FINAL ENVIRONMENTAL IMPACT STATEMENT FOR A PROPOSED WATER TREATMENT RESIDUALS MANAGEMENT PROCESS FOR THE WASHINGTON AQUEDUCT, WASHINGTON, D.C.

US Army Corps of Engineers
Baltimore District

VOLUME 3C
COMMENTS AND RESPONSES

SLUICE TOWER

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September 2005

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In Cooperation with:

NCPC

This Final Environmental Impact Statement (FEIS) describes a proposed project to alter the Washington Aqueduct's current practice of discharging water treatment residuals to the Potomac River to one of instead collecting, treating, then disposing of the residuals at an alternate location. Over 160 alternatives were considered and screened, and four of these, plus the no-action alternative were evaluated in detail to determine the potential for environmental, engineering, and economic impacts. A proposed action, the environmentally preferred alternative, is identified; It involves collection of the residuals at the Dalecarlia Water Treatment Plant and Georgetown Reservoir, treatment of residuals at an East Dalecarlia Processing Site on government property that is located north of Sibley Memorial Hospital in the District of Columbia, and then disposal of residuals by trucking on major streets to licensed land disposal sites likely located in Maryland or Virginia.

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September 2005

Volume 3 of the EIS includes the response to comments information. All comments and questions received from the public through e-mails and public meeting transcripts prior to publishing the DEIS and during the DEIS public comment period are evaluated and answered within this document. The unique names of those who provided comments have been removed to protect their privacy. In this volume of the EIS, a legend for comment type, the responses to each comment type, and a customized copy of each source document is included.

There are 59 documents that constitute the content of Volumes 3A and 3B and 127 documents that constitute Volumes 3C and 3D. A customized copy of each document is provided after an enumerated tab. In each volume, the tabs are preceded by an index of all documents in volume 3 to assist the reader in finding the correct volume (3A, 3B, 3C or 3D) for a specific comment. This document index is followed by a comment-topic legend and Table 1, the Response to Comment Topic Table. Table 1 is comprehensive, covering responses for all of the comments included within Volume 3.

Every comment or question is given a unique three-level code identified by source document, sequential comment number, and comment topic. Every comment is identified in a text box on the left side of the source document. For example, the comment identified as "1-1-AA" is for document one, first comment, and comment topic AA (or cost, water user rates, etc.). Additionally, each comment is identified within the source document by a box drawn around the comment.

Each identified comment is evaluated, categorized by comment topic, and answered. The comment topic categorization allows the comments to be grouped into relevant categories. A legend defining the comment topics is provided. The responses to each comment topic are shown in Table 1. Table 1 provides the topic, a brief summary of the topic, the general response, and the specific section in the EIS where the reader can look for additional information on the topic.

Questions raised and answered during the four public meetings and one public hearing when formal transcripts were prepared are flagged with the unique three level comment code. However, as these questions were answered during the public forum and are available within the transcript, the answers to these questions have not been repeated in Table 1.

Washington Aqueduct EIS Comment Document Index

Document Number	Title/Description	Date & Time
1	Oral Statements and Questions from Interested Parties at St. Patrick's Episcopal Church Open House	1/28/04
2	Oral Statements and Questions from Interested Parties at Dalecarlia Water Treatment Facility Open House	9/7/2004
3	Email comment on Follow-up to Washington Aqueduct's September 7 Public Meeting	9/12/2002; 10:50 AM
4	Email comments	9/21/2004; 4:23 PM
5	Email comment on residuals	9/22/2004; 3:48 PM
6	Email comment on Proposed Water Treatment Residuals Management Process	9/25/2004; 1:45 PM
7	Email comment on Proposed Water Treatment Residuals Management Process	9/25/2004; 2:39 PM
8	Public Comment and Question/Answer Session and Technical Presentation on Alternatives Identification and Screening Process public meeting at Sibley Memorial Hospital	9/28/2004
9	Email comments on Dalecarlia 9/28 Meeting	09/29/2004; 4:30 PM
10	Email comments on Residuals project question	9/29/2004; 10:27 PM
11	Email comments on Suggested Alternative	09/30/2004; 10:40 AM
12	Email comment	10/2/2004; 8:55 AM
13	Cold call to Mike Peterson from Lehigh cement	<date of Email notifying contents of call: 10/12/2004; 1:42 PM>
14	Email comments on Washington Aqueduct Residuals Treatment Alternative	11/05/2004; 2:15 PM
15	Email comments on Proposed Water Treatment Residuals Management Process	11/9/2004; 11:37AM
16	Email comments on Proposed Water Treatment Residuals Management Process	7/13/2004; 8:23 PM
17	Comments on Proposed Water Treatment Residuals Management Process	11/10/2004; 12:21 AM
18	Email comments on Proposed Water Treatment Residuals Management Process	11/11/2004; 10:24 AM
19	Email comments regarding sludge treatment plant	11/11/2004; 12:05 AM
20	Email comments on Dalecarlia Sludge Alternative proposals	11/11/2004; 1:08 PM

Document Number	Title/Description	Date & Time
21	Email comments on Proposed Water Treatment Residuals Management Process	11/11/2004; 5:22 PM
22	Proposed Water Treatment Residuals Management Process, Request for Comments	11/12/2004
23	Email comments on Proposed Water Treatment Residuals Management Process	11/14/2004; 9:15 PM
24	Email comments on Proposed Water Treatment Residuals Management Process	11/15/2004; 12:08 AM
25	Email comments on Proposed Water Treatment Residuals Management Process-“Public Submission of Residuals Alternatives” Set of 72	11/15/04; 4:57 PM
26	Email comments on Proposed Water Treatment Residuals Management Process	11/15/2004; 5:25 PM
27	Email comments on Proposed Water Treatment Residuals Management Process	11/15/2004; 6:09 PM
28	Email comments on Proposed Water Treatment Residuals Management Process	11/15/04; 9:18 PM
29	Brookmont Community comments on and alternatives to the proposed Washington Aqueduct Water Treatment Residuals Management Process Facility to be located at the existing Dalecarlia Facility	11/15/2004
30	Public Comment and Question/Answer Session and Technical Presentation on Alternatives Identification and Screening Process public meeting at Sibley Memorial Hospital	11/16/2004
31	Email comments on Barge Option	11/19/2004; 2:08 PM
32	Email comments on EIS Wastewater	1/24/2005; 1:45 PM
33	Concerned Neighbors letter - Washington Aqueduct Residuals Management Project: Comments on Alternatives	2/14/2005; 4:45 PM
34	Sludge Stoppers letter - Washington Aqueduct Residuals and Dewatering Facility Additional 40 Alternatives	2/14/2005
35	ANC Meeting Comments, Questions from the Commissioners	3/2/2005
36	DOPAA Meeting Notes	5/26/2005
37	Concerned Neighbors letter - Washington Aqueduct Residuals Management Project: Comments on Alternatives	11/15/2004
38	Washington Aqueduct Residuals EIS	1/24/2005; 9:23 PM
39	Suggested Alternatives	9/30/2004; 10:40 AM
40	Waste Management Plan	2/10/2004; 3:58 PM
41	Comments on Proposed Water Treatment Residuals Management Process	2/10/2004; 4:24 PM

Document Number	Title/Description	Date & Time
42	Comments on Proposed Water Treatment Residuals Management Process	6/3/2004; 6:54 PM
43	Sediment Disposal Options	5/24/2004; 1:41 PM
44	EIS and Related Activities relating to Proposed Water Treatment Residuals Management Process	6/18/2004; 11:43 AM
45	Comments on Proposed Water Treatment Residuals Management Process	1/11/2004; 2:12 PM
46	Comments on Proposed Water Treatment Residuals Management Process	7/14/2004; 8:06 PM
47	Comments on Proposed Water Treatment Residuals Management Process	7/19/2004; 2:24 PM
48	Comment on Residuals Project	7/28/2004; 4:47 PM
49	Comments on Proposed Water Treatment Residuals Management Process	9/22/2004; 10:19 AM
50	Comments on Proposed Water Treatment Residuals Management Process	9/21/2004; 4:17 PM
51	Comments on Proposed Water Treatment Residuals Management Process	9/25/2004; 1:45 PM
52	Comments on Proposed Water Treatment Residuals Management Process	9/8/2004; 10:10 AM
53	SSN-ANC – Needed Analysis for Next Public Review	9/22/2004; 6:01 PM
54	Comments on Proposed Water Treatment Residuals Management Process	9/25/2004; 2:39 PM
55	Comments on Proposed Water Treatment Residuals Management Process	10/4/2004; 8:39 PM
56	Residuals Project Question	10/9/2004; 11:19 AM
57	Comments on Proposed Water Treatment Residuals Management Process	11/7/2004; 10:30 PM
58	Comments on Proposed Water Treatment Residuals Management Process	11/9/2004; 11:37 AM
59	Concerned Neighbors letter - Fatal Flaws in the Corps' NEPA Analysis of Alternatives to the Current Residuals Disposal Practices at the Washington Aqueduct	3/30/2005
60	Comment regarding residuals trucking plan	Wed 7/6/2005 10:22 AM
61	Email comments on DEIS	Wed 7/6/2005 2:22 PM
62	Email comments on DEIS	Wed 7/6/2005 2:59 PM
63	Email comments on DEIS	Wed 7/6/2005 3:08 PM
64	Objection to Washington Aqueduct Project	Wed 7/6/2005 3:45 PM
65	Email comments on DEIS	Wed 7/6/2005 4:31 PM
66	Dewatering plant	Wed 7/6/2005 6:45 PM

Document Number	Title/Description	Date & Time
67	Dalecarlia water residuals treatment and DEIS	Wed 7/6/2005 9:57 PM
68	Strong opposition to Brookmont Option B	Wed 7/6/2005 10:47 PM
69	Response to the DEIS for the Washington Aqueduct proposal to construct a thickening and dewatering facility - Strong opposition to Brookmont Option B	Wed 7/6/2005 11:18 PM
70	Letter in Opposition Tio The Dalecarlia Sludge Factory	Thu 7/7/2005 12:20 AM
71	Sludge Plan public comment	Fri 7/8/2005 11:58 PM
72	thickening/dewatering facility	Mon 4/25/2005 11:16 AM
73	Dalecarlia water treatment facility	4/26/2005 12:55 PM
74	Washington Aqueduct Draft Environmental Impact Statement	Tue 4/26/2005 4:27 PM
75	Bait and Switch	Wed 4/27/2005 1:01 PM
76	Dalecarlia Water Treatment Facility	Wed 4/27/2005 2:33 PM
77	Request for Extension of Comment Period for Draft DEIS on the Washington Aqueduct Project	Mon 5/2/2005 10:26 PM
78	Testimony	Tue 5/10/2005 8:32 AM
79	Letter from Concerned Neighbors	Tue 5/10/2005 10:55 AM
80	Testimony	Tue 5/10/2005 11:45 AM
81	Washington Aqueduct Draft Environmental Impact Statement & Hearing Request	Wed 5/11/2005 3:06 PM
82	Email question	Wed 5/11/2005 4:36 PM
83	Washington Aqueduct Construction Funding?	Wed 5/11/2005 6:38 PM
84	Washington Aqueduct Construction Funding	Thu 5/12/2005 5:35 PM
85	Delcarlia Waste Plan	Fri 5/13/2005 4:17 PM
86	Email comment	Sat 5/14/2005 10:43 AM
87	Dewatering facility	Thu 5/26/2005 2:32 PM
88	Sludge Facility	Fri 6/3/2005 3:15 PM
89	Opposed to current plan of action	Fri 6/3/2005 3:27 PM
90	Comments on Proposed Water Treatment Residuals Management Process	Fri 6/3/2005 5:48 PM
91	Comments on DEIS	Fri 6/3/2005 9:40 PM
92	Comments on DEIS	Fri 6/3/2005 11:52 PM
93	I Oppose any Vehicular Solution to sludge removal!	Mon 6/6/2005 11:56 PM
94	Comments on Proposed Water Treatment Residuals Management Process	Mon 6/6/2005 4:32 PM
95	Opposition to Brookmont Option	Sun 6/5/2005 10:47 PM

Document Number	Title/Description	Date & Time
96	Comments on Proposed Water Treatment Residuals Management Process	Sun 6/5/2005 10:28 PM
97	Dalecarlia proposed dewatering facility	Fri 7/1/2005 2:15 PM
98	Comments on Proposed Water Treatment Residuals Management Process	Fri 6/10/2005 12:46 AM
99	Comment to DEIS	
100	Trucking	
101	Request for extension of comment period for draft DEIS on the Washington Aqueduct Project	April 29, 2005
102	Request for extension of comment period for draft DEIS on the Washington Aqueduct Project	April 30, 2005
103	Request for extension of comment period for draft DEIS on the Washington Aqueduct Project	April 30, 2005
104	Request for extension of comment period for draft DEIS on the Washington Aqueduct Project	
105	Request for extension of comment period for draft DEIS on the Washington Aqueduct Project	May 2, 2005
106	Request for extension of comment period for draft DEIS on the Washington Aqueduct Project	May 2, 2005
107	Request for extension of comment period for draft DEIS on the Washington Aqueduct Project	May 5, 2005
108	Comment	May 26, 2005
109	Dalecarlia Sludge Disposal	May 30, 2005
110	Comments on DEIS	June 2, 2005
111	Comments on DEIS	June 17, 2005
112	Plans for Water Extraction Facility	June 20, 2005
113	Comments on DESI	June 20, 2005
114	Comments on DEIS	June 21, 2005
115	Comments on DEIS	
116	Comments on DEIS	
117	Comments on DEIS	May 20, 2005
118	United States Senate - Comments on DEIS	June 2, 2005
119	Council of the District of Columbia - Comments on DEIS	May 10, 2005
120	US EPA - Request for Modification of Federal Facility Compliance Agreement	June 28, 2005
121	Council of the District of Columbia - See DOC 111 for responses	
122	US Department of the Interior - Comments to DEIS	May 31, 2005

Document Number	Title/Description	Date & Time
123	Montgomery County Council – Washington Aqueduct Residuals Project - Comments to DEIS	June 23, 2005
124	Commonwealth of Virginia – Water Treatment Residuals Management Process for the Washington Aqueduct - Comments to DEIS	May 26, 2005
125	Maryland National Capital Park and Planning Commission – Montgomery County Planning Board - Comments on DEIS	June 1, 2005
126	Sludge processing plant	Fri 6/10/2005 4:51 PM
127	Maryland State Highway Administration - Washington Aqueduct DEIS comments	Mon 6/13/2005 7:29 AM
128	Washington Aqueduct DEIS comment period	Mon 6/13/2005 10:31 AM
129	opposition to Dalecarlia sludge plant	Tue 6/21/2005 2:02 PM
130	DEIS-I oppose your proposal	Thu 6/30/2005 8:38 PM
131	Attached please find a letter to Mr. Thomas Jacobus	Thu 6/30/2005 5:59 PM
132	Washington Aqueduct	Tue 7/5/2005 6:59 AM
133	Alternative E of their Draft Environmental Impact Statement ('DEIS')	Mon 7/4/2005 11:34 AM
134	Sibley dewatering facility proposal	Mon 7/4/2005 12:02 PM
135	U.S. Army Corps of Engineers Draft Environmental Impact Statement ('DEIS') Alternative E	Mon 7/4/2005 12:20 PM
136	Washington Aqueduct	Mon 7/4/2005 2:10 PM
137	proposed industrial sludge treatment facility near Sibley Hospital	Mon 7/4/2005 5:00 PM
138	Alternative E opposition	Mon 7/4/2005 7:09 PM
139	Dewatering facility	Mon 7/4/2005 9:47 PM
140	industrial facility	Mon 7/4/2005 10:17 AM
141	80-foot industrial dewatering facility proposed behind Sibley Hospital (Alternative E)	Mon 7/4/2005 8:40 AM
142	Comments on DEIS	Mon 7/4/2005 9:11 AM
143	Dewatering Facility Proposal	Mon 7/4/2005 10:01 AM
144	Comments on DEIS	Mon 7/4/2005 7:55 AM
145	Comments on Proposed Water Treatment Residuals Management Process	Fri 7/1/2005 7:07 PM
146	Comments on DEIS	Fri 7/1/2005 6:00 PM
147	Washington Aqueduct	Mon 7/4/2005 12:29 AM
148	Washington Aqueduct	Sun 7/3/2005 11:32 PM
149	Deadline for comment period on DEIS for proposed dewatering plant	Sun 7/3/2005 4:08 PM

Document Number	Title/Description	Date & Time
150	Dewatering facility	Tue 7/5/2005 9:09 AM
151	Construction of Industrial Dewatering Facility Near Sibley Hospital	Tue 7/5/2005 10:05 AM
152	residue facility	Tue 7/5/2005 11:08 AM
153	Need for another alternative to siting of proposed 8 story tall toxic waste dump site next to Sibley Hospital under current Corps proposal E	Tuesday, July 05, 2005 11:36 AM
154	Water Extraction Facility at the Dalecarlia Filtration Plant	Tue 7/5/2005 11:47 AM
155	OPPOSITION TO Alternative E re the new industrial de-watering facility near Sibley Hospital	Tue 7/5/2005 11:44 AM
156	Sibley Memorial Hospital Comments on DEIS	June 27, 2005
157	Government of the District of Columbia Department of Health - Draft Environmental Impact Statement for Proposed Residuals Management Process	July 5, 2005
158	Washington Aqueduct	Tue 7/5/2005 12:35 PM
159	Opposition to DEISN	Tue 7/5/2005 1:36 PM
160	Washington Aqueduct: Draft EIS for dewatering facility	Tue 7/5/2005 2:44 PM
161	industrial plant in my backyard	Tue 7/5/2005 3:11 PM
162	Washington Aqueduct DEIS Response	Tue 7/5/2005 4:22 PM
163	Comments to DEIS	Tue 7/5/2005 4:59 PM
164	Dewatering Facility	Tue 7/5/2005 5:03 PM
165	Washington Aqueduct -	Tue 7/5/2005 5:45 PM
166	Washington Aqueduct: Draft EIS for De-Watering facility	Tue 7/5/2005 10:16 PM
167	Washington Aqueduct-environmental hazard	Wed 7/6/2005 7:10 AM
168	Transcripts (Private)	
169	Transcripts (Public)	
170	Letter from Concerned Neighbors - Fatal Flaws in the Corps' Draft Environmental Impact Statement ("DEIS") and Reasons Why the NEPA Process Must be Restarted	July 5, 2005
171	Public Comments on Draft Environmental Impact Statement (DEIS)	July 6, 2005
172	Comments on DEIS	July 5, 2005
173	Comments on DEIS	July 4, 2005
174	Comments on DEIS	July 1, 2005
175	Comments on DEIS	July 5, 2005
176	Comments on DEIS	July 4, 2005
177	Comments on DEIS	June 30, 2005
178	Comments on DEIS	June 30, 2005

Document Number	Title/Description	Date & Time
179	Comments on DEIS	July 5, 2005
180	Comments on DEIS	July 5, 2005
181	Industrial Dewatering Plant	Mon 7/5/05 5:59 PM
182	US EPA - Draft Environmental Impact Statement for the Washington Aqueduct Residuals Project CEQ #20050154	June 27, 2005
183	Comments on DEIS	May 17, 2005
184	Testimony	May 17, 2005
185	Statement Regarding the Draft Environmental Impact Statement for a Proposed Water Treatment Residuals Management Process for the Washington Aqueduct	May 17, 2005
186	Sludge Stoppers – Alternatives regarding the proposed Army Corps of Engineers Washington Aqueduct "residuals and dewatering facility" aka Sludge Factory	November 15, 2004

Agency Reviewers:

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United States Environmental Protection Agency	120, 182
United States Department of the Interior	122
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City and County Agencies, and Elected Officials:

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Montgomery County Council	123

LEGEND
Comment topics received through public and agency correspondence

Topic		Sub-Topic	
A	Cost	AA	Cost, water user rates, etc.
		AB	Cost, supporting data
		AC	Opportunity cost of land
		AD	Washington Aqueduct Funding
B	Facility (residuals processing)	BA	Facility appearance
		BB	Facility location
		BC	Facility noise
		BD	Facility simulation
		BE	Facility access
		BF	Facility light
		BG	Facility smell
		BH	Facility impact on habitats
		BI	Facility impact on Sibley Hospital
		BJ	Facility impact on dirt/dust
		BK	Facility impact on health
		BL	Facility will impact property values
		BM	Disturbing site B soil
C	Monofill	CA	Monofill, preference
		CB	Monofill, chemical exposure
		CC	Monofill, height
		CD	Monofill, trees
D	Pipeline	DA	Pipeline, preference to Blue Plains
		DB	Pipe in a pipe
		DC	Active management of residual discharge
		DD	WSSC Potomac WFP
		DE	Carderock
		DF	FCWA Corbalis WTP
		DG	Potomac River
		DH	George Washington Parkway

LEGEND
Comment topics received through public and agency correspondence

Topic		Sub-Topic	
		DI	Pipeline size
		DJ	Regionalization
		DK	Rockville WTP
		DL	New processing site near the Beltway
		DM	COE hasn't adequately investigated other piping alternatives
E	Residuals	EA	Residuals disposal method
		EB	Residuals processing method and impacts
		EC	Residuals Quantities
F	Schedule	FA	Construction schedule
		FB	EIS schedule
		FC	Compliance performance
		FD	Temporary alternatives
		FE	Public comment period
		FF	DEIS review period time extension
		FG	EPA grants interim FFCA schedule milestone
G	Trucking	GA	Trucking, neighborhood impact
		GB	Trucking alternative
		GC	Trucking, noise
		GD	Trucking, routes
		GE	Trucking, frequency
		GF	Trucking, air pollution
		GG	Trucking, safety
		GH	Trucking, vibration
		GI	Trucking costs
		GJ	Existing Dalecarlia Parkway vehicle/truck volumes
		GK	Trucking hours
H	Barge	HA	Barge, preference
I	Comment	IA	Preference
		IB	Useful Life of Alternatives

LEGEND
Comment topics received through public and agency correspondence

Topic		Sub-Topic	
J	Residuals Discharge Resolutions	JA	River discharge
		JB	Discharge during spawning season
K	Human Health and Environment	KA	Impure water quality, raw water intake
		KB	Monitoring water quality and safety
		KC	Residuals quality
		KD	Health Impacts of Diesel Truck Traffic
L	Alternate Water Treatment Process	LA	Suggested Processes
M	Government	MA	EPA mandate
		MB	FOIA requests
		MC	Conflict of Interest
		MD	Agency Recommendations on DEIS
N	EIS Process	NA	Understanding
		NB	Screening criteria and meeting
		NC	Communication
		ND	NEPA Process
		NE	Limited number of alternatives evaluated in DEIS
		NF	Institutional constraints screening criteria
		NG	Restart NEPA process
		NH	Regional approach to NEPA
O	Alternate Coagulants	OA	Continued River Discharge
P	Residuals Handling in Other Metropolitan Areas	PA	Disposal
		PB	Residuals studies throughout the world
Q	Residuals Alternatives	QA	Public Residuals Alternatives
		QB	Environmental assessment
		QC	Northwest (alternate B) versus east (alternate E) residuals processing sites
		QD	Residuals processing site near Beltway versus Dalecarlia WTP site

A number of comments were received from the public and the various agencies involved with the project prior to and following the issuance of the DEIS. Many of the comments are focused on similar EIS topics. This table documents the topics addressed in the comments, summarized the general response for each topic, and refers the reader to the EIS section where more information is provided on the topic/subtopic.

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
AA	Costs, water user rates, etc.	Costs of alternatives are estimated and compared. Screening criteria for cost: a feasible alternative must be no more than 30 percent of the baseline budget of $50 million, to avoid undue impact on user rates. Actual rate impacts are not estimated. The wholesale customers are responsible for estimating water rate impacts and adjusting water rates accordingly. Questions related to the effect of operations and capital improvements on retail rates should be directed to the appropriate wholesale customer. The effect of Washington Aqueduct project costs on the financial plans developed by individual wholesale customer varies from one customer to another. As a result, Washington Aqueduct is not able to describe the direct effect of our proposed project costs on retail rates. It is impossible to say at what cost users' rates will be "unduly" or "unreasonably" impacted, but it is likely that this project will have an impact on retail water rates. The 30% threshold is a number that the project engineers discussed at length early in the planning stage and consider to be a reasonable limit to use as screening. Note that there are no alternatives that are screened out based on cost alone. The residuals project will be paid for by the wholesale customers. See topic AD for a discussion of Washington Aqueduct project funding.	EIS Volume 1 - Section 2.3 Alternatives screening Process and Criteria EIS Volume 1 - Section 4.14 Cost
AB	Cost, supporting data	Capital and O&M costs and associated supporting data are provided in the Feasibility Study. Monofill operating costs were obtained from a neighboring wastewater treatment utility that operates a similar monofill facility. A question was raised concerning the difference between the pipeline construction costs included in Alternatives 5 versus Alternative 8, as summarized in the May 2004 Engineering Feasibility Study document. The pipeline cost included for Alternative 8 includes a $10,000,000.00 allowance for land purchase that is not included in the Alternative 5 cost. The cost for the Alternative 5 pipeline was modified in Volume 4 of the EIS to reflect a change in construction technique (to directional drilling).	EIS Volume 4 - Engineering Feasibility Study Compendium EIS Volume 4 –Engineering Feasibility Study Compendium Sections 3.1.2 and Section 5.7.

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		This change significantly increased the cost of the Alternative 5 pipeline. Several public comments were received on the costs summarized in Table 5-2 of the EIS Volume 4 - Engineering Feasibility Study Compendium. The same trucking costs were used for Alternatives B, C, and E. The unit trucking cost is based on an assumed haul distance. It is assumed that the permitted residuals disposal site would be the same distance from the Blue Plains AWWTP or the Dalecarlia WTP. Costs of hauling residuals to the monofill are included in the category name - Other Monofill Specific Costs. Road deterioration costs are not included in the trucking alternatives because the Department of Transportation provides funds for the maintenance of public roads.	EIS Volume 4 – Engineering Feasibility Study Compendium, Table 5-2
AC	Opportunity cost of land	The land surrounding the Dalecarlia Reservoir is owned by the Federal Government. The Federal Government does not intend to sell this land because it provides valuable buffer and security functions to the Washington Aqueduct. There is no Washington Aqueduct property considered to be excess and even if there were, proceeds from the sale of the property would belong to the U.S. Treasury, not the Washington Aqueduct.	The sale price of the land surrounding the Dalecarlia Reservoir was not evaluated in the EIS because this action is not planned by the Washington Aqueduct.
AD	Washington Aqueduct Funding	Although owned and operated by the Army Corps of Engineers, Washington Aqueduct functions as a public water utility and is not part of the Corps' civil works program to be included in the Civil Works budget request. All funds for Washington Aqueduct operations and capital improvements, whether self-initiated or in response to regulation and permitting actions, come from the wholesale customers (i.e., District of Columbia Water and Sewer Authority, Arlington County, and the City of Falls Church). Each year, the Washington Aqueduct Wholesale Customer Board, which is comprised of the General Manager of the DC Water and Sewer Authority, the County Manager of Arlington County, and the City Manager of the City of Falls Church, meets to discuss and approve the upcoming fiscal year operating and capital improvement budgets for Washington Aqueduct. At that time, future projects are described in a multiyear capital plan. This gives the customers an idea of how they will need to plan for funding Washington Aqueduct. Each customer may have a different approach. Customer funding of Washington Aqueduct operations and capital improvements is tied to the proportional use of the water produced. Those shares are approximately 75 percent for the District of Columbia Water	

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		and Sewer Authority, 15 percent for Arlington County, and 10 percent for Falls Church. The costs associated with Washington Aqueduct operations are completely reimbursable. Washington Aqueduct has no retained earnings. A section of the 1996 Safe Drinking Water Act Amendments provided Washington Aqueduct with $75 million of borrowing authority over fiscal years 1997, 1998 and 1999. The purpose of this authority was to allow the execution of an aggressive capital improvement program while the Army and the Washington Aqueduct customers considered alternative ownership and operations of Washington Aqueduct. This borrowing was added to the existing debt service that the customers pay as part of their cost of water service. This borrowing authority expired in fiscal year 1999 and was not renewed. All capital investments made by the customers in Washington Aqueduct infrastructure since then have been on a pay-as-you-go basis, in cash from their accounts. Although Washington Aqueduct annual operations and capital improvements are not funded through any Congressional appropriation, it is technically possible for Washington Aqueduct to receive a specific authorization and appropriation. The loans discussed earlier, are being repaid with interest, and those amounts are reflected in the water bills of the retail customers. Based on all discussions with officials throughout the development of the NPDES permit and the analysis of the nature of the project that would be required to comply with it, there has been no expression by any Congressional committee that an outright appropriation or authority for a new loan is under consideration. The timing of Washington Aqueduct's permit compliance under the Federal Facilities Compliance Agreement requires that the NEPA action be completed in accordance with the schedule in the FFCA and that the customers provide sufficient funds.	

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
BA	Facility appearance	The visual impact of residuals facilities is evaluated in Section 4 of the EIS. Visual simulations have been developed to show the anticipated look of the proposed buildings and structures. These views will be refined during the design phase of the project. The photos of the existing site included in the EIS were taken during both summer and winter seasons to show the variation in natural screening provided by the existing trees. The feasibility of building the settling tanks and truck entrance/exit below grade is influenced by cost impacts and available site topography and space. Reduced facility heights will be considered for applicable alternatives. Berms and other architectural landscape devices are possible measures to mitigate or minimize visual impacts. These features will be incorporated into the selected alternative. The proposed thickening and dewatering building has three floor levels plus a basement thickened residuals pump area located on each side of the building. The description of the building has been changed from three-story building to three-floor building to address any potential confusion related to the height of the building. The floor to floor spacing used on the proposed building is greater than those typically used for a commercial office building to allow sufficient vertical space for residuals processing and storage equipment and vehicles. The floor to floor spacing and overall building height are shown on the building drawings included in Volume 4 of the EIS. The project will be submitted to the National Capital Planning Commission (NCPC) and the Commission of Fine Arts (CFA) for full project review and approval. These agencies have authority for architectural review of Federal Projects in the Capital region. The architectural look of the proposed residuals processing facilities will continue to be developed as the project proceeds. The proposed facilities will be designed to provide a pleasant appearance in keeping with NCPC regulations. The architecture and siting of the building will take the natural and built surroundings into consideration.	EIS Volume 1 - Section 4.12 Visual Aesthetics EIS Volume 1 - Figures 4-2 to 4-11 EIS Volume 4 – Engineering Feasibility Study Compendium, Section 4.4

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
BB	Facility location	Washington Aqueduct would contract haul and dispose of residuals for alternatives B, C and E. Multiple disposal sites are required to ensure disposal reliability. Disposal site selection will be the responsibility of the residuals disposal contractor. An evaluation of residuals land application sites based solely on existing permits and capacity of specific locations is unable to accommodate a variety of land disposal practices that may take place in a dynamic market place over the 20-year design life of the project. The EIS uses a programmatic approach to evaluate the ability of the residuals disposal marketplace to meet increasing demand within an approved regulatory environment. Multiple residuals processing sites have been evaluated in the Engineering Feasibility Study Compendium, including numerous sites located distant from the Dalecarlia WTP site. One such alternative involves constructing new residuals processing facilities at the Carderock facility near the beltway. Several alternatives involving Carderock were suggested by the public. These alternatives were evaluated in Volume 4 of the EIS – Engineering Feasibility Study Compendium, Section 3.2.2. These alternatives screened out because the Navy had determined that the construction of Washington Aqueduct residuals facilities is inconsistent with their long-term plan for the Carderock facility. See topic DE for further discussion of the “Carderock” and other offsite residuals processing alternatives. Relocation of the entire existing Dalecarlia WTP and Georgetown Reservoir complex to another site would be a massive undertaking. Such a project could not be completed within the FFCA schedule and would be cost prohibitive. It is anticipated that such a project would cost at least $640,000,000.00, exclusive of land purchase and raw water conveyance cost impacts. The northwest Dalecarlia processing site was previously reviewed and approved by NCPC as part of a Master Plan update completed in 1980. The specific location of the proposed residuals thickening and dewatering facilities shown in Figure 4-22 of the Engineering Feasibility Study Compendium can be adjusted within the confines of the site area shown on this figure. Additional sites on the Dalecarlia WTP property are also evaluated in the EIS (such as the east site evaluated for Alternative E).	EIS Volume 1 - 4.16 Land Application of Water Treatment Residuals EIS Volume 4 - Engineering Feasibility Study Compendium Section 3 Screening of Alternatives EIS Volume 4 – Engineering Feasibility Study Compendium, Figure 4-22. EIS Volume 1, Section 6

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		Reference Section 6, Volume 1 of the EIS for a discussion of the reasons for recommending the East Dalecarlia Processing site. One of the public comments indicates that existing pine trees located along the west property line of the Northwest Processing Site, as shown on Figure 4-22 of the Engineering Feasibility Study Compendium, will be cut down if the proposed residuals facilities are constructed. This is not true of the case with Alternative B. In fact; it is likely that additional trees would be planted to provide a visual screen with this alternative.	
BC	Facility noise	The noise analysis summarized in the EIS is a conservative worst case approach to determining noise impacts based upon regulations. Sound attenuation attributable to distance from residential receptors is considered in this analysis. Construction measures, such as installation of berms, will be used as needed to mitigate noise impacts to "sensitive" receptors during construction and operation of the residuals facilities. The proposed residuals processing facility will not generate noise or vibrations that could travel through the ground or the groundwater. The various environmental impacts of the proposed residuals processing facility are summarized in the EIS.	EIS Volume 1, Section 4.3.3.2 Alternative B – Dewatering at Northwest Dalecarlia Processing Site and Disposal by Trucking EIS Volume 1, Section 4.3.3.5 Alternative E – Dewatering at East Dalecarlia Processing Site and Disposal by Trucking EIS Volume1, Section 4.
BD	Facility simulation	Visual simulations have been prepared for individual residuals facilities in lieu of an area-wide digital model.	EIS Volume 1 – Section 4
BE	Facility access	See transcript discussions labeled "BE" for responses.	EIS Volume 4 – Engineering Feasibility Study Compendium
BF	Facility light	Lighting surrounding or on the proposed thickening and dewatering facility will be designed to minimize impacts on area neighbors by directing light towards the ground. The lighting surrounding the residuals facilities will be designed to provide a safe environment for the public, vehicular traffic, and maintenance and emergency workers required to visit the facility during non daylight hours and serve as a deterrent to vandalism. The proposed lighting design will be reviewed by NCPC as part of their overall design review process. Lighting during construction will be restricted to levels required for safety and security. Light fixtures will be hooded and directed toward the work areas to minimize offsite impacts.	EIS Volume 4 – Engineering Feasibility Study Compendium EIS Volume 1- Section 4.12 Visual Aesthetics

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		Also, see transcript discussions labeled “BF” for responses.	
BG	Facility smell	The air pollution issues associated with each alternative are evaluated in the EIS. In general, the alternatives being considered are not anticipated to have a significant impact on area air pollutant levels. The water treatment residuals that would be processed at the proposed facility produce very little or no odor because they contain very low levels of biodegradable organic compounds. The majority of the residuals consist of river silt and alum residuals, both of which are biologically inert. The project team and a group of interested citizens, visited one or more similar facilities, the closest being WSSC’s Potomac Water Filtration Plant. Observation confirms that there is no objectionable smell associated with this type of facility.	EIS Volume 1 - Section 4.4 Air Quality
BH	Facility impact on habitats	Construction of the proposed residuals thickening and dewatering facilities on the East Dalecarlia Processing Site (Alternative E) and disposal by trucking would not adversely impact the river-based environmental indicators such as water quality, sediment quality, aquatic resources including the benthic community, fisheries, essential fish habitat, and submerged aquatic vegetation. The wildlife and bird habitats on site E are not expected to be negatively impacted as the area is already cleared and does not contain any habitat for wildlife or bird nesting.	EIS Volume 1- Sections 4.5 Aquatic Resources and Section 4.6 Biological Resources (Terrestrial) EIS Volume 2-Appendix 2B: Biological Resources
BI	Facility impact on Sibley Hospital	Earlier this year, Sibley Hospital completed construction of a major infrastructure improvement (a new parking garage). This construction project did not have an adverse effect on Sibley Hospital daily operations. The construction of the proposed Washington Aqueduct residuals facilities is also not anticipated to have a negative impact on ongoing operations at Sibley Hospital or upcoming Sibley Hospital construction projects. The two construction projects will take place on adjacent, but unique sites. Site access and deliveries to the residuals construction site will be coordinated with Sibley Hospital to ensure that the hospital operations are not impacted. The project has been coordinated with Sibley Hospital. By letter dated June 27, 2005, the hospital administration indicated a desire to coordinate future hospital and Washington Aqueduct residuals project activities and	

TABLE 1
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Topic / Sub-topic	Summary	Response	See EIS section
		offered suggestions related to the proposed residuals processing site.	
BJ	Facility, Dirt/Dust	The dust/dirt generated by construction and operation of the proposed residuals thickening and dewatering facilities on the East Dalecarlia Processing Site (Alternative E), the associated new residuals removal equipment at the Dalecarlia sedimentation basins, and operation of two new residuals dredges in the Georgetown Reservoir is less than the *de minimus* threshold levels for particulate matter (PM 10). The alum water treatment residuals for this facility are very moist and generally dewatered to 30% solids (70% water). This moist composition of the residuals physically minimizes the generation of dust and dirt. The nature of alum residuals is that they retain moisture and therefore are not expected to dry out on the haul route. The means of processing residuals would be through thickeners and centrifuges. These types of equipment operate in a wet/moist environment. In addition to the physical properties of the water treatment residuals, the amount of dust/dirt that becomes airborne during construction and operation of the facility will be further minimized by employing all appropriate dust control measures. During construction of the facility dust and dirt will be controlled by maintaining moist conditions using standard construction methods, such as wetting down the construction area periodically throughout the workday.	EIS Volume 1- Section 4.3 Air Quality EIS Volume 2A- Air Quality EIS Volume 4
BK	Facility impact on health	There are no specific health effects associated with the proposed residuals processing facility. See EIS Volume 1, Section 4 for an evaluation of the impacts of the proposed facilities on the environment and surrounding neighborhood.	EIS Volume 1, Section 4
BL	Facility will impact property values	The water treatment operation currently performed at the Dalecarlia WTP and Georgetown Reservoir sites will not significantly change as a result of adding residuals processing facilities. All of the property required for the proposed residuals project is currently owned by Washington Aqueduct and currently used in the production of drinking water. The proposed residuals processing operation is not anticipated to negatively impact	

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Topic / Sub-topic	Summary	Response	See EIS section
		neighborhood property values because the construction and operation of the proposed residuals facilities will have no significant environmental impact on the neighborhood. Similar previous neighborhood concerns related to the potentially negative impact of the AUES FUDS environmental remediation activities on neighborhood property values were analyzed as part of the Spring Valley project. This analysis examined the potential impact of the AUES FUDS remediation work on property values, average number of days that homes remain on the market and the difference between list price and sale price during the period between 1995 and 2001. This study concluded that housing values rose steadily between 1995 and 2001 while the average days on the market dropped considerably indicating that the neighborhood remained a very desirable location throughout this period. Given that the environmental impact of the proposed residuals processing and disposal project will be considerably less than the ongoing AUES FUDS project, no impact on neighborhood property values is anticipated to be associated with the residuals project. The full text of the report can be found in the Administrative Record.	Administrative Record
BM	Disturbing site B soil	The proposed action is to construct dewatering and thickening facilities at site E. As a result, no modifications are planned to site B (Brookmont site) where soil borings were conducted and an oily smell was observed in the existing fill material. The Washington Aqueduct reported the observed odor to Maryland Department of the Environment (MDE) and will work with MDE on any follow-up required.	EIS Volume 1 – Sections 3.7 and 4.8
CA	Monofill, preference	Alternative A (Monofill) was initially found to be technically feasible, based upon the screening criteria. However, when the alternative was thoroughly evaluated in the EIS and then balanced against the purpose and need for the project, it presented impacts that precluded its selection as the preferred alternative. The Corps of Engineers plans to investigate the monofill site for the potential presence of buried munitions in 2008. The public suggested several alternate transport systems, such as a small rail system or a conveyor in a tunnel, to move dewatered residuals from the Dalecarlia WTP to the monofill. These options were considered but none were determined to be relevant once it was determined that the monofill could no longer be potentially recommended as the preferred	EIS Volume 1 - Section 6.2.1 Detailed Reasons for Not Selecting Alternative A: Dewatering and Disposal by Monofill EIS Volume 4 – Engineering Feasibility Study Compendium - Section 3.1.2

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		alternative. Environmental impacts associated with the Alternative A (monofill) are described in the EIS. Current District of Columbia monofill regulations do not prohibit the government from constructing a residuals monofill on their property. This was confirmed in a meeting with the Office of the Attorney General of the District of Columbia held on September 24, 2004. The anticipated life span of the monofill alternative is not as long as some of the other alternatives considered in the EIS. However, it would not be considered a temporary alternative given its 20-year life – a typical life for such a project. The monofill would be located on the east side of the Dalecarlia Reservoir in an area designated the Dalecarlia Woods. The monofill cannot be buried deeper in the ground because it must be constructed above the groundwater table to prevent the liner system, designed to separate the residuals from the groundwater, from floating. The costs for the monofill alternative are included in the Volume 4 of the EIS.	 EIS Volume 1, Section 4 EIS Administrative Record EIS Volume 1, Figure 2-1 EIS Volume 1, Section 4.9.3 EIS Volume 4- Engineering Feasibility Study Compendium, Section 5-7.
CB	Monofill Chemical Exposure	The monofill site would be fenced off to prevent access by the public. Although the residuals are not toxic, an impermeable liner would be installed on the bottom of the monofill to prevent the residuals from coming into contact with the groundwater. Once completed, the monofill would be capped (or sealed). Reference topic CA for a discussion of why this alternative can no longer be recommended as the preferred alternative.	EIS Volume 4 – Engineering Feasibility Study Compendium, Section 3.1.2 Alternative 2
CC	Monofill height	The height and footprint of the monofill is defined in the Engineering Feasibility Study Compendium. Reference topic CA for a discussion of why this alternative can no longer be recommended as the preferred alternative.	EIS Volume 4 – Engineering Feasibility Study Compendium Section 3.1.2, Alternative 2. Additional information concerning the size of the monofill is provided in Figure 4-5b of the EIS.

