with DC Water constructing the two permeable alley pavement projects behind my home at completely separate periods of time! I fully support DC Water installing these two permeable alley pavement projects, however, I simply request that they are spaced out far enough from each other that one gets fully completed before construction begins on the second project in the same immediate area.*

Lastly, once DC Water determines when construction will actually begin on the first of these two specific permeable alley pavement projects, I urge DC Water to proactively notify all of the homeowners who reside immediately surrounding these projects at least one month in advance, so that preparations can be made!

Thank you for considering my comments on this important project.

Zachary Israel
[redacted]

22

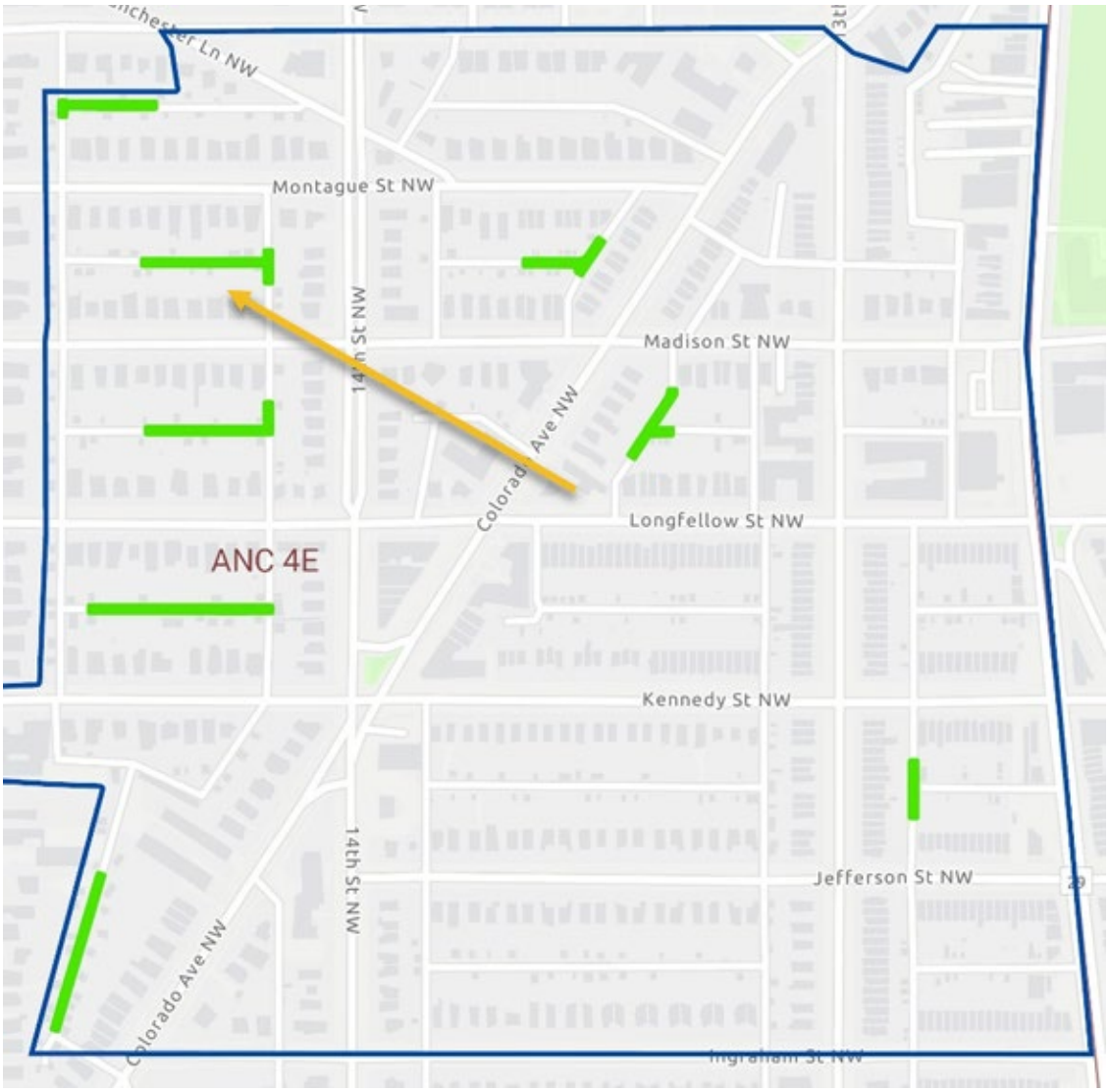
From: cell ranking [redacted]
Sent: Monday, May 6, 2024 10:48 PM
To: Clean Rivers GI <cleanriversgi@dcwater.com>; Fleet Washington [redacted]
Subject: Re: Rock Creek Project

