



December 14, 2017

By Hand Delivery

District Department of Energy and Environment
Water Quality Division
1200 First Street NE, 5th Floor
Washington, DC 20002
Attention: DOEE Water Quality Standards

Re: DOEE Water Quality Standards - Proposed Rulemaking Comments

Dear Sir/Madam:

The District of Columbia Water and Sewer Authority (“DC Water”) appreciates the opportunity to comment on the DOEE’s proposed changes to the E. coli recreational water quality criteria as part of its 2016 triennial review of the District’s water quality standards, published in the *D.C. Register* at 64 DCR 9089 on September 15, 2017 and comment period extended to December 14, 2017.

For the reasons set forth in these comments and pursuant to 21 DCMR 1101.5, please consider this letter as DC Water’s formal request for DOEE to conduct a Use Attainability Analysis (“UAA”) of the District’s primary contact recreation use designation as authorized by District and federal law.¹ Further, DC Water urges DOEE to defer making any changes to the existing E. coli criteria until the UAA is completed.

As you know, the rate increases required to fund the ongoing DC Clean River’s Project are already imposing well-publicized economic hardships on a significant segment of the District’s residents. These economic hardships will grow and spread throughout the District if DOEE applies the proposed changes to discharges occurring under all rainfall conditions. As explained and documented in these comments, DC Water’s detailed analysis of the proposed changes to the E. coli criteria shows that application of the proposed changes to all rainfall conditions would result in widespread adverse social and economic consequences for the District and its residents without any identifiable benefit to recreational use of the District’s waters. In circumstances such as these, EPA policy not only recommends, but encourages states and the District to conduct a UAA before imposing more stringent requirements such as the proposed changes to the E. coli criteria.² A properly conducted UAA will

¹ See 21 DCMR 1101.3 – 1101.5 and 40 C.F.R § 131.10.

² EPA’s CSO Control Policy [59 Fed. Reg. 18,688] provides that “States are encouraged to define more explicitly their recreational and aquatic uses and then, if appropriate, modify the criteria accordingly to protect the designated use.” (emphasis added). See Policy at Subpart III.B. Only a UAA can be used to more explicitly define recreational and aquatic uses and use designations. See 40 C.F.R § 131.10

provide the factual support for any change in the E. coli criteria by ensuring that the new criteria are applied and enforced in a way that is affordable, cost-effective, and necessary to protect existing and potential recreational uses of the District's waters during reasonable times and conditions.

The following comments explain why DOEE has not only the discretion, but the duty, to defer making any changes to the existing E. coli criteria until it has conducted a UAA of the District's primary contact recreation use designation to determine if changes to existing criteria are needed, and if so, when and where they should be applied to protect actual and potential recreational uses.

A. The Cost, Rate Impacts, and Consequences of Applying and Enforcing with the Proposed Changes to the E. coli Criteria

1. Introduction and Background

For over 13 years, DC Water and the District's residents and rate payers have relied on the 2004 standards compliance determinations by EPA and the District Department of Health ("DOH") (DOEE's predecessor agency) to make the enormous financial investments required to pay for controls costing more than two billion dollars that EPA and DOH said were necessary to protect the primary contact recreational use designation for the District's waters. Typical residential sewer bills have increased by more than 200 percent since the Long-term CSO Control Plan Consent Decree was signed in 2005 and are projected to increase by an additional 170 percent by 2030 when the Long-term CSO Control Plan (now known as the "DC Clean Rivers Project" or "Project") is scheduled for completion. The District's low-income residents have been particularly hard-hit by the increases, with rates projected to exceed two-percent of adjusted annual household income for 40 percent of these households by the end of the current fiscal year. Sewer bills will continue to increase sharply with the existing DC Clean Rivers Project, with rates exceeding more than 2.5 percent of adjusted annual household income for 40 percent of District households by 2030 and more than three percent of adjusted income by 2049. DC Water's analysis shows that the existing Project is already unaffordable for 40 percent of the households in Wards 7 and 8. The impacts of these rate increases have become so financially burdensome on a significant segment of the District's residents that the increases have become the subject of news reports as residents openly complain about their unaffordability.