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Topic / Sub-topic	Summary	Response	See EIS section
CD	Monofill Trees	The impacts associated with removing trees from the proposed monofill site are described in Section 4 of the EIS. Compliance with the Urban Forest Preservation Act of 2002 is acknowledged as one of the issues that would need to be addressed if this alternative were selected for implementation. Reference topic CA for a discussion of why this alternative can no longer be recommended as the preferred alternative.	EIS Volume 1, Section 4.
DA	Pipeline preference to Blue Plains	Alternative C (Pipeline to Blue Plains) was found feasible, based on screening criteria. However, when the alternative was thoroughly evaluated in the EIS and then balanced against the purpose and need for the project, it presents impacts that preclude selection as the preferred alternative. Some of the impacts could be mitigated to lesser levels, but the work is not possible within the schedule required by the Federal Facility Compliance Agreement (FFCA) issued by the U.S. EPA and it is more than double the cost of each of the other alternatives. In addition, DCWASA is not able to allocate space for residuals processing facilities at Blue Plains because the limited amount of available space is reserved for the District of Columbia Water and Sewer Authority's long-term plans for its Blue Plains AWWTP to meet future nutrient loading and CSO demands. The cost to construct the pipeline to Blue Plains alone is anticipated to be $142,600,000 in 2004 dollars (or $165,100,000 in July 2008 dollars). Alternate routings for residuals pipelines to Blue Plains, such as Metro Rights of Way or abandoned sewer lines were considered but none were determined to be relevant because WASA cannot accept the Washington Aqueduct residuals to be processed on the Blue Plains site. **Potomac Interceptor Shut-off Valve:** As discussed in Section 3.1.2of the Engineering Feasibility Study Compendium, Alternative 4, Washington Aqueduct residuals combined with sewage in the Potomac Interceptor sewer and piped directly to Blue Plains cannot be processed at Blue Plains AWWTP because of the adverse impact on the existing treatment process at Blue Plains. The writer of one comment proposed a novel approach for the use of the Potomac Interceptor. According to this approach, valves would be installed in the Potomac Interceptor at strategic locations to allow the sewage flow to be trapped and stored for a long enough period of time to allow the water treatment residuals to be flushed into the interceptor so	EIS Volume 1 - Section 6.2.2 Detailed Reasons for Not Selecting Alternative C: Thickening and Piping to Blue Plains AWWTP EIS Volume 4 – Engineering Feasibility Study Compendium Section 3.2.1. EIS Volume 1 – Table 4-6. EIS Volume 1 – Section 3.1.2. EIS Volume 4 – Engineering Feasibility Study Compendium, Section 3.1.2

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Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		that they could flow towards Blue Plains. In principle, it would be possible to send the residuals to Blue Plains daily as a relatively intact "slug" if enough valves and instrumentation were provided. The residuals slug could then be captured at Blue Plains for processing, or for pumping further downstream to another processing location. This approach is somewhat analogous to the concept that is planned for the control of sanitary sewer overflows (SSOs) and combined sewer overflows (CSOs) in many areas of the country, including the District of Columbia. In the case of SSOs and CSOs, sewage flows that exceed the capacity of a collection system would be captured and stored in tunnels to prevent them from overflowing into adjacent rivers and streams. The volume of storage required and the logistics of finding locations for and building the storage tunnels have shown this approach to be very expensive. For the management of water treatment residual flows, this approach would require that storage be constructed at the Dalecarlia site for at least the maximum daily flow of water treatment residuals (8,000,000 gallons if unthickened and 2,000,000 gallons if thickened). A large pump station would also be required to meter the entire day's flow of residuals into the Potomac Interceptor during a short period of time. In addition, valves, diversion chambers, and storage facilities would be needed at virtually every confluence point and pump station in the system for the management of sewage flows to keep them separate from the residuals flows. The cost of this effort was not calculated, but can be assumed to be tremendous since the cost for conveyance facilities is generally greater than that for associated treatment facilities. Dry weather low flow in the Potomac Interceptor near the Washington Aqueduct site is approximately 32 mgd (222,222 gpm), and typically occurs between the hours of 6:00 and 9:00 AM. A minimum of 1.3 million gallons (MG) of storage would be required to hold this flow for one hour. More storage volume would be required during wet weather periods. It would not be feasible to store flow in the pipeline because it would fill the pipeline at the rate of about 60 feet per minute at this flow rate. Without storage, overflows would occur at manholes and overflow points upstream of the point where the shutoff valve is located. While this approach seems like a solution, it would simply be too difficult to implement in a practical manner due to the large volume of sewage and	

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Topic / Sub-topic	Summary	Response	See EIS section
		residuals flows that would have to be addressed and the logistics, difficulties, and costs of making major system changes in an urban area. Since it would add many diversion chambers and storage facilities and would not eliminate any residuals processing facilities, this approach would certainly cost more than the Alternative 25.	
DB	Pipe in a pipe	The installation of two dedicated water treatment residuals pipes within the existing Potomac Interceptor pipe/conduit would be complex, dangerous, time consuming, and costly. Two redundant residuals pipelines would be required to avoid discharging residuals into the Potomac Interceptor in the event of a pipe break. Such a discharge could overload the Blue Plains plant and prevent further discharge of residuals from the Dalecarlia residuals thickening facilities until repairs were made to the residuals pipeline installed within the Potomac Interceptor. Based on the long length of pipeline required, the frequency of rainfall events, and the physical configuration of the Potomac Interceptor, it is anticipated that new water treatment residuals pipelines would need to be installed by workers dressed in Class D waterproof hazardous environment suits equipped with portable air supplies. Since the Potomac Interceptor is a stand alone sewer without a parallel back-up sewer over much of its length, it is anticipated that the new residuals pipelines would need to be installed within the Potomac Interceptor while it is partially filled with sewage. Pipeline installation contractor staff would likely work from portable platforms that float on the sewage flow while they install pipe hangers in the crown of the interceptor. Work would need to be interrupted whenever rainfall increases sewage liquid levels above safe depths within the interceptor. The hazardous and intermittent nature of this work would make it very expensive to complete. In addition to the cost escalation factors associated with the hazardous and intermittent nature of such a project, conversations with DCWASA indicate that they would require stainless steel pipe to be installed along the entire length of the Potomac Interceptor to minimize future maintenance issues associated with the corrosive atmosphere inside the interceptor. This pipe material is significantly more costly (2 to 3 times) than the pipe materials assumed for other piping alternatives. Even if the new residuals pipelines could be cost effectively installed within the Potomac Interceptor, the transfer of residuals to the Blue Plains site still could not be recommended as the preferred alternative because	EIS Volume 4 - Engineering Feasibility Study Compendium, Section 3.2.1

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Topic / Sub-topic	Summary	Response	See EIS section
		WASA has indicated that they need to reserve the available site space for future wastewater or CSO treatment facilities. As a result, no room exists to construct the residuals dewatering facilities required to process the Washington Aqueduct residuals.	
DC	Active management of residuals discharge	Discharging residuals to the Potomac Interceptor during dry weather conditions would require approximately 25 additional 105-foot diameter gravity thickeners to be constructed at the Dalecarlia WTP (above and beyond the 4 gravity thickeners anticipated for the current project). These thickeners would provide up to 30-days of residuals storage for rainy periods. The additional gravity thickener complex would occupy approximately 10 additional acres of area on the plant site. The additional thickeners would have a significant visual impact of the neighbors surrounding the plant site and increase the construction cost of the Blue Plains alternative significantly. Even if the additional gravity thickeners and associated thickened residuals pumping facilities could be constructed cost effectively (which is very unlikely), the dry-weather discharge of residuals to Blue Plains would still overload the existing Blue Plains treatment capacity. The total pounds of residuals delivered to Blue Plains would still be the same as suggested in Alternative 5. Based on these concerns, this option cannot be recommended as the preferred alternative.	EIS Volume 4 – Engineering Feasibility Study Supplement, Section 3.1.2, Alternative 5
DD	WSSC Potomac WTP	Alternative 7 was screened out based on economic and institutional concerns. The cost of the alternative did not comply with the cost screening criteria and WSSC is not willing to process residuals from the Washington Aqueduct at their facility.	EIS Volume 1, Section 3.1.2, Alternative 7 and Table 3-9. EIS Volume 2 – Appendices, Public Involvement and Agency Coordination Section.
DE	Carderock	The Navy was contacted to determine if they would be willing to allow the Washington Aqueduct to construct residuals processing facilities on the Carderock site. They responded that this action would be inconsistent with their mission and future plans for the Carderock site and could not be considered. The many piping alternatives are dependent upon the ability and willingness of the receiving facility at the other end of the pipe, whether to process and dispose of the residuals, or to supply space for the Washington Aqueduct to do so. None of the organizations involved, whether it be the DC WASA, WSSC, Fairfax Water, the Central Intelligence Agency (CIA), the United States Navy, the City of Rockville,	EIS Volume 4 - Engineering Feasibility Study Compendium, Section 3.

TABLE 1
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Topic / Sub-topic	Summary	Response	See EIS section
		or the Federal Highway Administration, are able or willing to provide processing capacity or facility space. Neither the United States Army Corps of Engineers, the United States Army, nor the Washington Aqueduct have any authority over any of the agencies. Like Washington Aqueduct, each of these facilities has mission requirements and short-term and long-term plans for meeting them. In addition, in many cases (for example, Carderock) even if there were space available for Washington Aqueduct facilities, it would not be a total solution. Many of the concerns being addressed at the Washington Aqueduct would just be transferred to another location.	
DF	Fairfax Water - Corbalis WTP	Fairfax Water was contacted to determine if they would be able to process Washington Aqueduct's residuals. They indicated that this was not feasible due to a lack of excess capacity. The processing of Washington Aqueduct residuals is also not within Fairfax Water's mission. In addition to issues related to the Fairfax Water's capacity and mission, implementation of a Fairfax Water residuals processing option would also require the construction of a dedicated residuals pipeline to convey the residuals from the Dalecarlia WTP site to the Corbalis Water Treatment Plan site. Such a pipeline would be difficult and costly to install, requiring permission from numerous agencies and private property owners. Based on our analysis of similar piping alternatives, the time required to obtain new easements and the costs associated with constructing the residuals pipeline would create additional obstacles to implementing such an option. Compliance with the FFCA residuals project schedule, as well as, cost screening criteria defined for the project are not feasible for this alternative.	EIS Volume 2A – Appendices EIS Volume 4 – Engineering Feasibility Study Compendium, Section 3
DG	Potomac River	It would be possible to use the existing residuals discharge pipes that connect the sedimentation basins to the Potomac River as carrier pipes to transport thickened residuals to the river. However, it is unlikely that the National Park Service would allow Washington Aqueduct to construct a barge loading station or residuals storage tanks on National Park land adjacent to the Potomac River. It is also likely that the approval to construct a residuals pipeline within the Potomac River bed to transport residuals to the Blue Plains AWWTP could be obtained and the pipeline constructed within the FFCA schedule milestones required by EPA. As a minimum, it is anticipated that a pipeline route study and archeological investigation of the route would be required to prove that there aren't any	EIS Volume 4 - Engineering Feasibility Study Compendium, Section 3.

TABLE 1
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Topic / Sub-topic	Summary	Response	See EIS section
		other routes available for the pipeline that present fewer impacts on park land. As with the pipeline to Blue Plains explored for Alternative C, it is anticipated that many Federal and local agencies would become involved in the design, permitting, and approval of such a pipeline route. The timeframe required for such approvals would be considerable, certainly beyond the timeframes allowed in the FFCA schedule. In addition to the pipeline issues, the alternative would also be negatively impacted by WASA's need to reserve property at the Blue Plains AWWTP for planned future nutrient reduction and CSO treatment improvements. This position prevents Washington Aqueduct from constructing any water treatment residuals processing on the Blue Plains AWWTP site.	
DH	George Washington Parkway	This alternate pipeline route was evaluated in Volume 4 of the EIS. The George Washington Parkway is not considered a suitable residuals disposal route through Virginia because truck access is restricted on this road. The two residuals haul routes proposed through northern Virginia in the EIS are considered more appropriate options because they do not have similar truck restrictions and are capable of handling the number of residuals trucks proposed for the Washington Aqueduct residuals project.	EIS Volume 4 – Engineering Feasibility Study Compendium, Table 3-7.
DI	Pipeline Size	The two 12-inch pipelines proposed for the Blue Plains alternative provide 100-percent redundancy for the design flow rate.	EIS Volume 4 – Engineering Feasibility Study Compendium, Section 3.1.2 Alternative 5 discussion
DJ	Regionalization	Washington Aqueduct has a copy of the December 2000 report entitled "DC WASA Regionalization Study" prepared by staff from the Metropolitan Washington Council of Governments under contract to the District of Columbia Water and Sewer Authority in support of the DC WASA Regionalization Committee. Washington Aqueduct management has met with the consultant conducting the study and given them a full understanding of our current and future operations. The acknowledgements of this report have no reference to any involvement by Washington Aqueduct specifically or the Corps of Engineers in general. Washington Aqueduct is also aware that in March 2005, the DC WASA board acted on an agenda item selecting a regionalization study committee to fulfill the commitment to do a five years hence reevaluation of the work done in 2000. The general manager of Washington Aqueduct has recently met with a representative of the contractor doing the study for DC WASA. Washington Aqueduct explained its role as a wholesale	EIS Volume 4 – Engineering Feasibility Study Compendium

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Topic / Sub-topic	Summary	Response	See EIS section
		producer and described its business and operational relationships with its customers. It is Washington Aqueduct's view that the current operational and business arrangement is sound. At the interview, the question of residuals was discussed and it was pointed out that the issue of piping to WASA's Blue Plains facility for processing and removal at that location is a technical, engineering issue and is not related to governance. The 2000 report was clear that there are many possible models for what might constitute regionalization of the wastewater and drinking water systems. Centralized ownership and operation of all wastewater and drinking water plants in the District of Columbia, in Northern Virginia, and in the Maryland counties adjacent to the District of Columbia is one option that might be studied. Without commenting on the appropriateness or likelihood of this model being selected and implemented, the practical issue is that EPA Region 3 has issued an NPDES permit that has an accompanying compliance schedule that is not compatible with the establishment of an independent regional authority. Regardless of the management structure that might come from a decision to create an independent regional authority sometime in the future, the fact remains that the Dalecarlia and McMillan water treatment plants will continue to operate to produce potable water for the region because the surrounding water treatment utilities do not have sufficient excess treatment capacity to offset the existing Washington Aqueduct production rate and residuals from these plants would have to be managed. Washington Aqueduct has consulted with WSSC, Fairfax Water and the city of Rockville to determine if those entities are able to handle the solids produced by Washington Aqueduct. In all cases, their existing residuals processing capacity is insufficient to accommodate the Washington Aqueduct residuals. In addition, the cost and environmental impacts associated with transporting the Washington Aqueduct residuals to another facility are significant.	
DK	Rockville WTP	The City of Rockville, MD was contacted to determine if they would be able to process Washington Aqueduct's residuals. They indicated that this was not feasible for a variety of reasons (inadequate treatment plant and residuals processing capacity (5 mgd average water production rate for Rockville WTP versus 185 mgd for Washington Aqueduct), tight site conditions, etc.).The processing of Washington Aqueduct residuals is also not within the mission of the City of Rockville. In addition to issues related	EIS Volume 2A – Appendices

TABLE 1
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Topic / Sub-topic	Summary	Response	See EIS section
		to the Rockville WTP site and mission, implementation of a Rockville residuals processing option would also require the construction of a dedicated residuals pipeline to convey the residuals from the Dalecarlia WTP site to the Rockville WTP site. Such a pipeline could be installed inside the existing Washington Aqueduct raw water conduit for some distance. However, a section of the pipeline to the Rockville WTP site would have to be direct buried and routed through either National Park Service or private property. New easements would be required for this portion of the route. Based on our analysis of other similar piping alternatives, the time required to obtain new easements and the costs associated with constructing the residuals pipeline would create additional obstacles to implementing such an option. Compliance with the FFCA residuals project schedule, as well as, cost screening criteria defined for the project is not feasible for this alternative.	EIS Volume 4 – Engineering Feasibility Study Compendium, Section 3
DL	Processing site near Beltway	As with Alternate 8 as evaluated in Volume 4 of the EIS (Engineering Feasibility Study Compendium), it is not feasible to locate and acquire a new site situated near the Beltway, design residuals transport and processing facilities, and construct said facilities within the requirements of the FFCA compliance schedule due to time requirements for siting, obtaining real estate at the new site, as well as, for obtaining a pipeline easement. The FFCA provides a legally mandated plan and time frame to achieve and maintain compliance with the NPDES permit. This suggested alternative cannot be achieved within the time frame constraints of the FFCA. Thus, this alternative is not consistent with the purpose and need of the project. Untimely or non-implementation of the FFCA would result in undesirable consequences impairing the Aqueduct's ability to provide water to its customers and continuing the practice of returning residuals to the Potomac River. EPA granted the Aqueduct an extension to the FFCA milestone to develop and notify EPA of the engineering and best management practices to be implemented to achieve compliance with the NPDES permit and a schedule to implement those practices with the understanding that the Aqueduct would not request an extension to the implementation schedule. In the project meeting described in 5.2.8 of the EIS, EPA ruled out extensions to the FFCA implementation schedule. Although there is no tangible evidence such a site is available, assume, for discussion, that there is a tract of land available in some location	EIS Volume 4 – Engineering Feasibility Study Compendium, Section 3.1.2 Alternatives That Do Not Require Continuous Trucks from the Dalecarlia WTP Complex (see Alternative 8 write-up)

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		adjacent to the Beltway. If the Washington Aqueduct were to consider this tract for residuals processing it would first have to get a commitment that this land would be available for the intended use. In the case of private land this would mean that the land would have to be purchased. After securing the property the new alternative would need to be evaluated in the same manner as the alternatives considered to this point. This would involve everything from studying the engineering feasibility of getting the liquid residuals to the processing point to assessing all environmental impacts associated with the alternative. In any case, the cost would include most or all costs associated with the current alternative E plus the cost of securing land for the facilities and the right of way to get there and the time it would take to accomplish this would be many months to years. Many of the recent alternatives suggested by the public have involved transporting liquid residuals in a dedicated pipeline installed within the raw water conduit that connects the Great Falls Potomac River intake structure with the Dalecarlia Reservoir as a means to avoid the time and cost associated with acquiring a dedicated right-of-way for the liquid residuals pipeline to a processing site near the Beltway. The potential schedule and cost benefit afforded by using the existing raw water conduit as a "carrier" pipe for a residuals pipeline cannot be taken full advantage of unless a residuals processing site can be identified immediately adjacent to or near the existing raw water conduit. In order to provide a benefit from a residential neighborhood impact perspective, this site must also be located along a major trucking route (i.e., non-residential street) that connects to the Beltway without requiring trucks to drive on neighborhood streets. The Carderock alternative provided one of these two potential benefits – it is located adjacent to the raw water conduit. However, processing residuals on the Carderock site would have still required dewatered residuals to be hauled through residential neighborhoods serviced by 2-lane subdivision roads no more suitable for truck traffic than similar haul routes proposed for residuals Alternative E. This suggested alternative also included speculation that a direct Beltway interchange could be constructed. Creating a direct Beltway interchange is a remote, costly and time prohibitive possibility. It would require basic changes in legislation and policies of other federal and local agencies, such as the National Park Service, which would be likely to result in protracted debate and possible litigation of their own. In addition, a residuals processing site located near the Beltway would still have the	

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		round trip residuals haul distance of approximately 140 miles (versus the 150 miles assumed or the Dalecarlia WTP alternative. We are not aware of any site, nor has any site been suggested adjacent to the raw water conduit that is available for use and also serviced by roads that are any more suitable for residuals trucks than the routes proposed for Alternative E.	
DM	COE hasn't adequately investigated other piping alternatives	The Washington Aqueduct has investigated over 120 piping alternatives to a variety of potential residuals processing locations. In all cases, the owners of the potential processing locations have declined to allow Washington Aqueduct to site residuals processing facilities on their site. This renders all such alternatives infeasible. Any other possible piping alternatives not already addressed in the EIS and discussed in topic DL above would have common components that make them infeasible.	EIS Volume 4 - Engineering Feasibility Study Compendium
EA	Residuals disposal method	Marketing of residuals as a "soil conditioner" is evaluated in the EIS. It can be concluded that the market for the land disposal of water treatment residuals is viable. Water treatment residuals are generally not suitable to apply as a fertilizer or use in composting operations because their organic content is quite low. Alum-based water treatment residuals typically have some ability to bind phosphorus, such as present in runoff. However the phosphorous binding characteristics of water treatment residuals vary from site to site. The water treatment residuals disposal market is not currently focused on taking advantage of this characteristic of alum-based water treatment residuals. However, given the level of concern associated with excess phosphorous being discharged into the Chesapeake Bay, it seems likely that this could change in the future. Washington Aqueduct remains interested in exploring a beneficial reuse disposal option for their water treatment residuals if it can be implemented cost effectively and reliably. The application of water treatment residuals to agricultural land is different than discharging it to the Potomac River because the solids contained within the residuals do not return to the river. Land application rates are regulated by the States to prevent runoff from containing excess solids. One potential residuals disposal method under consideration by Washington Aqueduct is to allow a cement plant to use the residuals in	EIS Volume 1 – Section 4.16 Land Application of Water Treatment Residuals

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		the manufacturer of cement. A sample of residuals was provided to Lehigh Cement for their evaluation so that they can determine if this option is cost effective. The public comments received to date suggest disposing of dewatered residuals at multiple sites. Depending upon the contractors that are awarded disposal contracts, multiple sites may or may not be used. Using the dewatered residuals to create a residuals island in the Potomac River or the Chesapeake Bay cannot be recommended as the preferred alternative given EPA's opposition to continuing to discharge the residuals to the Potomac River. It is also unlikely that the permitting activities associated with such an endeavor, assuming that EPA would consider it, could be accomplished within the schedule imposed by the FFCA. The disposal of dewatered residuals in a landfill is considered a feasible alternative. Based on our discussion with various residuals disposal contractors, land application on agricultural land may be preferable to landfilling from a cost perspective. Specific residuals disposal locations have not been identified in the EIS because disposal locations vary by residuals disposal contractor. Specific land application sites are also expected to change over time, as regional development transforms agricultural land uses into suburban land uses.	EIS Volume 4 – Engineering Feasibility Study Compendium section 3.2 Alternative P84 discussion. EIS Volume 1 – Section 4.16

TABLE 1
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Topic / Sub-topic	Summary	Response	See EIS section
EB	Residuals processing method and impacts	Plasma heat treatment of residuals is one of the alternatives (Alternative 26) that were considered and screened in May 2004 following the Scoping Meeting. Alternative 26 was found inconsistent with screening criteria, proven methods, reliability and redundancy and economic considerations and is therefore not carried forward for detailed evaluation in the EIS.	EIS Volume 4 - Engineering Feasibility Study Compendium Section 3.1 – May 2004 Alternatives Screening
		Alternate temporary residuals storage locations, such as the Dalecarlia Reservoir, are evaluated in the Engineering Feasibility Study Compendium.	EIS Volume 4 – Engineering Feasibility Study Compendium Section 3.2.2 – Public Alternative P82 discussion
		Some public comments suggest alternate residuals processing methods to reduce the number of trucks per day required to haul residuals to a remote disposal site. The number of trucks required per day is directly related to the dryness of the residuals cake being hauled. Thirty-percent cake dryness is currently envisioned for the trucking alternatives. Grinding residuals into a finer material as suggested in one public comment would not have an impact on the density or dryness of the residuals and, as a result, would not reduce the number of trucks required to haul the residuals.	EIS Volume 4 – Engineering Feasibility Study Compendium, Section 3.
		Alternate residuals dewatering technologies, such as centrifuges and belt filter presses, will be evaluated further during the design phase of the project. Both technologies can fit into the proposed residuals dewatering building described in the EFS. Neither technology has an environmental impact advantage because they dewater the residuals to essentially the same dryness and generate similar noise levels outside of the dewatering building.	
		Chapter 4 of Volume 1 of the EIS describes the environmental impacts of 4 alternatives plus the No Action alternative. This information allows the public to compare the relative impacts of various alternatives.	EIS Volume 1, Chapter 4

TABLE 1
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Topic / Sub-topic	Summary	Response	See EIS section
EC	Residuals Quantities	The quantities of residuals that require disposal varies considerably from alternative to alternative because some alternatives anticipate pumping thickened residuals at 2-percent solids while others assume that dewatered residuals at 30-percent solids will be trucked offsite. Less concentrated residuals (such as thickened residuals) require a much larger volume of water to be pumped or hauled away to remove the same number of pounds of solids. This is why the number of trucks of dewatered residuals is not directly comparable to the number of gallons of thickened residuals without adjusting for the extra volume of water associated with the thickened residuals. An example residuals volume calculation has been added to the appendices of the Volume 4 of the EIS – Engineering Feasibility Study Compendium to help explain this conversion. The impacts associated with each residuals processing alternative are discussed in Section 4 of the EIS.	EIS Volume 4 – Engineering Feasibility Study Compendium, Appendices and Sections 2 and 3. EIS Volume 1, Section 4.
FA	Construction Schedule	See transcripts for responses. A bar chart schedule showing the estimated durations of the EIS preparation and review, design, and construction periods for the residuals project is provided in the Executive Summary section of the EIS. This schedule describes how the residuals project will be completed in conformance with the FFCA milestone deadlines defined by EPA.	EIS, Volume 1, Section 2.3 EIS Volume 1, Executive Summary
FB	EIS Schedule	A discussion of the Washington Aqueduct's NPDES permit and associated FFCA is provided in the Background and Project History section of the EIS Executive Summary. The EIS schedule is driven by the need to meet milestones associated with the overall compliance with the FFCA. The alternatives screening process also included compliance with this schedule as one of the criterion for determining whether an alternative was consistent with the purpose and need for the project. The objectives defining the purpose and need were listed in the Notice of Intent, which was published in the Federal Register on January 12, 2004. The final EIS contains an updated project schedule which reflects the extensions granted in the interest of public involvement during the EIS process. The schedule indicates that the project can still be completed within the FFCA schedule milestones without taking any extraordinary	EIS Volume 1, the Executive Summary lists the objectives defining the project's purpose and need and provides a project schedule. EIS Volume 1, Section 2.3 describes the screening criteria, including the one to meet the FFCA schedule. EIS Volume 2, A copy of the FFCA schedule is included under the Regulatory Information tab. EIS Volume 4, Engineering Feasibility Studies Compendium provides a complete description of the screening evaluation and results.

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		measures.	
FC	Compliance performance	Alternatives that would otherwise be feasible but cannot be implemented within the timeframe stipulated within the FFCA schedule were eliminated from consideration as the recommended alternative because the FFCA schedule is a legally binding requirement. The FFCA provides a legally mandated plan and time frame to achieve and maintain compliance with the NPDES permit. Thus, these alternatives that are not compatible with the FFCA are not consistent with the purpose and need of the project. Untimely or non-implementation of the FFCA would result in undesirable consequences impairing the Aqueduct's ability to provide water to its customers and continuing the practice of returning residuals to the Potomac River. EPA granted the Aqueduct an extension to an internal milestone in the FFCA deadline to develop and notify EPA of the engineering and best management practices to be implemented to achieve compliance with the NPDES permit and a schedule to implement those practices with the understanding that the Aqueduct would be held to the final compliance deadlines in 2008 and 2009. In the project meeting described in 5.2.8 of the EIS, EPA ruled out extensions to the FFCA implementation schedule.	EIS Volume 2 – Appendices, Regulatory Information Section
FD	Short-term or Temporary alternatives	The 20-year life defined for the monofill is consistent with the planning period adopted for the EIS as a whole. It is also consistent with planning horizons used in engineering feasibility studies. The consideration of short and long-term alternatives within the Engineering Feasibility Study Compendium is limited to residuals options such as the use of alternate coagulants, etc. In general, two-phased residuals processing alternatives (i.e., truck for a short period of time followed by the Blue Plains alternative) are not recommended because they could result in residuals processing facilities that are required for the initial phase having to be abandoned in the second phase. Alternate two phase residuals processing suggestions offered by the public, such as hauling wetter residuals initially followed by "a better long term solution" in the future, would result in a significantly larger number of trucks being required to haul wetter residuals in the short term – worst case average in excess of 300 trucks per day to truck thickened residuals. Most residuals dewatering technologies are capable of producing a dewatered residuals cake with a solids concentration of 30-percent or greater (i.e., 70-percent water and 30-percent solids). Technologies that	EIS Volume 4 – Engineering Feasibility Study Compendium Sections 3 and 4.