Hi Seth,

It was nice meeting you at the virtual meeting tonight. I have significant concerns about the Rock Creek Project C: Area 4E-1. The brick pavement in the back alley has slowly become a green alley, with rubble building up between the gaps and weeds growing into them. Everything piles up when rain water flows down to the lower point. Over the past two years, my neighbor and I have reported the weed overgrowth in the middle of an alley to the city many times and the broken alley needs to be patched, but no one has come out to clean it up and fix it. Consequently, I have had to trim weed down by myself. I do not think so the city will come time and time to clean up the debris.

Our company built a green parking lot with 100 cars lot about five years ago with brick pavement similar to your idea, but it failed miserably and caused significant financial losses, leading to a complete rebuild with concrete cement. Therefore, I am totally against using brick pavement (also known as Green Alley) and instead advocate for a long-lasting and durable solution such as concrete for block alley.

Thanks so much hope you will change your decision in my alley


Montague St NW
Madison St NW
Longfellow St NW
Kennedy St NW
Jefferson St NW
Ingraham St NW
14th St NW
Colorado Ave NW
ANC 4E

23

From: Jacqueline Coleman [redacted]
Sent: Friday, May 10, 2024 4:26 PM
To: Clean Rivers GI <cleanriversgi@dcwater.com>
Cc: Seth Charde [redacted]; Eric Lienhard (CTR) [redacted]
Subject: Comments on DC Water's Rock Creek GI Project C (RC-C) draft project description document
Importance: High

Good Afternoon DC Clean River Project Team,

I would like to offer my comments regarding **DC Water's Rock Creek GI Project C (RC-C**) draft project description document in hopes that you may consider installing and constructing the two permeable alley pavement projects at completely different times.

My husband and I are senior residents who live at [redacted] in **Area 4D-1.**The two project areas include two segments of the public alleyway which both lead directly to the rear of our home. My specific comment and request to DC Water would be to install and construct each of the two permeable alley projects at completely different times so that the public alley located between the the two projects remains accessible all times for the residents and others including service companies and Department of Public Works(DPW).The rear of our home is located between the two projects and it is imperative that we retain access to our driveway ,particularly since my husband is handicapped .We do not have handicap accessibility in the front of our home which makes it impossible for him to enter our front entrance. Further, it is not aesthetically pleasing to store our rodent-gnawed trash and recycling containers as well as compost pick-up containers and bulk trash items in front of our homes for pick up for the duration of the project.

We are not opposed to DC Water constructing these permeable alley pavement projects in our alleyway as the end result will benefit the residents. We are opposed to the inconvenience we will be subjected for an undetermined extended period of time .We do hope that all parties involved keep the residents updated with any pertinent information.

Thank you for the opportunity to share our thoughts on this matter.

Respectfully,
Ronald and Jacqueline Coleman
[redacted]

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LETTER OF SUPPORT FROM COMMISSIONER 4B02

ERIN PALMER, Advisory Neighborhood Commissioner, 4B02

By Electronic Mail

May 8, 2024

DC Clean Rivers Project, DC Water
cleanriversgi@dcwater.com

RE: Public Comment on Rock Creek Project C (Area 4B-1)

Dear DC Clean Rivers Project:

DC Water's Clean Rivers Project will be installing 13 permeable alleys in Area 4B-1 as part of Rock Creek Project C, which seeks to reduce the volume of combined sewer overflows to the District's waterways and improve the District's water quality. Area 4B-1 includes a substantial portion of Single Member District 4B02. I am writing to describe my community outreach and feedback received from neighbors with regard to the project, as well as to express strong support for the proposed installations.