DOEE is now proposing to adopt a more stringent E. coli Statistical Threshold Value ("STV") criteria that would add additional billions of dollars in costs to both the DC Clean Rivers Project and the District's storm water program before the controls required to comply with the 2004 standards compliance determinations are even completed. These additional costs will be unaffordable if applied and enforced under all rainfall conditions as well as unjustified in light of the 2004 EPA and DOH determinations that the current bacteria standards were sufficient to attain the primary contact recreational use designation. Consequently, if adopted, the proposed new E. coli STV criteria would risk potentially ruinous economic consequences for the District and its residents without any identifiable benefit to recreational use of the District's waters. For these reasons, DC Water's comments urge DOEE to use its discretionary authority to defer acting on the proposed new E. coli criteria pending completion of a UAA of the District's primary contact recreation use designation.

2. Summary of Cost and Rate Impacts Analysis³

DC Water conducted a detailed Impacts Analysis of the cost and rate impacts of applying and enforcing the proposed new E. coli STV criteria if added to the cost and rate impacts of the current DC Clean Rivers Project. DC Water's Impacts Analysis, which evaluated 67 years (1949-2016) of rainfall data, shows that compliance with the proposed new E. coli STV criteria would require the addition of 245 million gallons of CSO storage capacity and the addition of 1,275 million gallons per day of wet weather treatment capacity beyond the storage and treatment capacities either completed or now under design or construction as part of the current Project. The cost of this additional capacity is estimated at over \$13.5 billion in year-of-disbursement dollars, which would increase the total estimated cost of the Project in year-of-disbursement dollars from \$2.6 billion to over \$16 billion. If the proposed new E. coli criteria are applied and enforced for all rainfall conditions, sewer bills are projected to be well above EPA's affordability criteria for all of the District's Wards by 2049.

Further, the rate impacts would not stop with the DC Clean River's Project. DC Water's Impact Analysis also evaluated the impact to the District's storm water system. This analysis, which also evaluated the same 67 years of rainfall data, shows that compliance with the proposed E. coli STV criteria would require the District to fund and construct more than 671 million gallons of storm water storage capacity along with more than 2.3 billion gallons per day of wet weather treatment capacity in addition to the control measures identified in the District's Consolidated TMDL Implementation Plan Report to achieve the E. coli STV criteria.⁴ The Implementation Plan projects that, in compliance with the District's 2013 storm water regulations, the entire MS4 area will be retrofitted with BMPs within the next one-hundred and ten years, (i.e., by 2127) through re-development and re-construction.⁵ However, this will only achieve 5 of the current 20 Bacteria WLAs by 2127. To achieve the remaining 15 Bacteria WLAs "some combination of new technologies, improved BMP efficiencies, or BMP treatment trains" will be needed, but this will not be achieved until 2154.⁶ In order to meet the proposed E. coli STV criteria, additional controls will be required because the proposed E. coli STV criteria are more stringent than the current WQS. DC Water has estimated the costs of stormwater storage and treatment needed to meet the proposed E. coli STV criteria. The cost of the additional stormwater storage and treatment capacity is estimated at over \$23 billion in year-of-disbursement dollars. Together, the combined costs of the CSO and storm water controls required to meet the proposed E. Coli STV criteria would exceed \$39 billion in year-of-disbursement dollars.

³ The accompanying Triennial Review Tech Memo titled "Impacts of Proposed Bacteria Water Quality Standards – 2016 Triennial Review (November 2017)" (the "Impacts Analysis") contains the details of the analysis, including DC Water's findings and conclusions and the approach, methodology and data used by DC Water to conduct the analysis. The Impacts Analysis is part of DC Water's comments.

⁴ DOEE "Consolidated Total Maximum Daily Load (TMDL) Implementation Plan Report" Revised Draft, 2 August 2016 "Implementation Plan".

⁵ The District has not estimated the cost to implement the 2013 storm water regulation.

⁶ See Implementation Plan at pages 76-78.