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		produce a wetter material, such as gravity thickening, tend to produce a liquid residual product. Gravity thickening is currently envisioned as the first step in the residuals handling process, followed by centrifuge dewatering. Gravity thickening is capable of reliably producing a 2-percent solid product. The trucking alternatives discussed in the EIS anticipated producing 6-8 trucks of water treatment residuals per day on average. Six trucks per day of dewatered residuals (at 30-percent solids) is equivalent to approximately 85-90 trucks per day of thickened liquid residuals (at 2-percent solids).	
FE	Public comment period	Four public comment periods were provided prior to the issuance of the FEIS: 1. The Scoping Period - January 11, 2004 through February 11, 2004) 2. The first extension of alternatives identification period (September 10, 2004 through November 15, 2004) 3. The second extension of the alternatives identification period (December 23, 2004 through February 14, 2005) 4. The DEIS comment period starting with the publication of the Notice of Availability of the DEIS in the Federal Register on April 22, 2005 and ending on July 6, 2005. This period includes a 30 day extension to the original 45 day DEIS comment period.	EIS Volume 1 - Section 5 Public Involvement
FF	EIS review period time extension	The Notice of Availability for the DEIS was published in the Federal Register on April 22 2005, and the 45 day public comment period was initiated. The public comment period was extended to 75 days, or to July 6, 2005.	EIS Volume 1 - Section 5 Public Involvement EIS Volume 3 – Comments and Responses – Document 120
FG	EPA grants interim FFCA schedule milestone extension	In response to various requests for additional time to review the DEIS, Washington Aqueduct requested that EPA extend their intermediate milestone deadline for submission of the Record of Decision to November 2, 2005 (paragraph 22 of the FFCA). This request was granted by EPA in a letter dated June 27, 2005. Although additional time was granted by EPA for DEIS review by the public, the 2008 and 2009 deadlines defined in the FFCA for removing part or all of the residuals from the Potomac River remain unchanged.	EIS Volume 3 - Comments and Responses – Document 120

TABLE 1
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Topic / Sub-topic	Summary	Response	See EIS section
GA	Trucking, neighborhood impact	Unless the water treatment residuals are returned to the Potomac River or are stockpiled locally at Dalecarlia in a monofill, there will necessarily be trucking of the residuals from the dewatering facility whether newly constructed or at an existing location to an eventual land application site. Those trucks will transit public streets and highways. Alternatives B and E thoroughly evaluate impacts of trucking on nearby neighbors, from two different residuals processing locations (B- Northwest Dalecarlia Processing Site, E- East Dalecarlia Processing Site) For alternatives that rely on hauling residuals to a remote disposal site trucking operations will meet all requirements established for the use of trucking routes including weight limitations, if any, permitting, etc. Following the issuance of the DEIS, numerous comments were received from the public regarding the worst-case number of trucks per day predicted during extremely wet conditions (anticipated to occur for approximately a 2-week duration on a frequency of 2 out of 11 years). A 132-truck-per-day value is defined in the public comment correspondence, but this value is not correct. In the DEIS, Washington Aqueduct committed to a maximum of 33 trucks per day (inbound) and 33 trucks per day (outbound) under worst-case wet-weather conditions. The discussion below explains why these peak truck-per-day values have now been reduced to 25 trucks per day (inbound) and 25 trucks per day (outbound) for the final EIS. A complete listing of predicted residuals truck loads associated with a variety of river turbidity conditions are provided in the Engineering Feasibility Study Compendium. Truck load estimates have been prepared for two sets of conditions, loads associated with long term (11-year) average conditions and loads associated with wet year conditions. The highest river turbidity conditions are associated with wet year, design conditions and the lowest river turbidity conditions are associated with the long-term annual average conditions. A maximum of 33 truck loads per day (based on hauling peak residuals quantities 5 days per week) were predicted for worst case conditions that are expected to occur no more than approximately 14 days every 11 years. This number has been reduced to 25 truck loads per day for worst case conditions. See discussion below. A more typical maximum truck load value of 13 trips per day is predicted for up to 30 days each year. The average number of	EIS Volume 1 - Sections 3 and 4, throughout EIS Volume 4 – Engineering Feasibility Study Compendium, Table 3-6. EIS Volume 1 – Section 7 Cumulative Impacts and Mitigation

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		truck loads predicted over an annual period is 8 per day. **Impact of residuals equalization on truckloads per day:** Based on the public's concern about the peak number of residual trucks identified in the DEIS, Washington Aqueduct re-analyzed whether the peak number of truck loads could be further reduced within the current project budget. The peak residuals truck load values listed in the DEIS (i.e., 33 truck loads per day during the maximum design wet year) assumed that a portion of the water treatment residuals generated in the Georgetown Reservoir would be stored within the reservoir temporarily before pumping them to the residuals thickening and dewatering facility. This approach lessens the peak theoretical dewatered residuals truck loads per day predicted for this worse-case event. Due to the nature of the existing basins and the proposed residual removal equipment, liquid residuals cannot be similarly stored in the Dalecarlia sedimentation basins. However, the gravity thickeners located downstream of the sedimentation basins provide some opportunity to further equalize residuals flows. This capability was not taken into consideration in the DEIS analysis. Limited temporary storage of thickened residuals is possible in the gravity thickeners if they are deepened slightly (approximately 1 foot) and operated such that some thickener storage volume is reserved to store the peak residuals quantities associated with storm events. Consideration of this additional residuals flow equalization capability could allow the peak number of anticipated dewatered residuals truck loads per day to be lowered from 33 truck loads per day (maximum design year wet weather conditions) to a maximum design wet year rate of between 20 and 25 truck loads per day depending upon the demand for finished drinking water. Washington Aqueduct is committed to providing this additional thickener depth and operating the thickeners is such a manner so as to restrict the peak number of truck loads leaving the dewatering site to a maximum of 25 truck loads per day. The increased depth should be able to be designed so that is does not increase the overall height of the thickener structures. **Start-up year versus design year truck trips per day:** Practically speaking, the peak number of trucks listed above will be further reduced during the initial years of operation of the residuals thickening and dewatering facility. This is possible because the residuals truck loads	EIS Volume 4 – Engineering Feasibility Study Compendium – Appendices EIS Volume 1 – Section 7 Cumulative Impacts and Mitigation

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		listed in the DEIS are based upon water demands projected for the design year (i.e., the end of the 20-year EIS planning period). An average design year water demand of 220 mgd was used to estimate the residuals quantities listed in the DEIS. The historical average Washington Aqueduct water demands have been significantly lower than 220 mgd, ranging between 175 and 180 mgd, or approximately 80-percent of the design value used for the DEIS. The 11-years of historical data analyzed for the DEIS also indicates that the Washington Aqueduct average water demands have remained stable or declined slightly over the last 11 years, indicating that the water demand values used in the DEIS are quite conservative. When the current demand factors are applied to the 33 peak residuals truckloads predicted for the wet year, initial start-up peak truckload values of 26-27 truck loads per day are predicted (i.e., 33 truck loads/day X 0.8 = 26.4 truck loads per day at system start-up). Assuming that the gravity thickeners are used to temporarily store start-up peak residuals quantities as described above, the 26-27 peak truck loads per day predicted for initial start-up wet years would be further reduced to approximately 20 truck loads per day. In all cases described above, the use of the gravity thickeners as temporary storage vessels would reduce only the peak number of loads produced at the Washington Aqueduct residuals facility. The total volume of material requiring disposal (i.e., the total number of truck loads required) would remain unchanged. The stored residuals would be hauled as part of future activity when the volume of residuals requiring removal is reduced. **Listing schools along truck routes:** Although the EIS lists some of the schools along the proposed truck routes, the intent of the EIS was not to identify all schools along each route. Rather, the intent was to identify typical types of facilities along the truck routes. Additional schools, located along the proposed truck hauling routes, were added to the EIS text following the receipt of the DEIS comments. **Truck accidents along proposed truck hauling routes:** The number of truck accidents on proposed truck hauling routes is not	EIS Volume 4 – Engineering Feasibility Study Compendium – Appendices] EIS Volume 1 – Section 3.10

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		anticipated to increase as a result of adding an average of 8 truck loads per day to these roads. The accident rate along roads is only partially related to the volume of traffic. Other road and intersection design criteria are potentially more important than truck volumes given the relatively small truck volume increase proposed for the neighborhood roads with this project. The truck haul routes under consideration on this project generally have existing trucks counts ranging from approximately one hundred trucks per day to 2,000 trucks per day. The contract terms for the potential residuals haulers will require full disclosure of each haulers accident record. This information will be considered as one of the selection criteria for the haulers. Accident reporting as response procedures will also be required as part of the hauling contract to ensure that accidents are responded to quickly. **Trucking mitigation measures requested by the public:** Repave Dalecarlia Parkway with sound deadening asphalt: Washington Aqueduct does not know the basis of the pavement deign used by the District of Columbia for Dalecarlia Parkway that has resulted in the concrete surface. The current roadway will (as will all roadways on routes considered for trucking) properly support the loaded weight of the trucks. Washington Aqueduct will address the surface noise concern to the DC Department of Transportation, but must defer to the Department for their determination of the appropriate surface for this road. Reimbursement for truck related damage to Montgomery County roads: The public roads exist for personal and commercial use. State and local jurisdictions are responsible or maintenance of roads. Each jurisdiction funds road maintenance and repair within its budget often through permitting, taxes, etc. Speed limit and warning signs: All employees and contractors of Washington Aqueduct using the public roads in accordance with their duties at Washington Aqueduct are responsible to operate their vehicles in a safe and courteous manner. That operation will be commensurate with the speed and caution postings of the local jurisdictions. At the exit point from a residuals facility constructed on Washington Aqueduct property, a prominent sign will be erected reminding drivers to cover their loads, avoid tracking mud on to the roads, and to drive in accordance with law, regulation, and common courtesy. Additional speed monitoring and enforcement by the police: Washington	

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		Aqueduct will cooperate with any speed-monitoring program initiated by police agencies. Any driver found to violate speed limits will be disciplined. Neighborhood reporting system for excess truck noise, speeding trucks, etc.. Washington Aqueduct management will periodically attend neighborhood meetings to receive general feedback on its operations in general and respond to any questions relating to trucks serving the needs of Washington Aqueduct. Management will also respond to any direct inquires. Sound barriers along truck routes: Trucks hauling residuals from Washington Aqueduct do not change the service classification of the routes identified. The additional few trips per day on any of these roads do not warrant installation of sound barriers. Improved signaling at Dalecarlia Parkway/Little Falls Road intersection: It is anticipated; in order to facilitate the proposed expansion at Sibley Hospital, that minor realignment of the intersection of Little Falls Road and Dalecarlia Parkway will take place. Washington Aqueduct will coordinate with Sibley Hospital on these improvements to their private road to ensure that they also meet residuals hauling truck needs. At this time there is nothing in the data that suggest that the addition of our routine traffic is significant. However, the Washington Aqueduct is very aware of the public concern over traffic and intends to pay very close attention to the operation of this part of the project. **Residuals falling from the trucks:** Residuals hauling trucks will be equipped with fabric covers to prevent residuals from blowing or falling off trucks and gasketed tailgates (to prevent dripping). **Truck vibration impacts on neighborhood homes:** The average number of additional residuals trucks proposed for this project represents a small fraction of the current number of trucks traveling many of the proposed haul routes. The routes were selected because they are designed to function as truck routes. Any current home foundation issues associated with existing traffic loads on the proposed routes are not anticipated to be worsened as a result of the additional	EIS Volume 1, Section 7.2 EIS Volume 1 – Section 4.11

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		trucks proposed for this project. **Truck impact on neighborhood ambience:** No significant impact on neighborhood ambience is anticipated to be associated with the additional trucks proposed for this residuals handling project given the relatively large number of trucks and vehicles that currently make use of the proposed trucking routes. **Trucking impact on traffic congestion in an already congested area:** The analysis in the EIS shows that none of the feasible routes would have traffic flow or congestion impacts that reduce the level of service on the route due to the project's trucking operation, with the exception of route A. Trucking hours will be restricted on Route A to between 9:30 AM and 3:00 PM to reduce any potential impact on this route. Routes F and G are designated as emergency use only due to pedestrian traffic and security issues related to the use of Constitution Avenue. The use of these two routes, F&G, for this project would not change their level of service but will require a permit from the National Park Service. **Incomplete response to Montgomery County Planning Board letter:** Responses to the individual comments contained within the June 1, 2005 letter from the Montgomery County Planning Board (document 125) are discussed in the applicable topic categories summarized herein.	
GB	Trucking alternative	Under all of the feasible alternatives selected for evaluation in the EIS, pipelines would convey water treatment residuals from both the onsite sedimentation basins and the Georgetown Reservoir to the Dalecarlia thickening facility. Trucking from Georgetown to Dalecarlia is not under consideration for detailed evaluation in the EIS. Trucking at night was suggested by the public as an alternative to daytime trucking. While potentially favorable from a traffic standpoint, night trucking would likely result in more noise impacts on the surrounding neighborhoods due to lower ambient nighttime noise levels. Moreover, the residuals receiving facilities typically do not operate at night. Trucking dewatered residuals to offsite disposal is a common practice in the water and wastewater treatment industry, including the other two large water treatment facilities in the region (the Fairfax Water Corbalis WTP	EIS Volume 4 – Engineering Feasibility Study Compendium Section 3 – Screening of Alternatives EIS Volume 1 – Section 4.16

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		and the WSSC Potomac WFP). Other, more uncommon processing options, such as plasma treatment of residuals cannot be recommended as the preferred alternative because they are not considered proven and are not cost effective, although, even these technologies, typically result in a byproduct that is commonly trucked away to an offsite disposal site. **Alum Recovery:** Reference a memo discussing alum recovery included in the Appendices of the Engineering Feasibility Study Compendium.	EIS Volume 4 – Engineering Feasibility Study Compendium - Appendices
GC	Trucking, noise	**Noise impacts from facility and trucks:** Noise impacts associated with the proposed residuals thickening and dewatering facility are evaluated in the EIS. In general, the dewatering building is not anticipated to contribute noise to the surrounding neighborhood due to the distance from the facility to the neighbors and the use of sound absorbing building materials. Truck noise entering and exiting the dewatering facility will be minimized by prohibiting idling before loading, providing enclosed loading bays, and providing berms around the loading area that will function similar to sounds walls along area interstates by directing noise away from neighbors. With this mitigation, noise impacts are determined to be not significant. **Truck noise mitigation measures:** Noise mitigation measures will include selecting building materials that absorb noise associated with the enclosed dewatering equipment, enclosing truck loading bays, constructing earthen berms around the dewatering building to deflect/absorb truck related noise, and providing storage hoppers on the intermediate floor to act as sound buffers that prevent noise associated with the dewatering centrifuges (located on the top floor of the building) from reaching the truck loading area. Noise mitigation along residuals trucking routes will be accomplished by reminding truck drivers to drive responsibly and to be considerate of the residential neighborhood impacts that their trucks could have by posting a sign at the exit from the site.	EIS Volume 1 – Section 4.3 Noise EIS Volume 1 – Section 7.2
GD	Trucking routes	One of the alternatives suggested by the public, which was found to be consistent with the screening criteria, involves a new site at the Dalecarlia Reservoir, located adjacent to Little Falls Road, for the residuals	EIS Volume 4 – Engineering Feasibility Study Compendium, Section 3.2.3- Description of Public Alternatives Consistent with Screening

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		thickening and dewatering facilities. This alternative is carried through for detailed evaluation in the EIS as Alternative E. It offers some advantages from a trucking perspective because it does not require trucks to travel loaded with residuals to travel uphill on Loughboro Road.	Criteria
		One of the alternative truck routes considered, but subsequently eliminated, involves constructing a new access road from the Dalecarlia WTP site to the Clara Barton Parkway. This route was eliminated from consideration because the National Park Service does not allow truck traffic on the Clara Barton Parkway.	EIS Volume 4 – Engineering Feasibility Study Compendium, Table 3-7 Alternative P79
		Using smaller trucks to dispose of dewatered residuals offsite would not increase the number of available of haul routes through the area surrounding the Dalecarlia WTP. The proposed routes were selected based upon their suitability for truck traffic. This criterion does not change if smaller trucks are proposed.	
		Trucking route maps are included in the EIS.	EIS Volume 1, Section 3.
		MacArthur Boulevard appropriate as a truck route?	
		Some members of the public expressed concern about the appropriateness of using MacArthur Boulevard as a truck haul road, indicating that trucks are not allowed on this road. There are no special weight restrictions on MacArthur Boulevard in the District of Columbia. Weight restrictions exist in Maryland due to the raw water conduits under the roadway.	
		Do trucks traveling to Westmoreland Circle immediately access Dalecarlia Parkway?	EIS Volume 1 – Figure 3-8
		Yes, truck access routes near the Dalecarlia plant are shown in Figure 4-1.	
		Single truck route proposed in DEIS:	
		In the Draft EIS we evaluated eight truck haul routes, not one or two routes as stated in the comments submitted by the public. All of the routes evaluated, except route C, can be used to haul residuals. A permit from the National Park Service would be required to haul residuals on routes F and G. All routes were selected because they followed high volume roads designated for truck traffic keeping with DC DOT's truck route policies and recommendations. Although five of the original eight routes studied can	EIS Volume 1 – Section 7.2

TABLE 1
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Topic / Sub-topic	Summary	Response	See EIS section
		be used without restriction and without causing a significant impact, the Washington Aqueduct may choose to study and propose additional routes to replace the three that were found to have limitations or restrictions. In this case the Washington Aqueduct would provide appropriate supplemental documentation in the future. **Quantify Impact of Trucks on Neighborhood Roads:** The proposed number of residuals trucks is relatively small when compared with the daily truck volume on the proposed haul routes. As a result, truck impacts are expected to be relatively small and well within the range of impacts taken into account in the design of urban truck routes. The public roads exist for personal and commercial use. State and local jurisdictions are responsible or maintenance of roads. Each jurisdiction plans for and funds road maintenance and repair within its budget often through permitting, taxes, etc. **Limit trucks through Montgomery County to those delivering to Maryland disposal sites:** Because limitations could have the effect of higher contract costs, limitations will not be included. However, it is logical to expect that elevated fuel and maintenance costs associated with lengthy haul distances will encourage residuals haulers to follow the most direct haul route to their destination. **Truck dispersal plan needed:** Distributing residuals trucks on all feasible proposed routes is not cost effective. The total haul distance could be increased by up to 30-40 miles if trucks are evenly distributed on all routes. For example, some trucks destined for a disposal site in Maryland would have to travel southeast to the Beltway and then travel around the Beltway on the east side of the City. This practice would increase hauling costs and increase traffic congestion within the District of Columbia and on the Beltway in Maryland or Virginia. If a disposal contractor did have disposal sites available in several directions he would choose the best routes to get to those sites but to commit to evenly distributing routes would be impractical and would have undesirable consequences. In all cases studied, concentrating	

TABLE 1
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Topic / Sub-topic	Summary	Response	See EIS section
		trucks on one route would not decrease the level of service of that route. See topic GA for a discussion of schools along trucking routes.	
GE	Trucking frequency	See transcripts for responses and topic GA for additional information on 132 trucks per day. The number of truck loads required to haul dewatered residuals offsite is summarized in the Volume 4 of the EIS. **Adverse impacts of 132 trucks per day through a residential area:** With the proposed mitigation implemented (as described in topic GA), the maximum number of truck loads per day required to remove residuals from the Dalecarlia WTP under worst case wet year conditions is 25 truck loads per day based upon 20-ton trucks. The 132 truck per day value suggested in the public comments corresponds to a theoretical maximum number of times that a truck could pass by a given house if all trucks used the same route entering and exiting the site on the maximum residuals production day (expected to occur 2 weeks every 11 years) anticipated in the design year and if 10-ton trucks were used. The 132 truck per day number is not an accurate representation of the number of trucks that will typically be traveling through the neighborhoods surrounding the Dalecarlia WTP. It represents an extreme peak operating condition. It also does not consider: - lower water production rates historically produced by the Washington Aqueduct - the planned use of 20-ton trucks versus 10 ton trucks to reduce operating costs - the potential for reducing peak truck loads per day by equalizing peak residual processing rates In addition, it does not represent the number of trucks, but rather, one way truck trips. **Trucking Schedule:** See discussion under topic GK.	EIS Volume 4 – Engineering Feasibility Study Compendium, Tables 2-1 and 3-6 EIS Volume 1 – Section 7.2 EIS Volume 4 – Engineering Feasibility Study Compendium, Appendix E contains water treatment residuals calculations used to predict the anticipated number of residual truck loads per day.
GF	Trucking Air Pollution	The emissions associated with trucking residuals to a remote disposal location result in an emission increase that is less than *de minimis* levels	EIS Volume 1 - Section 4.4.3.2

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		and, therefore, present no short or long term impact on air quality. **Will trucks use alternate fuels?** Washington Aqueduct will require their hauling contractors to use low-sulfur diesel fuels. The use of low sulfur fuel will reduce hazardous air pollutant emissions from diesel fuels. Alternate fuels, such as natural gas, although now being used in commuter buses in urban environments are not typically being used in vehicles as large as 20-ton trucks. As the market for alternate fuel trucks develops, their use will be considered in developing hauling contracts at that time. **Will newer trucks be used to reduce emissions?** Regardless of age, all trucks will be required to be maintained in a safe operating condition, consistent with the vehicle inspection and emission standards established for the State in which they are registered. **Will trucks be retrofitted to reduce air quality impacts?** Washington Aqueduct is committed to use low sulfur fuels as stated above. However, trucks similar to those anticipated to be used by residuals hauling contractors are not currently required by regulators to be retrofitted to reduce air quality impacts. The immediate implementation of vehicle modification requirements could increase hauling costs or restrict the number of haulers willing to bid on the hauling contract. In order to avoid this outcome, additional truck modifications, beyond the use of low sulfur fuels, will be considered as modified vehicles become more common in the marketplace. **Monitor fuel used by trucks:** Washington Aqueduct does not plan to monitor the individual fuel usage of each residual disposal contractor's truck. The competitive bid nature of the residuals disposal contract should provide sufficient incentive to minimize excess fuel consumption. **How can 132 trucks per day not have an impact on the environment?** The environmental impact of trucking is analyzed in Section 4 of Volume 1 of the EIS. As explained in topics GA and GE, 132 trucks is not an accurate characterization of the transportation impacts of this project.	EIS Volume 1 – Section 7.2.1 EIS Volume 1 – Section 7.2.1

TABLE 1
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Topic / Sub-topic	Summary	Response	See EIS section
		You did not adequately consider the air impacts of the preferred alternative: The impacts of the proposed action (or environmentally preferred alternative) are presented and then analyzed in Sections 3 and 4, respectively, of the EIS. The air emission sources of the proposed action (Alternative E) are truck traffic, operation of residuals processing facility, and construction of the residuals facility. Construction emissions for the dewatering facilities are deemed to be less significant than the emissions associated with the operation of the facility. The impacts of the proposed action are negligible with respect to the *de minimis* threshold limits, and the construction emissions are less than that of operating the facility via any alternative, the construction emissions are negligible. Therefore, it is appropriate not to quantify emissions from construction activities associated with all alternatives. Needs work – also need to reference Section 4 EIS for additional information text regarding the relative number of diesel engine hour/miles during construction versus operation and the relative acres of earthwork disturbed with the proposed action versus the monofill option. Regional air quality and air pollution in the Metropolitan Washington Interstate Air Quality Planning Region is regulated by U.S. Environmental Protection Agency (USEPA) using two sets of criteria: National Ambient Air Quality Standards (NAAQS) and General Conformity. These two regulations are described in general below: <u>National Ambient Air Quality Standards</u> The Clean Air Act (CAA) and its associated 1977 and 1990 amendments established NAAQS for six criteria pollutants: lead, carbon monoxide (CO), nitrogen dioxide, sulfur dioxide, particulate matter (PM) and ozone. The NAAQS established primary standards at concentrations that protect human health and secondary standards that protect the public welfare—particularly vegetation, livestock, building materials, and other environmental elements. These standards are periodically reviewed and revised, if necessary, as is currently being done for particulate matter and ozone. The Washington, DC area is in attainment for lead, CO, nitrogen dioxide particulate matter (PM10) and sulfur dioxide and in non-attainment for	EIS Volume 1 – Sections 3.3 and 4.4 EIS Volume 1 – Section 4.4

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		ozone and fine particulate matter (PM2.5). The 1990 amendments to the CAA categorized the nation's non-attainment ozone areas into five groups, based on increasing severity of exceedance of the standard: marginal, moderate, serious, severe, and extreme. The DC area is designated a severe nonattainment for the 1-hr ozone NAAQS and moderate nonattainment for the 8-hour ozone NAAQS. An interstate planning area was developed called the National Capital Interstate Air Quality Control Region (AQCR) to reduce ozone concentrations and bring the Washington, DC area into compliance. To bring the AQCR into compliance the states and district included in this area are tasked with developing a plan by November 17, 2005. The implementation plan must outline specific measures to be taken and a means of monitoring progress toward attainment. State Implementation Plans (SIPs) prepared by the State of Maryland, the Commonwealth of Virginia, and the District of Columbia include control strategies to reduce volatile organic compounds and nitrogen oxides that contribute to the formation of ozone. On April 5, 2005, designations under the NAAQS for fine particle pollution or PM2.5 became effective. Fine particles are those less than 2.5 micrometers in diameter which are unhealthy to breathe. The Washington, DC-MD-VA metropolitan area has been designated as non-attainment for fine particulate matter. States designated as PM2.5 nonattainment areas must submit plans that outline how they will meet the $PM_{2.5}$ standards. These plans are due to EPA by April 5, 2008. <u>General Conformity</u> Section 176(c) of the 1990 CAA amendments requires that federal actions conform to applicable state implementation plans, ensuring that the actions do not interfere with strategies developed for NAAQS attainment. The USACE Washington Aqueduct management alternatives for water treatment plant residuals are considered a federal action. This action must not interfere with the National Capital Interstate AQCR's established plans to attain ozone ambient air quality standard compliance. If the total direct and indirect emissions calculated for each non-attainment area pollutant are below the *de minimis* threshold levels established in 40 CFR 93.153 of the State Implementation Plan (SIP), the project is presumed by EPA to conform to the regional implementation plans. As *de minimus* threshold	

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		limits have not yet been established for PM2.5 non-attainment areas, EPA guides the action to compare calculated emissions to the PM10 *de minimus* threshold level established in 40 CFR 93.153. Conformity is a planning process used to determine if a federal action will prevent state from meeting air quality plan. The mobile sources, such as truck traffic, associated with an action are evaluated in a conformity analysis by calculating the average emissions for the worst case year. In the case of the USACE Washington Aqueduct management alternatives for water treatment residuals, a conservative average of 20 truck trips by a 10 ton truck is used to calculate annual emissions from mobile sources. The average number of water treatment residuals loads per a day is 8 trucks as stated in the EIS. The conservative estimate of average trucks used to calculate emissions from trucks for the conformity analysis can provide an allowance for average water treatment residuals and the few construction related vehicles and Forebay residuals (if included in the project). <u>Emissions Inventory for Washington Aqueduct</u> The most recent air emissions inventory for the Dalecarlia Reservoir and Little Falls Raw Water Pump Station as filed with the EPA (Table 3-2, Section 3 of the EIS) shows that the existing facilities are a minor source of air emissions, contributing less than 1 ton per year for all pollutants, with the exception of volatile organic compounds, which contribute less than 3 tons per year. Ozone is not listed in this table because it is not emitted, but rather forms in the atmosphere as a reaction between nitrogen oxides (NOx), volatile organic compounds (VOCs), and sunlight. Consequently, two of its primary precursors are measured: nitrogen oxides and volatile organic compounds. The *de minimis* threshold levels for the region's SIP, is listed in 40 CFR 93.153. If the total air emissions (the sum of all individual sources) of an alternative are less than the *de minimis* level, that alternative is presumed by EPA to be in conformance with the state implementation plans and will not adversely affect plans to bring the region into compliance with the NAAQS. A *de minimus* threshold for PM2.5 has not yet been established. Until such action occurs, EPA recommends application of the PM10 *de minimus* threshold to PM2.5 total air emission calculations. State Implementation Plans (SIPs) prepared by the State of Maryland, the Commonwealth of Virginia, and the District of Columbia include control	

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		strategies to reduce volatile organic compounds and nitrogen oxides that contribute to the formation of ozone. Air Quality Significance Criteria The project is presumed to conform to the regional implementation plans if the potential increase in emissions is less than the *de minimis* thresholds. By using these criteria, the following levels of impacts were identified: *No Impact* If implementation of the action causes an increase in air emissions that is less than the *de minimis* threshold levels, the alternative is considered to have no impact. *No Significant Impact* If implementation of the action causes an increase in air emissions that is greater than the *de minimis* threshold levels but has been accommodated with the existing regional implementation plan, the action has no significant impact. *Significant Impact* A significant impact occurs if the potential increase in emissions is above the *de minimis* thresholds and requires a demonstration of regional significance to determine whether an adverse air quality impact would result. Significant impacts may be reduced to no significant level by implementing appropriate mitigation measures. Impact Evaluation by Alternative and Option The Washington Aqueduct must determine if their proposed actions exceed *de minimis* thresholds listed in the regulations (40 CFR 93.153) and specific to the pollutant attainment status of the National Capital Interstate Air Quality Control Region (AQCR). If they do, they will have to take additional steps to demonstrate whether the proposed emissions are regionally significant in order to assure conformance with the region's	

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		SIP. To make this comparison, a conservative air pollution scenario was developed to represent the largest emission factors from the components of the various alternatives. Two scenarios were developed: one for Alternative A, which includes a monofill, and one for Alternatives B, C and E, which all involve the construction of residuals thickening and dewatering facilities and rely upon trucking dewatered residuals to a remote dewatering site. The location of the dewatering site and the direction that the trucks take on the highways is somewhat different for Alternatives B and E versus Alternative C, however, the net impact on air pollution is similar. Stationary facilities and mobile sources (such as trucks) are included in these estimates. Alternative E represents the air quality emission estimates for the proposed action. The primary sources of air emissions include exhaust from trucks used to transport residuals to onsite or offsite disposal areas, use of natural gas for dewatering building heating, and fugitive dust from the onsite monofill. Not all of these activities are included in each of the action alternatives. The potential air emissions from this alternative are quantified in Table 4-2 of the EIS. The results are that VOC is at a maximum of 4.3 tons/year, Carbon Monoxide at a maximum of 21.4 tons/year, Nitrogen Oxides at a maximum of 20.5 tons/year, Particulate Matter from diesel fueled trucks at a 0.21 and 0.17 tons/year for PM10 and PM2.5 respectively, Particulate Matter from low-sulfur diesel fueled trucks at 0.18 and 0.14 tons/year for PM10 and PM2.5 respectively, and Sulfur Dioxides at a maximum of 0.41 tons/year. Constructing and operation of Alternatives E would increase air emissions to a degree less than the *de minimis* threshold levels and therefore present no short term, long-term, direct, or indirect adverse impacts to the affected resources. A full set of air quality emissions calculations and model output is provided in Appendix 2A. These calculations provide the basis for the air quality analysis for each proposed alternative as presented in Section 4 of the EIS. The analysis of the air emission impacts from each facility involved in the operations of the alternatives – Northwest or East Dalecarlia Processing Site, Trucking Routes, Georgetown Reservoir, Dalecarlia Sedimentation Basins, and Monofill. Supplemental analysis has been provided since the completion of the	

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Topic / Sub-topic	Summary	Response	See EIS section
		draft EIS to address the recent establishment of the Metro WA area as non-attainment for PM2.5. Currently there is no established threshold *de minimus* level for PM2.5 in the SIP. EPA has recommended that the *de minimus* level for PM10 in the SIP be applied to PM2.5 emission calculations for determination of compliance. The supplemental analysis conducted quantifies the emissions from mobile sources (i.e. trucks) for the criteria air pollutants. It also allows one to quantify the air emission effects of using different types of fuels for vehicle classes. The AP42 analysis presented in the draft EIS provided conservative estimates for all criteria pollutants, but was not designed to calculate particulate matter emissions from truck trips. This new analysis, MOBILE6.2 provides air emissions estimates for all criteria pollutants, and does not change the basic conclusion of the previous analysis (i.e., air emissions remain below *de minimus* threshold levels for all (attainment and non-attainment) areas and there is, therefore, no impact and the action is inconsequential. The results from the new analysis, MOBILE6.2 is provided in Section 4 along with the existing AP42 analysis. MOBILE 6.2 is a computer model approved by EPA for SIP development and transportation conformity analysis to estimate emissions of various air pollutants typically emitted from vehicle exhaust, brake and tire wear. Also see topic BJ for a discussion of dust and dirt control during the construction phase of the project.	
GG	Trucking Safety	The truck routes studied in the EIS generally conform to the proposed District of Columbia truck traffic management plan. The proposed number of residuals trucks does not negatively impact the level of service of the proposed routes. The selection criteria for residuals contract haulers would include their safety track record. Washington Aqueduct places high priority on operating a safe water treatment facility. This philosophy would extend to a residuals contract hauling operation. The non-toxicity of the water treatment residuals is discussed in the EIS. Based on the testing conducted in 1995, and again in 2004, the water treatment residuals are suitable to apply on agricultural land disposal sites. A similar practice is used by two other large regional water treatment utilities also using Potomac River water (Fairfax Water and	EIS Volume 1 - Section 4.11 – Transportation EIS Volume 1 – Table 4-11

TABLE 1
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Topic / Sub-topic	Summary	Response	See EIS section
		WSSC). Safe operation of the residuals hauling trucks associated with some of the proposed alternatives would be addressed by considering the safety track record of each hauler during the contracting phase and monitoring their safety record throughout their contract period. Safe hauling of residuals would be a high priority to the Washington Aqueduct if a hauling alternative were selected. Minimal dust is typically associated with the dewatering and transport of alum residuals because the aluminum hydroxide present in the residuals limits the dryness of the dewatered cake to about 30-percent solids (or 70-percent water). Alum residuals also tend to retain their moisture more than topsoil or other types of residuals. As a result, they do not dry out quickly while being transported. Based on these factors, dust issues associated with the transport of alum residuals are anticipated to be minimal. **Safety implications of 132 trucks per day through MD/DC residential neighborhoods:** As explained in topics GA and GE, 132 trucks is not an accurate characterization of the transportation impacts of this project. Regardless the proposed residuals hauling activities are not expected to negatively impact neighborhood safety. Residuals will be hauled in a lawful, considerate manner. An average of 8 truck loads per day and a maximum of 25 truck loads per day of residuals are anticipated to be hauled on the routes designated in the EIS. This number of additional trucks is not anticipated to create a negative safety impact given that the proposed haul routes are designated haul routes that currently handle many more trucks per day than proposed by Washington Aqueduct. There are schools in the vicinity of each of the truck routes. Because each route is an established truck route, and the level of service will not be decreased as a result of the proposed residuals hauling operation, existing traffic controls and child safety measures currently in place would be no less effective than they are currently. **Additional traffic accidents anticipated with more trucks on the road:** The accident rates on the designated haul routes are not anticipated to increase as a result of the proposed residuals hauling activities. The accident rate for a given road or intersections typically influenced by	

TABLE 1
Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		several factors, only one of which is the volume of vehicles. Other factors related to the design of the road or intersection frequently has equal or greater impact on accident rates. In addition, the relative increase in vehicles planned as a result of the residuals hauling project is quite small.	
GH	Trucking Vibration	The average number of additional residuals trucks proposed for this project represents a small fraction of the current number of trucks traveling many of the proposed haul routes. The routes were selected because they are designed to function as truck routes. Any current home foundation issues associated with existing traffic loads on the proposed routes are not anticipated to be worsened as a result of the additional trucks proposed for this project.	EIS Volume 1 - Section 4.11 - Transportation
GI	Trucking Costs	Residuals hauling costs were estimated based on hauling costs provided by neighboring water and wastewater treatment utilities of similar size. Non-cost issues, such as noise, light, and pollution were assessed based on their environmental impact rather than by assigning them a dollar value. **Seriously mischaracterized the true cost of trucking:** Concern was raised about whether the draft EIS contained all costs associated with the trucking alternative. A comparison was made to previous Washington Aqueduct residuals reports that estimated residuals hauling and disposal costs using different methods. The residuals hauling and disposal costs included in Table 4-7 of the draft EIS were based on similar residuals hauling bid costs received from neighboring utilities. Following receipt of the draft EIS comments, these costs were verified through discussions with residuals hauling contractors responsible for disposing of water treatment residuals in the Washington metropolitan area. The $30.00 per wet ton hauling and disposal cost assumed for dewatered residuals in the DEIS was confirmed as appropriate. The present value of the residuals hauling and disposal cost was changed in the final EIS to add an additional measure of conservatism to the haul distance anticipated to be required by the end of the 20 year planning period and ensure consistency with the haul distance assumed in the air section of the EIS. A round trip residuals disposal haul distance of 150 miles has now been used as the basis of both the air emissions	EIS Volume 1- Section 4 throughout EIS Volume 1 – Tables 4-7 and 4-8

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Comments and Responses by Topic

Topic / Sub-topic	Summary	Response	See EIS section
		calculations (no change from the draft EIS) and the present value of the residuals hauling cost. This change increases the present value of residuals hauling alternatives B or E from $76,200,000.00 to $82,100,000.00. This change does not change the relative cost rankings of the dewater and monofill, dewater and truck from Dalecarlia WTP, or dewatering and truck from Blue Plains alternatives. All alternatives except the "No Action" include trucking costs. Alternatives B, C, and E would require similar hauling distances. **Include the cost of trucking forever (versus 20 years):** Some members of the public commented that truck hauling costs should be assumed to continue forever in the present value analysis. The approach taken in the EIS (i.e., to define capital and annual operating costs for the planning period and calculate associated present value costs for that period) is more typical for NEPA analyses and treats all alternatives in the same manner. **Use Combined Trucking and Operating Costs to Screen Alternatives:** One of the public comments suggested modifying the cost screening criteria from capital cost to the sum of 20 years of operating costs plus the capital cost of an alternative. This approach to cost evaluations is not typical and does not address the primary cost issue of concern to the wholesale customers (capital cost) Combined capital and operating costs were evaluated in the EIS by comparing the present value of each alternative. This method of comparing combined capital and operating costs is more traditional and does not unduly weight the operating portion of the cost. The two cost comparison methods used in the EIS confirm that dewatering and hauling residuals to a permitted offsite disposal site is a cost effective alternative when compared with the other alternatives.	
GJ	Existing Dalecarlia Parkway vehicle/truck volumes	**What are the current vehicle/truck volumes on Dalecarlia Parkway?** Vehicle and truck counts were conducted on Dalecarlia Parkway on June 16, 2004 and June 17, 2004. This data is summarized in the EIS Volume 2B – Appendices. A summary of the data is provided below:	EIS Volume - 2B - Appendices, Transportation Section

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<table>
<tr><th>Topic / Sub-topic</th><th>Summary</th><th>Response</th><th>See EIS section</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><th>Date</th><th>Total Vehicles per day</th><th>Trucks per day (3 or more axles)</th></tr>
<tr><td>6/16/2004</td><td>15,013</td><td>70</td></tr>
<tr><td>6/17/2004</td><td>15,789</td><td>99</td></tr>
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</td><td></td></tr>
<tr><td>GK</td><td>Trucking Hours</td><td>DEIS has conflicting information on trucking hours,

MNCPPC letter recommends trucking between 9:30 AM and 4:00PM

The EIS has been revised to reflect consistent information regarding trucking hours.

Trucking operations will meet all requirements established for the use of trucking routes. Washington Aqueduct anticipates that the dewatering facility will typically be staffed between the hours of 7:00 AM and 7:00 PM. These are the hours during which trucks will typically be loaded.

The analysis in the EIS shows that none of the feasible routes (B,D, E,F&G (with permit), and H) would have traffic flow or congestion impacts due to the action’s trucking operation that would reduce the level of service with the exception of route A. Trucking will be allowed on Route A only between 9:30 AM and 3:00 PM.

Because trucking restrictions could have the effect of increased contract costs, further restrictions will not be included, however, it is logical to expect that a trucking company would minimize costs by concentrating trucking during optimal periods. Considering the relatively small amount of residuals generated on a daily basis and the hours of operation, there is sufficient opportunity for a company to truck mainly during the off peak periods

Also see response to topics GA and GD.</td><td>EIS Volume 1 – Sections 4.11 and 7.2</td></tr>
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HA	Barge, preference	Barging residuals via the Potomac River (not C&O Canal) to Blue Plains is one of the alternatives (Alternative 6) that was considered and screened in May 2004 following the Scoping Meeting. The C&O canal is a National Historic Landmark and is therefore not suitable for accepting barge traffic. Alternative 6 was found inconsistent with screening criteria, and is therefore not carried forward for detailed evaluation in the EIS. Constructing an above grade conveyor or buried pipeline to a Potomac River barge loading station located within land controlled by the National Park Service would create a significant impact on the park and would not receive approval from the park service.	EIS Volume 1 -TABLE 3-9: May 2004 Alternatives Screening Results Summary EIS Volume 4 - Engineering Feasibility Study Compendium Section 3.1.2- Alternative 6: Thicken Water Treatment Residuals at Dalecarlia WTP, Then Transport by Barge to Blue Plains AWWTP
IA	Preference	Comment or preference noted.	EIS Volume 1 – Section 5, Public Involvement
IB	Useful Life of Alternatives	The 20-year life defined for the monofill is consistent with the planning period adopted for the EIS as a whole. It is also consistent with planning horizons used in engineering feasibility studies.	EIS Volume 4 – Engineering Feasibility Study, Section 3.
JA	River Discharge	The return of silt and water treatment residuals back to the river after they are removed is generally prohibited by the Clean Water Act. Given the long track record of EPA requiring water treatment utilities throughout the country to remove their residuals from the rivers, from which they withdraw water, it is unlikely that this regulation could be successfully challenged.	