Rock Creek Project C includes several proposed permeable alley installations within Single Member District 4B02. These proposed locations were selected based on their "feasibility of design and construction, cost-effective implementation, and ability to meet the required stormwater volume capture." Rock Creek Project C is the third green infrastructure project constructed in the Rock Creek sewershed. The first two green infrastructure projects, Rock Creek Project A and Rock Creek Project B were completed in 2018 and 2023, respectively. Rock Creek Project C exclusively proposes construction of permeable pavement alley sites in the public right-of-way in eight project areas throughout the Rock Creek sewershed of Ward 4.

Representatives from DC Water's Clean Rivers Project first contacted Advisory Neighborhood Commission 4B on March 14, 2024, to "inform [us] that DC Water's Clean Rivers Project [was] finalizing the plan for the next green infrastructure project, Rock Creek Project C (RC-C)." These representatives again contacted the Commission on April 2, 2024, to provide project fact sheets. DC Water's Clean Rivers Project provided informational flyers to neighbors, and in early April, I distributed flyers I created to over 100 residences in the areas surrounding the proposed installations within Single Member District 4B02, noting the request for public comment regarding the project and the public comment deadline (flyer attached). Advisory Neighborhood Commission 4B received a presentation about the project at the Commission's April 29, 2024, meeting, where Commissioners and residents asked questions regarding the project details.

After communicating with neighbors, considering the proposed installations, and engaging with representatives from DC Water's Clean Rivers Project at a public Advisory Neighborhood Commission 4B meeting, I am providing the following feedback:

- I continue to express strong support for the installations proposed as part of the Rock Creek green infrastructure projects, including Rock Creek Project C. This support reflects longstanding advocacy for more green infrastructure in our neighborhood:

  — In May 2021, Commissioner Evan Yeats (4B04) and I submitted public comments regarding Rock Creek Project B "to encourage DC Water's consideration of expanded green infrastructure to include larger sites and additional sites within our Single Member Districts in Takoma." The comments noted strong community support for these types of projects: "Together we represent the Takoma neighborhood, which welcomes green infrastructure projects large and small. Our neighbors regularly contact us seeking additional mechanisms to implement green infrastructure, including (but not limited to) bioretention and permeable alleys." In addition, we provided other proposed locations for DC Water's consideration. That submission is attached to this letter.

  — In June 2023, Commissioner Evan Yeats (4B04) and I met with representatives from DC Water and subsequently communicated with them by email again expressing support for their green infrastructure projects and providing areas that might be good locations for additional stormwater management. That email and the referenced map are attached to this letter.

  — Advisory Neighborhood Commission 4B has unanimously approved Resolutions highlighting the need and expressing support for installation and management of stormwater management green infrastructure, noting our continued belief "that stormwater facilities are an asset for our neighborhoods." Resolution 4B-23-0601, Calling for Timely Maintenance and Stronger Coordination Among DC Government Agencies for Stormwater Management Facilities (June 26, 2023); *see also* Resolution 4B-23-0803, Requesting Applicant Engagement with Advisory Neighborhood Commission 4B and Highlighting Stormwater Mitigation Needs for [redacted] (HPA 23-364) and [redacted] (HPA 23-365) (Aug. 28, 2023) ("it is especially important to reduce impermeable surfaces and install additional green infrastructure"); Letter Requesting a Community-Driven Process for Park Programming and Design at the Takoma Metro Station Project (HPA 23-288) (June 26, 2023) ("[T]he Commission believes that any development of these sites should require developer efforts to mitigate transportation and infrastructure impacts on surrounding communities, including mechanisms for stormwater impact mitigation and for increased transit service to ensure livability for existing neighborhoods.").

- I reiterate requests for consideration of the locations previously highlighted by myself and Commissioner Evan Yeats (4B04). Specifically, I continue to request consideration of installation of stormwater management green infrastructure on the 6500 block of Piney Branch Road, NW (west side parking) and the 900 block of Underwood Street, NW (north side parking). As previously noted, these locations are underutilized for parking and invite illegal commercial vehicle parking, an issue Advisory Neighborhood Commission 4B has struggled with and sought to mitigate for years. *See* Letter Noting

Lengthy History of Requests & Calling for Action to Address Illegal Commercial Vehicles (May 22, 2023) (noting requests for "several infrastructure and enforcement solutions, including 'physical barriers to prevent the ability of commercial vehicles to park along this stretch, including a Bikeshare station, stormwater infrastructure, planters, and/or concrete barriers'"). While Rock Creek Project C is limited to permeable alleys, future Installation of stormwater management green infrastructure in these areas would serve the dual purpose of managing stormwater runoff while also preventing illegal commercial vehicle parking.