3. The Consequences of Applying and Enforcing the Proposed E. coli STV Criteria

DC Water's Impact Analysis clearly demonstrates that the additional costs of the controls required to comply with the proposed E. coli STV criteria are well above any rational measure of affordability if the new criteria are applied and enforced under all rainfall conditions. However, their unaffordability would not prevent the new criteria from imposing additional burdens and hardships on District residents and ratepayers already burdened by the enormous costs of complying with the existing E. coli criteria. This is because the new criteria would be enforceable under federal law through NPDES Permits once promulgated by DOEE and approved by EPA. Their enforceability, in turn, would also clear the way for lawsuits against the District and DC Water seeking court decrees requiring installation of the controls needed to comply with the proposed E. coli STV criteria by specified deadlines even though the controls would be unaffordable.⁷

These lawsuits and their outcomes would inevitably lead to potentially ruinous socio-economic consequences for the District and its residents resulting from the endless rate increases required to pay for the additional CSO and storm water controls required by the court decrees. At some point the District would reach the financial breaking point as funding for municipal services such as fire and police protection and essential social services would have to be reduced to continue paying for additional CSO and storm water controls that would not produce any identifiable benefit to recreational use of the District's waters. Significant reductions in services together with ever-increasing sewer bills and storm water-related costs and fees, in turn, could be expected to lead to lost development opportunities and economic decline in the District.⁸

As explained below, these consequences are not necessary to protect recreational use of the District's waters and can be avoided if DOEE will only defer making any changes to the current E. coli criteria pending completion of a UAA. A properly conducted UAA will ensure that any new, more stringent E. coli criteria and resulting additional CSO and storm water controls are affordable, cost-effective, and necessary to protect recreational use of the District's waters during reasonable times and conditions.

B. DOEE Should Exercise its Discretionary Authority to Defer any Change to the E. coli Criteria Pending Completion of a Use Attainability Analysis

1. Introduction

The proposed new E. coli criteria are based on EPA's 2012 Recreational Water Quality Criteria document (EPA 820-F-12-058) for protecting human health in waters designated for use for swimming, bathing, surfing, or similar water contact activities (the "EPA Criteria Document"). The EPA Criteria Document and its recommended new E. coli criteria serve as guidance to the states except for states

⁷ Once promulgated and approved by EPA, water quality standards are enforceable under federal law regardless of the financial consequences. *See* 33 U.S.C. § 1311(b)(1)(C)

⁸ In addition to the above-described impacts on the District and its residents, the financial expenditures required to comply with the proposed criteria would force DC Water to divert resources away from important ongoing water quality programs such as maintenance and repair of its aging sewer infrastructure.

with “Coastal Recreation Waters”⁹ as defined in the *Beaches Environmental Assessment and Coastal Health Act* (Public Law, Oct. 10, 2000) (the “Beaches Act”). In those states, the Beaches Act requires adoption of the recommended criteria for all Coastal Recreation Waters within three years after EPA publishes the criteria. DOEE is not required to adopt the recommended E. coli criteria because none of the District’s waters fall within the Beaches Act’s definition of Coastal Recreation Waters. Therefore, in the District’s case, the recommended criteria serve as guidance from EPA. This means that DOEE has the discretion to either adopt or not adopt the recommended criteria based on the record compiled during this rulemaking. Further, DOEE is not under any deadline to act in response to the EPA Criteria Document, which means that it can defer taking any action at this time if it does not have sufficient information upon which to act.

As explained below and documented in the accompanying Impacts Analysis, the facts in this case present overwhelming support for leaving the current E. coli criteria in place until DOEE has sufficient evidence to determine if changes to the criteria are needed to protect primary contact recreation in the District’s waters; and if so, when and where the criteria should be applied and enforced. This can be accomplished only by conducting the UAA provided for in DOEE’s and EPA’s regulations¹⁰ and recommended by EPA. Acting without first conducting the UAA risks subjecting the District and its residents to the potentially ruinous economic consequences described above.

2. The 2004 EPA and DOH Standards Compliance Determinations Support Leaving the Current E. coli Criteria in Place Until the Use Attainability Analysis is Conducted

DC Water committed to undertake implementation of its two billion dollar-plus DC Clean Rivers Project in reliance on prior bacteria standards compliance determinations by EPA and DOH.¹¹ When completed, the Project will reduce CSO discharges by 96 percent on a system-wide basis during the average rainfall year, which is one of the highest, if not the highest, levels of CSO control achieved by any utility in the United States. The Project will limit overflows to only two in the average year in the Anacostia, only four overflows in the average year in the Potomac, only one overflow in the average year in Piney Branch, and only four overflows in the average year at the other Rock Creek CSOs. As documented in the Impacts Analysis and shown on the table below, most of the few remaining overflows will occur in locations and/or under weather and rainfall conditions (high winds and waves, high current velocity, floods, freezing rain, ice conditions, electrical storms, hurricanes, tornadoes, and other adverse natural conditions) posing dangers that effectively preclude primary contact recreation regardless of ambient bacteria concentrations. These considerations led EPA and DOH to conclude in 2004 that the few CSOs remaining after completion of the Project would protect the District’s primary contact recreational use designation subject to post-construction monitoring.