JB	Discharge during spawning season	The NPDES Permit was issued on March 14, 2003. The Federal Facilities Compliance Agreement was signed on June 12, 2003. The spawning season is defined in the NPDES permit as February 15 through June 30. There have been no discharges to the Potomac River during the spawning season since the issuance of the NPDES Permit in March 2003. Discharges were made on the following dates: <u>From Dalecarlia</u> 7/1/03; 7/7/03; 7/14/03; 7/28/03; 10/10/03; 10/20/03; 10/21/03; 1/12/04; 1/16/04; 1/20/04; 2/8/04; 7/14/04; 7/24/04; 7/25/04; 8/2/04; 8/8/04; 10/27/04; 11/30/04; 1/26/05; 2/1/05; 2/7/05; 2/10/05; 7/4/2005; 7/10/2005; 7/12/2005; 7/18/2005 <u>From Georgetown</u> 7/20/04; 8/10/04; 8/19/04; 12/2/04; 2/2/05; 7/12/2005 In accordance with the NPDES permit, before each discharge, Washington Aqueduct has made notifications to the agencies described in the permit. There is no general public notification because the discharge itself does not put the public in any personal danger and the exact timing is dependent on operational conditions at the treatment plants.	
KA	Impure water quality, raw water intake	Converting the existing surface intake on the Potomac River to a well-based intake was considered in the Engineering Feasibility Study Compendium and subsequently screened out from consideration. Options that involve reconfiguring the existing raw water intake structures are evaluated in the Engineering Feasibility Study Compendium. In general, these options are found to be inconsistent with the screening criteria for the project.	EIS Volume 4 – Engineering Feasibility Study Compendium, Section 4.5 and Table 3-7
KB	Monitoring water quality and safety	Residuals deposited in the Forebay portion of the Dalecarlia Reservoir and water treatment residuals produced in the sedimentation basin of the Dalecarlia WTP were tested to determine their potential to leach toxic substances if applied to land of landfilled. Residuals samples were also tested directly to quantify the concentration of key regulatory constituents. The results of this testing indicated that the residuals are non-toxic and suitable for land application on agricultural land or landfilling.	EIS Volume 1 - Section 4-17: Public Health
KC	Residuals quality	The water treatment residuals produced by the Washington Aqueduct are considered non-toxic by regulatory agencies responsible for overseeing their potential application to agricultural land of deposition in a landfill. Specific toxicity testing was performed on the Washington Aqueduct residuals as part of this DEIS effort. These tests confirmed that the residuals are non-toxic. These results agreed with similar previous testing conducted in the mid-1990's.	EIS Volume 1 - Section 4-17: Public Health

KD	Health Impacts of Diesel Truck Traffic	The 1990 Clean Air Act amendments require that federal actions conform to applicable State Implementation Plans (SIPs) to ensure that the action will not interfere with strategies developed for attainment of National Ambient Air Quality Standards (NAAQS). Federal actions conform to the SIPs if the action's emissions do not exceed the *de minimis* threshold for the criteria pollutants. These actions are termed "inconsequential" by the CAA regulations. The *de minimus* threshold for each criteria pollutant represents a small fraction of the state inventory of emission from all air sources in state. All alternatives evaluated in the EIS produce emission estimates below *de minimus* for all criteria pollutants. Therefore, these emissions will not cause or contribute to an exceedance of NAAQS. The NAAQS are developed and periodically reviewed based on human health and welfare criteria and include factors such as frequency of asthma cases, respiratory impairment, and health of children and elderly with adequate margin of safety. Our decision making as an agency will be based on the regulations that apply to the area in which our proposed action will take place. Our hauling operations will always comply with applicable air quality regulations.	EIS Volume 1 – Sections 3.3 and 4.4
LA	Suggested processes	Alternate treatment processes that minimize or change the form of the residuals (such as MIEX, ultrafiltration, etc.) were evaluated in the Engineering Feasibility Study Compendium. These alternatives were screened out based on concerns related to unproven technology, cost, and compliance with the FFCA schedule.	EIS Volume 4 – Engineering Feasibility Study Compendium Section 3.2.2 – review of Public Alternative P99.
MA	EPA mandate	EPA is not obligated to perform NEPA analysis for a permit enforcement action. The obligation to perform this analysis belongs with the Federal Agency being regulated by EPA, Washington Aqueduct in this case. In cases where the water treatment utility is not operated by a federal agency, a NEPA analysis is not required.	
MB	FOIA requests	See transcripts for responses. Washington Aqueduct has provided written responses to FOIA request letters. These responses are available in the administrative record.	Administrative record.
MC	Conflict of interest	CH2MHill filed a disclosure statement in accordance with 40 CFR Section 1506.5(c) which is included in the project's administrative record. The Baltimore District Corps of Engineers has no basis to believe that CH2MHill has a financial or other interest in the outcome of this project that would cause a conflict of interest. Any future procurement to implement this project will be in accordance with applicable statutory, regulatory and policy provisions regarding conflict of interest.	Administrative record.
MD	Agency Recommendations on DEIS	Changes were made as requested by US Department of Interior (Document 122). Response to Montgomery County Council letter (Document contained in	EIS Volume 1 - Section 3.4.1 Dwarf Wedge Mussel EIS Volume 1 - Section 3.5.1 Terrestrial

		Appendix Volume 2A.. Response to the individual comments contained within the June 2, 2005 letter from the United States Senate (document 118) are discussed in the applicable topics summarized herein. Responses to the individual comments contained within the May 10, 2005 letter from the Council of the District of Columbia (document 119) and the June 1, 2005 letter from the Montgomery County Planning Board (document 125) are discussed in the applicable topics summarized herein. Responses to the individual comments contained within the June 2, 2005 Commonwealth of Virginia letter (document 124) are discussed in the applicable topics summarized herein and below: • Open Burning and Dust Control: The referenced requirements will be followed. • All impacts to historical structures and archeological resources will be considered as required. • George Washington Memorial Parkway: See topic DH. • The requested life cycle cost analysis will be performed as part of the residuals facility design. Residuals processing equipment will be tested as necessary during the design phase of the project to confirm performance. Consideration will also be given to previous testing performed on Dalecarlia WTP residuals. • Costs were verified as part of the final EIS preparation effort. Costs will continue to be evaluated throughout the design phase to ensure that ongoing fluctuations in materials and labor cost factors are properly considered. Responses to the individual comments contained within the July 5, 2005 District of Columbia Department of Health letter (document 157) are discussed in the applicable topics summarized herein. A traffic study was completed for the EIS, the results of which are contained within EIS Sections 3.10 and 4.11 and Appendix Volume 2B. The air quality analysis conducted for the DEIS was expanded to include additional emissions information on truck traffic. The results of this analysis are presented in EIS Section 4.4. The model data from which this data was derived is provided in Appendix Volume 2A. Responses to the individual comments contained within the June 27, 2005 EPA letter (document 182) are discussed in the applicable topics summarized herein. In addition, several suggestions designed to enhance the clarity of the EIS were also made. These suggestions were implemented where practical.	Special Status EIS Volume 1 – Section 3.10 Transportation EIS Volume 1 - Section 4.5.3 Impact Evaluation by Alternative and Option EIS Volume 1 - Section 4.6.3.1 Hay's Spring amphipod EIS Volume 1- Section 4.6.3.2 Alternative B EIS Volume 1- Section 4.6.3.3 Impact to Special Status Species EIS Volume 1- 4.6.3.4 Special Status Species EIS Volume 1- Section 4.11 Transportation

NA	NEPA Process Understanding	The intent of the public meetings held in September and November 2004 was to inform the public of the status of the alternative evaluation process as it was proceeding, as well as, inform the public of how this information would be considered within the context of the NEPA process.	EIS Volume 1 - Section 5.0 Public Involvement
NB	Screening criteria and Scoping Meeting	The screening criteria were developed prior to the January 28, 2004 Scoping Meeting. Public input on the screening criteria was received during the Scoping Period, which ran from January 12, 2004 through February 11, 2004. The alternatives were screened by the Washington Aqueduct EIS project team. A summary of the initial alternative screening results was presented in the Engineering Feasibility Study dated May 2004. This document was placed on the Washington Aqueduct project website following its completion. The Engineering Feasibility Study was subsequently updated to include additional alternatives submitted by the public. This updated document is provided as Volume 4 of the EIS. The EIS evaluates a total of 4 alternatives plus the no action alternative. This number is not unusually low when compared with other EIS's and therefore, is not considered an indication that the screening criteria should be revised. The screening criteria include cost because the proposed action must be economically feasible to the wholesale customers.	EIS Volume 1 - Section 5.0 Public Involvement and EIS Volume 4 - Engineering Feasibility Study Compendium, Section 2.2 Development of Alternatives EIS Volume 4 - Engineering Feasibility Study (original and updated Engineering Feasibility Study Compendium – Volume 4 of the EIS)
NC	Communication	Prior to each public meeting related to the residual project, starting with the January 28, 2004 Scoping Meeting, the public was notified of meeting, date, time, and location. This was typically accomplished by placing display ads in the Washington Post and at least one local paper. A notice was also placed in the Federal Register prior to the Scoping Meeting. The alternative screening approach and alternative screening results were also presented during subsequent public meetings at the request of the public. The public meetings held between September and October 2004 included a progressive discussion of the environmental evaluation of new public and screened alternatives. Following the DOPAA public meeting held on May 26, 2004, three additional opportunities for public input were provided on September 7, 2004, September 28, 2004, and November 16, 2004. Two additional opportunities for the public to submit alternatives were also provided in September/October, 2004 and January/February, 2005. Numerous public comments were received regarding the shortcomings of the forum chosen for the September 7, 2004 project update meeting. The larger than anticipated number of attendees rendered the selected format ineffective. A different format was chosen for subsequent meetings to	EIS Section 5.0 - Public Involvement.

		address this issue.	
ND	NEPA Process	The NEPA process has been followed to the letter and the intent of the law. Additionally, several public meetings, not required by NEPA, have been held in order to address the high level of public interest in this project. See topic FC for a discussion of the FFCA schedule and its role in the screening process. In the mid-1970's and the mid-1990's, in response to EPA intentions to issue an NPDES permit that would have caused Washington Aqueduct to recover and dewater and dispose of the water treatment residuals in lieu of returning them to the Potomac River, Washington Aqueduct investigated methods of accomplishing that. In both of those instances, coordination with the government of the District of Columbia resulted in a declaration that the Washington Aqueduct water treatment residuals would not be permitted to be sent to the Blue Plains advanced waster water treatment plant. In both of those instances a concept to recover and dewater the residuals at Dalecarlia for trucking to an off-site location for disposal was developed. EPA in both occasions made decisions that did not require Washington Aqueduct to complete action on the residuals process at that time. In the mid-1990's Washington Aqueduct also was directed by EPA to dredge the Dalecarlia Reservoir. That process was a very high intensity but of limited duration. It did generate many loads of sediment that were removed by truck. To do it safely and with the minimum effect on the surrounding neighborhoods, Washington Aqueduct worked very closely with the neighborhood groups and local officials. It was from that experience that Washington Aqueduct became well aware of the sensitivity of trucking to the surrounding neighborhoods on the traffic routes. Therefore when the current NPDES permit and FFCA were issued in the first half of 2003, Washington Aqueduct decided to take a completely fresh look at alternatives that might be employed to comply with the permit and the FFCA. Washington Aqueduct had no preconceived notion of what alternative it preferred when it started the NEPA evaluation of residuals alternatives in late 2003. What came out of the screening process and the follow-on extended public comment periods were ideas that had never been analyzed in connection with the two previous studies. Specifically, the monofill option was presented as a means to alleviate trucking for at least a 20 year period. Other ideas to transfer the residuals in a liquid form to off site processing locations such as McMillan and other water treatment plants and sites where no current dewatering facility existed were also	

		considered.	
NE	Limited number of alternatives evaluated in EIS	A total of 160 residuals alternatives plus eight treatment options were evaluated for this project. A total of 135 of these alternatives, plus eight options were submitted by the public during three public involvement opportunities. The alternatives were screened by a set of criteria developed to reflect the project's purpose and need, as described in the Notice of Intent published in the Federal Register on January 12, 2004. It is not anticipated that additional alternatives exist that could be implemented within the Aqueduct's FFCA compliance deadline and meet the remaining screening criteria.	Section 2.0 Selection of Proposed Action and Alternatives contains a summary of the process followed to identify and screen feasible alternatives. Volume 4 Engineering Feasibility Study Compendium contains the complete description of the screening process and results
NF	Institutional constraints screening criteria	The many piping alternatives are dependent upon the willingness of the receiving facility at the other end of the pipe, whether to process and dispose of the residuals, or simply to supply space for the Washington Aqueduct to do so. None of the agencies involved, whether it be the DC WASA, WSSC, Fairfax Water, the Central Intelligence Agency (CIA), the United States Navy, the City of Rockville, or the Federal Highway Administration, are able or willing to provide processing capacity or facility space. Neither the United States Army Corps of Engineers, the United States Army, nor the Washington Aqueduct has any authority over any of the agencies. Trucking is still involved in some degree with each piping alternative. It is worth noting that the David Taylor facility at Carderock is surrounded by the Clara Barton Parkway and MacArthur Boulevard, both of which have truck weight limitations. Despite how close the Capital Beltway may appear to be, processing residuals on the Carderock site would have still required dewatered residuals to be hauled through residential neighborhoods serviced by 2-lane subdivision roads no more suitable for truck traffic than similar haul routes proposed for residuals Alternative E. This suggested alternative also included speculation that a direct Beltway interchange could be constructed. Creating a direct Beltway interchange is a remote, costly and time prohibitive possibility. It would require basic changes in legislation and policies of other federal and local agencies, such as the National Park Service, which would be likely to result in protracted debate and possible litigation of their own. Given the highly developed nature of the area, finding a new site at the discharge end of a residuals pipeline would involve years of acquisition time and without sufficient land for disposal on-site would still mean the same amount of trucking away from that site. Furthermore, our analysis for Alternative C, while specific to that particular route, illustrates generally	EIS Volume 4 - Engineering Feasibility Study Compendium, Section 3.

		that pipelines are not without significant environmental and cost impacts.	
NG	Restart NEPA process	The NEPA process has been carefully and dutifully followed. The EIS process included six public meetings and at least 20 consultations or conversations with interested individuals, groups, or agencies. Through this process 160 alternatives and 8 options were identified; 135 of these alternatives and all options were identified by the public. These alternatives span a range of approaches for the management and conveyance or water treatment residuals. These were screened to determine feasible options by a set of criteria that reflect the project's purpose and need.	EIS Section 2.0 Selection of Proposed Action and Alternatives contains a summary of the process followed to identify and screen feasible alternatives. EIS Section 5.0 - Public Involvement. EIS Volume 4 - Engineering Feasibility Study Compendium, Section 3.
NH	Regional approach to NEPA	A regional approach has been taken for the evaluation and decision making process: the National Capital Planning Commission is a Cooperating Agency. NCPC provides overall planning guidance for federal land and buildings in the National Capital Region, which includes the District of Columbia; Prince George's and Montgomery Counties in Maryland; and Arlington, Fairfax, Loudoun and Prince William Counties in Virginia. Federal, state (VA and MD) and local agencies were all consulted during the development of the DEIS and the impact analysis is both regional and site specific, depending on the requirements of the particular subject area. Regionalization specific to water and wastewater is discussed in topic DJ.	EIS Sections 3.0 and 4.0 for descriptions of existing conditions and impact evaluation. EIS Section 5.0 for public involvement and Agency Consultation
OA	Alternate coagulants – continued river discharge	The current NPDES permit does not allow the Washington Aqueduct to switch to an alternate coagulant and continue to discharge residuals to the river. The intent of the NPDES permit is to remove essentially all residuals from the river. Washington Aqueduct is planning to evaluate the use of alternate coagulants, such as polyaluminum chloride, in the future. This coagulant has the potential to reduce the quantity of residuals requiring processing and disposal. However, additional testing is required to confirm that it does not reduce the quality of the drinking water in other areas, such as organics removal, lead corrosion, etc. EPA approval would also be required before an alternate coagulant could be used.	EIS Volume 4 - Engineering Feasibility Study Compendium, Section 4.3 for a discussion of alternate coagulants that could be used to reduce the volume of residuals that requires disposal.
PA	Residuals Handling in Other Metropolitan Areas	Other large cities dispose of their water treatment residuals using a variety of methods including land application, sewer disposal, landfilling, etc. Neighboring water treatment utilities, such as Fairfax Water and WSSC dispose of their residuals by land application, quarry disposal, and discharge to the sewer.	
PB	Residuals studies throughout the world	To make sure we were evaluating alternatives within the appropriate regulatory constraints and geographical issues, the Aqueduct's residuals management evaluation is based largely on the experience of water	EIS Volume 4 – Engineering Feasibility Study Compendium, Section 2.0 for a discussion of

		providers in the domestic United States in general and in the National Capital Region in particular. Approaches that work in one part of the country (or world) are not necessarily applicable to the Aqueduct's situation. For example, sewers are used with some frequency throughout the country for residuals disposal, but that is not possible here for a variety of reasons detailed in the evaluation. Wherever in the world water treatment residuals are being generated, management approaches must all address the common questions of collection, processing, conveyance, and final disposal. The alternatives identified and evaluated in this project represented a range of different approaches for resolving each type of issue.	the proposed action and alternatives.
QA	Public Residuals Alternatives	160 residuals alternatives and eight options are evaluated in the Engineering Feasibility Study Compendium. Approximately 135 of these alternatives were identified by the public.	EIS Volume 4 – Engineering Feasibility Study Compendium, Section 3.2 Alternatives P-1 through P-27
QB	Environmental assessment	The analysis in the EIS includes detailed descriptions of the existing conditions for each of the five alternatives. This includes land use, noise, air quality, aquatic resources, biological (terrestrial) resources, cultural resources, hazardous, toxic and radioactive substances, soils, geology, and groundwater, infrastructure, transportation, visual aesthetics, socioeconomics including environmental justice. Note that these existing conditions include the natural as well as the human environment (pre-historical resources, historical resources, the built environment and demographics, employment and economic analysis.) The potential for each alternative to impact these existing conditions, both short term and long term was carefully evaluated and is described in the EIS. The impact of the proposed action in concert with one or more other past, present, or reasonably foreseeable future actions or projects was also evaluated. In EPA's detailed comments on the DEIS dated June 27, 2005, EPA disagrees with the conclusion in Section 4.5.3.4 that implementation of Alternative D, the No Action Alternative, would have no significant impact on Aquatic Resources. EPA asserts that implementation of the NPDES permit will "reduce pollutant loading to the Potomac River…". Based on previous studies, the Washington Aqueduct observes that its historical practice of returning residuals solids removed during the water treatment process to the Potomac River does not result in significant detrimental impact. However, elimination of this practice, in compliance with the NPDES permit, will meet the CWA requirement that water utilities use the best available technology. See topics GA, GD, GF and GI for additional information regarding trucking.	EIS Volume 1 – Section 3 for a discussion of existing conditions, Section 4 for a discussion of potential impacts, Section 7 for a discussion of cumulative impacts and mitigation.

QC	Northwest (alternate B) versus east (alternate E) residuals processing sites	The Aqueduct recognizes that each of the alternatives under evaluation necessitates developing infrastructure in an urban setting, characterized by natural and man-made resources. All alternatives to meet this federally mandated action will carry some degree of impact. Please see section 6 for a discussion of the Aqueduct's rationale for recommending Alternative E as the proposed action.	EIS Volume 1 – Section 6 for a description of the selection of the preferred alternative.
QD	Residuals processing site near Beltway versus Dalecarlia WTP site	See responses to topics DL, NE, and NF.	EIS Volume 4 – Engineering Feasibility Study Compendium, Section 3.

From:
Sent: Wednesday, July 06, 2005 10:22 AM
To: Peterson, Michael C WAD
Cc:

Subject: Comment regarding residuals trucking plan

Attachments: 1113578448-Washington Aquaduct letter.doc
Dear Mr. Peterson,

Please see our attached letter opposing the proposal to build a dewatering facility near Sibley Hospital and haul water residuals via truck.

Sincerely,

Mr. Thomas P. Jacobus
General Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Blvd., N.W.
Washington, D.C. 200016

Dear Mr. Jacobus:

We are writing to express our concern about the 80-foot industrial dewatering facility you are proposing behind Sibley Hospital (Alternative E) and the impact it will have on our neighborhood. We favor finding a piping solution that will send the residuals to a non-residential area closer to the beltway. We ask you to carefully review and respond to Concerned Neighbors' concerns that:

. The DEIS contains virtually no analysis of environmental impacts of the Corps' preferred option.

. The environmental impacts of the Corps' preferred 'trucking alternative' are profound in a region that is already suffering from severe non-attainment under Clean Air Act standards and serious traffic congestion.

. The Corps' DEIS seriously mischaracterizes the true cost of the 'trucking alternative' by failing to include the cost of operating large diesel trucks indefinitely.

. The entire process has been flawed, starting with the Corps' failure to involve the community when it started the scoping process for this project in January of 2004. The Corps pre-selected an outcome more than 10 years ago (trucking residuals through our neighborhoods) and crafted the NEPA process to fit their desired outcome.

. The Corps has looked at a limited range of alternatives, raising concerns that the NEPA process was not properly followed.

In addition, we are personally concerned about the adverse safety implications of sending up to 132 trucks a day through our area. Our young son soon will be traveling to school, walking, jogging and biking regularly on roads in our neighborhood. The addition of sustained heavy truck traffic to already congested roads will significantly increase the likelihood of our son and the many other children living in our neighborhood being involved in an accident.

In short, we urge you not to adopt the plan to truck residuals through our residential area.

Thank you for your careful consideration of this matter.

Sincerely,

Sarah Efird Stephens
John C. Stephens

From:
Sent: Wednesday, July 06, 2005 2:22 PM
To: Peterson, Michael C WAD
Subject: DEIS Comment

Dear Mr. Jacobus:

I am writing to express my concern about the 80-foot industrial dewatering facility you are proposing behind Sibley Hospital (Alternative E) and the impact it will have on my neighborhood. I favor finding a piping solution that will send the residuals to a non-residential area closer to the beltway. I ask you to carefully review and respond to Concerned Neighbors' concerns that:

- The DEIS contains virtually no analysis of environmental impacts of the Corps' preferred option.
- The environmental impacts of the Corps' preferred "trucking alternative" are profound in a region that is already suffering from severe non-attainment under Clean Air Act standards and serious traffic congestion.
- The Corps' DEIS seriously mischaracterizes the true cost of the "trucking alternative" by failing to include the cost of operating large diesel trucks indefinitely.
- The entire process has been flawed, starting with the Corps' failure to involve the community when it started the scoping process for this project in January of 2004. The Corps pre-selected an outcome more than 10 years ago (trucking residuals through our neighborhoods) and crafted the NEPA process to fit their desired outcome.
- The Corps has looked at a limited range of alternatives, raising concerns that the NEPA process was not properly followed.

In addition, I am personally concerned about the safety implications of sending 132 trucks a day through Maryland and DC past at least 10 public and private schools.
Many students walk to and from Westland Middle School and Little Flower, both located on Mass. Ave. These children are as young as 5 years old. It is imperative that the schools along all trucking routes be notified and included in the process.

Your neighbor-

From:

Sent: Wednesday, July 06, 2005 2:59 PM
To: Peterson, Michael C WAD
Cc:

Subject: Washington Aqueduct

Dear Mr. Peterson:

I am writing to express my concern about the 80-foot industrial dewatering facility you are proposing behind Sibley Hospital (Alternative E) and the impact it will have on my neighborhood. I favor finding a piping solution that will send the residuals to a non-residential area closer to the beltway. I ask you to carefully review and respond to Concerned Neighbors' Concerns that:

• The DEIS contains virtually no analysis of environmental impacts of the Corps' preferred option.

• The environmental impacts of the Corps' preferred 'trucking alternative' are profound in a region that is already suffering from severe non-attainment under Clean Air Act standards and serious traffic congestion.

• The Corps' DEIS seriously mischaracterizes the true cost of the 'trucking alternative' by failing to include the cost of operating large diesel trucks indefinitely.

• The entire process has been flawed, starting with the Corps' failure to involve the community when it started the scoping process for this project in January of 2004. The Corps pre-selected an outcome more than 10 years ago (trucking residuals through our neighborhoods) and crafted the NEPA process to fit their desired outcome.

• The Corps has looked at a limited range of alternatives, raising concerns that the NEPA process was not properly followed.

In addition, I am personally concerned about the environmental impact in a region that is already classified as being in severe non-attainment under the Clean Air Act, and the safety implications of sending 132 trucks a day through Maryland and DC past at least 10 public and private schools.

I strongly urge that the proposed dewatering project be stopped and moved to a non-residential area.

Sincerely yours,

cc: The Honorable Chris Van Hollen
The Honorable Barbara Mikulski
The Honorable Paul Sarbanes
Councilmember Howard A. Denis
Councilmember Nancy Floreen

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From:
Sent: Wednesday, July 06, 2005 3:08 PM
To: Peterson, Michael C WAD
Cc:

Dear Mr. Jacobus: I am writing to express my concern about the 80-foot industrial dewatering facility you are proposing behind Sibley Hospital (Alternative E) and the impact it will have on my neighborhood. I favor finding a piping solution that will send the residuals to a non-residential area closer to the beltway. I ask you to carefully review and respond to Concerned Neighbors' concerns that: (1) The DEIS contains virtually no analysis of environmental impacts of the Corps' preferred option. (2) The environmental impacts of the Corps' preferred 'trucking alternative' are profound in a region that is already suffering from severe non-attainment under Clean Air Act standards and serious traffic congestion. (3) The Corps' DEIS seriously mischaracterizes the true cost of the 'trucking alternative' by failing to include the cost of operating large diesel trucks indefinitely. (4) The entire process has been flawed, starting with the Corps' failure to involve the community when it started the scoping process for this project in January of 2004. The Corps pre-selected an outcome more than 10 years ago (trucking residuals through our neighborhoods) and crafted the NEPA process to fit their desired outcome. (5) The Corps has looked at a limited range of alternatives, raising concerns that the NEPA process was not properly followed.

In addition, I am personally concerned about the loss of wildlife and bird habitat in the reservoir area, which connects biologically to the riverine system.

Thank you very much.

Home address:

From:
Sent: Wednesday, July 06, 2005 3:45 PM
To: Peterson, Michael C WAD
Cc:

Subject: Objection to Washington Acqueduct Project

Mr. Thomas P. Jacobus
General Manager
C/O Michael.C.Peterson@usace.army.mil
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District 5900 MacArthur Blvd., N.W.
Washington, D.C. 200016

Dear Mr. Jacobus:

I am writing to express my concern about the 80-foot industrial dewatering facility you are proposing behind Sibley Hospital (Alternative E) and the impact it will have on my neighborhood. I favor finding a piping solution that will send the residuals to a non-residential area closer to the beltway. I ask you to carefully review and respond to Concerned Neighbors' concerns that:

* The DEIS contains virtually no analysis of environmental impacts of the Corps' preferred option.
* The environmental impacts of the Corps' preferred 'trucking alternative' are profound in a region that is already suffering from severe non-attainment under Clean Air Act standards and serious traffic congestion.
* The Corps' DEIS seriously mischaracterizes the true cost of the 'trucking alternative' by failing to include the cost of operating large diesel trucks indefinitely.
* The entire process has been flawed, starting with the Corps' failure to involve the community when it started the scoping process for this project in January of 2004. The Corps pre-selected an outcome more than 10 years ago (trucking residuals through our neighborhoods) and crafted the NEPA process to fit their desired outcome.
* The Corps has looked at a limited range of alternatives, raising concerns that the NEPA process was not properly followed.

In addition, I am personally concerned about the combined health and safety impacts of having trucks enter the
dewatering facility at the same time Sibley Hospital is engaged in a major expansion of its facility, the air quality impact of trucking and potential increase in the number of asthma or cancer cases resulting from this volume of diesel emissions, and the safety implications of sending 132 trucks a day through Maryland and DC in an area where there is already major congestion.
*

From:
Sent: Wednesday, July 06, 2005 4:31 PM
To: Peterson, Michael C WAD
Subject: Washington Aqueduct
6 July 2005
Michael C. Peterson
Environmental Manager

Dear Mr. Peterson:

Please relay my concern as well as our neighors to Thomas P. Jacobus, General Manager of the Washington Aqueduct, and other interested parties about the 80 foot industrial dewatering facilty proposed behind Sibley Hospital (Alternative E).

The impact of this project will have a dreadful effect on our community and should not proceed.

Please review and respond to me and other concerned citizens about the project that has not had any analysis of the environmental impact of the Corps preferred option. In particular, the trucking alternative will profoundly affect my area. We are a residential area with many children and senior citizens. The combined result of all the trucking proposed will increase the traffic enormously.

As a community, we are particularly disturbed that we were not involved when the project began in January 2004. There were rumors, but it hardly seemed likely that the U.S. Army Corps of Engineers would conceive seriously of a project so deletrious to our area.

Sincerely,

_____

From:
Sent: Wednesday, July 06, 2005 6:45 PM
To: Peterson, Michael C WAD

Attachments: Dewatering plant.doc

Mr. Thomas Jacobus
General Manager
Washington Aqueduct
US Army Corps of Engineers
5900 MacArthur Blvd., NW
Washington, DC 20016

Dear Mr. Jacobus:

The people of the Brookmont neighborhood of Bethesda have had to put up with the jet travel to Reagan National Airport, helicopters roaring overhead and it certainly doesn't need a dewatering plant parked next-door (Alternate B) with the noise, pollution and more than 130 trucks a day. Another solution should be found, regardless of cost (piping).

Sincerely,

From:
Sent: Wednesday, July 06, 2005 9:57 PM
To: Peterson, Michael C WAD
Cc:

Subject: Dalecarlia water residuals treatment and DEIS

Dear Mr. Jacobus,

I am writing to emphasize that you must not go forward with plans for residuals treatment and trucking from the Dalecarlia facility of the Washington Aqueduct without taking the appropriate steps and truly searching for the most environmentally friendly, lowest impact solution--that is, PIPING of the residuals from the site to an appropriate location for treatment. We realize that you have invested a decade's planning work in this project, but you also live in a neighborhood yourself, and would be outraged to find that you pay taxes and yet have had NO input/information/warning on the placement of an industrial plant in your backyard.

I am writing to express my concern about the massive industrial dewatering facility you are proposing to build either near Brookmont ("Alternative B") or behind Sibley Hospital ("Alternative E"), and the impact it will have on my neighborhood. I favor finding a piping solution that will send the residuals to a site closer to the beltway.
I ask you to carefully review and respond to "Concerned Neighbors"' concerns that:

- The DEIS contains virtually no analysis of environmental impacts of the Corps' preferred option.
- The environmental impacts of the Corps' preferred "trucking alternative" are profound in a region that is already suffering from severe non-attainment under Clean Air Act standards and serious traffic congestion.
- The Corps' DEIS seriously mischaracterizes the true cost of the "trucking alternative" by failing to include the cost of operating large diesel trucks indefinitely.
- The entire process has been flawed, starting with the Corps' failure to involve the community when it started the scoping process for this project in January of 2004. The Corps pre-selected an outcome more than 10 years ago (trucking residuals through our neighborhoods) and crafted the NEPA process to fit their desired outcome.
- The Corps has looked at a limited range of alternatives, raising concerns that the NEPA process was not properly followed.

* The Corps has not adequately investigated the piping alternatives.

Please show us that you have the environment and our well being in your plans. You must begin again and cut your losses. I believe that you are in a very difficult position, but you will be rewarded for reaching into the future and working with our suggestions to find a progressive and showcase solution.

Sincerely,

From:
Sent: Wednesday, July 06, 2005 10:47 PM
To: Peterson, Michael C WAD
Subject: From in Brookmont

Michael C. Peterson
5900 MacArthur Blvd NW
Washington, DC 20016-2514 July 6, 2005

Subject: Strong opposition to Brookmont Option B
Response to the DEIS for the Washington Aqueduct proposal to construct a thickening and dewatering facility close to Brookmont, MD.

Dear Michael C. Peterson,

I have lived in Brookmont for 35 years and it is my strong opinion that the Brookmont site for the Sludge Factory is totally unacceptable.

I along with all the members of SludgeStoppers feel it should not be built in ANY residential neighborhood. The proposed site is close to my home where I have lived for -- years, and would destroy and tranquility of this idylic, quiet, wooded community. I am absolutely appalled that such a structure would have been planned, literally, in my community, unbeknownst to me and my neighbors.

There is no question in my mind that the reason that I and many of my neighbors moved to Brookmont and live here is because of the exceptional beauty of this neighborhood. My home is surrounded by nature and a small stream, and the Potomac river. One would never know that I live very close to Washington, DC, or from some views, even that I have other neighbors. In recent months as I have contemplated of the sludge treatment facility being here, I can't tell you the pain that I feel, not only for myself, but for my neighbors who live here. There is no question the invasion of our community of this proposed facility.

Of course, the property value would be slashed. The peace and nature, which is so comforting and soothing to me and to my neighbors, would be destroyed. Although I feel it is preferable to consider properties that would be outside the Beltway, I do feel that the Sibley option is far less invasive of residential peace and harmony than the Brookmont option.

Furthermore, the trucking issues of pollution and noise would be unwieldy here in Brookmont. I am asthmatic, and only have 25% of my breathing. The pollution that would ensue from nearly thousands of trucks going out through the years would prevent me from staying in this community. The trucks going down Loughboro Rd would also be far worse than the Dalacarlia Pky on the Sibley Hospital residents and the houses of Sibley. It seems that everything is pointing to that spot instead of Brookmont. I hope there is a way to use the Navy property in Carderock outside the Beltway. I feel that piping is a far more

acceptable solution is better than the trucking. It seems that in the long run, the piping option would be less expensive. I think that it is important that that option stay open, and that we continue to work on the blue plains facility and other similar facilities, which again, are not in a residential neighborhood.

In addition, the Brookmont site is unacceptably close to the Capital Crescent Trail. This trail has been used by people from all over the area as a way to get away from the busy city pressures and to have relaxation and the joy of nature during their free times. To rob them of this opportunity by having an unsightly immense building which is working 16 hours a day and bordering the trail is a very poor solution. Many people who go on the trail are up in arms about that possibility as well.

Certainly the Brookmont site would create an unsightly visual impact on the existing landscape. It can be seen from several views in Brookmont and the balloons which you flew, showed us how tall this building would be and it would disrupt the beauty we enjoy.

In addition, many of us are concerned that the Brookmont site contains polluted soil that should not be disturbed. As we know, the contaminants contained in sludge can do a great deal in altering with environments and interfere with the natural balance and harmony of this environment.

Furthermore, the truck traffic would increase by many thousands of trips on MacArthur Blvd and would negatively impact the already bad traffic situation that occurs in this area. It is my understanding that trucks aren't even permitted on MacArthur Blvd and now this would be a major truck route.

Of course, the noise generated by many thousands of trucks going from Brookmont up Loughboro Rd is unacceptable. Instead of being a major route downtown by many residents, this would more be like a highway that one might see in New Jersey. It just doesn't fit in this area.

I am very concerned about the pollution generated by thousands of trucks going up from Brookmont up Loughboro Rd. This would be unacceptable and unhealthy for many residents and since we know asthma is a major problem for a growing number of children and adults, it is important not to knowingly create this level of pollution.

This whole process is undemocratic. You have been dong plans on this for 10 years. I and many others only found our about this fall. Only yesterday I mentioned this to neighbors who live nearby and have never heard about this. Your efforts to inform us about this have been negligible and only recently have we received letters on the subject. In any case, we should have been involved in the decision-making. Then maybe you would not have inspired such negativity now.

In conclusion, it is the very strong and adamant position that I take, as well as that of my neighbors that the Brookmont option should not be considered as a viable option. I sat at the polls on election day and informed local voters about the sludge factory. They were horrified. We have over a thousand signatures, many of which we gave to you at the last Sibley meeting. We feel strongly that the Brookmont site is the absolute wrong place to be. I understand that you have a mandate from EPA, but I also think that human lives and the sanctity of one of the few areas near Washington DC, the capitol of our country, which is exquisite, should be saved. The idea of this facility being here

in Brookmont holds absolutely no merit. I will continue to put a great deal of time and money info fighting option B, The Brookmont site, as well many of my neighbors and friends. Please put your energy into places that do not destroy the lives of those who are so directly impacted by this project.

I request that the whole process be done so that you consider the many options that you already eliminated without what seems to be really careful investigation. Please eliminate the Brookmont option.

Sincerely,

From:
Sent: Wednesday, July 06, 2005 11:18 PM
To: Peterson, Michael C WAD
Subject: Strong opposition to Brookmont Option B

Michael C. Peterson
5900 MacArthur Blvd NW
Washington, DC 20016-2514

Strong opposition to Brookmont Option B

Subject: Response to the DEIS for the Washington Aqueduct proposal to construct a thickening and dewatering facility
July 6, 2005

Dear Michael C. Peterson,

I feel that the Brookmont site is totally unacceptable. It is very close to my home where I have lived for 31 years, and would destroy and tranquility of this idylic, quiet, wooded community. I have lived here for 31 years and am absolutely appalled that such a structure would have been planned, literally, in my back yard. There is no question in my mind that the reason that I and many of my neighbors moved to Brookmont and live here is because of the exceptional beauty of this neighborhood. My home is surrounded by nature and a small stream. As I look out my windows, I see trees and water. One would never know that I live very close to Washington, DC, or even that I have other neighbors. In recent months as I have contemplated of the sludge treatment facility being here, I can't tell you the pain that I feel, not only for myself, but for my son, who would potentially live here after my death. There is no question of the 200ft of proximity that is proposed to my home would destroy everything he and I have.

Of course, the property value would be slashed. The peace and nature, which is so comforting and soothing to me, would be destroyed. Although I feel it is important to consider properties that would be outside the Beltway. I do feel that the Sibley option is far less invasive of residential peace and harmony than the Brookmont option. Furthermore, the trucking issues of pollution and noise would be unwieldy here in Brookmont. I am asthmatic, and only have 25% of my breathing. The pollution that would ensue from nearly thousands of trucks going out through the years would prevent me from staying in this community. The trucks going down Loughboro Rd would also be far worse than the Dalacarlia Pky on the Sibley Hospital residents and the houses of Sibley. It seems that everything is pointing to that spot instead of Brookmont. I hope there i s a way to use the Navy property in Carderock outside the Beltway. I feel that piping is a far more acceptable solution is better than the trucking. It seems that in the long run, the piping option would be less expensive. I think that it is important that that option stay open, and that we continue to work on the blue plains facility, which again, not in a residential neighborhood.