- The District Department of Transportation's current installation of alley improvements for the alley bounded by Underwood Street, NW, 8th Street, NW, Tewkesbury Place, NW, and 9th Street, NW, encompasses the location of a proposed permeable alley installation. Representatives from DC Water's Clean Rivers Project indicated they are working with the Department to coordinate alley efforts and asked that our Commission provide any overlapping projects during Advisory Neighborhood Commission 4B's April 29, 2024, meeting.

- Residents along the 600 block of Aspen Street, NW, have raised stormwater runoff concerns for the alley behind that block. The proposed installation for the alley bounded by Piney Branch Road, NW, Whittier Street, NW, and Aspen Street, NW, has the potential to address resident complaints about flooding in the alley behind the 600 block of Aspen Street, NW (slightly to the east of the proposed installation and part of the same alley). DC Water may wish to further assess the alley behind the 600 block of Piney Branch Road, NW, to ensure the proposal is mitigating stormwater runoff as much as possible.

- The resident at [redacted] expressed support for the proposed installation for the alley bounded by Underwood Street, NW, 8th Street, NW, Van Buren Street, NW, and 7th Place, NW. That resident expressed a desire for the installation to extend to the full alley for aesthetic reasons. In response to my question about the proposed installations being limited to portions of alleys (and not full alleys) at Advisory Neighborhood Commission 4B's April 29, 2024, meeting, representatives from DC Water's Clean Rivers Project explained that locations are designed to maximize stormwater capture. I support consideration of larger installations to cover more of each alleyway, but not to the extent any additional installation would limit installations where they are most needed to mitigate stormwater runoff.

In sum, the Takoma community strongly supports these installations and welcomes more of them, particularly in locations like the 6500 block of Piney Branch Road, NW (west side parking) and the 900 block of Underwood Street, NW (north side parking), where such installations could serve multiple beneficial purposes for the community.

Thank you for your time and consideration. I look forward to installation of permeable alleys throughout Advisory Neighborhood Commission 4B, as well as future stormwater management green infrastructure installations throughout Takoma.

Sincerely,

Commissioner Erin Palmer, 4B02

cc: Seth Charde, Senior Manager, Green Infrastructure, DC Clean Rivers Project, DC Water
Eric Lienhard, Deputy Program Manager, DC Clean Rivers Project, DC Water
Andrew Galli, Public Outreach Coordinator, DC Clean Rivers Project, DC Water

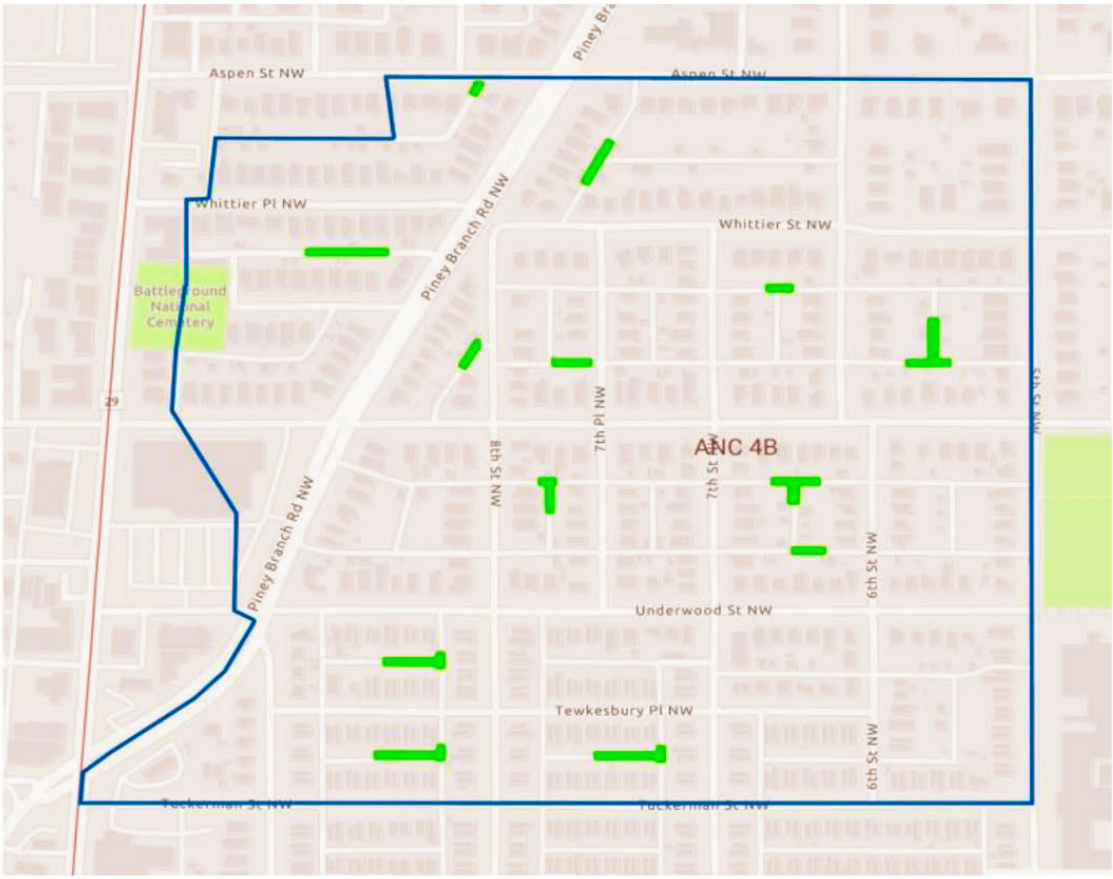
Councilmember Janeese Lewis George, Ward 4
Will Perkins, Committee Director, Committee on Facilities and Family Services