⁹ Section 502 of the Beaches Act defines Coastal Recreation Waters to mean: “(i) the Great Lakes; and (ii) marine coastal waters (including coastal estuaries) that are designated under section 303(c) [of the Clean Water Act] by a State for use for swimming, bathing, surfing, or similar water contact activities”.

¹⁰ See 21 DCMR 1101.3 – 1101.5 and 40 C.F.R § 131.10.

¹¹ DOH’s determination is in a memorandum dated November 3, 2004, from James R. Collier to Doreen E. Thompson and a memorandum dated November 4, 2004, from Caroline Burnett to Bruce Brennan. EPA’s determination is in a memorandum to the file dated November 29, 2004. Copies of these memoranda are included with and made a part of these comments.

The STV in the proposed E. coli criteria is more stringent than the current bacteria standards, which means that in light of EPA and DDH's standards compliance determinations, DOEE would be justified in adopting the proposed STV criteria only if (1) it is under a legal mandate to do so, or (2) new information developed since 2004 shows that, contrary to the 2004 determinations, the District's current E. coli criteria are not sufficiently stringent to attain the primary contact recreational use designation. As explained above, DOEE is not under a legal mandate to adopt EPA's recommended criteria. As explained below, no new information superseding or questioning the original determinations has been developed since 2004.

The proposed new STV criteria is designed to prevent significant exposure to short-term spikes in ambient E. coli concentrations that could pose a health risk to persons engaged in swimming, bathing, surfing, or similar water contact activities. Consequently, in the absence of evidence of the potential for significant exposure, the occurrence of short-term spikes in E. coli concentrations alone is not sufficient to justify adopting the STV criteria as a compliance standard. A site-specific risk assessment must also find that these spikes would occur at times and locations posing the potential for significant human exposure to high bacteria concentrations considering the nature and extent of recreational use of the District's waters. No such finding exists. To the contrary, the risk assessment performed by EPA and DOH and reflected in their 2004 compliance determinations found that any short-term spike in ambient bacteria concentrations that would remain following completion of the DC Clean Rivers Project would not pose the potential for significant exposure to the spikes, and therefore, an unacceptable risk to persons engaged in primary contact recreation. This risk assessment and its findings have never been challenged or superseded and remain the controlling assessment and finding today.

In conducting their risk assessment, EPA and DOH relied on the very high level of CSO control proposed in DC Water's Long-term CSO Control Plan. While not expressly addressed in the 2004 determinations, it is apparent that two considerations played a significant role in their findings. As mentioned above, the first was that most of the overflows remaining after completion of the DC Clean Rivers Project will occur in locations and under weather and rainfall conditions posing dangers that effectively preclude water recreation regardless of ambient bacteria conditions. The second consideration was the limited water contact associated with the types of recreation that actually occur on the District's waters. The District's waters may be suitable for swimming and bathing (i.e., the presence of beaches, sandy bottoms, and shallow water) at very limited locations and times, but boating (which involves the potential for limited exposure) is the dominant recreational use of the District's surface waters. The 2004 determinations by EPA and DOH found that these uses would not be impaired by the few overflows remaining after completion of the DC Clean Rivers Project.

Nothing in the EPA Criteria Document undermines or contradicts EPA's and DOH's 2004 risk assessment finding and standards compliance determinations. It is apparent from the 2004 risk assessment that EPA and DOH were well aware that short-term spikes in bacteria concentrations could pose a risk to human health in the event of significant exposure to the spikes, but concluded that there was little such risk in light of the very high level of CSO control and types of recreation that actually occur or have the potential to occur on the District's waters. The EPA Criteria Document places a numerical value on short-term spikes in bacteria concentrations that are deemed to pose a risk in the in the event of significant exposure - it does not say or otherwise suggest that the risk of such exposure

will exist for those engaged in recreation on the District’s waters following completion of the Project. Accordingly, there is no factual support for promulgating the proposed new E. coli criteria or any other new E. coli criteria that would be more stringent than the current criteria.