In addition, the Brookmont site is unacceptably close to the Capital Crescent Trail. This trail has been used by people from all over the area as a way to

get away from the busy city pressures and to have relaxation and the joy of nature during their free times. To rob them of this opportunity by having an unsightly immense building which is working 16 hours a day and bordering the trail is a very poor solution. Many people who go on the trail are up in arms about that possibility as well.

Certainly the Brookmont site would create an unsightly visual impact on the existing landscape. It can be seen from several views in Brookmont and the balloons which you flew, showed us how tall this building would be and it would disrupt the beauty we enjoy.

In addition, many of us are concerned that the Brookmont site contains polluted soil that should not be disturbed. As we know, the contaminants contained in sludge can do a great deal in altering with environments and interfere with the natural balance and harmony of this environment.

Furthermore, the truck traffic would increase by many thousands of trips on MacArthur Blvd and would negatively impact the already bad traffic situation that occurs in this area. It is my understanding that trucks aren't even permitted on MacArthur Blvd and now this would be a major truck route.

Of course, the noise generated by many thousands of trucks going from Brookmont up Loughboro Rd is unacceptable. Instead of being a major route downtown by many residents, this would more be like a highway that one might see in New Jersey. It just doesn't fit in this area.

Because of my asthma, I am very concerned about the pollution generated by thousands of trucks going up from Brookmont up Loughboro Rd. This would be unacceptable and unhealthy for many residents and since we know asthma is a major problem for a growing number of children and adults, it is important not to knowingly create this level of pollution.

This whole process is undemocratic. You have been dong plans on this for 10 years. I and many others only found our about this this fall. Only yesterday I mentioned this to neighbors who live nearby and have never heard about this. Your efforts to inform us about this have been negligible and only recently have we received letters on the subject. In any case, we should have been involved in the decision-making. Then maybe you would not have inspired such negativiy=ty now.

In conclusion, it is the very strong and adamant position that I take, as well as that of my neighbors that the Brookmont option should not be considered as a viable option. I sat at the polls on election day and informed local voters about the sludge factory. They were horrified. We have over a thousand signatures, many of which we gave to you at the last Sibley meeting. We feel strongly that the Brookmont site is the absolute wrong place to be. I understand that you have a mandate from EPA, but I also think that human lives and the sanctity of one of the few areas near Washington DC, the capitol of our country, which is exquisite, should be saved. The idea of this facility being here in Brookmont holds absolutely no merit. I will continue to put a great deal of time and money info fighting option E, The Brookmont site, as well many of my neighbors and friends. Please put your energy into places that do not destroy the lives of those who are so directly impacted by this project.

I request that the whole process be done so that you consider the many options that you already eliminated without what seems to be really careful investigation. Please eliminate the Brookmont option.

In conclusion, while both sites above Brookmont (Plan B) and on your 30-arce tract between Dalecarlia Parkway and Little Falls creek, behind Sibley Hospital (Plan E) are unacceptable, the Brookmont site is by far the least desirable.

The Brookmont site would be located just a few hundred feet from residents' homes, would be lie immediately alongside the Capital Crescent Trail, would require all the trucks to travel onto MacArther Blvd, and would have them travel up (and down) the steep Loughboro hill in front of Sibley Hospital to the Dalecarlia Parkway.

The Sibley site would be less intrusive, tucked in behind the hospital, and exiting directly onto the Dalecarlia Parkway, but from either site the trucks with the dried sludge would then be routed around Westmoreland Circle and through neighboring communities at the rate of more than one every hour, taking its debilitating toll on the roads and residential ambience along the way to the Capital Beltway.

There are other options beside the two described that are available for consideration. There are actually over a hundred other alternatives being considered, but four are outstanding and described below. Another solution for the disposal should be found.

1 The Carderock/David Taylor Model Basin is a Federal facility right off the Capital Beltway that would provide a secure site with absolutely NO neighborhood intrusion.

#2 WSSC has a plant on River Road a few miles beyond Great Falls that is already performing the exact same function and could provide the facilities needed for the extraction.

3 The City of Rockville has its own water facility on the Potomac and could also provide space for the Corps' dewatering building.

4 The Corps could purchase a small piece of ground with access to the Capital Beltway upstream near to the Potomac river and could locate all or part of the facility there.

In all of these four cases, the raw river water would be piped to the Washington Aqueduct from Great Falls and treated at the Dalecarlia filtration plant, just as it is today. However, instead of dumping the the leftover 'sludge' (the muck created when the river water is filtered) back into the river as they do now, it would be piped to one of these four off-site facilities to be 'dewatered' (dried) before being hauled away by trucks to dumping sites in Maryland and/or Virginia.

The key issue is that the trucks hauling the sludge away would be starting from a site closer to the Beltway and would not have to travel through densely populated urban communities for any of these four options. But the other major advantage of these alternatives is that the sludge pipe could be run INSIDE the already existing raw water conduit, eliminating the need to dig a long (and expensive and destructive) trench to the facility.

The Corps is resisting popular opposition because it owns the property of the two described sites which are local, and there is no authority to control what the ACE does on either the Plan B or

For those of us living in Montgomery County, it is also important to understand that 100% of the water to be "de-sludged" will be purified at the Dalecarlia plant on MacArthur Blvd at D. C. line and will BE SOLD TO D C and TO FAIRFAX, VA. Montgomery County residents will not use one drop of Dalecarlia water, but would be paying nearly all the environmental costs and other negative effects such as traffic, road degradation, and so forth.

For these reasons we strongly urge opposition to the Corps' Plan B. The Army Corps of Engineers can and MUST come up with a better plan.

Sincerely,

Dr. Patricia G. Webbink of SludgeStoppers

From:
Sent: Thursday, July 07, 2005 12:20 AM
To: Peterson, Michael C WAD
Subject: Scott Webber's Letter In Opposition To The Dalecarlia Sludge Factory

Dear Mr. Jacobus, Mr. Peterson, and all persons who are concerned about and/or work with the Washington Aqueduct,

My name is . I am a Montgomery County resident and taxpayer, traveler of the Capital Crescent Trail, Friend of Brookmont (and the surrounding neighborhoods), and an ardent supporter of wise public policy and reasoned regional development for the greater good. I am also a founding member and SpokesPerson for the SludgeStoppers, a coalition of concerned citizens concerned by the actions and decisions being made by the management of the Washington Aqueduct... Because Industrial Sludge Factories Do Not Belong In Residential Neighborhoods!!

Consequently, I am writing to join the all but unanimous chorus of voices in opposition to the current plans of the Army Corp of Engineers (ACE) to construct a thickening and dewatering facility (aka: Sludge Factory) on the grounds of the Dalecarlia Water Treatment Campus.

But before I continue, let me also state on the record where I differ from many of my colleagues. It has been said that the ACE has not solicited community input into the decision-making process leading to the 'preferred choice(s)' now being presented. It has been suggested that the ACE was merely going through the motions of involving the concerned public. It has even been asserted that the entire NEPA process has been a total sham. I disagree, at least in part.

The efforts now being made by your staff, and Mr. Michael Peterson specifically, to include and inform the public are not only sufficient, I consider them extraordinary. Thousands of pages of documents have been made available at not one, but two, public libraries. Your website contains a significant portion of these documents, available instantly from the comfort of home. You have held numerous public forums, and attended many more civic meetings. You have mailed out CD ROMs of much of your supporting materials, as well as letters - and reminder letters - of your events and deadlines. I even received personal phone calls from Mr. Peterson, first reminding me of deadlines, and then subsequently of their extensions. From the bottom of my heart, I find this to be a wonderful example of Government fulfilling its obligations to be a 'good citizen' with its neighboring 'good citizens'. Such efforts are truly appreciated. This successful current campaign to involve the local public is a shining example, both of what CAN be done, but also, what SHOULD be done to meet the ACE's obligations for such a serious and consequential decision.

However.... this is also the exact reason for my greatest concern. Why wasn't this level of communication exerted in the beginning? Why wasn't the public contacted and invited to participate then, just as it is now? Your current efforts are living proof of what the ACE COULD have done for the first few, and utmost CRITICAL meetings, but you did not? Thus, the question begs to be answered, 'Why not?' Unfortunately, any answer will likely fall short of satisfactory:

Was it a total lack of understanding of the fear, anxieties, and concerns held by the public?

Was it a lack of financial resources at the beginning to send out letters?

Was it a lack of time in the beginning to visit civic associations, or inform public officials?

Or was it a sinister plot to 'fix' the results before the public realized it was caught off-guard?

A very well thought out and reasonable (to the local public) answer must be provided, lest you prove by your own (current) actions exactly how paltry, minimalist, and totally unsatisfactory your initial actions were.

Now, my personal belief is that you simply underestimated the extent of interest (fear, anxiety, concern, ???) this seemingly benign matter of 'water treatment infrastructure' would generate. This I could understand. BUT... once it came to your attention the extent of this miscalculation, I also feel it was entirely your responsibility to rectify the problem by 're-starting' the process FROM THE VERY BEGINNING! A stream that has been polluted from the headwaters can never be cleaned up, unless the headwaters are first purified....

The public participation and input was unsuccessful and unsatisfactory at the very beginning, and by this, I am clearly referring to the initial scoping and screening criteria setting. No amount of effort at this stage can remedy this deficiency. The ONLY solution that can ever bring closure to this matter - and compliance with the spirit and intent of NEPA - is to START OVER and invite and include public participation, just as you are doing so very well now.

Notwithstanding, the procedural deficiencies, I also take great exception to your conclusion that the only viable alternatives involve situating the Sludge Factory on Dalecarlia property. As the author of 112 of the publicly submitted alternatives, I know full well that there are MANY vastly superior alternatives, or at the bare minimum, a couple that deserve further study and analysis. To be clear, I am including specifically, those alternatives that involve the pumping of the residuals to a site located in a less-populated area in closer proximity to the Capital Beltway. To simply dismiss the vast majority of these alternatives, simply because they have unresolved issues - especially regarding any matter of 'institutional constraint' - is disingenuous to the process, or at the least, lazy.

While in the end, such solutions may indeed be found untenable for the reasons provided, dismissing them outright without strenuous inquiry shows to me, a lack of interest in finding feasible - and publicly acceptable - solutions, but a certain lack of good faith as well.

The efforts of the SludgeStoppers, Concerned Neighbors, and others have demonstrated both an interest and willingness to participate from our elected officials, yet what is to be made of your repeated rebuffs of their efforts to find a better solution than the perpetual massive trucking through residential neighborhoods that has been put forth by you as the ONLY solution?

I strongly believe that broader regional goals need to be injected into the decision-making process. It is nothing short of insane to think that imposing hundreds of thousands of truck

trips through residential neighborhood over the next few decades is the best solution that could be developed for our region.

If you have already pre-determined that you will be building the Sludge Factory at Dalecarlia, I must admit in all honesty (and per SludgeStoppers P71) that I find the Sibley option (E) to be a clearly superior choice over the Brookmont option (B). Not only will the physical structure be further away from residential homes and the Capital Crescent Trail, and less visually intrusive overall, but the truck route directly onto the Dalecarlia Parkway will eliminate the traffic issues on MacArthur Blvd, will alleviate the noise and pollution issues of fully-loaded sludge trucks going up the steep Loughboro hill in front of the hospital, as well as the safety factors of these trucks coming down the same dangerous hill, especially in inclement weather.

Nonetheless, while 'E' is a lessor evil when compared only against 'B', I still stand firm that a PIPING solution can and should and must be found. Whether to Carderock, Rockville, WSSC, Travillah, or even a purchased private lot near(er) the Beltway, any or all of these are vastly superior to the endless stream of trucks coming from Dalecarlia.

For these and other reason articulated by so many, in so many forums, I respectfully ask that you reconsider your current ‘choices’, open the NEPA process back to the very beginning, and find a long-term and fair solution that meets the standards and expectations of a fair process made in good faith in an open process with a fully involved and informed public.

To do anything less, is to openly invite dissatisfaction, hostile feelings, and neighborhood resentment for decades to come. Even water treatment facilities do not need such perpetual and overwhelmingly negative karma (energy/thought).

Respectfully submitted this 6th day of July, 2005

From:
Sent: Friday, July 08, 2005 11:58 PM
To: Jacobus, Thomas P WAD; Peterson, Michael C WAD
Subject: SSS-Aqueduct - Sludge Plan public comment

Attachments: Aqueduct-PlanComment-Jul6-2005.doc
Hello Messrs. Jacobus and Peterson --
Attached is my comment for the public record on the Draft EIS for the proposed de-watering plant. I also paste it in below. -

---

MEMORANDUM CONVEYED ELECTRONICALLY, JULY 6, 2005
TO: Thomas Jacobus, General Manager
Washington Aqueduct
5900 MacArthur Blvd., NW Washington, DC 20016-2514
FROM:

RE: PUBLIC COMMENT ON DRAFT ENVIRONMENTAL IMPACT STATEMENT

I recommend certain considerations and actions in the event that the proposed de-watering plant to treat sludge residues from treatment for DC water at the Dalecarlia Reservoir. I have toured the site and reviewed the Draft EIS as well as the June 26, 2005 memorandum from the firm "CH2MHill" provided to you concerning the methodology "to predict the anticipated number of water treatment residuals load per day". I wish to associate myself with the ideas and concerns of a Spring Valley neighbor, whose property backs onto Dalecarlia Parkway, Mr. and Mrs. Ernest May, which have been conveyed in their comment for the record. I pledge as an Advisory Neighborhood Commissioner (ANC-3D-02, Spring Valley) to pursue these ideas in the coming months and years.

Assuming Dalecarlia Parkway is used as a trucking route in and out of the site, the Aqueduct should support efforts to have the DC Department of Transportation
= document the current traffic loads and truck loads;
= put the road on a priority agenda for the next four year to be re-laid with sound-mitigating surface; and
= engineer access and signaling to Little Falls Road at the Sibley Hospital entrance to facilitate both trucking and residential use.

Assuming Dalecarlia Parkway is used as a trucking route, the Aqueduct should stage the trucking of residual loads during the peak days so as to spread the disposal over time so as to minimize the trucking to approximate the expected normal loads. This should mean that the norm would be some eight truck loads per day (on a five-day week) and these would occur in midday to avoid commuter hours and evening and night hours. If the present design for a three-storey facility with four basins needs to be amended to accomplish this staging, then it should be done. Finally, I recommend that the Aqueduct, in contracting for such trucking, seek to employ the best truck technology with respect to noise and exhaust for the period of the contract.

cc.

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Finally, I recommend that the Aqueduct, in contracting for such trucking, seek to employ the best truck technology with respect to noise and exhaust for the period of the contract.

cc.

From:
Sent: Monday, April 25, 2005 11:16 AM
To: Peterson, Michael C WAD
Subject: thickening/dewatering facilty
Dear Mr. Peterson,

As a 28-year resident of Brookmont, I am writing to register concern about the construction of the residuals thickening and dewatering facility adjacent to our neighborhood. I concur completely with points made to you by other members of our community, as follows:

* The facilty should not be built in ANY residential neighborhood like Brookmont.
* The Brookmont site is unacceptably close to residents' homes.
* The Brookmont site is unacceptably close to the Capital Crescent Trail.
* The Brookmont site will create an unsightly visual impact on the existing landscape.
* The truck traffic will increase by many thousands of trips on MacArthur Blvd and will negatively impact the already bad traffic situation.
* The noise generated by many thousands of trucks going from Brookmont yearly up Loughboro Rd. will be unacceptable.
* The pollution generated by many thousands of trucks going from Brookmont yearly up Loughboro Rd. is unacceptable and unhealthy.

I hope the Corps of Engineers will exercise good citizenship and not inflct this facility on us. Thank you for your attention and consideration.

From:
Sent: Tuesday, April 26, 2005 12:55 PM
To: Peterson, Michael C WAD
Cc:
Subject: Dalecarlia water treatment facility

Dear Mr. Peterson,

I am in receipt of the Army Corps letter regarding the residuals thickening and dewatering facility that you are planning to build for the Dalecarlia water treatment facility.

As a resident of Brookmont I want to go on record being totally and completely AGAINST the DEIS building of this facility anywhere near here. In fact, I am outraged and mortified to think that the Army Corps is even considering these two options, especially the Brookmont one.
Clearly the Brookmont option would negatively impact our lives and the lives of our children the greatest:

* The Sludge Factory should not be built in ANY residential neighborhood like Brookmont.

* The Brookmont site is unacceptably close to residents' homes.

* The Brookmont site is unacceptably close to the Capital Crescent Trail.

* The Brookmont site will create an unsightly visual impact on the existing landscape.

* The Brookmont site contains polluted soil that should not be disturbed.

* The truck traffic will increase by many thousands of trips on MacArthur Blvd will negatively impact the already bad traffic situation.

* The noise generated by many thousands of trucks going from Brookmont yearly up Loughboro Rd. will be unacceptable.

* The pollution generated by many thousands of trucks going from Brookmont yearly up Loughboro Rd. is unacceptable and unhealthy.

As I stated I am completely AGAINST the building of this facility near Brookmont and I will do everything that I can to stop this.

From:
Sent: Tuesday, April 26, 2005 4:27 PM
To: Peterson, Michael C WAD
Subject: Re: Washington Aqueduct Draft Environmental Impact Statement
Thanks for keeping me in the loop. I support the Aqueducts proposal. Regards,

----- Original Message -----
From: Peterson, Michael C WAD
Sent: Tuesday, April 26, 2005 10:00 AM
Subject: Washington Aqueduct Draft Environmental Impact Statement

The Draft Environmental Impact Statement (DEIS) for the Washington Aqueduct proposed residuals management process is now available. Compact disc copies of the DEIS are available upon request (see contact information below). The DEIS can be downloaded from the project website at: http://washingtonaqueduct.nab.usace.army.mil/aqueduct.htm. Paper copies of the administrative record including the DEIS are available for viewing at the Palisades Branch of the District of Columbia Public Library and the Little Falls Branch of the Montgomery County Public Library.

The recommended alternative in the DEIS is the construction of a thickening and dewatering facility north of Little Falls Road on the Dalecarlia Reservoir property and disposal by trucking to appropriate land application sites or other permitted facilities (Alternative E).

A public hearing will be held for the DEIS for further explanation and receipt of public comments. This public hearing will be held on May 17, 2005 at Metropolitan Memorial United Methodist Church located at 3401 Nebraska Avenue NW, Washington, DC 20016 at 6:30 pm.

The Notice of Availability for the DEIS was published in the *Federal Register* on April 22, 2005, which starts the 45-day public comment. If you wish to submit written comments, send them c/o Mr. Michael C. Peterson, Washington Aqueduct, 5900 MacArthur Boulevard NW, Washington, DC 20016-2514. As an alternative to submitting comments by mail, comments may be submitted by using the project website comment form, or by e-mail message to michael.c.peterson@usace.army.mil. Comments must be received or postmarked within the 45 day public comment period, or no later than June 6, 2005.

Very Respectfully,

MICHAEL C. PETERSON
Environmental Engineer
Washington Aqueduct
5900 MacArthur Boulevard, NW
Washington, DC 20016-2514
michael.c.peterson@usace.army.mil
Phone: 202-764-0025

From:
Sent: Wednesday, April 27, 2005 1:01 PM
To: Peterson, Michael C WAD
Subject: Bait and Switch
Mr. Peterson:

The alternative location of the processing facility from the Dalecarlia WTP Northwest site in Alternative B to the East Dalecarlia Processing site in the "recommended" Alternative E is a relatively new development as far as the community is concerned. The previous information I received about the eastern side of the Dalecarlia Reservoir property was only about the monofill in the Dalecarlia Woods. This is the first that I have received notice of the change in location proposed for the processing facility. The lack of information on this change sent to those who have registered to receive information and its recommendation in the DEIS without prior notification to those who requested to be kept directly informed unfortunately raises questions about the credibility of the US Army Corps of Engineers/Washington Aqueduct's communications to the public. A full discussion of this issue is requested at the scheduled hearing. Please answer the following question to me by e-mail: Is the DEIS still subject to consideration for major amendments based on public comment at the scheduled hearing?

From:
Sent: Wednesday, April 27, 2005 2:33 PM
To: Peterson, Michael C WAD
Cc:
Subject: Dalecarlia Water Treatment Facitlity
Dear Mr. Peterson,

I am in receipt of the Army Corps letter regarding the residuals thickening and dewatering facility that you are planning to build for the Dalecarlia water treatment facility.

As a resident of Brookmont I want to go on record being totally and completely AGAINST the DEIS building of this facility anywhere near here. In fact, I am outraged and mortified to think that the Army Corps is even considering these two options, especially the Brookmont one.
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* The noise generated by many thousands of trucks going from Brookmont yearly up Loughboro Rd. will be unacceptable.

* The pollution generated by many thousands of trucks going from Brookmont yearly up Loughboro Rd. is unacceptable and unhealthy.

As I stated I am completely AGAINST the building of this facility near Brookmont and I will do everything that I can to stop this.

From:
Sent: Monday, May 02, 2005 10:26 PM
To: Peterson, Michael C WAD
Subject: Extension of Comment Period

Mohican Hills Citizens' Association

Mr. Michael C. Peterson
Washington Aqueduct
Baltimore District, U.S. Army Corps of Engineers
5900 MacArthur Boulevard, N.W.
Washington, DC 20016.

Re: Request for Extension of Comment Period for Draft DEIS on the Washington Aqueduct Project

Dear Mr. Peterson:

The Mohican Hills Citizens' Association wishes to join the community of Westmoreland Hills in requesting a 45 day extension of the comment period for the DEIS. We note that Westmoreland Hills residents will be impacted particularly seriously by the location of the dewatering facility across the reservoir from their community and by the flow of trucks along Dalecarlia Parkway and Massachusetts Avenue, and that the surrounding communities, including Mohican Hills, which would be affected by the truck traffic, should be entitled to an adequate review period to search for alternative solutions and possible ways to mitigate the impacts.

In particular, although the Corps states that it has discussed with EPA alternatives involving a continuation of dumping some residuals into the Potomac, it is not clear to me that EPA is fully engaged in this issue, and the communities should be given an opportunity to discuss it at length with EPA. Surely EPA must take into account the environmental side effects of its own rules. The extension of the comment period would allow time for such a dialog with EPA as well as with the Corps to take place.

Sincerely

SIGNED

From:
Sent: Tuesday, May 10, 2005 8:32 AM
To: Peterson, Michael C WAD
Subject: RE: Testimony

Thanks. I look forward to the Q & A before hand so hopefully I can learn enough to make some worthwhile comments.

FYI, questions I have are how does Sibley Hospital feel about the currently recommended location of the drying plant,

how much noise does it make,

where will the trucks pick up the residue pellets,

what is the specific truck route on both Army Corps of Engineers land and public highways,

and how much dirt/dust will become air born.

Forgive me if this information is in the hundreds of pages of the DEIS. I only read the executive summary.

From: Peterson, Michael C WAD [mailto:Michael.C.Peterson@wad01.usace.army.mil]
Sent: Tuesday, May 10, 2005 7:50 AM
To:
Cc:
Subject: RE: Testimony

Dear Mr.

This is to confirm that you are registered to testify at the DEIS hearing on May 17. You were the first person to register, so you will be the first scheduled to testify following testimony by elected officials.

The answer to the question that you asked in your previous email is yes, all comments received during the DEIS review and comment period must be addressed. Depending on the comments, there could be major changes or supplementary documents developed to address comments.

Thank you for your comments and involvment in the EIS process.

Best regards,

MICHAEL C. PETERSON
Environmental Engineer
Washington Aqueduct
5900 MacArthur Boulevard, NW
Washington, DC 20016-2514
michael.c.peterson@usace.army.mil
Phone: 202-764-0025
Fax: 202-764-1823

From:
Sent: Tuesday, May 10, 2005 10:55 AM
To:
Cc: Peterson, Michael C WAD
Subject: Letter from Concerned Neighbors

Attachments: 0510111812.pdf

Attached is a letter from Concerned Neighbors containing their initial response to the DEIS. The original letter is being sent today by certified mail. The group will submit more detailed comments prior to the submission deadline. Please let me know if you have any questions. Thank you.

<<0510111812.pdf>>

Document 79

CONCERNED NEIGHBORS
Bethesda, MD
Washington, D.C.

May 9, 2005

Mr. Thomas P. Jacobus
General Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Boulevard, N.W.
Washington, D.C. 20016-2514

Re: Draft Environmental Impact Statement For the Washington Aqueduct Residuals Project

Dear Mr. Jacobus:

We have begun to review the lengthy Draft Environmental Impact Statement (DEIS) that the Corps has prepared regarding the Washington Aqueduct residuals project. Our initial review has strengthened our belief that the process is so fatally flawed that the DEIS must be withdrawn and the process begun anew, thereby assuring full participation by all affected residents in this important NEPA analysis.

We had hoped that the DEIS would address many of the community's concerns. Instead, we were disturbed to learn that many questions have gone unanswered, while even more questions are raised by the lengthy document.

The DEIS does little to dispel the notion that the Corps has engaged in a sham process. It is clear that the Corps has paid only lip-service to the wide range of stakeholder comments and that the Corps made up its mind about which alternative it considered "preferred" long before it began writing this document. The Corps eliminated three of the four "alternatives" as early as May of 2004. The Corps improperly established an unduly narrow "purpose and need" with only one possible outcome. Your unduly narrow purpose and need statement, and narrow objectives, foreclosed any serious consideration of truly reasonable alternatives. The Corps should restart the process and rigorously examine other alternatives, including piping the residuals to locations other than Blue Plains.

79-1-NB

79-2-NG

Even more troubling is the serious inconsistency between your public statements about the level and likely impact that trucking will have on the community, compared with the actual estimates of the number of trucks that will be needed. The key information is buried in the fine print in volume 4 in Table 3-6. Contrary to your public assertions that the Corps will only need to use 8 trucks per day, a careful reading of the footnotes to Table 3-6 (which clarify that the numbers are for **one way trips** only using **20 ton trucks** for just the next eleven years), demonstrates that up

79-3-GE

to **132 ten ton truck trips per day** could be traveling local roads during the wet season!! This figure far exceeds the number of truck trips per day that you have consistently referred to in public meetings.

It is also unclear from the cost estimates provided in the DEIS **whether the cost of operating the trucks** has been included in the "cost" of the trucking option. We expect these costs to be substantial, and we demand immediate clarification of this issue. The actual cost of operating this many trucks, 5 days a week, for an indefinite number of years, is a key component of the true cost of the trucking option, and appears to have been excluded from the identified $47,600,000 cost to "construct" this option as described in the DEIS. 79-4-GI

We reiterate our request that the DEIS be withdrawn so that the NEPA process can begin anew. If you refuse to grant this request, you must, at a minimum, provide an extension of the public comment period from 45 days to at least 90 days, *i.e.*, July 21, 2005, in order to provide the affected communities with an adequate opportunity to review this very lengthy DEIS. The Corps has had **ten years** to develop these options. The community needs more than a **month and a half** to review the hundreds of pages that constitute the DEIS. We look forward to your prompt response. 79-5-FF

Sincerely,

From:
Sent: Tuesday, May 10, 2005 11:45 AM
To: Peterson, Michael C WAD
Subject: RE: Testimony

Thanks. Your response is very helpful. Do the trucks to Westmoreland Circle immediately access Dalecarla Parkway from the facility? It seems logical that they would leave the facility by the shortest route possible with minimum alteration to the landscape.

From: Peterson, Michael C WAD [mailto:Michael.C.Peterson@wad01.usace.army.mil]
Sent: Tuesday, May 10, 2005 9:45 AM
To:
Subject: RE: Testimony

The analysis with answers to your questions is in the DEIS. In addition to the Executive Summary, Section 6 in Volume 1 provides a good summary of the impacts analysis and the rationale for recommending Alternative E.

Sibley Hospital supports our recommendation of Alternative E. The aesthetics of the facility would be compatible with Sibley's current and planned structures.

Without going into the minute details contained in the DEIS, I'll try to answer your other questions in terms of the calculated potential levels of impact. The explanations for the levels of impact are in Section 4 of the DEIS.

The facility will not create a significant amount of noise. The explanation and calculations start on page 4-7 of Volume 1. The backup data is contained in the Noise Appendix in Volume 2A.

Due to the wet nature of the dewatered residuals, additional dust is not expected from this facility or from the conveyance of the material by trucks. We'll try to get a sample of dewatered residuals from another water treatment plant and bring it to the hearing so that people can get an idea about the physical nature of the material. All of the air emissions expected both during construction and during operation of the facility fall below the de minimus threshold. The detailed explanation starts on page 4-13 in Volume 1. Calculations and backup information is contained in the Air Appendix in Volume 2A.

Trucks would be loaded from bins inside the building. Trucks would drive under bins inside the building that store the residuals after they have been dewatered.

We have proposed using contract trucking for the conveyance of the dewatered residuals. We have analyzed the potential routes that a contractor might use in order to get to one of the local major highways. Those routes are shown in Figure 3-8, which can be found at the end of Section 3 of Volume 1. Several of these routes pass through Westmoreland Circle. Little Falls Road, next to Sibley Hospital, would be used to get to either MacArthur Boulevard or Dalecarlia Parkway.

I'll be in the workshop room on May 17, so I can try to answer your questions in more detail there.

Best Regards,

MICHAEL C. PETERSON
Environmental Engineer
Washington Aqueduct
5900 MacArthur Boulevard, NW

Washington, DC 20016-2514
michael.c.peterson@usace.army.mil
Phone: 202-764-0025
Fax: 202-764-1823

From:
Sent: Tuesday, May 10, 2005 8:32 AM
To: Peterson, Michael C WAD
Subject: RE: Testimony

Thanks. I look forward to the Q & A before hand so hopefully I can learn enough to make some worthwhile comments. FYI, questions I have are how does Sibley Hospital feel about the currently recommended location of the drying plant, how much noise does it make, where will the trucks pick up the residue pellets, what is the specific truck route on both Army Corps of Engineers land and public highways, and how much dirt/dust will become air born. Forgive me if this information is in the hundreds of pages of the DEIS. I only read the executive summary.

From: Peterson, Michael C WAD [mailto:Michael.C.Peterson@wad01.usace.army.mil]
Sent: Tuesday, May 10, 2005 7:50 AM
To:
Cc:
Subject: RE: Testimony

Dear Mr.

This is to confirm that you are registered to testify at the DEIS hearing on May 17. You were the first person to register, so you will be the first scheduled to testify following testimony by elected officials.

The answer to the question that you asked in your previous email is yes, all comments received during the DEIS review and comment period must be addressed. Depending on the comments, there could be major changes or supplementary documents developed to address comments.

Thank you for your comments and involvment in the EIS process.

Best regards,

MICHAEL C. PETERSON
Environmental Engineer
Washington Aqueduct
5900 MacArthur Boulevard, NW
Washington, DC 20016-2514
michael.c.peterson@usace.army.mil
Phone: 202-764-0025
Fax: 202-764-1823

From:
Sent: Monday, May 09, 2005 8:56 AM
To: Peterson, Michael C WAD
Cc:
Subject: Testimony

I appreciate receiving the Washington Aqueduct's letter of May 6 and would like to register for public testimony at the DEIS hearing on May 17. Please confirm. Many thanks.

From:
Sent: Wednesday, May 11, 2005 3:06 PM
To: Peterson, Michael C WAD
Subject: Re: Washington Aqueduct Draft Environmental Impact Statement & Hearing Request
Dear Michael,

Please allow me to commend (all of) you on both the extent and the quality of your current communication with your Aqueduct neighbors and other concerned parties. While it is unfortunate that such a level did not occur at the beginning of this process, at this point, you are exemplifying every intent of the NEPA spirit. It is noticed, appreciated, and should be recognized.

With this said, please accept my request to continue down this path of dialog with this notice of my intent to speak at the May 17, 2005 hearing. Please allot me the maximum time allowed.

Regards,

On Apr 26, 2005, at 10:00 AM, Peterson, Michael C WAD wrote:

The Draft Environmental Impact Statement (DEIS) for the Washington Aqueduct proposed residuals management process is now available. Compact disc copies of the DEIS are available upon request (see contact information below). The DEIS can be downloaded from the project website at: http://washingtonaqueduct.nab.usace.army.mil/aqueduct.htm. Paper copies of the administrative record including the DEIS are available for viewing at the Palisades Branch of the District of Columbia Public Library and the Little Falls Branch of the Montgomery County Public Library.

The recommended alternative in the DEIS is the construction of a thickening and dewatering facility north of Little Falls Road on the Dalecarlia Reservoir property and disposal by trucking to appropriate land application sites or other permitted facilities (Alternative E).

A public hearing will be held for the DEIS for further explanation and receipt of public comments. This public hearing will be held on May 17, 2005 at Metropolitan Memorial United Methodist Church located at 3401 Nebraska Avenue NW, Washington, DC 20016 at 6:30 pm.

The Notice of Availability for the DEIS was published in the *Federal Register* on April 22, 2005, which starts the 45-day public comment. If you wish to submit written comments, send them c/o Mr. Michael C. Peterson, Washington Aqueduct, 5900 MacArthur Boulevard NW,Washington, DC 20016-2514. As an alternative to submitting comments by mail, comments may be submitted by using the project website

comment form, or by e-mail message to michael.c.peterson@usace.army.mil. Comments must be received or postmarked within the 45 day public comment period, or no later than June 6, 2005.

Very Respectfully,

MICHAEL C. PETERSON
Environmental Engineer
Washington Aqueduct
5900 MacArthur Boulevard, NW
Washington, DC 20016-2514
michael.c.peterson@usace.army.mil
Phone: 202-764-0025

From:
Sent: Wednesday, May 11, 2005 4:36 PM
To: Peterson, Michael C WAD
Subject: acquaduct

if you are doing off-site disposal, have you found a site and what is it?

From:
Sent: Wednesday, May 11, 2005 6:38 PM
To: Peterson, Michael C WAD
Subject: Washington Aqueduct Construction Funding?

Dear Michael,

Somebody asked me recently to explain exactly 'where' the funds were coming from to pay for the thickening and dewatering facility planning and construction? I had to admit, I had no clue, but promised to forward the question to you and report back with your answer.

Plant construction and initial facility upgrades will come from:

- Aqueduct reserve fund?
- DCSA CIP dollars?
- ProRata contribution from all your 'customers' (ie: WSSC, DCWASA, FCWA)?
- ACE budget?
- Congressional Authorization?
- Bond issue?
- Loan? From whom?

I thank you in advance for your reply.

Regards,

Document 84

Palen, Glenn/WDC

From:
Sent: Thursday, May 12, 2005 5:35 PM
To: Peterson, Michael C WAD
Subject: Re: Washington Aqueduct Construction Funding?

84-1-AA

Dear Michael,

Thank you for the rapid reply, for at least part of the answer. But the other part that still didn't get answered, was the real gist of the question, namely, exactly where are the funds for the proposed facility going to come from?

Specifically, the person(s) asking are DC residents (ratepayers), and they wanted to know how much their rates were going to go up because of the facility. This lead to the questions below, including whether the ACE has already 'saved' the money and already has $50 million set aside (from the past sale of water), or whether the Army (or anybody else) is going to 'loan' the ACE the funds to be paid back from the sale of 'future' water? This is the difference between 'already paid for' and 'you will get an increase'.

Or put another way, if the Aqueduct has 1 million customers, and it is going to cost $50 million to build the facility, will each ratepayer get a bill for $50.00? Or, will/has WASA, Arlington, and Falls Church simply advance the ACE their share ($17 million +/-), then charge their ratepayers portions accordingly?

As you are certainly well aware, the DCWASA board has been working on its CIP for the CSOs etc. They published extensive analysis down to the penny per month per ratepayer for several scenarios. However, I don't recall seeing any mention of the new Aqueduct facility charge or breakdown. Understandable, because it is not built yet, but then again, neither are the CSO dams, storage conduits, etc.

So, this 'simple' question is, 'Where are the funds coming from to plan, design, and build the proposed facility, whatever form it takes?

Thanks much.

On May 12, 2005, at 7:32 AM, Peterson, Michael C WAD wrote:

> All of Washington Aqueduct's funding comes from the sale of water
> to our
> customers (WASA, Arlington County, City of Falls Church). This
> money pays
> for all capital, operational, and maintenance expenses. There is
> no money
> appropriated to the Washington Aqueduct from Congress or the DC
> government,

Document 84

> nor is there any other source.
>
>
> -----Original Message-----
> From:
> Sent: Wednesday, May 11, 2005 6:38 PM
> To: Peterson, Michael C WAD
> Subject: Washington Aqueduct Construction Funding?
>
> Dear Michael,
>
> Somebody asked me recently to explain exactly 'where' the funds
> were coming
> from to pay for the thickening and dewatering facility
> planning and construction? I had to admit, I had no clue, but
> promised to forward the question to you and report back with your
> answer.
>
> Plant construction and initial facility upgrades will come from:
>
> - Aqueduct reserve fund?
> - DCSA CIP dollars?
> - ProRata contribution from all your 'customers' (ie: WSSC,
> DCWASA,
> FCWA)?
> - ACE budget?
> - Congressional Authorization?
> - Bond issue?
> - Loan? From whom?
>
> I thank you in advance for your reply.
>
> Regards,
>
> -
>

Note: The remainder of this document is addressed as Document 83

From:
Sent: Friday, May 13, 2005 4:17 PM
To: Peterson, Michael C WAD
Cc:
Subject: Delcarlia Waste Plan

For the record, I am totally and completely opposed to the plan of trucking sludge waste products through the Westmoreland and surrounding communities.

I am confident that the COE can come up with a more realistic solution than to drive sludge through residential neighborhoods. What about the pipeline to Blue Plains? Please explain to me why that is not a viable solution?

Thank you.

From:
Sent: Saturday, May 14, 2005 10:43 AM
To: Peterson, Michael C WAD
Subject: Washington Aqueduct
Mr. Peterson:

I wish to register my protest against the proposal to build an eight story high sludge facility behind Sibley Hospital and truck residuals through our neighborhoods.