Commissioner Alison Brooks, Chair, Advisory Neighborhood Commission 4B
Commissioner Evan Yeats, 4B04, Advisory Neighborhood Commission 4B

notice and opportunity to comment:

PERMEABLE ALLEY INSTALLATIONS

throughout Single Member District 4B02



READ MORE DETAILS, SEE MAPS & FIND PUBLIC MEETINGS:

FLYER PREPARED BY:

ERIN PALMER
Commissioner, ANC 4B02

DC WATER'S PROPOSAL:

DC Water is proposing **13 permeable alleys** throughout the neighborhood (Area 4B-1) as part of its Clean Rivers Project to reduce combined sewer overflows into the Anacostia and Potomac Rivers and Rock Creek.

Selection Criteria: DC Water selected areas based on feasibility, cost-effective implementation, and ability to capture required stormwater volume.

Timeline: Construction will begin in early 2025 and end in 2027.

Learn More: DC Water will be at Advisory Neighborhood Commission 4B's April 29th meeting. More at anc4b.com.

Comments are accepted through **May 10th**. Email your comments to cleanriversgi@dcwater.com and/or Commissioner Erin Palmer (4B02) at 4B02@anc.dc.gov with the subject "Rock Creek GI Project C - Area 4B-1."

Public Comment - Rock Creek Green Infrastructure Project B

Palmer, Erin (SMD 4B02) <4B02@anc.dc.gov>

Mon 5/3/2021 5:28 PM

To:cleanriversgi@dcwater.com <cleanriversgi@dcwater.com>
Cc:Amanda Zander [redacted] Lewis-George, Janeese (Council) [redacted] Cheh, Mary (COUNCIL) [redacted];[redacted];Yeats, Evan (SMD 4B01) [redacted]
Bcc:Paul Schwartz [redacted]

To whom it may concern:

As Commissioners of Advisory Neighborhood Commission 4B, we are writing in response to DC Water's request for public comment on the Rock Creek Green Infrastructure Project B Project Description and to encourage DC Water's consideration of expanded green infrastructure to include larger sites and additional sites within our Single Member Districts in Takoma.

Project Area 2 – the only project area within Advisory Neighborhood Commission 4B's boundaries – is extremely limited. The project area includes only ten permeable alleys within one Single Member District (specifically, the area bounded by Underwood Street, NW, and Rittenhouse Street, NW, to the north and south, and 5th Street, NW, and 8th Street, NW, to the east and west). Project Area 2 does not include any bioretention sites within that Single Member District, and does not include any bioretention sites or permeable alleys within the other eight Single Member Districts in Advisory Neighborhood Commission 4B.