3. Even Assuming that the Proposed New E. coli Criteria Would Prevent Potential Exposure to Short-term Spikes in E. coli Concentrations, they Would Provide No Identifiable Benefit to Recreational Use of the District’s Waters

The following table shows the projected exceedances of the proposed 90-day STV criteria following implementation of the DC Clean Rivers Project. The exceedances are expressed as number of times and percent of time based on the 67 years of rainfall data evaluated in DC Water’s analysis of the impacts of applying and enforcing the proposed criteria under all rainfall conditions that occurred during that period. Although the exceedances represent only a fraction one percent of the time during the 67-year period, it is important to note that most of them would occur during cold weather and periods of high river flows when little, if any, recreational use would be expected to occur. Consequently, those periods and times when exceedances of the STV criteria would reflect the potential for exposure to peak E. coli concentrations would be even smaller than the periods and times shown in the table.

DC Water offers the following table for two purposes: First, to demonstrate why EPA’s and DOH’s 2004 risk assessment concluded that the current E. coli criteria are sufficiently stringent to protect the primary contact recreation use designation. With so very few remaining overflows occurring during times suitable for recreation, there simply was no basis for concluding that they would create an unreasonable risk to those engaged in water recreation.

The table also shows that very little improvement in ambient E. coli concentrations would be achieved with the enormous cost of applying and enforcing the proposed E. coli STV criteria. As noted above and documented in the accompanying Impacts Analysis, the additional CSO controls required to achieve the new criteria under the rainfall conditions reflected in the table are estimated to cost over \$13 billion. This equates to a capital cost of just under \$100 million to eliminate each 90-day exceedance period, most of which would not even present the potential for significant exposure to peak E. coli concentrations because the exceedance periods would not occur during times suitable for recreation due to cold weather and high river flows.

Predicted Water Quality Performance After Implementation of DC Clean Rivers Project

Location	67 Year Period	
	# of 90-day Periods Exceeding 90-Day STV	Percent of time Exceeding 90-Day STV
Anacostia River		
DC/MD Boundary	0	0 %

Location	67 Year Period	
	# of 90-day Periods Exceeding 90-Day STV	Percent of time Exceeding 90-Day STV
RFK Stadium	75	0.3 %
Navy Yard	136	0.6 %
Haines Point	24	0.1 %
Potomac River		
DC/MD Boundary	0	0 %
Memorial Bridge	38	0.2 %
Wilson Bridge	0	0 %

4. Deferring Adoption of the Proposed New E. coli Criteria Pending Completion of a Use Attainability Analysis will not Delay Attaining the Designated Use

As explained above, DOEE would be completely justified in relying on the 2004 standards compliance determinations to conclude that the current E. coli standards are sufficiently stringent to attain the recreational use designation. But even if DOEE were to assume that the proposed new E. coli criteria are needed to attain the designated use, the Impacts Analysis shows that storm water and non-point sources upstream in Maryland would continue to cause exceedances of the proposed STV criteria long after the additional CSO controls were installed assuming they were affordable, which, as shown in DC Water’s Impacts Analysis, they are not.

5. EPA’s 2006 UAA Road Map

In 2006, EPA outlined several approaches the District could employ to implement changes to the primary contact recreational designated use. In 2005, the District finalized the Water Quality Standards, revising the definition of primary contact recreation by adding the sentence, “Such uses are not expected during times of high current velocity, floods, electrical storms, hurricanes, tornadoes, winter temperatures, heavy ice conditions and other adverse natural conditions.” EPA accepted the concept of the limitation, but disapproved it because it was not appropriately supported by a UAA.¹² EPA, however, recommended several approaches to incorporate seasonal and subcategories of recreational use limitations:

- 1) Create a seasonal use subcategory: adopt a seasonal recreational use to identify the period of time, or the ambient temperature to which the seasonal use would apply, i.e., May 1st though September 30th;

¹² See EPA’s Review of District Water Quality Standards, promulgated October 28, 2005 dated February 15, 2006.

- 2) Limit the use due to adverse weather conditions: conduct a UAA to show that primary contact recreation is not an existing use and is not attainable during an electrical storm, a tornado or a hurricane; or
- 3) Create use subcategories correlated to wet weather: conduct a UAA to define the primary contact recreation designated use as applying at all times except during a certain number of CSO events (e.g., 4 overflows per year).