You have several of the most beautiful neighborhoods in the Washington Metropolitan Area that will be affected by this proposal.
The traffic on the Mass. Avenue corridor is congested enough as it is and the noise level is high for the neighborhoods. Also, there is a question of pedestrian safety as many people including many students walk to the bus stops along Mass. Avenue. Additionally, young children walk from the neighborhood to Westland Middle School and Little Flower school along Mass. Avenue. 132 ten ton trucks routed onto Dalecarlia Parkway, a beautiful stretch of parkway I might add, would add to an already dangerous situation for pedestrians.
How can you possibly think that a high industrial facility would be appropriate for a residential area?
You have used a very narrow criteria to select the trucking option and did not consider the 144 options put forward by the community.
There has to be another alternative for disposing of waste residuals from the Aqueduct facility.
Ruining the beauty, safety and lifestyle of residents should not be one of them.

From:
Sent: Thursday, May 26, 2005 2:32 PM
To: Peterson, Michael C WAD
Cc:
Subject: Dewatering facility
Dear Michael Peterson:

I'm writing to you as minister of Brookmont Church and a resident of Brookkmont community. I have attended the hearings at Sibley Hospital and Metropolitan United Methodist Church about the dewatering facility. I certainly honor your desire to take a just and equitable position and to have the hearings in public.
Originally I refrained from making a public statement, because I thought that it would be redundant. Upon further thought, I decided to write this statement.
I haven't found one resident in Brookmont who approves of the plant going up in his area. The reasons have been made abundantly clear at the hearings. I concur with the residents' testimonies.
I had hope that a select joint working committee of the EPA, Army Core of Engineers, and representatives of the local communities effected, such as civic associations, churches, schools, and hospitals, might work together to develop a solution acceptable to all. However, local residents speaking randomly in an open meeting to voice their complaints doesn't go far enough even though it is helpful to hear their feedback.This respects the democratic group process: demos (means people) and cracy (means authority), that is, the authority is in the people. In this way power is shared by the group.
While we need to respect the Clean Water Act, consideration is due for the rights of local residents effected as well. I understand the limited options for the resolution of this concern. However, I suggest the EPA and Army Corp of Engineers expand theirs perimeters to include a broader power base.

From:
Sent: Friday, June 03, 2005 3:15 PM
To: Peterson, Michael C WAD
Subject: Sludge Facility

Dear Mr. Peterson,

I am writing to oppose the construction of a a sludge treatment facility in my community. It seems clear to me that the Corps has not approached this project with the proper input from the community and without genuine concern for the implications of the facility for the community. I urge you to provide the community and the Corp the requisite time to develop creative and viable options that will meet the majority of needs at hand.

Sincerely,

From: Penny Cuff [pcuff@livable.com]
Sent: Friday, June 03, 2005 3:27 PM
To: Peterson, Michael C WAD
Subject: OPPOSED

Opposed to current plan of action.

The DEIS contains virtually no analysis of environmental impacts
>of the Corps' preferred alternative - building an 80 foot dewatering
>facility on federal land near Sibley Hospital, and sending up to 132
>trucks a day along one limited trucking route into Maryland ("trucking
>alternative").
>
The environmental impacts of the Corps' preferred "trucking
>alternative" are profound in a region that is already suffering from
>severe non-attainment under Clean Air Act standards and serious traffic
>congestion.
>
>* The Corps' DEIS seriously mischaracterizes the true cost of the
>"trucking alternative" by failing to include the cost of operating
>large diesel trucks indefinitely.
>
>* A close reading of the hundreds of pages of the DEIS shows that
>the Corps would be sending up to 132 trucks a day along one preferred
>trucking route to dispose of the water treatment residuals.
>
>* The entire process has been flawed, starting with the Corps'
>failure to involve the community when it started the scoping process
>for this project in January of 2004. The Corps pre-selected an outcome
>more than 10 years ago (trucking residuals through our neighborhoods)
>and crafted the NEPA process to fit their desired outcome.
>
>* The NEPA Process has been a complete sham. The Corps has only
>pretended to look at a limited range of alternatives, knowing that the
>identified "alternatives" were not feasible.
>
>* How can the Corps conceivable claim that 132 trucks a day will
>have no environmental impact on a region that is already classified as
>being in severe non-attainment under the Clean Air Act?

* What analysis has the Corps done of the increase in the number
>of asthma or cancer cases resulting from this volume of diesel
>emissions daily?

>* What analysis has the Corps done of safety implications of
>sending 132 trucks a day along one primary truck route surrounded by at
>least 8 public and private schools?

>* What analysis has the Corps done of the combined health and
>safety impacts of having trucks enter the dewatering facility at the
>same time Sibley Hospital is engaged in a major expansion of its
>facility?
>
>The answer to all these questions is none. For all these reasons the
>Corps must restart the NEPA process and engage in a meaningful
>discussion with the community, local representatives and regulators

>about reasonable alternatives to it current practice to disposing the
>residuals into the Potomac River. The Corps must restart the NEPA
>process and consider reasonable alternatives, including piping of the
>residuals to alternative locations.
>

Penny Cuff
Senior Program Officer
Partners for Livable Communities
202-887-5990 x 19
www.livable.com

From: WWW [www@wfpub.usace.army.mil]
Sent: Friday, June 03, 2005 5:48 PM
To: Peterson, Michael C WAD
Cc:
Subject: Comments on Proposed Water Treatment Residuals Management Process

Specific Comments	As a resident who will suffer the brunt of this proposal, I protest vehemently. We now suffer from ambulances, hospital traffic, speeding commuter traffic, heliocopters and the fact that huge dump trucks have adopted Loughboro Rd., NW and Dalecarlia Parkway as their personal speedway. The addition of more trucks is irresponsible. The pipeline should be funded.
Name	
Agency	
E-Mail Address	
Telephone Number	
Please Contact	

.

Mr. Thomas P. Jacobus
General Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Blvd., N.W.
Washington, D.C. 200016
by email via:
Michael.C.Peterson@usace.army.mil.

Dear Mr. Jacobus:

As a resident of the Brookmont neighborhood of Bethesda, I'm writing to express deep concern about the Army Corps' of Engineers preferred alternative, the plan to build an 80 foot dewatering facility on federal land near Sibley Hospital, and to send up to 132 trucks a day along one limited trucking route into Maryland.

The entire process has been flawed, starting with the Corps' failure to involve the community when it started the scoping process for this project in January of 2004. The Corps pre-selected an outcome more than 10 years ago (trucking residuals through our neighborhoods) and crafted the NEPA process to fit their desired outcome.

The NEPA Process has been a complete sham. The Corps has only pretended to look at a limited range of alternatives, knowing that the identified "alternatives" were not feasible.

Among other things, I wonder what analysis has the Corps done of the increase in the number of asthma or cancer cases resulting from this volume of diesel emissions daily? And what analysis has the Corps done of safety implications of sending 132 trucks a day along one primary truck route surrounded by at least 8 public and private schools?

The answer to these questions is none. For all these reasons the Corps must restart the NEPA process and engage in a meaningful discussion with the community, local representatives and regulators about reasonable alternatives to it current practice to disposing the residuals into the Potomac River. The Corps must restart the NEPA process and consider reasonable alternatives, including piping of the residuals to alternative locations.

Sincerely yours,

From:
Sent: Friday, June 03, 2005 11:52 PM
To: Michael.C.Peterson@usace.army.mil.
Subject: DEIS

My husband and I are writing with regard to our concerns about the Draft Environmental Impact Statement ("DEIS"). We are concerned that the DEIS contains an inadequate analysis regarding the environmental impacts of the Army Corps of Engineers' ("Corps'") preferred alternative - building an 80 foot dewatering facility on federal land near Sibley Hospital, and sending, though the Corps does not spell this out adequately in the DEIS, what may be 132 diesel trucks or more a day along one limited trucking route into Maryland ("trucking alternative").

I. Trucking Alternatives

The environmental impacts of the Corps' preferred "trucking alternative" are profound in a region that is already suffering from severe non-attainment under Clean Air Act standards and serious traffic congestion. We are understand that the Corps is proposing to send up to 132 trucks a day along one preferred trucking route to dispose of the water treatment residuals.

We are particularly concerned about the health impact on our lungs and those of our three young children. How many more cases of lung cancer, lung disease, and/or asthma will this result in? Where are these costs summarized in the DEIS?

We are also concerned that the Corps' DEIS has mischaracterized the actual costs of the "trucking alternative" by failing to include the cost of operating large diesel trucks indefinitely and by failing to count return trips and to adequately assess the number of trucks that will be needed.

II. Dewatering Facility

The Corps has also failed to analyze the costs of building a giant dewatering facility in a residential neighborhood. We understand that this facility will be the length of a football field and many stories high. The facility will be an eyesore in a residential neighborhood, driving down the value of real estate in the neighborhood where it is situated. Further, given that the dewatering facility will be lit up at night and in operation around the clock, it will be imposing considerable noise and light pollution on its neighbors. To the best of our knowledge, the Corps has made no real effort to assess these costs in the DEIS. Finally, we are concerned about the pollution that the proposed dewatering facility will create. Again, the safety and health costs from the placement of this dewatering facility in a residential neighborhood have not been analyzed by the Corps.

III. Failed NEPA Process

We also are writing to voice our concern that the entire process followed by the Corps has been flawed and not in compliance with NEPA standards.

The Corps failed to involve the community when it started the scoping process for this project in January of 2004. The Corps pre-selected an outcome more than 10 years ago (building a dewatering facility and then trucking residuals through our neighborhoods)and simply has used the NEPA process to fit their desired outcome, not to gain community input or to evaluate seriously the environmental impacts of alternative options to remove the water treatment residuals.

We believe that the Corps purposefully looked at a limited range of alternatives, knowing that the identified "alternatives" were not feasible.

IV. Questions

We have the following questions that we would like to ask the Corps:

How can the Corps claim that 132 trucks a day will have no environmental impact on a region that is already classified as being in severe non-attainment under the Clean Air Act?

Has the Corps analyzed the health costs posed by the pollution from having up to 132 diesel trucks go through our neighborhoods? What analysis has the Corps done of the increased number of cases of asthma, lung disease, and/or lung cancer cases that will result from this volume of diesel emissions daily?

Has the Corps analyzed the costs of the greater congestion that will be imposed on drivers who already suffer from among the worst traffic congestion in the United States?

Has the Corps done any analysis of the costs involved in greater truck usage and whether this may lead to increased accidents on our roadways or increased costs to maintain these roadways? We are certainly concerned that this amount of trucks will pose increased danger to our children who live on these roadways and to our schools that are located just off of these roadways.

What analysis has the Corps done of the combined health and safety impacts of having trucks enter the dewatering facility at the same time that Sibley Hospital is planning a major expansion of its facility?

Where are the costs of placing a dewatering facility in a residential neighborhood assessed in the DEIS? Has the Corps considered the costs of the light and noise emissions on neighboring properties? Has the Corps assessed the impact of this placement on the real estate values of neighboring properties? Also, has the Corps assessed the safety and health costs posed to neighbors from the pollution that the dewatering facility will produce?

The answer to all these questions is none. For all these reasons the Corps must restart the NEPA process and engage in a meaningful discussion with the community, local representatives and regulators about reasonable alternatives to its current practice of disposing the residuals into the Potomac River. The Corps must restart the NEPA process and consider reasonable alternatives, including piping of the residuals to alternative locations.

Thank you, in advance, for your consideration of our comments and questions.

Debbie Friendly
David Kaufman
6330 Broad Street
Bethesda, MD 20816

cc.

Senataor Sarbanes
Senator Mikulski
Representative Van Hollen

From:
Sent: Monday, June 06, 2005 11:56 PM
To: Peterson, Michael C WAD
Cc:
Subject: I Oppose any Vehicular Solution to sludge removal!

Dear Mr Peterson,

I am writing to you as you are the environmental manager for the Aquaduct Facility which is near my home on Sherier Pl NW.

You, no doubt know by heart all of the issues raised by formal and informal groups of citizens on why trucking waste is a bad idea.

I am interested in hearing from you, however, on why you think it is a good idea to employ more vehicles in the area to do anything that can be done in an efficient, environmental friendly way.

Will you write me at this email address and tell me:

- Fuel-burning is good for the environment (will these trucks utilize the latest natural fuels to keep the environment clean?)
- Truck traffic is good for the environment (who will pay for potholds which will surely be a result of heavy usage by trucks)
- Allowing manual removal of waste is good for the environment (what if it drops on the street?)
- What studies are underway anywhere in the world to solve the problem of removing sludge manually from one place to another?

I anxiously await your detailed, and thoroughly researched reply. In the meantime, please add my name to the NO TRUCKS for SLUDGE column.

All the best,

From: WWW [www@wfpub.usace.army.mil]
Sent: Monday, June 06, 2005 4:32 PM
To: Peterson, Michael C WAD
Cc:
Subject: Comments on Proposed Water Treatment Residuals Management Process

Specific Comments	On behalf of the Potomac Conservancy, I am writing to raise significant concerns about the alternatives proposed in the draft Environmental Impact State for the Washington Aqueduct and the Dalecarlia Reservoir and to urge the U.S. Army Corps of Engineers to re-open the discussion of potential alternatives. The Potomac Conservancy is a regional non-profit organization that protects land vital to the health, beauty, and enjoyment of the Potomac River and its tributaries. Though we applaud the Corps' efforts to comply with the Clean Water Act by eliminating discharges of solids into the Potomac River, the Potomac Conservancy cannot support any of the alternatives proposed, particularly the proposed monofill, the piping to Blue Plains AWWTP, nor the disposal by trucking to other facilities. All present significant environmental and local social impacts discussed below. There is no simple, low-cost, clean-cut solution to this problem; therefore, in the public interest, t! he Corps should re-open the discussion to identify other acceptable alternatives. Alternative A: Disposal by Monofill • Alternative A has a high environmental impact with short-term gain. Thirty acres of forest would be destroyed for the monofill which would remain in use for only twenty years. The monofill then would become a permanent feature of the landscape but have no working use. In addition, the cutting down of the woods will destroy the forest cover that is critical to filtering polluted stormwater runoff in the area. The forested area currently provides critical air and water quality benefits, and provides habitat for wildlife. • The construction of a residual processing facility needed to complement the monofill along with the monofill will also alter the look of the neighborhood, decrease property values, and visually impact the landscape. • The creation of a monofill will conflict with the Spring Valley clean-up and possibly hamper investigations or create a public safety hazard. • The possibility of toxic polluted runoff from the site that could flow directly into the Potomac River is of significant concern regarding the water quality of the Potomac River and the Chesapeake Bay. Alternative B: Disposal by Trucking • Alternative B has a significant social and environmental impact on the community surrounding the Reservoir as well as other communities along the truck route. • Eight trucks per day carrying waste along residential routes and through neighborhoods will exacerbate traffic congestion and create vehicular noise resulting in an untenable situation for residents for the majority of the week. The inconvenience and safety concerns related to these trucks could cause property values to decline. • The increased movement of trucks in a residential community including school zones will jeopardize public safety including that of children due to the increase in large vehicles on the residential roads. • More trucks on the roads will lead additional air pollution in an area that already has a serious air pollution problem. Alternative C: Piping to Blue Plains AWWTP • Alternative C also has a high environmental impact and a negative impact on

	public resources. The proposed pipeline would pass through the C&O Canal National Historic District, Georgetown Historical District and nearby monuments. A major concern would be the aesthetic and environmental impacts on the Potomac River, C&O Canal, other access points to the river, and the parks during construction and afterwards. • The pipeline will pass through five different national parks, two different activities of the Department of the Navy and the Department of the Air Force. Obtaining easements and rights of way along the pipeline will be administratively difficult. In addition, according to WASA, there is no existing right of way along the proposed pipeline so it must be acquired. This may not be feasible from a time perspective. • Finally, Blue Plains AWWTP, the final destination of the proposed pipeline, is unable to handle current loads of wastewater. The prospect of coping with another facility's solid discharge is unlikely and impractical so other options must be considered. None of the alternatives present feasible options to solve the Washington Aqueduct discharge situation. Other options must be explored that achieve less environmental impacts and greater sensitivity to the community. Therefore, the Potomac Conservancy recommends returning to the discussion of alternatives with greater environmental feasibility. Thank you for your consideration of these comments and the opportunity to comment on this important matter.
Name	
Agency	
E-Mail Address	
Telephone Number	
Please Contact	

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From:
Sent: Sunday, June 05, 2005 10:47 PM
To: Peterson, Michael C WAD
Subject: Opposition to Brookmont Option

Dear Army Corps of Engineers, June 5, 2005

I live in Brookmont and have lived here my entire life. The plant is only a few feet from where I live. It is far too close to many of our homes. You are destroying our living space. It would destroy the tranquility of this ideal, quiet, wooded community. The noise and pollution, both from the sounds of the plant and from the constant truck traffic would be extremely bothersome. The smells would be horrible, and I am concerned about the air quality. Moreover, you are trying to build a plant to fix a problem that you are not directly dealing with and instead just making a quick fix. In other words, you are taking pollution from the Potomac and instead polluting my small residential community.

Not only will the Sludge Factory ruin the existing Brookmont landscape, but its beauty can also be seen from several views in Brookmont and will be destroyed by the Factory. An additional concern is that Brookmont is unacceptably close to the Capital Crescent Trail, whose single purpose has been for busy people to get away from their busy city pressures and relax in the joy of nature during their free times.

You are in essence trying to put a Band-Aid on an amputated arm. I seriously doubt that this is the best that you as a team of engineers could muster. My main recommendation is to stay away from Brookmont as it is clearly not the right place to try and do what you are doing. You would be destroying at least one community while still picking an inadequate site. The roads and area are not suited for what you want to do. With it here in Brookmont, truck traffic, which is not even permitted on MacArthur Blvd., would increase by many thousands of trips and would heighten the severity of the traffic problem that every one of us suffers through now.

The Sludge Factory would also completely change the nature of MacArthur Blvd.: an already overused road that needs no more traffic. It is a small road for the area that is already over used as a thoroughfare into the city.

The Sibley option is far less invasive of residential peace and harmony than the Brookmont option. Trucking issues of noise and pollution are unwieldy in Brookmont Instead of just building this plant you should try and fix the actual problem of pollution in the Potomac and possibly try and utilize the Blue Plains water treatment facility. Look into hiring the people who designed it, and while they might not meet the lofty requirements of the ACE employment they may have experience and intelligence in dealing with the matter.

There are environmental and health issues associated with the proposed Sludge Factory in Brookmont. The Brookmont site contains polluted soil, which must NOT be disturbed. The Sludge Factory would undoubtedly interfere with the natural balance and harmony of this ecosystem.

People with asthma are very concerned by the pollution generated by the thousands of trucks going up from Brookmont and Loughboro Rd. Because asthma is such a pressing, growing problem for children and adults alike, we must not knowingly exacerbate such a serious health problem.

In summary, I see no reason to be building this plant here. Picking Brookmont as the building site is absolutely insane. The idea of building in a residential community is surely not your best plan, so I recommend trying to solve the problem instead of just moving it around. I do feel that Brookmont is the worst of any choice that you can offer, even worse than Sibley. At least with Sibley the traffic is going along Delacarlia Parkway and not along Loughboro Road, and it is more removed from a residential community as we are.

From: WWW [www@wfpub.usace.army.mil]
Sent: Sunday, June 05, 2005 10:28 PM
To: Peterson, Michael C WAD
Cc:
Subject: Comments on Proposed Water Treatment Residuals Management Process

Specific Comments	The proposed dewatering facility is a wonderful idea. Little visual impact and a byproduct(cake) that is easy to handle with the quanities not approaching what shows. This cake is also in fact largly top soil. There is an identicle facility on River Rd. at the WSSC plant.
Name	
Agency	
E-Mail Address	
Telephone Number	
Please Contact	

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From:
Sent: Friday, July 01, 2005 2:15 PM
To: Peterson, Michael C WAD
Cc:

Subject: Dalecarlia proposed dewatering facility
Mr. Peterson, Please add this to the record for the proposed dewatering facility record

Mr. Thomas P. Jacobus
General Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Blvd., N.W.
Washington, D.C. 200016

Dear Mr. Jacobus:

I am writing to register my concern about the dewatering facility you are proposing near Brookmont (Alternative B) or behind Sibley Hospital Alternative E) and the impact it will have on my neighborhood. I favor finding a piping solution that will send the residuals to a non-residential area closer to the beltway. I ask you to carefully review and respond to the issues identified below.

The environmental impacts of the Corps' preferred "trucking alternative" are significant in a region that is already suffering from severe non-attainment under Clean Air Act standards and very serious traffic congestion. In addition, while it is difficult to adequately describe and quantify the negative impacts of running more trucks through residential neighborhoods - the Corp hasn't even tried. Because the Dalecarlia plant is essentially an industrial facility within a densely populated residential area, it is critical that public decision makers be doubly sure that the solution is the very best one available. The NEPA process should include a quantitative and a qualitative discussion of options to fully address the cumulative impacts of the options and the indirect impacts of the options. If these were done properly it would have led the Corp to consider more fully - and I believe in fact - aggressively seek a piping solution to address the alum sludge removal. This quite simply has not been done and therefore, the entire approach is suspect. Beyond the notion that as dedicated public servants you regularly strive to make the best choices, there is also the issue of protecting the process from legal actions. I recently needed to do some research on NEPA related cases and found that a number of them were brought against federal agencies due to lack of assessment of cumulative impacts. The trucking impacts would need to be considered in light of the expansion of traffic in the region over time to do such an assessment.

To be direct, the entire process has thus far been very dissatisfying, starting with the Corps' failure to truly reach out and involve the community when it started the scoping process for this project in January of 2004. From the outside it looks like the Corps pre-selected the solution - trucking residuals through neighborhoods - and crafted the NEPA process to fit their desired outcome. I found the serious proposal of a nearby landfill and the design of the dewatering facility to be particularly upsetting. Numerous dewatering solutions are in place across the country that do not require such a tall structure Including a towering structure in the solution when it is known that a long

existing residential community is only a stones throw away and will be directly impacted by it is like throwing salt on a wound. Surly the project managers could have done better with the proposed dewatering design and the rest of the project.

Please pause and revisit the options. If you are willing to do so but believe that you cannot act because EPA is forcing your hand, let us all know so we can appeal to them through the proper channels to allow a more appropriate process to proceed.

Thank you,

CC:

From: WWW [www@wfpub.usace.army.mil]
Sent: Friday, June 10, 2005 12:46 AM
To: Peterson, Michael C WAD
Cc:
Subject: Comments on Proposed Water Treatment Residuals Management Process

Specific Comments	Thanks for the opportunity to comment on the 4/05 Proposed Water Treatment Residuals Mangagement Process for the Washington Aqueduct: Draft Environmental Impact Statement. Although we feel that Alternative C, Piping, is the best of the five examined alternatives, of the remaining viable alternatives, the preferred alternative (Alternative E, Dewatering at East Dalecarlia) is by far the best of the remaining alternatives, minimizing both residential, trucking. and other impacts. With regard to the reference on the forebay- it seems contingent on costs. This is buried somewhat deeply in the draft EIS. We're concerned about this because of the trend of depredations: the loud noise from what must be the operation of the dredge late in the night/early in the morning when all else is still. It has been quite objectionable over the last few summers. There have been adverse visual alterations of the forebay area as seen from the CC trail. Historical and natural values have been replaced with constuction roads and an overall industrial look. We would like to get assurances that the man-made noises will be eliminated, that the visual resources will be restored, and that any proposed changes will not exacerbate the problems. Thank you for your attention and care in examining all concerns. Note- this replaces the prior version of comments.
Name	
Agency	
E-Mail Address	
Telephone Number	
Please Contact	ContactRequested

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Document 99

99-1-IA

Dear Mr. Jacobus -

I live in Brookmont I don't want a 80' Building in my neighborhood. I'm sure you wouldn't in yours

Make it to Sibley or give it out,

Yours,

Document 100

100-1-IA

Dear Sirs:

Please revisit the trucking sludge from the aqueduct to the Potomac. Your plan pollutes a residential area, compounds already heavy traffic, loads on local streets, etc. There are ways

April 29, 2005

Mr. Michael C. Peterson
Washington Aqueduct
Baltimore District, U.S. Army Corps of Engineers
5900 MacArthur Boulevard, N.W.
Washington, DC 20016.

Re: Request for Extension of Comment Period for Draft DEIS on the Washington Aqueduct Project

Dear Mr. Peterson

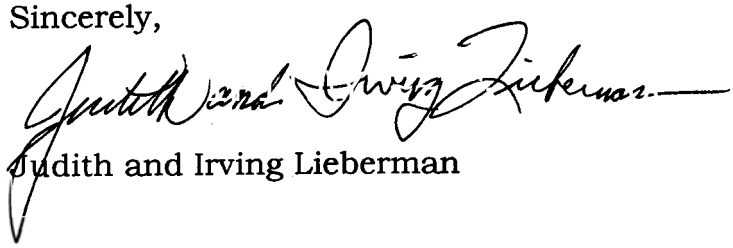
We write to request that the Army Corps of Engineers (the "Corps") extend the comment period for the Draft Environmental Impact Statement (DIES) for the Proposed Water Treatment Residuals Management Project (the "Project") at the Washington Aqueduct. Specifically, we request that the comment period be extended from 45 days to at least 90 days.

The Corps has had 10 years to study this issue. It is unreasonable to expect that the community and other stake holders can meaningfully comment on the draft DEIS in less than 2 months. As is evident by the length of the draft DEIS, this is a complicated issue involving a range of issues including public safety and environmental protection. The public has not had the benefit of reviewing a majority of the key planning documents, despite a number of Freedom of Information Act (FOIA) requests for all the relevant material.

This project will have a major impact on our region for decades to come so it deserves full consideration. From the start of the process, the Corps has not meaningfully involved the communities that would be most directly impacted by the alternatives. The public has a right to engage in a serious dialogue with the Corps about a reasonable range of alternatives.

For these reasons, we respectfully request that the Corps extend the public comment period on the draft DEIS to at least 90 days.

Sincerely,



Judith and Irving Lieberman

Document 102

April 30, 2005

Mr. Michael C. Peterson
Washington Aqueduct
Baltimore District, U.S. Army Corps of Engineers
5900 MacArthur Boulevard, N.W.
Washington, DC 20016.

102-1-FF

Re: Request for Extension of Comment Period for Draft DEIS on the Washington Aqueduct Project

Dear Mr. Peterson:

We write to request that the Army Corps of Engineers (the "Corps") extend the comment period for the Draft Environmental Impact Statement (DIES) for the Proposed Water Treatment Residuals Management Project (the "Project") at the Washington Aqueduct. Specifically, we request that the comment period be extended from 45 days to at least 90 days.

The Corps has had 10 years to study this issue. It is unreasonable to expect that the community and other stake holders can meaningfully comment on the draft DEIS in less than 2 months. As is evident by the length of the draft DEIS, this is a complicated issue involving a range of issues including public safety and environmental protection. The public has not had the benefit of reviewing a majority of the key planning documents, despite a number of Freedom of Information Act (FOIA) requests for all the relevant material.

This project will have a major impact on our region for decades to come so it deserves full consideration. From the start of the process, the Corps has not meaningfully involved the communities that would be most directly impacted by the alternatives. The public has a right to engage in a serious dialogue with the Corps about a reasonable range of alternatives.

For these reasons, we respectfully request that the Corps extend the public comment period on the draft DEIS to at least 90 days.

Sincerely,

Document 103

WESTMORELAND CITIZENS ASSOCIATION, INC.

April 30, 2005

103-1-FF

Mr. Michael C. Peterson
Washington Aqueduct
Baltimore District, U.S. Army Corps of Engineers
5900 MacArthur Boulevard, N.W.
Washington, DC 20016.

Re: Request for Extension of Comment Period for Draft DEIS on the Washington Aqueduct Project

Dear Mr. Peterson:

We write to request that the Army Corps of Engineers (the "Corps") extend the comment period for the Draft Environmental Impact Statement (DIES) for the Proposed Water Treatment Residuals Management Project (the "Project") at the Washington Aqueduct. Specifically, we request that the comment period be extended from 45 days to at least 90 days.

The Corps has had 10 years to study this issue. It is unreasonable to expect that the community and other stake holders can meaningfully comment on the draft DEIS in less than 2 months. As is evident by the length of the draft DEIS, this is a complicated issue involving a range of issues including public safety and environmental protection. The public has not had the benefit of reviewing a majority of the key planning documents, despite a number of Freedom of Information Act (FOIA) requests for all the relevant material.

This project will have a major impact on our region for decades to come so it deserves full consideration. From the start of the process, the Corps has not meaningfully involved the communities that would be most directly impacted by the alternatives. The public has a right to engage in a serious dialogue with the Corps about a reasonable range of alternatives.

For these reasons, we respectfully request that the Corps extend the public comment period on the draft DEIS to at least 90 days.

Sincerely,

Document 104

6671 Mac Arthur Blvd
Bethesda, MD 20816
May 1, 2005

Mr. Michael C. Peterson
Washington Aqueduct
Baltimore District, U.S. Army Corps of Engineers
5900 MacArthur Boulevard, N.W.
Washington, DC 20016.

104-1-FF

Re: Request for Extension of Comment Period for Draft DEIS on the Washington Aqueduct Project

Dear Mr. Peterson:

We write to request that the Army Corps of Engineers (the "Corps") extend the comment period for the Draft Environmental Impact Statement (DIES) for the Proposed Water Treatment Residuals Management Project (the "Project") at the Washington Aqueduct. Specifically, we request that the comment period be extended from 45 days to at least 90 days.

The Corps has had 10 years to study this issue. It is unreasonable to expect that the community and other stake holders can meaningfully comment on the draft DEIS in less than 2 months. As is evident by the length of the draft DEIS, this is a complicated issue involving a range of issues including public safety and environmental protection. The public has not had the benefit of reviewing a majority of the key planning documents, despite a number of Freedom of Information Act (FOIA) requests for all the relevant material. We are affected and very concerned neighbors of this upcoming project.

This project will have a major impact on our region for decades to come so it deserves full consideration. From the start of the process, the Corps has not meaningfully involved the communities that would be most directly impacted by the alternatives. The public has a right to engage in a serious dialogue with the Corps about a reasonable range of alternatives.

For these reasons, we respectfully request that the Corps extend the public comment period on the draft DEIS to at least 90 days.

Sincerely,

Document 105

SUMNER VILLAGE

COMMUNITY ASSOCIATION, INC.
4910 Sentinel Drive, Bethesda, Maryland 20816
Phone: (301) - 229-2278

May 2, 2005

105-1-FF

Mr. Michael C. Peterson
Washington Aqueduct
Baltimore District, U.S. Army Corps of Engineers
5900 MacArthur Boulevard, N.W.
Washington, DC 20016

Re: Request for Extension of Comment Period for Draft DEIS
On the Washington Aqueduct Project

Dear Mr. Peterson:

I am writing on behalf of the residents of Sumner Village, a condominium with 395 apartments located off MacArthur Boulevard and Sangamore Road. We have been concerned with plans of the U.S. Army Corps of Engineers to address residual collection, processing and disposal.

At this time, we are requesting that the Corps extend the comment period for the Draft Environmental Impact Statement from 45 days to at least 90 days. This project will have a major impact on our region for years to come, so it should have full consideration with involvement of the communities that would be impacted most directly by the measures to be taken. We are concerned by the public safety and environmental protection issues, and feel more time must be provided for the entire community to review the DEIS in detail and make educated comments on it.

We therefore respectfully request that the Corps extend the public comment period on the draft DEIS to at least 90 days.

Sincerely,

Document 106

May 2, 2005

106-1-FF

Michael C. Peterson
Washington Aqueduct
Baltimore District, U.S. Army Corps of Engineers
5900 MacArthur Boulevard, N.W.
Washington, DC 20016

Re: Request for Extension of Comment Period for Draft DEIS on the Washington Aqueduct Project

Dear Mr. Peterson:

We write to request that the Army Corps of Engineers extend the comment period for the Draft Environmental Impact Statement (DEIS) for the Proposed Water Treatment Residuals Management Project at the Washington Aqueduct, to at least 90 days.

The Corps has had 10 years to study this issue. It is unreasonable to expect that the community and other stakeholders meaningfully comment on the draft DEIS in less than two months. As is evident by the length of the draft DEIS, this is a complicated issue involving a range of issues including public safety and environmental protection. The public has not had the benefit of reviewing most of the key planning documents, despite a number of FOIA requests.

This project deserves full consideration. The public has a right to engage in a serious dialogue with the Corps about a reasonable range of alternatives. For these reasons, we respectfully request that the Corps extend the public comment period on the draft DEIS to at least 90 days.

Regards,

Document 107

May 5,
[redacted], 2005

Mr. Michael C. Peterson
Washington Aqueduct
Baltimore District, U.S. Army Corps of Engineers
5900 MacArthur Boulevard, N.W.
Washington, DC 20016.

107-1-FF

Re: Request for Extension of Comment Period for Draft DEIS on the Washington Aqueduct Project

Dear Mr. Peterson:

We write to request that the Army Corps of Engineers (the "Corps") extend the comment period for the Draft Environmental Impact Statement (DIES) for the Proposed Water Treatment Residuals Management Project (the "Project") at the Washington Aqueduct. Specifically, we request that the comment period be extended from 45 days to at least 90 days.

The Corps has had 10 years to study this issue. It is unreasonable to expect that the community and other stake holders can meaningfully comment on the draft DEIS in less than 2 months. As is evident by the length of the draft DEIS, this is a complicated issue involving a range of issues including public safety and environmental protection. The public has not had the benefit of reviewing a majority of the key planning documents, despite a number of Freedom of Information Act (FOIA) requests for all the relevant material.

This project will have a major impact on our region for decades to come so it deserves full consideration. From the start of the process, the Corps has not meaningfully involved the communities that would be most directly impacted by the alternatives. The public has a right to engage in a serious dialogue with the Corps about a reasonable range of alternatives.

For these reasons, we respectfully request that the Corps extend the public comment period on the draft DEIS to at least 90 days.

Sincerely,

Document 108

May 26, 2005

Washington Aqueduct
C/o Michael Peterson
5900 MacArthur Boulevard, NW
Washington, DC 20016-2414

108-1-IA

Dear Mr. Peterson:

We appreciate your efforts in resisting the idiodic Army Corps of Engineers sludge plan. From what the PALISADES NEWS of our Palisades Citizens Association indicates, the real reason for siting it near Sibley Hospital and carefully tended private dwellings is the fact that the Army Corps is unable to obtain cooperation from other government agencies!

Rather, the Army Corps chooses to pick on relatively unorganized citizens as easier than to tackle the tough unelected bureaucrats. The Corps believes it can sneak in to destroy an entire residential and hospital area for a project that should be done instead on the huge David Taylor Naval Facilty already dedicated to water projects. Why cannot these two agencies communicate with one another?

Shame on the ACE. They should in this context be reminded of their billions if not trillions of dollars they already have expended on failed Mississippi River and other projects which have worsened the environment. The perilous future of New Orleans is only one case of its headlong disasterous decisions.

We also need to inform the heartless Army Corps of Engineers of just whom it serves and pays its expenses and how important it is to listen to those whom they intend to ruin.

Sincerely,

Document 109

May 30, 2005

Michael C. Peterson
Washington Aqueduct, Baltimore District,
U.S. Army Corps of Engineers
5900 MacArthur Blvd.
Washington, DC 20016

109-1-DA

Ref: Dalecarlia Sludge Disposal

Dear Sir:

The EIS clearly eliminated the Alternatives of flushing the Dalecarlia Water Treatment Plant residue downstream much too quickly and cavalierly.

Unquestionably, constructing a dedicated pair of pipelines to Blue Plains would be enormously expensive and disruptive. However, using the existing Potomac Interceptor was not sufficiently well investigated. While the EIS acknowledges that the Interceptor has excess capacity, Blue Plains is not ready to host a residue processing facility. Following are alternatives that should be seriously considered before the first choice of building an intrusive drying facility on site with a noisy and air-polluting trucking operation is accepted.

During low flow periods in the Potomac Interceptor, perhaps 2 to 4 hours in the early morning hours, the residue could be flushed down the Interceptor. Some mixing with sewage would occur. To minimize the mixing, it might be possible to install butterfly valves at strategic locations of the Interceptor to trap the sewage and store it upstream (in the pipe) until all the residue for the flushing period has reached its destination. This would require careful real-time monitoring, but with today's technology such a dynamic operation could readily by implement.

The quick dismissal of Blue Plains not being ready to host a processing facility should not dismiss the use of the Interceptor as the logical outlet for the residue. If Blue Plains can't handle such a facility, a dedicated pipe could be built from there down river to an acceptable site.

Years ago, the Potomac Interceptor was constructed at an enormous cost. It should now be put to its potential maximum use. I would appreciate hearing from you what you think of the operational options I describe above and if they had been investigated and considered.

Sincerely,

Document 110

Mr. Thomas P. Jacobus
General Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Blvd., N.W.
Washington, DC 20016-2514

Dear Mr. Jacobus:

On behalf of the Springfield Civic Association in Bethesda, Maryland, I am writing to oppose Alternative E, which the U.S. Army Corps of Engineers has proposed in its Draft Environmental Impact Statement for the treatment of water residuals at the Dalecarlia Reservoir. We strongly oppose this and any of the other alternatives the Washington Aqueduct has suggested that require the trucking of residuals through Montgomery County, Maryland. In particular, we oppose Alternative E because one of the proposed routes for trucking these residual materials, River Road, is on the northern edge of our community and its use would adversely affect the quality of life for many in our community who live near the road and particularly for the nearly three dozen homes that directly border the easement along River Road.

We feel the U.S. Army Corps of Engineers has inadequately addressed the following issues regarding the trucking of the residuals:

- **The number of trucks to be traveling along River Road.** The DEIS is misleading because it only mentions the number of trucks traveling from the Dalecarlia Plant, not the number of trucks that must also travel **to** the plant. In other words, only half the truck legs have been "counted" in your analysis. In addition, as was noted at the Montgomery County Planning Board meeting on May 19, the number of trucks depends upon both the size of the truck – 20 or 10 tons – and the amount of sediment in the water, which depends upon the flow and churning of the Potomac. This could range from a potential low of 8 20-ton truck trips (actually 16 if both legs of each trip are counted) to a high of 66 (actually 132 legs of a trip) 10-ton trucks that could be using River Road under Alternative E.