Together we represent the Takoma neighborhood, which welcomes green infrastructure projects large and small. Our neighbors regularly contact us seeking additional mechanisms to implement green infrastructure, including (but not limited to) bioretention and permeable alleys. Neighbors along a block in Single Member District 4B02 recently received a Community Stormwater Solutions grant award from the District Department of Energy and Environment and Chesapeake Bay Trust to design a blockwide green infrastructure solution for their stormwater challenges. The grant award has the possibility to serve as a model for community-based design processes to achieve holistic solutions to neighborhood stormwater challenges.

Several locations within Advisory Neighborhood Commission 4B, and specifically within Single Member Districts 4B01 and 4B02, provide the opportunity for flagship projects that are larger in scale and potentially offer cost savings and other efficiencies. We encourage consideration of the following locations for green infrastructure, either via Rock Creek Green Infrastructure Project B or future green infrastructure projects:

- grassy area adjacent to 353 Cedar Street, NW, and the Metropolitan Subdivision tracks (a current source of runoff and drain overflow to the Cedar Street, NW, train underpass);
- planned curb extensions at Dahlia Street, NW, and Blair Road, NW;
- green space adjoining Piney Branch Road, NW, (either side) between the Metropolitan Subdivision tracks and Eastern Avenue, NW;
- triangle at Piney Branch Road, NW, and Blair Road, NW;
- triangle at 6th Street, NW, Cedar Street, NW, and Piney Branch Road, NW;
- medians along Piney Branch Road, NW, between Van Buren Street, NW, and Butternut Street, NW; and
- additional alleys (we are happy to discuss specific locations, as desired).

In addition, we encourage DC Water to coordinate with the District Department of Transportation as it implements projects that create additional spaces that may be suitable for green

infrastructure (e.g., upcoming changes to the intersection of 8th Street, NW, Whittier Street, NW, and Piney Branch Road, NW; construction of the Metropolitan Branch Trail, etc.).

The Rock Creek Green Infrastructure Project A, completed in October 2018, included construction of green infrastructure technologies like bioretention (rain gardens) in planter strips and curb extensions, permeable pavement on streets and alleys, and two green infrastructure parks. We encourage consideration of our neighborhood for more extensive and expansive green infrastructure similar to the projects implemented via Project A.

Thank you for your consideration, and we look forward to answering any questions you might have.

Sincerely,

Erin Palmer, ANC 4B02 Commissioner
Evan Yeats, ANC 4B01 Commissioner

Takoma Stormwater Visit Follow up

Yeats, Evan (SMD 4B04) <4B04@anc.dc.gov>
Thu 6/29/2023 12:26 PM

To:eric.lienhard@dcwater.com [redacted]
Cc:Amanda Zander [redacted]>;Palmer, Erin (SMD 4B02) [redacted]

[redacted] attachments (743 KB)
Rock Creek Green Email.pdf; Triangle Garden Photos.pdf;

Dear Eric:

Thanks for joining us in Takoma to talk about stormwater in our area. We appreciate you taking the time to meet with us. Here are the follow-up materials from our walkthrough we promised. However, we didn't have the email for everyone who joined us on the walk so please forward as appropriate.

With regards to the Metropolitan Branch Trail, you can see the thirty percent design plans here and more information, including a roll map, here. This would be relevant both for 4th/Blair/Cedar and Whittier/Blair/3rd triangles.

In addition to those locations, other areas that we have identified that might be good locations for active stormwater management are mapped out here. We are attaching our past letter listing areas of interest. We are very interested in these locations (as well as any others you might propose), but our top priority remains the triangle park at 4th/Blair/Cedar if that is feasible. We have also attached some photos showing how the triangle park used to look that were referenced in our conversation.