DOEE may choose to conduct the UAA of the District's primary contact recreation use designation utilizing the one or more of the approaches outlined by EPA or another approach to limit the application of the primary contact designated use, or create subcategories to ensure that the changes to the existing E. coli criteria are needed, and if so, when and where they should be applied to protect actual and potential recreational uses as appropriate.

C. DOEE's Socio-Economic Analysis of the New E. coli Criteria

1. A Socio-Economic Analysis is Not Required for the Proposed New E. coli Criteria if DOEE Defers Acting on the Proposal Pending Completion of a Use Attainability Analysis

D.C. Official Code § 8 – 103.04 requires DOEE to conduct an analysis of the environmental, technological, institutional, and socio-economic impacts (“Socio-Economic Analysis”) before promulgating new criteria, but it need not conduct a Socio-Economic Analysis of the proposed E. coli criteria if it decides to defer promulgating them pending completion of a UAA. DC Water’s Impacts Analysis and the still-valid prior standards compliance determinations by EPA and DOH offer compelling support for withdrawing the proposed E. coli criteria until after DOEE conducts a UAA. Conducting the Socio-Economic Analysis as part of this rulemaking would be a waste of time and resources that should be devoted to conducting the UAA, which could then be used to satisfy DOEE’s Socio-Economic Analysis requirement should it decide to proceed with changing the E. coli criteria following the UAA.¹³

¹³ A UAA is different from the Socio-Economic Analysis required by District law. Both analyses would examine the socio-economic impacts of proposed changes to the E. coli criteria, but unlike a UAA, the results of the analysis required by District law can only be used as a basis for either adopting or not adopting the changes based on the current primary contact recreational use designation. The current designation applies to all District waters under all rainfall conditions, and therefore, does not reflect actual and potential recreational use of the District’s waters. The results of a UAA can be used to support appropriate changes to the primary contact use designation to reflect actual and potential recreational uses of the District’s waters. These changes, in turn, could be used to support changing the current E. coli criteria as needed to protect these uses. The changes to the use designation together with any changes that might be needed to the E. coli criteria will ensure that any new criteria are applied and enforced in a way that is affordable, cost-effective, and necessary to protect actual and potential recreational use of the District’s waters.

2. There Should be More Opportunities for Public Comment if DOEE Decides to Proceed with the Socio-Economic Analysis

If DOEE decides to proceed with the Socio-Economic Analysis, it should also provide opportunities for public comment and participation while the analysis is underway and before it is finalized. The issues that must be addressed in the analysis are too numerous, complicated and important to the District and its residents to be conducted based solely on comments on its scope and approach at this early stage. Future opportunities for public comment and participation should include formation of a stakeholder advisory panel to provide input and feedback to DOEE as the analysis proceeds, periodic public progress meetings, and a 60-day written comment period and a public hearing on the draft Socio-Economic Analysis report.

3. The Socio-Economic Analysis Must Evaluate the Impacts of Applying and Enforcing the Proposed New E. coli Criteria Under All Rainfall Conditions

DC Water's recommended scope for the Socio-Economic Analysis is included in Attachment A to these comments. Of critical importance in this scope are the rainfall conditions used by DOEE to evaluate the environmental, technological, institutional, and socio-economic impacts of applying and enforcing the proposed new E. coli criteria. Application and enforcement of the proposed criteria are not qualified or limited in any way. Therefore, because the proposed E. coli STV criteria is more stringent than the existing E. coli criteria (which is applied and enforced under the average rainfall condition), it must be assumed that the new criteria would be applied and enforced under all rainfall conditions. Promulgating the new criteria as proposed in reliance on a Socio-Economic Analysis based on any condition other than all rainfall conditions occurring during the 67-year period used in DC Water's Impacts Analysis would be clear error on DOEE's part. If DOEE wishes to limit the rainfall conditions used in its Socio-Economic Analysis, its final rule must explicitly state the rainfall conditions that will be used to apply and enforce the criteria. Further, the rainfall conditions specified in the criteria must be rainfall conditions that were evaluated in the Socio-Economic Analysis.

Thank you for the opportunity to comment and please do not hesitate to contact me at 202-787-2358 or at leonard.benson@dcwater.com if you have any questions or need additional information.

Sincerely,



Leonard R. Benson
Chief Engineer

C: Henderson Brown – DC Water
Carton Ray – DC Water

Enclosures: Impacts of Proposed Bacteria Water Quality Standards – 2016 Triennial Review