110-1-GE

- **The air and noise pollution resulting from these trucks.** There are no recommendations in the DEIS to mitigate truck noise. There is a glossed over recommendation to mitigate air pollution -- to use newer trucks that run on less polluting alternative fuels -- but this recommendation is dismissed because of expense. As was brought out at the Planning Board meeting, the U.S. Army Corps of Engineers will be using contractors for trucking the residuals. As a result, the Corps will have little control on a day-to-day basis of the air and noise pollution levels unless you stipulate and monitor the fuel used in the trucks in your contract with the trucking company and also the noise abatement equipment of each truck.

110-2-GC, GF

- **The vibration of these trucks as they drive past our homes.** This is not addressed in the DEIS. River Road is not a flat road, and as it passes by our community, trucks will have to shift gears for going both up and down hill. How this might affect the foundations of our homes, especially during peak production when there is greater truck traffic, is of grave concern to us. It has been ignored by you.

110-3-GA

- **The hours when these truck trips will be made.** The DEIS recommends truck trips be concentrated during off-peak travel times during weekdays, i.e. between 9:30 a.m. and 4:00 p.m. If you traveled River Road daily you would know that off-peak is really from 10:00 a.m. to 3:00 p.m. There is still substantial eastbound rush hour traffic at 9:30 a.m., and by 3:00 p.m. westbound traffic has significantly increased. Large trucks and increased vehicular traffic do not mix well. To add to that mix, beginning at 2:15 p.m. there are numerous school buses that use River Road to transport our children to home from our neighborhood schools. These 10- and 20-ton trucks would create a safety hazard for all vehicular traffic in and out of our neighborhood via River Road. They would also create a hazard for communities that abut River Road, all the way to the Beltway.

110-4-GE

- **Compensation for the wear and tear on our roads.** Although the U.S. Army Corps of Engineers looks upon River Road as merely a route to get to the Capital Beltway, it is in our eyes a community road that we (and countless other Montgomery County residents) use to travel between Springfield and other communities. It is our tax dollars that will pay for road repairs caused directly by the increased wear and tear resulting from your contractors' trucks. At the very least, Montgomery County should be compensated by the Corps for this increase in wear and tear to our roads..

110-5-GA

Document 110

Finally, we would like to recommend that you reconsider the option of piping the residuals to either the Blue Plains AWWTP or to some other facility that you build in an industrial area that is more conducive to having the type of water treatment residuals plant your are proposing. We do not want to have 10- and 20-ton trucks driving by our community along River Road in perpetuity. And, we do not wish to pay with a decreased quality of life and increased costs for treating water that is not a resource for Montgomery County, but is one for Arlington County and Falls Church in Virginia and the District of Columbia.

Sincerely,

Document 111

June 17, 2005

Washington Aqueduct
c/o Michael Peterson
5900 MacArthur Boulevard, NW
Washington DC 20016-2514

Gentlemen

My husband and I have lived on 52nd Terrace for about 45 years. Our property backs up to a narrow strip of land that separates us from Dalecarlia Parkway .

As we understand it, the current plan for sludge treatment and dewatering facilities includes structures to be located across Little Falls Road from Sibley Hospital, and presumably invisable to owners of property along Dalecarlia Parkway. This will be an improvement over the earlier plan to have a dump site between the Resevoir and the Parkway.

That said, traffic noise on Dalecarlia Parkway is already a problem. There are already a number of heavy trucks on the Parkway, in addition to the normal automobile traffic, Consquently we suggest that with the additional truck traffic from the dewatering plant, an effort should be made to reduce traffic sounds. 111-1-GC

We suggest that the concrete surface includeing the joints are a major source of noise, and a smooth black top surface without joints could reduce the sound.

We also suggest that the 35 mph speed limit be enforced, with additional warning signs and established means for neighbors to report excessive noise to responsible authorities.

Finally, a solid sound barrier similiar to those on parts of the Beltway, would be a great help in reducing traffic noise. 111-2-GA

These traffic sound-reduction steps will also assist your desire to be a good neighbor and create a win-win climate between the Washington Acqeduct , and its neighbors on the other side of Dalecarlia Parkway.

Yours sincerely,

cc: The Honorable Carol Schwartz
Miss Sarah S. Shapley

Document 112

Mr. Thomas P. Jacobus
General Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Boulevard, NW
Washington, DC 20016

Re: Plans For Water Extraction Facility

Dear Mr. Jacobus:

It is with great dismay that my husband and I have learned that the U.S. Army Corps of Engineers (USACE) is moving forward with plans to build a water extraction facility off of Dalecarlia Parkway – which is very near to our home. We understand that, within the community, there is a need for such a facility. However, we strongly object to the current plan, and request that USACE continue to explore other, more appropriate locations for this facility.

It is our understanding that the planned facility will include a set of at least four large settling tanks for the sludge that will be transported there – and an 80-foot tall "dewatering" tower. It is also our understanding that, on a daily basis, a voluminous number of large trucks will be transporting sludge from this facility. A water treatment facility of this scope does not belong at the proposed site, abutting densely populated, residential neighborhoods, such as ours.

We have learned that there are several, alternative options that USACE could explore for the proposed treatment center, which are situated closer to the Washington Beltway and would obviate the need for the sludge trucks to travel through residential communities to carry away sludge. We strongly urge USACE to investigate these alternatives, in order to come up with a plan that works best for all of the surrounding communities.

112-1-BB

Sincerely,

Document 113

June 20, 2005

Mr. Thomas P. Jacobus, General Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Blvd. M.W.
Washington , D.C. 20016

Dear Mr Jacobus,

As the President of the Tulip Hill Citizens Association, representing over 100 households on the tract bordering Massachusetts Ave and Goldsboro Rd, I wish to express our opposition to the Army Corps of Engineers proposal to build a sludge extraction facility in either of two nearby sites which would require the trucking of the residual solids through residential communities to the Beltway via Massachusetts Ave., River Road, Wisconsin Ave.,and/or MacArthur Blvd.

I understand that the Corps proposes to build this water extraction facility, aka 'Sludge Factory' on the Dalecarlia filtration plant grounds either overlooking Little Falls creek above Brookmont (Plan B), or on their 30-arce tract between Dalecarlia Parkway and Little Falls creek, behind Sibley Hospital (Plan E). While both sites are unacceptable, the Brookmont site is by far the least desirable. It would be located just a few hundred feet from residents' homes and would lie immediately alongside the Capital Crescent Trail, requiring all the trucks to travel onto MacArther Blvd,and would have them travel up (and down) the steep Loughboro hill in front of Sibley Hospital to the Dalecarlia Parkway. The Sibley site would be less intrusive, tucked in behind the hospital, and exiting directly onto the Dalecarlia Parkway, but from either site the trucks with the dried sludge would then be routed around Westmoreland Circle and through neighboring communities at the rate of more than one every hour, taking its debilitating toll on the roads and residential ambience along the way to the Capital Beltway.

113-1-GA

There are a number of alternative sites including the following which should be further studied:

113-2-BB

1 The Carderock/David Taylor Model Basin is a Federal facility right off the Capital Beltway that would provide a secure site with absolutely NO neighborhood intrusion.

#2 WSSC has a plant on River Road a few miles beyond Great Falls that is already performing the exact same function and could provide the facilities needed for the extraction.

3 The City of Rockville has its own water facility on the Potomac and could also provide space for the Corps' dewatering building.

113-3-BB

4 The Corps could purchase a small piece of ground with access to the Capital Beltway upstream near to the Potomac river and could locate all or part of the facility there.

The key issue is that the trucks hauling the sludge away would be starting from a site closer to the Beltway and would not have to travel through densely populated urban communities for any of these four options. But the other major advantage of these alternatives is that the sludge pipe could be run INSIDE the already existing raw water conduit, eliminating the need to dig a long (and expensive and destructive) trench to the facility.

This is to request further analysis of alternatives given the negative impact of siting such a facility in our neighborhood.

Sincerely,

Document 114

June 21, 2005

Mr. Thomas P. Jacobus, General Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Blvd., N.W.
Washington, D.C. 200016

Dear Mr. Jacobus,

We are writing to express our deeply held opposition to the proposed Army Corps of Engineers' sludge factory in the Dalecarlia area. This facility would greatly add to the already congested traffic, as well as significantly contribute to extensive wear & tear on our local roads. In addition, there are a variety of other options that would serve the purpose at least as well as this proposed site at Dalecarlia.

114-1-GA

As lifelong residents of this community, we hope you will please note our strong opposition to this project.

Sincerely,

Document 115

115-1-IA

Dear Mr. Jacobs

I live in Brookmont
¼ mile from the proposed
Sludge plant I am opposed
to this industrial building
in my neighborhood
Please move it some where
else. or purge out the

Alan
your

Document 116

116-1-IA

Dear Mr. Peterson,

I live at
Bethesda, Md - This is across
from the proposed sludge Plant
I oppose this structure because
it is an eye sore, Disturbing
to the environment, increases traffic
and is in a residential area.
I moved to Md. to get
away from this kind of
environmental eye sore
take it somewhere else - hopefully
on a commercial or Industrial
site town,

Document 117

Washington Aquaduct
C/o Michael Peterson
5900 MacArthur Blvd., NW
Washington DC 20016-2514

117-1-IA

Dear Mr. Peterson:

I would like to express my dismay at the way the Army Corps of Engineers (Corps) has handled the problem of sludge at the Washington Aquaduct. The Corps's failure to involve the public during the initial development of options and the subsequent evaluation of the options has fatally flawed the process. I urge you to obtain an extension from EPA and restart the process.

Second, your proposal is inaccurate and, I am sorry to say, is so misleading that it creates the distinct impression that it is intentionally misleading. The number of truck trips is so inaccurate that it is hard to imagine that it is an honest mistake.

117-2-GE

Thirdly, your proposal does not represent very good work. Did the Corps research what other cities, both here and in other parts of the world, are doing to address this problem? Particularly in Europe, which is more densely populated, it is hard to imagine that a sludge mountain or hundreds of trucks a day would be seriously proposed.

Finally, your approach is embarrassing to me, a federal government employee. Your patronizing attitude, your determination to ignore the interests of the citizens that live around the reservoir, the inelegance of your proposals, the clear lack of any vision or significant research is a poor reflection on those of us who try to give the government and our fellow citizens good value for our salaries.

117-3-IA

I hope that you will finally do the right thing, start from the beginning and work with the citizens to find a good solution for everyone.

Sincerely,

Document 118

PAUL S. SARBANES
MARYLAND

309 HART SENATE OFFICE BUILDING
WASHINGTON, DC 20510

United States Senate

WASHINGTON, DC 20510-2002

June 2, 2005

Mr. Thomas P. Jacobus
General Manager
Department of the Army
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Boulevard, NW
Washington, D.C. 20016

Dear Mr. Jacobus:

118-2-BB

118-1-FF

We are writing to urge you to approve an extension of at least 45 days of the public comment period on the Draft Environmental Impact Statement (EIS) for the residuals management project at the Washington Aqueduct to provide interested parties with a more reasonable time in which to comment on the document. We also urge you to give full and careful consideration to the recommendations of the Montgomery County Planning Board that the Corps consider piping the residuals to a private industrial site, present a more formal dispersion plan for the trucks, and present detailed quantification of the costs of trucking on Montgomery County.

118-3-GD

118-4-GI

As we have pointed out in previous correspondence, it is vital to the integrity of the NEPA process that the public and parties that would be impacted by the proposed project be given an adequate and meaningful opportunity to review the project and participate in identifying reasonable alternatives. The DEIS that was released on April 22, 2005 is a four volume document containing more than one thousand pages of information and technical data. In our judgment, and in the opinion of many of the residents who would be affected by the project, the current 45-day period for public comment is inadequate to fully analyze and respond to this voluminous document, the technical aspects of the alternatives identified, and the effects of the proposed action on the local community and the environment. We remain concerned that there may be a fundamental conflict between the deadline imposed by the Federal Facilities Compliance Agreement and the National Environmental Policy Act's public involvement requirements. Moreover, we have been advised by the Concerned Neighbors organization of numerous deficiencies in the DEIS. These include the failure to consider alternatives to the chemical "alum" in the water treatment process, inadequate consideration of air quality impacts of the preferred alternative, as well as inadequate or incomplete information on the trucking impacts identified by the Montgomery County Planning Board.

118-5-OA

118-6-GF

118-7-GA

Your attention to this matter is greatly appreciated and we look forward to hearing from you.

Sincerely,

Paul S. Sarbanes
United States Senator

Barbara A. Mikulski
United States Senator

Chris Van Hollen
Member of Congress

Document 118

Congress of the United States

Washington, DC 20510

April 18, 2005

Mr. Thomas P. Jacobus
General Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Boulevard, NW
Washington, DC 20016

Dear Mr. Jacobus:

We are writing to follow up on our previous correspondence regarding the Environmental Impact Study (EIS) process for the water treatment residuals project at the Dalecarlia Reservoir. Residents in the local community continue to express the following concerns:

The NEPA process requires consultation with and consideration of input from the public. Unfortunately, many residents in the area were only notified that the issue was being considered after completion of both the purpose and needs statement and the scoping process, development of the screening criteria, and the elimination of numerous alternatives.

2. Despite FOIA requests to the Corps from the community, all responsive documents were not provided until March 31, 2005, days before the scheduled release of the DEIS. The community still believes, in fact, that the Corps' response was incomplete and that additional documents should be forthcoming.

3. The Federal Facilities Compliance Agreement, a contract between the Corps of Engineers and EPA, appears to continue drive the "purpose and need" for this project, rather than the need to find reasonable alternatives to the current practice of disposing of residuals into the Potomac River.

4. The Corps is required under NEPA to coordinate its environmental analysis of alternatives with other federal, state and local agencies. It is unclear the extent to which this has occurred. We understand that water regionalization discussions are being conducted between Montgomery County and representatives of WASA. These discussions are directly relevant to the disposal options being evaluated as part of this project.

5. The community has offered a number of alternatives that need to be carefully considered and not rejected under the pressure of a voluntarily imposed timetable. Serious consideration must be given to alternatives that would minimize the impact of the project on local residents.

Given the magnitude of this project and the long-term impact that any solution will entail, we request that the publication of the DEIS in the Federal Register be deferred until these issues can be considered.

Sincerely,

Congressman Chris Van Hollen

Senator Barbara A. Mikulski

Congresswoman Eleanor Holmes Norton

Senator Paul S. Sarbanes

Document 119

COUNCIL OF THE DISTRICT OF COLUMBIA
THE JOHN A. WILSON BUILDING
1350 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20004

May 10, 2005

Attn: Office of the General Manager
C/O: Mr. Thomas P. Jacobus
General Manager
Department of the Army
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 McArthur Boulevard, N.W.
Washington, D.C. 20016-25147

Dear Mr. Jacobus:

This is to acknowledge our office is in receipt of your request to meet with Councilmember Barry. Unfortunately, it is not possible to grant your request at this time to meet with Councilmember Barry due to long-standing meetings previously arranged. If you are interested in meeting with a member of Councilmember Barry's staff, please let me know.

Sincerely,

Donna Rouse
Administrative Assistant

Document 119

Government of the District of Columbia
ADVISORY NEIGHBORHOOD COMMISSION 3-D
P.O. Box 40846
Palisades Station
Washington, D.C. 20016

May 10, 2005

Mr. Thomas P. Jacobus, P.E.
General Manager
Washington Aqueduct
US Army Corps of Engineers
5900 MacArthur Boulevard, NW
Washington DC 20016-2514

Dear Mr. Jacobus:

Advisory Neighborhood Commission 3D held its regularly scheduled monthly meeting on May 4, 2005 at Sibley Memorial Hospital's Ernst Auditorium. A quorum (4) was present at all times. At that meeting, a Resolution on the "Environmental Impact Statement for a Proposed Water Treatment Residuals Management Process for the Washington Aqueduct, Washington DC" was adopted by the Commission. (A copy of the Resolution is attached.)

ANC3D respectfully requests that the Army Corps of Engineers extend the comment period for the DEIS for the Proposed Water Treatment Residuals management Project at the Washington Aqueduct. Further, ANC 3D requests that the comment period be extended 45 days beyond the current deadline for comments of June 2nd.

119-1-FF

ANC3D respectfully urges other agencies and elected officials to review the DEIS carefully and to engage in meetings with neighborhood representatives before filing comments on the draft.

Thank you for your consideration of this matter.

Sincerely,

Alma Gates
Chair, ANC3D

Document 119

RESOLUTION
Adopted by ANC 3D at its meeting of May 4, 2005
ENVIRONMENTAL IMPACT STATEMENT FOR A PROPOSED WATER TREATMENT RESIDUALS MANAGEMENT PROCESS FOR THE WASHINGTON AQUEDUCT, WASHINGTON, DC

WHEREAS, the Army Corps of Engineers in the January 12, 2004 Federal Register announced its intention to undertake an Environmental Impact Survey (EIS) as a first step toward bringing the Washington Aqueduct into compliance by 2009 with Environmental Protection Agency rules that forbid release of so-called residuals into the nation's streams and rivers (National Discharge Elimination System NPDES Permit DC0000019); and

WHEREAS the EPA order is designed to bring about an overall enhancement of environmental protections and should not result in the substitution of one environmentally unsound practice with another; and

WHEREAS the issues at hand are highly technical, the outcome of the EIS process will have a major impact on surrounding communities and the region for decades to come; and

WHEREAS the public has a right to engage in informed and serious dialogue with the Corps about potential impacts and a reasonable range of alternatives; and

WHEREAS the Spring Valley-Wesley Heights Neighborhood Association and the Palisades Citizens Association have joined neighborhood groups in Maryland (under the moniker Concerned Neighbors) in opposing the process by which the Corps narrowed its options to five "Alternatives Evaluated in Detail in the DEIS;" and

119-2-NB

WHEREAS the general manager of the Washington Aqueduct, on March 2, 2005 appeared before the ANC to apprise the commission on the alternatives under consideration and specifically Alternative E (Dewatering at East Dalecarlia Processing); and

WHEREAS ANC 3D has expressed particular concern about the impact of Alternative E on prospective plans for a campus expansion and relocation of Little Falls Road by Sibley Hospital, as well as the visual impact of the dewatering facility and the environmental impact of trucking on neighborhood streets; and

119-3-GA

WHEREAS in the view of ANC 3D there may exist alternative approaches which the Army Corps has failed to explore thoroughly that would enable EPA compliance by the Washington Aqueduct that would have fewer impacts on surrounding communities and prove equally or more cost-effective long term; and

119-4-NE

WHEREAS at the request of neighborhood leaders and residents of adjacent communities of Washington, D.C. and Maryland, Reps. Eleanor Holmes Norton (DC) and Chris Van Hollen (MD), and Senators Barbara Mikulski (MD) and Paul Sarbanes (MD), in an April 21 letter to the Army Corps requested the Corps delay publication of its DEIS to provide for further meetings and input with community representatives; and

WHEREAS the Army Corps nevertheless proceeded to publish the DEIS in the Federal Register after releasing the report on April 14; and

WHEREAS the DEIS is six volumes and, upon initial review, may contain information concerning impacts which is inconsistent with the ANC's and the public's understanding to date; and

WHEREAS in any event the DEIS is immensely complex and the ANC, neighborhood associations and residents deserve ample time to review its contents: 119-5-FF

THEREFORE, BE IT RESOLVED that ANC 3D respectfully requests that the Army Corps of Engineers (the "Corps") extend the comment period for the Draft Environmental Impact Statement (DIES) for the Proposed Water Treatment Residuals Management Project (the "Project") at the Washington Aqueduct. Specifically, the ANC requests that the comment period be extended from 45 days to 90 days, or 45 days beyond the current deadline for comments of June 2. 119-6-FF

ANC 3D FURTHER respectfully urges agencies and elected officials of Washington, D.C. including members of the Mayor's Office, City Council representatives, the office of the City Administrator, and the directors of the Departments of Health, Public Works and Transportation in particular, to review the DEIS carefully and to engage in meetings with neighborhood representatives before filing comments on the draft.

Copies to:

Mayor Anthony Williams
Councilmember Kathy Patterson (Ward 3)
Councilmember Carol Schwartz (At-Large, Chair of Committee on DPW & Environment)
CouncilmemberAdrian Fenty (Ward 4, Chair of Committee on Health)
Senators: Sarbanes & Mikulski (MD)
Delegate Eleanor Holmes Norton(Washington DC)
Rep. Chris Van Hollen (MD)
Mr. Robert Bobb, City Administrator
Mr. Dan Tangherlini, Director, Department of Transportation
Dr. Gregory Pane, Director, Department of Health
Mr. Jerry Johnson, General Manager, D.C. Water & Sewer
Mr. Robert Sloan, Chief Executive Officer, Sibley Hospital
Mr. Michael Peterson, Chief Engineer, Washington Aqueduct, U.S. Army Corps

Document 119

Government of the District of Columbia
ADVISORY NEIGHBORHOOD COMMISSION 3-D
P.O. Box 40846
Palisades Station
Washington, D.C. 20016

May 13, 2005

Mr. Thomas P. Jacobus, P.E.
General Manager
Washington Aqueduct
US Army Corps of Engineers
5900 MacArthur Boulevard, NW
Washington DC 20016-2514

Dear Mr. Jacobus:

Advisory Neighborhood Commission 3D held its regularly scheduled monthly meeting on May 4, 2005 at Sibley Memorial Hospital's Ernst Auditorium. A quorum (4) was present at all times. At that meeting, a Resolution on the "Environmental Impact Statement for a Proposed Water Treatment Residuals Management Process for the Washington Aqueduct, Washington DC" was adopted by the Commission. (A copy of the Resolution is attached.)

ANC3D respectfully requests that the Army Corps of Engineers extend the comment period for the DEIS for the Proposed Water Treatment Residuals management Project at the Washington Aqueduct. Further, ANC 3D requests that the comment period be extended 45 days beyond the current deadline for comments of June 2nd.

119-7-FF

ANC3D respectfully urges other agencies and elected officials to review the DEIS carefully and to engage in meetings with neighborhood representatives before filing comments on the draft.

Thank you for your consideration of this matter.

Sincerely,

Alma Gates
Chair, ANC3D

Document 119

RESOLUTION
Adopted by at its meeting of May 4, 2005
ENVIRONMENTAL IMPACT STATEMENT FOR A PROPOSED WATER TREATMENT RESIDUALS MANAGEMENT PROCESS FOR THE WASHINGTON AQUEDUCT, WASHINGTON, DC

WHEREAS, the Army Corps of Engineers in the January 12, 2004 Federal Register announced its intention to undertake an Environmental Impact Survey (EIS) as a first step toward bringing the Washington Aqueduct into compliance by 2009 with Environmental Protection Agency rules that forbid release of so-called residuals into the nation's streams and rivers (National Discharge Elimination System NPDES Permit DC0000019); and

WHEREAS the EPA order is designed to bring about an overall enhancement of environmental protections and should not result in the substitution of one environmentally unsound practice with another; and

WHEREAS the issues at hand are highly technical, the outcome of the EIS process will have a major impact on surrounding communities and the region for decades to come; and

WHEREAS the public has a right to engage in informed and serious dialogue with the Corps about potential impacts and a reasonable range of alternatives; and

WHEREAS the Spring Valley-Wesley Heights Neighborhood Association and the Palisades Citizens Association have joined neighborhood groups in Maryland (under the moniker Concerned Neighbors) in opposing the process by which the Corps narrowed its options to five "Alternatives Evaluated in Detail in the DEIS;" and

WHEREAS the general manager of the Washington Aqueduct, on March 2, 2005 appeared before the ANC to apprise the commission on the alternatives under consideration and specifically Alternative E (Dewatering at East Dalecarlia Processing); and

WHEREAS ANC 3D has expressed particular concern about the impact of Alternative E on prospective plans for a campus expansion and relocation of Little Falls Road by Sibley Hospital, as well as the visual impact of the dewatering facility and the environmental impact of trucking on neighborhood streets; and

WHEREAS in the view of ANC 3D there may exist alternative approaches which the Army Corps has failed to explore thoroughly that would enable EPA compliance by the Washington Aqueduct that would have fewer impacts on surrounding communities and prove equally or more cost-effective long term; and

WHEREAS at the request of neighborhood leaders and residents of adjacent communities of Washington, D.C. and Maryland, Reps. Eleanor Holmes Norton (DC) and Chris Van Hollen (MD), and Senators Barbara Mikulski (MD) and Paul Sarbanes (MD), in an April 21 letter to the Army Corps requested the Corps delay publication of its DEIS to provide for further meetings and input with community representatives; and

WHEREAS the Army Corps nevertheless proceeded to publish the DEIS in the Federal Register after releasing the report on April 14; and

WHEREAS the DEIS is six volumes and, upon initial review, may contain information concerning impacts which is inconsistent with the ANC's and the public's understanding to date; and

WHEREAS in any event the DEIS is immensely complex and the ANC, neighborhood associations and residents deserve ample time to review its contents:

THEREFORE, BE IT RESOLVED that ANC 3D respectfully requests that the Army Corps of Engineers (the "Corps") extend the comment period for the Draft Environmental Impact Statement (DIES) for the Proposed Water Treatment Residuals Management Project (the "Project") at the Washington Aqueduct. Specifically, the ANC requests that the comment period be extended from 45 days to 90 days, or 45 days beyond the current deadline for comments of June 2.

ANC 3D FURTHER respectfully urges agencies and elected officials of Washington, D.C. including members of the Mayor's Office, City Council representatives, the office of the City Administrator, and the directors of the Departments of Health, Public Works and Transportation in particular, to review the DEIS carefully and to engage in meetings with neighborhood representatives before filing comments on the draft.

RESOLUTION TO BE ADDRESSED TO;

Mr. Thomas P. Jacobus, P.E. √
General Manager
Washington Aqueduct
U.S. Army Corps of Engineers
5900 MacArthur Boulevard, NW
Washington, D.C. 20016-2514

AND COPIED TO:

Document 119

Council of the District of Columbia
1350 Pennsylvania Avenue, N.W., Suite 105
Washington, D.C. 20004

Carol Schwartz
Councilmember, At - Large

Tel: (202) 724-8105
Fax: (202) 724-8071
carol.schwartz@dc.gov

May 27, 2005

Mr. Thomas P. Jacobus, General Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Boulevard NW
Washington, DC 20016

Dear Mr. Jacobus:

I am writing again in reference to the water treatment residuals project at the Dalecarlia Reservoir and the concerns that have been expressed by residents in the neighborhood surrounding the reservoir about the draft environmental impact study (EIS) process for this project. This is to let you know that I have contacted Congresswoman Eleanor Holmes Norton, Senators Paul Sarbanes and Barbara Mikulski and Congressman Chris Van Hollen to see if they would like to join me in requesting that the Corps of Engineers extend the public comment period regarding this draft EIS beyond the current closing date of June 6. Once again, I ask that the public be given an additional 45 days beyond June 6 in order to submit comments on this controversial project.

I look forward to your response.

Sincerely,

Carol Schwartz
Councilmember, At-Large
Chair, Committee on Public Works
and the Environment

cc: Congresswoman Eleanor Holmes Norton
Senator Paul Sarbanes
Senator Barbara Mikulski
Congressman Chris Van Hollen

Document 119

COUNCIL OF THE DISTRICT OF COLUMBIA

June 3, 2005

Mr. Thomas P. Jacobus
General Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Boulevard, N.W.
Washington, D.C. 20016

Via Facsimile

Dear Mr. Jacobus:

We are writing in support of ANC 3D's request for a 45-day extension of the current June 6 deadline for public comment on the Corps' Draft Environmental Impact Statement on water treatment residuals management.

ANC 3D and others have requested additional time to analyze the contents of the DEIS, which is over a thousand pages long and contains highly-technical information on the environmental, health and traffic impacts of the Corps' proposed dewatering facility.

This request is entirely reasonable given the amount of data contained in the report and the potential impact of a permanent trucking scheme on residents of ANC 3D and nearby Maryland neighborhoods.

In addition, as the Aqueduct is responsible for providing drinking water to all of the city's residents, along with residents of Fairfax and Falls Church, Virginia, additional time is necessary to give elected officials and city administrators an opportunity to fully review the draft report and prepare their comments.

We share ANC 3D's interest in learning how the proposed approach to residuals removal, which the Aqueduct is undertaking in order to comply with an EPA order to comply with the Clean Water Act, benefits surrounding communities in terms of limiting impacts and increasing environmental quality.

We appreciate your consideration of the extension request.

Sincerely,

Councilmember Jim Graham

Councilmember David A. Catania

Councilmember Phil Mendelson

Councilmember Adrian Fenty

1350 PENNSYLVANIA AVENUE, N.W. • WASHINGTON, D.C. • 20004
PHONE: 202-724-8000

Document 120

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

BY FACSIMILE & FIRST CLASS MAIL

Mr. Thomas P. Jacobus, P.E.
General Manager
Washington Aqueduct
U.S. Army Corps of Engineers
5900 MacArthur Boulevard, NW
Washington, DC 20016-2514

28 JUN 2005

120-1-FG

RE: Request for Modification of Federal Facility Compliance Agreement

Dear Mr. Jacobus:

The U.S. Environmental Protection Agency Region III (EPA) has received your letter dated June 9, 2005 requesting an extension of the deadline identified in Paragraph 22 of the June 12, 2003 Federal Facility Compliance Agreement (FFCA), Docket No. CWA-03-2003-0136DN. This letter serves as EPA's response, pursuant to Paragraph 52 of the FFCA, agreeing to the Washington Aqueduct's request for modification of the FFCA. Your June 9, 2005 letter and this letter should be considered as Exhibits E & F to the FFCA.

Pursuant to paragraph 50 of the FFCA, the Washington Aqueduct has submitted a request for modification of Paragraph 22 of the FFCA that would extend the interim milestone described in that paragraph from October 17, 2005 to November 2, 2005. With this modification, Paragraph 22 now should read as follows:

> "No later than **November 2, 2005**, the Corps shall identify in a notice to EPA the engineering/ best management practices it will implement in order to achieve compliance with the numeric discharge limitations set forth in the NPDES Permit and a schedule for implementing the identified engineering/best management practices as expeditiously as practicable, consistent with best engineering judgment. The schedule shall include major milestones, including selection of a contractor, preliminary design, and final design, as well as the construction phase. The schedule shall achieve compliance with the numeric discharge limitations set forth in the NPDES Permit at one or more of the sedimentation basins no later than March 1, 2008, and to achieve full compliance with the numeric discharge limitations at all basins no later than December 30, 2009."

It is EPA's understanding that the Washington Aqueduct does not propose to extend the March 1, 2008 deadline for achieving compliance with the numeric discharge limitations set forth in National Pollutant Discharge Elimination System Permit No. DC 0000019 (the NPDES Permit) at one or more of the sedimentation basins. It is also EPA's understanding that the Washington Aqueduct does not propose to extend the December 30, 2009 deadline for achieving full compliance with the NPDES Permit. Your letter states that the Washington Aqueduct intends to exercise its best efforts to comply with the March 1, 2008 and December 30, 2009 deadlines in Paragraph 22. These deadlines remain operative.

It is EPA's understanding that the Washington Aqueduct proposed this modification to the FFCA to accommodate requests from individuals, organizations, and elected officials for additional time for public comment on the Draft Environmental Impact Statement ("DEIS"), which analyzes treatment alternatives for achieving compliance with the Washington Aqueduct's NPDES Permit. As you are aware, in January 2005, the Washington Aqueduct proposed and EPA agreed to a modification of the same Paragraph 22 of the FFCA to extend from June 3, 2005 to October 17, 2005 the interim milestone for the Washington Aqueduct to notify EPA of its selected best engineering/best management practices and a schedule for achieving compliance with the NPDES permit. The Washington Aqueduct proposed and EPA agreed to that extension in order to accommodate requests for greater opportunity for public involvement prior to issuance of the DEIS.

120-2-FG

EPA recognizes that the evaluation of alternatives for residual solids handling has engendered significant interest in the communities located in the vicinity of the Washington Aqueduct. EPA acknowledges the Washington Aqueduct's efforts to inform and involve the public throughout this process and agrees those efforts are appropriate in light of the circumstances.

Accordingly, EPA finds that the Washington Aqueduct has demonstrated good cause, as described in Paragraphs 50 and 51, for a modification of the FFCA. With this modification to the FFCA, the Washington Aqueduct now has until November 2, 2005 to develop and notify EPA of the engineering/ best management practices it will implement in order to achieve compliance with the numeric discharge limitations set forth in the NPDES Permit and a schedule for implementing the identified engineering/best management practices as expeditiously as practicable, consistent with best engineering judgment as set forth in Paragraph 22 of the FFCA.

Thank you for your continued efforts to comply with NPDES Permit No. DC0000019 and the FFCA. If you have any questions regarding the FFCA, please feel free to contact Stefania D. Shamet, Senior Assistant Regional Counsel, at (215) 814-2682.

Sincerely,

Jon M. Capacasa, Director
Water Protection Division

cc: Jim Bemis (USACE, Baltimore District)

Document 121

Council of the District of Columbia
1350 Pennsylvania Avenue, N.W., Suite 105
Washington, D.C. 20004

Carol Schwartz
Councilmember, At - Large

Tel: (202) 724-8105
Fax: (202) 724-8071
carol.schwartz@dc.gov

June 23, 2005

Mr. Thomas P. Jacobus, General Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Boulevard NW
Washington, DC 20016

Dear Mr. Jacobus:

I am attaching a copy of a letter we received from a constituent regarding the proposed dewatering structure near Dalecarlia Reservoir. Councilmember Schwartz wanted you to have a copy of this letter.

Sincerely,

Andrew L. Gerst
Counsel, Committee on Public Works and the Environment

Document 121

June 17, 2005

Washington Aqueduct
c/o Michael Peterson
5900 MacArthur Boulevard, NW
Washington DC 20016-2514

Gentlemen:

My husband and I have lived on 52nd Terrace for about 45 years. Our property backs up to a narrow strip of land that separates us from Dalecarlia Parkway .

As we understand it, the current plan for sludge treatment and dewatering facilities includes structures to be located across Little Falls Road from Sibley Hospital, and presumably invisable to owners of property along Dalecarlia Parkway. This will be an improvement over the earlier plan to have a dump site between the Resevoir and the Parkway.

That said, traffic noise on Dalecarlia Parkway is already a problem. There are already a number of heavy trucks on the Parkway, in addition to the normal automobile traffic, Consquently we suggest that with the additional truck traffic from the dewatering plant, an effort should be made to reduce traffic sounds. 121-1-GC

We suggest that the concrete surface includeing the joints are a major source of noise, and a smooth black top surface without joints could reduce the sound.

We also suggest that the 35 mph speed limit be enforced, with additional warning signs and established means for neighbors to report excessive noise to responsible authorities.

Finally, a solid sound barrier similiar to those on parts of the Beltway, would be a great help in reducing traffic noise. 121-2-GA

These traffic sound-reduction steps will also assist your desire to be a good neighbor and create a win-win climate between the Washington Acqeduct , and its neighbors on the other side of Dalecarlia Parkway.

Yours sincerely,

Document 122

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904

TAKE PRIDE IN AMERICA

IN REPLY REFER TO:

May 31, 2005

ER 05/352

Mr. Thomas P. Jacobus
General Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Boulevard, N.W.
Washington, D.C. 20016-2514

122-1-MD

Dear Mr. Jacobus:

The Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS) for a Proposed Water Treatment Residuals Management Process for the Washington Aqueduct, Washington, D.C. Please give careful consideration to the following comments.

General Comments

The DEIS adequately addresses most issues that fall within the jurisdiction or special expertise of the Department. The following comments, prepared by the U.S. Fish and Wildlife Service, concern endangered species and follow the format of the DEIS.

3 Existing Conditions

3.4.1 Aquatic Special Status (Rare, Threatened, and Endangered) Species
p.3-10 Dwarf Wedge Mussel
We recommend changing the last sentence of this paragraph to read: "Because there have been no documented records for the dwarf wedge mussel in the mainstem Potomac River in the District of Columbia for over 100 years in spite of significant survey effort, the Fish and Wildlife Service does not consider the species to be present in the Potomac River mainstem in the study reach."

3.5.1 Terrestrial Special Status (Rare, Threatened, and Endangered) Species
p.3-19, first full paragraph
This paragraph should be revised to indicate that the Eastern puma, dwarf wedge mussel, and small-whorled pogonia occurred *historically* in the District of Columbia or adjacent Montgomery County, Maryland, but are not considered extant there. The eastern puma is extirpated from D.C. and vicinity and should not be mentioned again in this document. The last record of the dwarf wedge

mussel in D.C. is from 1856, while the small-whorled pogonia, which once was found in Montgomery County near the D.C. line, has not been documented there since 1930.

4 Impacts Evaluation

4.5.3 Impact Evaluation by Alternative and Option

We concur with the conclusions of this section, that none of the alternatives under consideration will impact or adversely impact any endangered or threatened aquatic species [of the Potomac and Anacostia Rivers] under the jurisdiction of the U.S. Fish and Wildlife Service. However, we believe that these conclusions, made individually during the discussions of each of the alternatives, should be more explicitly stated.

4.6.3.1 Alternative A–Dewatering at Northwest Dalecarlia Processing Site and Disposal by Monofill p. 4-23, second paragraph (**Monofill**), last sentence

We concur with the conclusion that there would not be any impact to special status species, *with the possible exception* of the Hay's spring amphipod.

p. 4-23, third paragraph (**Special Status Species**)

Any reference to the eastern puma should be removed for the reasons stated previously. Although the Hay's spring amphipod is known only from the Rock Creek watershed in D.C., it is possible that at also inhabits adjacent watersheds such as that of Little Falls Creek. Therefore, surveys for this species, by a species expert, are recommended in the area to be affected by the monofill, should this alternative be pursued.