4B04 and 4B02 Stormwater Locations - Google My Maps

4B04 and 4B02 Stormwater Locations

www.google.com

Our best contacts for the Metropolitan Branch Trail are:

Michael Alvino, [redacted]
Samer Alhamwadeh, [redacted]

For the 400 block of Aspen Street stormwater project and stormwater management for the Metropolitan Branch Trail:

Rebecca Stack, Designgreen, [redacted]

For the closure at Dahlia/Blair and the space across from Takoma Elementary:

Michael Goodno, [redacted]

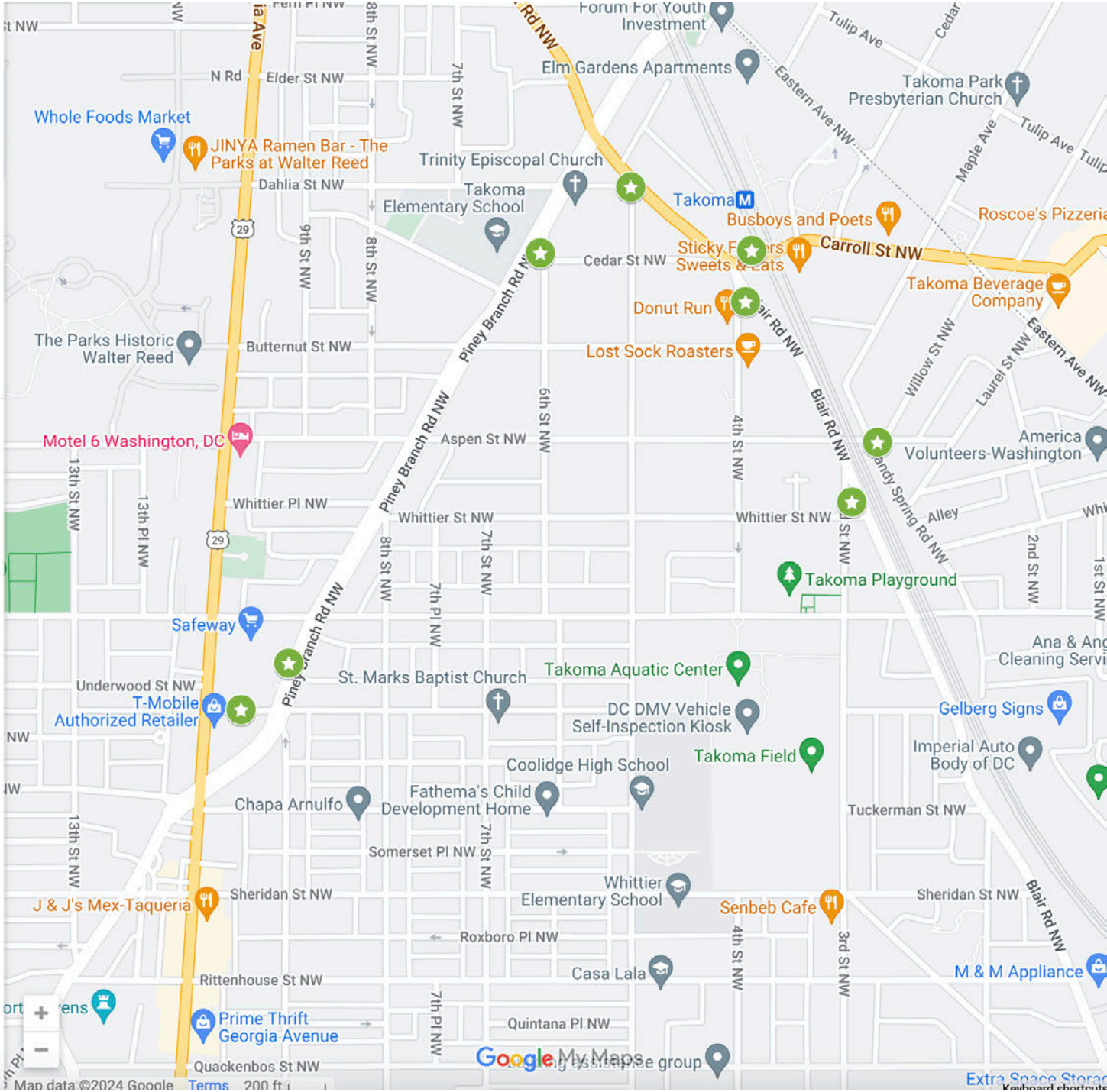
We welcome your feedback and questions.

Thanks again,

Evan and Erin

Proposed locations

- Adjacent to 343 Cedar Street NW
- Takoma Triangle Park
- Whittier Triangle
- Road Closure at Dahlia/5th/Blair
- Triangle opposite Takoma Elementary
- Truck Parking
- Truck Parking
- Narrow Overly Large Roadway Geometry



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