4.6.3.2 Alternative B–Dewatering at Northwest Dalecarlia Processing Site and Disposal by Trucking

We concur that no impacts to any Federally listed species are expected to occur due to this alternative.

4.6.3.3 Alternative C–Thickening and piping to Blue Plains AWWTP

Special Status Species (third heading under Alternative C)

Bald eagles nest about three quarters of a mile east of the proposed pipeline route, near the confluence of the Potomac and Anacostia Rivers. Because of the distance between the nest and the proposed pipeline and the method (directional drilling) proposed for pipeline installation, adverse impacts to nesting eagles are unlikely. No other Federally listed species under Fish and Wildlife Service jurisdiction are known to occur in the area affected by this alternative. This information should be included in this section of the EIS.

4.6.3.4 Alternative D–No Action Alternative

Special Status Species (first heading under Alternative D)

We concur with the conclusion that no impacts to any Federally listed threatened or endangered terrestrial species are expected to occur due to this alternative.

4.6.3.5 Alternative E–Dewatering at East Dalecarlia Processing Site and Disposal by Trucking **Special Status Species** (first heading under Alternative E)
No Federally listed species are known to occur in the area affected by this alternative; therefore, no effects on Federally listed species are expected. This information should be included in this section of the EIS.

Thank you for the opportunity to comment. If you have any questions regarding these comments, please contact the U.S. Fish and Wildlife Service's Andy Moser in Annapolis, Maryland at (410) 573-4537.

Sincerely,

Michael T. Chezik
Regional Environmental Officer

cc:
A. Moser, FWS, Annapolis, MD

Document 123

MONTGOMERY COUNTY COUNCIL
ROCKVILLE, MARYLAND

June 23, 2005

Mr. Thomas P. Jacobus J 6/28/05
General Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Boulevard, N.W.
Washington, D.C. 20016-2514

Re: Washington Aqueduct Residuals Project

Dear Mr. Jacobus:

As County Councilmembers who represent the area most affected by this proposal, we are writing to reiterate our concerns about the Corps' preferred alternative (trucking) under the Draft Environmental Impact Statement ("DEIS") for the Washington Aqueduct Residuals Project. This long-established neighborhood is extremely worried about the Corps' failure to consider the full environmental, safety and economic impacts of trucking the residuals from the Dalecarlia Water Treatment Plant along a single route in Montgomery County. We would like a written update on the Corps' plans to consider other alternatives that would place less of a burden of this project on residents of Montgomery County. We also offer our assistance in identifying alternative piping routes and disposal locations.

Contrary to your public assertions that the Corps will only need to use 8 trucks per day, a careful reading of the footnotes to Table 3-6 in the DEIS (which clarify that the numbers listed are for one way trips only using 20 ton trucks for just the next eleven years), demonstrates that *up to 132 ten ton truck trips per day* could be traveling local Montgomery County roads during the wet season. This figure far exceeds the number of truck trips per day that you have consistently referred to in public meetings. Similarly, while you have allegedly evaluated eight trucking routes, a careful reading of the DEIS shows that only one truck route would be used: Dalecarlia Parkway to Western Avenue to River Road to the Beltway. We have serious concerns about your failure to evaluate the full environmental, safety and economic impacts of using this single route to "solve" the Aqueduct's water treatment residuals disposal problem.

123-1-GE

123-2-GD

The DEIS also fails to consider the full costs of operating so many trucks over the life of this project. If these costs had been fully considered, trucking would not have survived the Corps' screening criteria to become its "preferred" alternative. These costs are likely to be substantial,

123-3-GI

STELLA B. WERNER COUNCIL OFFICE BUILDING, 100 MARYLAND AVENUE, ROCKVILLE, MARYLAND 20850
240/777-7900 TTY 240/777-7914 FAX 240/777-7989
WWW.CO.MO.MD.US/COUNCIL

Document 123

based upon information that the Corps considered more than ten years ago. The actual cost of operating this many trucks, 5 days a week, for an indefinite number of years, is a key component of the true cost of the trucking option, and appears to have been excluded from the identified $47,600,000 cost to "construct" this option as described in the DEIS. In particular, we are concerned about what the cost of operating such a large number of trucks will have on Montgomery County's roads. If you are to proceed with this alternative, we would note that Montgomery County roads will incur additional wear and tear. We respectfully request that you include sufficient funding in the cost of this option to pay for the impact on our local streets. 123-4-GA

Our final concern has to do with the impacts that the trucking option will have upon Montgomery County's air quality and the health and safety of our citizens. The DEIS that the Corps released on April 14, 2005 contained virtually no analysis of the environmental or safety impacts of the Corps' preferred alternative. The environmental impacts of this alternative are significant in light of the fact that our region is already suffering severe non-attainment under current Clean Air Act ("CAA") standards and serious traffic congestion. Diesel fumes from trucks contain known carcinogens and have been documented as increasing the number of asthma cases along heavily traveled highways. The additional air pollution created by the large volume of trucks that will be concentrated along a single route in Montgomery County will be significant and will adversely impact the health of our children and elderly citizens residing along the preferred trucking route. Again, we request that you provide us with your analysis of this issue and describe what steps the Corps is planning to mitigate this danger.

123-6-GF

123-5-GE

123-7-GD

The Montgomery County Council is closely monitoring this project. We strongly encourage you to give the concerns of our constituents greater weight and to ensure that, before choosing the final residual management plan, every consideration be given as to that plan's compatibility within a large established residential area. We again offer our assistance in identifying piping routes and other disposal locations that would have a fewer adverse environmental, safety and economic impacts upon residents of Montgomery County.

Sincerely,

Nancy Floreen
At-Large Councilmember
Chair, Transportation and Environment Committee

Howard A. Denis
District 1 Councilmember
(Bethesda, Chevy Chase, Potomac)

Document 124

COMMONWEALTH of VIRGINIA

Department of Historic Resources

W. Taylor Murphy, Jr.
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Kathleen S. Kilpatrick
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
TDD: (804) 367-2386
www.dhr.state.va.us

May 26, 2005

Mr. Thomas P. Jacobus
Washington Aqueduct
US Army Corps of Engineers—Baltimore District
5800 MacArthur Boulevard, NW
Washington, DC 20016-2514

Re: Water Treatment Residuals Management Process for the Washington Aqueduct
Fairfax and Arlington Counties
DEQ Project No. 05-122F
VDHR File No. 2004-1374

Dear Mr. Silva:

Through the Virginia Department of Environmental Quality we have received a draft Environmental Impact Statement for the proposed Water Treatment Residuals Management Process for the Washington Aqueduct.

We want to remind you that the Army Corps of Engineers, as a federal agency, must consider the effects of its actions on historic properties listed in or eligible for the National Register of Historic Places and provide the Advisory Council on Historic Preservation the opportunity to comment in accordance with Sections 106 of the National Historic Preservation Act, as amended, and its implementing regulation 36 CFR 800. The Section 106 review process begins when the federal agency provides a description of the undertaking and its Area of Potential Effect (APE) to the State Historic Preservation Officer (SHPO), which in Virginia is the Department of Historic Resources (DHR). For this reason we request that you consult with us directly on this undertaking. While 36 CFR 800.8 allows federal agencies to coordinate Section 106 compliance with the National Environmental Policy Act (NEPA), the agency must inform the applicable SHPO early in the process that it intends to do so. The agency must also take care that the environmental documentation prepared under NEPA does present information about historic properties and potential effects to such resources at a level of detail that allows the SHPO and other consulting parties to comment.

We look forward to working with you on this project. If you have any questions concerning our comments, please contact me at (804) 367-2323, ext. 114.

Sincerely,

Marc Holma, Architectural Historian
Office of Review and Compliance

Cc: Mr. Charles H. Ellis, III, Department of Environmental Quality

Document 124

COMMONWEALTH of VIRGINIA

W. Tayloe Murphy, Jr.
Secretary of Natural Resources

DEPARTMENT OF ENVIRONMENTAL QUALITY
Street address: 629 East Main Street, Richmond, Virginia 23219
Mailing address: P. O. Box 10009, Richmond, Virginia 23240
Fax (804) 698-4500 TDD (804) 698-4021
www.deq.virginia.gov

Robert G. Burnley
Director

(804) 698-4000
1-800-592-5482

June 2, 2005

Mr. Thomas P. Jacobus
General Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Boulevard, N.W.
Washington, D.C. 20016-2514

RE: Draft Environmental Impact Statement for a Proposed Water Treatment Residuals Management Process for the Washington Aqueduct, Washington, D.C.
DEQ-05-122F

Dear Mr. Jacobus:

The Commonwealth of Virginia has completed its review of the above-listed Draft Environmental Impact Statement ("Draft EIS"). The Department of Environmental Quality is responsible for coordinating Virginia's review of federal environmental documents and responding to appropriate federal officials on behalf of the Commonwealth. The following state agencies, regional planning district commission, and localities joined in this review:

Department of Environmental Quality
Department of Game and Inland Fisheries
Department of Agriculture and Consumer Services
Department of Conservation and Recreation
Department of Health
Department of Transportation
Department of Historic Resources
Department of Mines, Minerals, and Energy
Department of Forestry
Northern Virginia Regional Commission
Arlington County
Fairfax County.

Project Description

The Washington Aqueduct, a unit of the Baltimore District, Army Corps of Engineers, serves water supply customers in the District of Columbia and Northern Virginia from the Dalecarlia and McMillan Water Treatment Plants in the District (Draft EIS, page ES-1). Pursuant to a federal facilities compliance agreement with the U.S. Environmental Protection Agency and in keeping with NPDES permit requirements for concentrations of solids, the Washington Aqueduct proposes to change its current practice of discharging water treatment residual solids to the Potomac River. The Draft EIS considers five alternative courses of action:

- Alternative A - De-watering at the Northwest Dalecarlia Processing site and disposal by monofill. This alternative would involve dredging and pumping of material, de-watering, and final placement by trucking to a new disposal area in the water treatment plant complex (Draft EIS, page 2-6, section 2.5.2).

- Alternative B - Same as Alternative A, but trucking by contract to an off-site disposal area (pages 2-6 and 2-7, section 2.5.3).

- Alternative C - Thickening, sending by pipeline to the Blue Plains Advanced Wastewater Treatment Plant, and contract hauling to off-site disposal areas (page 2-7, section 2.5.4).

- Alternative D - "No-action alternative" (page 2-7, section 2.5.5).

  Alternative E - De-watering at the East Dalecarlia Processing Site and disposal by contract trucking to an off-site disposal area (page 2-8, section 2.5.6).

The Washington Aqueduct indicates its preference for Alternative E, for reasons of environmental impact, scheduling of implementation, and cost (Draft EIS, pages ES-6 through ES-8).

In addition, the Draft EIS considers eight (8) transport routes for the contract trucking contemplated in Alternatives A, B, C, and E above (pages 3-48 and 3-49). Two of these routes pertain to Virginia, as follows (page 3-48):

- Route D would have trucks travel Chain Bridge to Chain Bridge Road (state route 123) and continue on that route (Dolley Madison Boulevard) to the Dulles Access/Toll Route and thence to the Beltway (Interstate 495).

- Route E would have trucks travel over Chain Bridge to Chain Bridge Road (state route 123) and Old Georgetown Road (state route 193) to the Dulles Access/Toll Route and thence to the Beltway (Interstate 495).

124-2-EA

The Draft EIS does not appear to indicate or analyze proposed or alternative permitted disposal sites to which the residual solids would be trucked. As DEQ's Northern Virginia Regional Office states, if a disposal site in Virginia is selected, further review by DEQ would be necessary to ensure compliance with all environmental laws and regulations.

Environmental Impacts and Mitigation

1. Natural Heritage Resources. The Department of Conservation and Recreation (DCR) has searched its Biotics Data System for occurrences of natural heritage resources in the Virginia areas mapped in the Draft EIS. "Natural heritage resources" are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations. According to DCR, natural heritage resources have been documented in project areas, but DCR does not anticipate that the project would adversely affect natural heritage resources because of the scope of project activities and the distance to the resources.

Under a memorandum of agreement between DCR and the Department of Agriculture and Consumer Services (VDACS), DCR represents VDACS in comments on project impacts on endangered plant and insect species. According to DCR, the project will not affect any such species. VDACS confirms this determination.

2. Wildlife Resources. The Department of Game and Inland Fisheries does not anticipate any adverse impacts upon Virginia wildlife resources from this project.

3. Natural Area Preserves. According to the Department of Conservation and Recreation, there are no state Natural Area Preserves under its jurisdiction in the vicinity of project activities.

4. Air Quality. According to DEQ's Division of Air Program Coordination, the project area is an ozone non-attainment area. Accordingly, the Washington Aqueduct should take all precautions necessary to restrict emissions of volatile organic compounds (VOCs) and oxides of nitrogen (NO_x) in carrying out this project.

124-3-GF

124-4-CA

(a) Alternatives Analysis. DEQ's Division of Air Program Coordination indicates that either Alternative A, involving disposal of residuals to a monofill on the Dalecarlia water treatment plant site, or Alternative C, involving piping of the material to the Blue

124-5-DA

Plains advanced wastewater treatment plant, would eliminate perennial use of trucks, conserving oil and reducing air pollution compared with the preferred alternative.

(b) Open Burning. If project activities include the any open burning in Virginia, this activity must meet the requirements of the Regulations for the Control and Abatement of Air Pollution for open burning (9 VAC 5-40-5600 et seq.), and it may require a permit (see "Regulatory and Coordination Needs," item 1, below). The Regulations provide for, but do not require, the local adoption of a model ordinance concerning open burning. The Washington Aqueduct should contact appropriate local officials to determine what local requirements, if any, exist. The model ordinance includes, but is not limited to, the following provisions:

124-6-MD

- All reasonable effort shall be made to minimize the amount of material burned, with the number and size of the debris piles;
- The material to be burned shall consist of brush, stumps and similar debris waste and clean burning demolition material;
- The burning shall be at least 500 feet from any occupied building unless the occupants have given prior permission, other than a building located on the property on which the burning is conducted;
- The burning shall be conducted at the greatest distance practicable from highways and air fields;
- The burning shall be attended at all times and conducted to ensure the best possible combustion with a minimum of smoke being produced;
- The burning shall not be allowed to smolder beyond the minimum period of time necessary for the destruction of the materials; and
  The burning shall be conducted only when the prevailing winds are away from any city, town or built-up area.

(c) Fugitive Dust Control. Fugitive dust from project activities, such as disposal of solids in a permitted site in Virginia, must be kept to a minimum by using control methods outlined in 9 VAC 5-50-60 et seq. of the Regulations cited above. These precautions include, but are not limited to, the following:

124-7-MD

- Use, where possible, of water or chemicals for dust control;
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

5. Historic Structures and Archaeological Resources. The Washington Aqueduct must consider the effects of its actions on historic properties listed in or eligible for the

National Register of Historic Places and provide the Advisory Council on Historic Preservation the opportunity to comment in accordance with section 106 of the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800. See "Regulatory and Coordination Needs," item 2, below. 124-8-MD

6. Forest Resources. According to the Department of Forestry, the project will not significantly affect Virginia's forest resources.

7. Mineral Resources. According to the Department of Mines, Minerals, and Energy, the project will not affect Virginia's mineral resources or geology.

8. Transportation.

(a) Impacts on Road Projects. According to the Virginia Department of Transportation (VDOT), the preferred alternative will not significantly affect any planned road projects. VDOT plans widening of state route 123 between the Dulles Toll Road ramps and Great Falls Street (state route 694) from four lanes to six; this is a linear distance of a few hundred feet. State route 193 (Old Georgetown Pike), a Virginia Byway or scenic route that is two lanes wide, is under consideration for traffic calming measures because of its geometry and concerns regarding through traffic by its adjoining residents.

Additional evaluation of project impacts on local roads must await identification of other roads that may be involved in the trucking of solids. For example, there is no indication of routes that would be used once the trucks have traveled the Beltway, perhaps because the Draft EIS does not indicate potential disposal sites.

(b) Alternative Routes. VDOT recommends that the Washington Aqueduct consider obtaining permission from the National Park Service to use the George Washington Memorial Parkway as a route to reach the Beltway from Chain Bridge. If allowed, this alternative would eliminate impacts of truck traffic on residential areas, delays at traffic lights and intersections along Route 123 or 193, and hazards to pedestrians along these routes. 124-9-MD

(c) Route 193. The Draft EIS fails to mention the presence of Cooper Middle School near Route 193 and the Beltway. The school has an entrance on Balls Hill Road (state route 686), which is very close to the Route 193 interchange with the Beltway. There is likely to be morning and afternoon traffic congestion in the vicinity of the school. 124-10-GA

(d) Hauling Hours. The Draft EIS has a discrepancy in regard to the hauling hours for trucked residuals from the water treatment plant. In Chapter 3 (Existing

Conditions), the document states that hauling would take place between 6 AM and 4 PM on weekdays, with a concentration between 9 AM and 3 PM (page 3-48, section 3.10.5). In Chapter 4 (Impacts Evaluation), the document states that hauling would take place on weekdays between 7 AM and 7 PM (page 4-54, section 4.11.3.2) 124-11-GK

(e) Disposal Sites. As indicated above, disposal sites are not identified in the Draft EIS. The document mentions two Fairfax County Water Authority treatment plants (in Occoquan and in Herndon) to show current practice, but indicates a need for identification of additional end users before all the residuals could be assimilated into the market (Draft EIS, page 4-98, section 4.16.3.2, "Availability of Suitable Resources" heading).

9. Local and Regional Concerns. The Northern Virginia Regional Commission had no comment. The same is true for Fairfax County.

Arlington County, through its Utilities and Environmental Policy Division, indicated its agreement with Alternative E as the preferred alternative on environmental grounds and states that it offers potential environmental benefits in using the residual solids.

(a) Life Cycle Cost Analysis. Arlington County recommends that a 20-year lowest life cycle cost analysis be performed to determine the most appropriate equipment and the best choice of materials for the construction of wetted materials. Arlington's experience with a major upgrade of its Water Pollution Control Plant indicates that selection of materials and equipment on this basis substantially reduces long-term facility costs, minimizes down time, and provides better reliability. 124-12-MD

Arlington County also recommends on-site tests be performed on all equipment, including de-watering equipment, under controlled conditions. This would verify performance and allow a valid net 20-year lowest life cycle cost analysis to be performed. Site visits to other facilities using the proposed equipment are recommended as well. 124-13-MD

Arlington recommends that the assumptions stated in the Draft EIS relative to chemicals, labor, and contract hauling costs (page 4-83, Table 4-8) be verified. Based on the County's experience, these figures appear somewhat low. 124-14-MD

(b) Redundancy Levels. Arlington County agrees with the redundancy levels proposed in the Draft EIS to accommodate anticipated residual loading at the facility:

Gravity thickeners - one unit out of a total of four units;

- Centrifuges, if selected - two units out of a total of six units;

- Transmission lines for conveying the residuals from remote locations -- two lines, each sized to convey 100% of the normal loading.

(c) Little Falls Road. Arlington recommends that Little Falls Road be analyzed to determine whether it has the structural capability to handle truck traffic modifications that are required to support the preferred alternative, and to determine whether there are any additional costs for improvements. 124-15-MD

(d) Commendations. Arlington County notes the significant financial and operational impacts of the decision to discontinue the historic practice of discharging water treatment residuals to the Potomac River. In this light, the County commends the Washington Aqueduct for the open and inclusive process that has been followed throughout the development of the Draft EIS. The recommended option, Alternative E, appears best to the County on environmental and economic grounds, although there may still be concerns about neighborhood impacts of the proposed trucking operation. The approach taken by the Washington Aqueduct has been thorough and professional.

Regulatory and Coordination Needs

1. Air Quality Regulation. As indicated above ("Environmental Impacts and Mitigation," item 4(b)), any open burning in Virginia may require open burning permits from DEQ. For guidance on applicability of the requirement and permit processing, the Washington Aqueduct should contact DEQ's Northern Virginia Regional Office (Mr. Terry Darton, telephone (703) 583-3845).

2. Historic Resources Consultation. To ensure compliance with section 106 of the National Historic Preservation Act, the Washington Aqueduct should provide a description of the undertaking and its Area of Potential Effect to the State Historic Preservation Office (SHPO), which in Virginia is the Department of Historic Resources (DHR). While federal agencies may coordinate section 106 compliance activities with those for the National Environmental Policy Act (see 36 CFR section 800.8), the agency must inform the appropriate SHPO early in the process, and ensure that the NEPA documentation includes sufficient information about historic properties and project impacts. We recommend that the Washington Aqueduct contact the Department of Historic Resources (Marc Holma, telephone (804) 367-2323, extension 114).

Thank you for the opportunity to comment. If you have questions about this response, please feel free to contact me (telephone (804) 698-4325) or Charles Ellis of this Office (telephone (804) 698-4488).

Sincerely,

Ellie L. Irons
Program Manager
Office of Environmental Impact Review

Enclosures

cc: Andrew K. Zadnik, DGIF
Keith R. Tignor, VDACS
S. Rene Hypes, DCR-DNH
Alice R. T. Baird, DCR-DCBLA
Alan D. Weber, VDH
Allen R. Brockman, DEQ-Waste
Kotur S. Narasimhan, DEQ-Air
John D. Bowden, DEQ-NVRO
Marlee A. Parker, VDOT
Marc E. Holma, DHR
Gerald P. Wilkes, DMME
J. Michael Foreman, DOF
Katherine K. Mull, NVRC
John Mausert-Mooney, Arlington County DES
Pamela G. Nee, Fairfax County DPZ

Document 124

Ellis,Charles

From: Andrew Zadnik [Andrew.Zadnik@dgif.virginia.gov]
Sent: Thursday, May 26, 2005 4:50 PM
To: Ellis,Charles
Cc: ProjectReview.Richmond_PO.DGIF@dgif.virginia.gov
Subject: Re: Washington Aqueduct (Balt. Corps of Engineers): EIS on"Water Treatment Residuals Management Process

This project involves constructing a permanent residuals management process that will collect, treat, and dispose of water treatment residuals. The preferred alternative (Alt E) involves collecting residuals from the Georgetown Reservoir and the Dalecarlia WTP sedimentation basins, processing the material (via gravity thickening and dewatering) at the eastern portion of the Dalecarlia WTP property and hauling the material to an offsite disposal facility.

As this project will occur within Maryland and the District of Columbia, we do not anticipate a significant adverse impact upon threatened or endangered wildlife resources under our jurisdiction to occur.

Thank you,

Andrew K. Zadnik
Environmental Services Section Biologist
Department of Game and Inland Fisheries
4010 West Broad Street
Richmond, VA 23230

(804) 367-2733
(804) 367-2427 (fax)

Document 124

If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.

B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.

C. Use your agency stationery or the space below for your comments. **IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.**

Please return your comments to:

MR.CHARLES H. ELLIS III
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

RECEIVED

MAY 24 2005

DEQ-Office of Environmental Impact Review

Charles H. Ellis III

CHARLES H. ELLIS III
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

Statements in the project document concerning endangered species were reviewed and compared to available information. No additional comments are necessary in reference to endangered plant and insect species regarding this project.

(signed) (Keith R. Tignor) (date) May 20, 2005

(title) Endangered Species Coordinator

(agency) VDACS, Office of Plant and Pest Service

PROJECT # 05-122F

8/98

Document 124

RECEIVED

MAY 27 2005

DEQ-Office of Environmental Impact Review

W. Tayloe Murphy, Jr.
Secretary of Natural Resources

Joseph H. Maroon
Director

COMMONWEALTH of VIRGINIA

DEPARTMENT OF CONSERVATION AND RECREATION

217 Governor Street
Richmond, Virginia 23219-2010
Telephone (804) 786-7951 FAX (804) 371-2674 TDD (804) 786-2121

May 25, 2005

Charles Ellis III
DEQ- Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, VA 23219

Re: #05-122F Water Treatment Residuals Management Process for the Washington Aqueduct

Dear Mr. Ellis:

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

Biotics documents the presence of natural heritage resources in the project area. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the Virginia Department of Conservation and Recreation (DCR), DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

Our files do not indicate the presence of any State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

Any absence of data may indicate that the project area has not been surveyed, rather than confirm that the area lacks additional natural heritage resources. New and updated information is continually added to Biotics. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

The Virginia Department of Game and Inland Fisheries maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters, that may contain information not documented in this letter. Their database may be accessed from http://www.dgif.virginia.gov/wildlife/info_map/index.html , or contact Shirl Dressler at (804) 367-6913.

Should you have any questions or concerns, feel free to contact me at 804-692-0984. Thank you for the opportunity to comment on this project.

Sincerely,

Michelle E. Edwards

Michelle E. Edwards
Locality Liaison

cc: Scott Crafton, DCR

Ellis,Charles

From: Larry Gavan [Larry.Gavan@dcr.virginia.gov]
Sent: Tuesday, May 31, 2005 1:14 PM
To: Ellis,Charles
Cc: Scott Crafton
Subject: EIR- Proposed Water Treatment Residuals Process, WashingtonAquaduct, Washington D.C.

No Comment. Thanks.

Ellis,Charles

From: Larry Gavan [Larry.Gavan@dcr.virginia.gov]
Sent: Tuesday, May 31, 2005 1:14 PM
To: Ellis,Charles
Cc: Scott Crafton
Subject: EIR- Proposed Water Treatment Residuals Process, WashingtonAquaduct, Washington D.C.

No Comment. Thanks.

If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

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B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.

C. Use your agency stationery or the space below for your comments. **IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.**

Please return your comments to:

MR.CHARLES H. ELLIS III
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

Charles H. Ellis III
CHARLES H. ELLIS III
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

Any waste impacts from this project would occur on the Maryland side of the State Line. Therefore, the waste Division has no comments on this document.

(signed) Allen R. Brockman (date) 5-18-05
(title) Waste Regulations Writer + EIR Contact
(agency) VA. Dept. of Environmental Quality

PROJECT # 05-122F

Document 124

If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

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DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

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MAY 23 2005

DEQ-Office of Environmental Impact Review

Charles H. Ellis III

CHARLES H. ELLIS III
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

No comments

(signed) Alan D. Weber (date) 5-19-05

(title)

(agency) VDH

PROJECT # 05-122F

8/98

Document 124

DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR PROGRAM COORDINATION

ENVIRONMENTAL REVIEW COMMENTS APPLICABLE TO AIR QUALITY

RECEIVED
MAY 09 2005
DEQ-Office of Environmental Impact Review

TO: Charles H. Ellis III **DEQ - OEIA PROJECT NUMBER: 05 – 122F**

PROJECT TYPE: ☐ STATE EA / EIR / FONSI **X FEDERAL EA** / EIS ☐ SCC

☐ CONSISTENCY DETERMINATION/CERTIFICATION

PROJECT TITLE: WATER TREATMENT RESIDUALS MANAGEMENT PROCESS FOR THE WASHINGTON AQUEDUCT

PROJECT SPONSOR: DOD / ARMY / ARMY CORPS OF ENGINEERS

PROJECT LOCATION: **X OZONE NON ATTAINMENT AREA**

REGULATORY REQUIREMENTSMAY BE APPLICABLE TO: **X** **CONSTRUCTION**
☐ OPERATION

STATE AIR POLLUTION CONTROL BOARD REGULATIONS THAT MAY APPLY:

1. ☐ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 E – STAGE I
2. ☐ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 F – STAGE II Vapor Recovery
3. ☐ 9 VAC 5-40-5490 et seq. – Asphalt Paving operations
4. **X** **9 VAC 5-40-5600 et seq. – Open Burning**
5. **X** **9 VAC 5-50-60 et seq. Fugitive Dust Emissions**
6. ☐ 9 VAC 5-50-130 et seq. - Odorous Emissions; Applicable to_____
7. ☐ 9 VAC 5-50-160 et seq. – Standards of Performance for Toxic Pollutants
8. ☐ 9 VAC 5-50-400 Subpart_____, Standards of Performance for New Stationary Sources, designates standards of performance for the_____
9. ☐ 9 VAC 5-80-10 et seq. of the regulations – Permits for Stationary Sources
10. ☐ 9 VAC 5-80-1700 et seq. Of the regulations – Major or Modified Sources located in PSD areas. This rule may be applicable to the _____
11. ☐ 9 VAC 5-80-2000 et seq. of the regulations – New and modified sources located in non-attainment areas
12. ☐ 9 VAC 5-80-800 et seq. Of the regulations – Operating Permits and exemptions. This rule may be applicable to _____

COMMENTS SPECIFIC TO THE PROJECT:

Being in an area of ozone non-attainment, all precautions are necessary to restrict the emissions of volatile organic compounds (VOC) and oxides of nitrogen (NOx) during construction.

P.S: It is presumed that an alternative of locating residual recovery facility at the Monofill site itself with pipeline transportation of feed for recovery is also considered and dispensed to eliminate perennial use of trucks. This alternative favors to protect air quality and conserve oil.

K.S. Narasimhan

(Kotur S. Narasimhan)
Office of Air Data Analysis

DATE: May 9, 2005

Ellis,Charles

From: Bowden,John

Sent: Monday, May 23, 2005 10:22 AM

To: Ellis,Charles

Subject: Draft EIS #05-122F

NVRO comments regarding the Water Treatment Residuals Management Process for the Washington Aqueduct project sponsored by the DOS/Army/Army Corps of Engineers are as follows:

It appears that all of the activities of this project fall outside the jurisdictional boundaries of the Commonwealth of Virginia except that the hauling of de-watered residuals by truck may be on some highways located in Virginia, namely the Beltway Rt. 495. The draft EIS indicates that the residuals would be possibly be hauled to a yet undetermined disposal site. If disposal at a site in Virginia is selected, then further review by DEQ would be necessary to ensure compliance with all environmental laws and regulations.

John D. Bowden
Deputy Regional Director
Department of Environmental Quality
Northern Virginia Regional Office
(703) 583-3880
jdbowden@deq.virginia.gov

Document 124

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MAY 13 2005

DEQ-Office of Environmental Impact Review

COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION
1401 EAST BROAD STREET
RICHMOND, 23219-2000

PHILIP A. SHUCET
COMMISSIONER

May 11, 2005

Mr. Charles H. Ellis
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main St., Sixth Floor
Richmond VA 23219

Re: **Project #05-122F**, Water Treatment Residuals Management Process for the Washington Aqueduct, Washington D.C.

Dear Mr. Ellis:

Mr. Robert McDonald, P.E., of the Virginia Department of Transportation has reviewed the attached Draft Environmental Impact Statement (DEIS) that you provided relating to the proposed actions to dispose of water treatment residuals from the Dalecarlia treatment plant in Washington, D.C. The preferred alternative is to truck the residuals from the treatment plant to a disposal site in either Maryland or Virginia. Two (2) of the potential Virginia Routes involved in the hauling are Routes VA 123 (Chain Bridge Road) and VA 193 (Georgetown Pike), in addition to the Capital Beltway (I-495) and other unspecified routes – the disposal site is not identified in the DEIS.

Both VA 123 and VA 193 pass through many residential areas between the District of Columbia and the Capital Beltway. The preferred alternative will not significantly impact any planned highway improvement projects. Route 123 is slated to be widened between the Dulles Toll Road ramps and Great Falls Street (VA 694) – a distance of only a few hundred feet – from its present four (4) lanes to six (6) lanes in the 2010 timeframe. No specific improvements have been scheduled for VA 193, but are being studied for traffic calming measures (VDOT project UPC 57547) because of its geometry and concerns by adjoining residents over thru-traffic. The entire length of VA 193 (from VA 7 to VA 123) is a scenic route (Virginia Byway) and is only two (2) lanes wide. A feature along VA 193 that is not mentioned in the DEIS, but which should be given consideration, is the Cooper Middle School that has an entrance on Balls Hill Road (VA 686) which is very close to the VA 193 interchange with I-495. While the school traffic does not directly access VA 193, the school property is adjacent to VA 193 and there is likely to be some morning and afternoon congestion in the vicinity of the school.

Mr. McDonald suggests that consideration be given to using the George Washington Memorial Parkway as a route to reach I-495, if the selected truck haul route goes through northern Virginia. While the Parkway prohibits truck usage, it seems that if one agency of the Federal Government (the Corps of Engineers, which operates the Dalecarlia treatment plan) wants to dispose of its waste it could obtain a permit for the limited truck operation on the Parkway from another element of the same Federal Government (the National Park Service). Use of the Parkway would eliminate impacts on residential areas, pedestrian impacts, and delays at traffic lights / intersections.

Mr. McDonald identified two (2) specific concerns with the DEIS text:

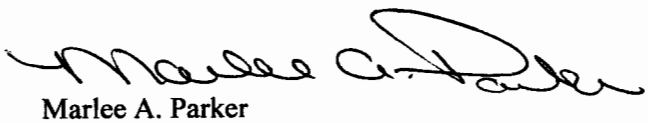
- Truck hauling hours. Section 3.10.5 (page 3-48) indicates the hauling will take place between 6 AM and 4 PM, with a concentration between 9 AM and 3 PM to avoid peak period traffic. However, Section 4.11.3.2 (page 4-54) indicates that the haul operation may occur between 7 AM and 7 PM. The times should be consistent.
- Disposal site(s). The DEIS addresses options to haul residual water treatment waste from the treatment plant and proposes haul routes that lead to the Capital Beltway. However, the potential disposal sites are not mentioned so it is impossible to evaluate whether the proposed haul operation will have a significant impact on local roads leading from I-495 (or other major arterial involved) to the disposal sites. Section 4.16.3.2 (page 4-98) states that "... additional agricultural end users would need to be identified"... before all the residuals could be assimilated into the market for residual disposal. The residual disposal case studies cited to show current practice mention two Fairfax County Water Authority treatment plants, one in Occoquan and the other in Herndon. Without an indication of the likely disposal sites for the Dalecarlia residuals, it is not possible to fully evaluate the impact on local northern Virginia roads of the preferred alternative.

In summary, a complete evaluation of the preferred alternative's impacts on local roads in Northern Virginia can not be provided since not all the roads that may be involved have been identified. Both of the two (2) haul road options cited in the DEIS (VA 123 and VA 193) traverse residential areas. An existing road that does not pass through any residential areas or intersections (George Washington Parkway) was not considered, but should be.

All work with the potential to effect roadways or other transportation facilities should be coordinated with VDOT's Northern Virginia District Office 703.383.2000.

Thank you for the opportunity to comment on this project.

Sincerely,



Marlee A. Parker
Environmental Specialist II
VDOT
1401 East Broad Street
Richmond, Virginia 23219
804.786.9683 - O
804.786.7401 - FAX

Document 124

If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

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C. Use your agency stationery or the space below for your comments. **IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.**

Please return your comments to:

MR.CHARLES H. ELLIS III
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

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MAY 18 2005
DEQ-Office of Environmental Impact Review

Charles H. Ellis III
CHARLES H. ELLIS III
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

NO IMPACT TO THE GEOLOGY OR MINERAL RESOURCES.

signed) [signature] (date) 5/16/05

(title) GEOLOGIST

(agency) DMME

PROJECT # 05-122F 8/98

Document 124

COMMONWEALTH of VIRGINIA

Department of Historic Resources

W. Tayloe Murphy, Jr.
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Kathleen S. Kilpatrick
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
TDD: (804) 367-2386
www.dhr.state.va.us

May 26, 2005

Mr. Thomas P. Jacobus
Washington Aqueduct
US Army Corps of Engineers—Baltimore District
5800 MacArthur Boulevard, NW
Washington, DC 20016-2514

Re: Water Treatment Residuals Management Process for the Washington Aqueduct
Fairfax and Arlington Counties
DEQ Project No. 05-122F
VDHR File No. 2004-1374

Dear Mr. Silva:

Through the Virginia Department of Environmental Quality we have received a draft Environmental Impact Statement for the proposed Water Treatment Residuals Management Process for the Washington Aqueduct.

We want to remind you that the Army Corps of Engineers, as a federal agency, must consider the effects of its actions on historic properties listed in or eligible for the National Register of Historic Places and provide the Advisory Council on Historic Preservation the opportunity to comment in accordance with Sections 106 of the National Historic Preservation Act, as amended, and its implementing regulation 36 CFR 800. The Section 106 review process begins when the federal agency provides a description of the undertaking and its Area of Potential Effect (APE) to the State Historic Preservation Officer (SHPO), which in Virginia is the Department of Historic Resources (DHR). For this reason we request that you consult with us directly on this undertaking. While 36 CFR 800.8 allows federal agencies to coordinate Section 106 compliance with the National Environmental Policy Act (NEPA), the agency must inform the applicable SHPO early in the process that it intends to do so. The agency must also take care that the environmental documentation prepared under NEPA does present information about historic properties and potential effects to such resources at a level of detail that allows the SHPO and other consulting parties to comment.

We look forward to working with you on this project. If you have any questions concerning our comments, please contact me at (804) 367-2323, ext. 114.

Sincerely,

Marc Holma, Architectural Historian
Office of Review and Compliance

Administrative Services
10 Courthouse Avenue
Petersburg, VA 23803
Tel: (804) 863-1624
Fax: (804) 862-6196

Capital Region Office
2801 Kensington Ave.
Richmond, VA 23221
Tel: (804) 367-2323
Fax: (804) 367-2391

Portsmouth Region Office
612 Court Street, 3rd Floor
Portsmouth, VA 23704
Tel: (757) 396-6707
Fax: (757) 396-6712

Roanoke Region Office
1030 Penmar Ave., SE
Roanoke, VA 24013
Tel: (540) 857-7585
Fax: (540) 857-7588

Winchester Region Office
107 N. Kent Street, Suite 203
Winchester, VA 22601
Tel: (540) 722-3427
Fax: (540) 722-7535

Cc: Mr. Charles H. Ellis, III, Department of Environmental Quality

If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

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Please return your comments to:

MR.CHARLES H. ELLIS III
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

Charles H. Ellis III
CHARLES H. ELLIS III
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

No significant impact on the forest resources of the Commonwealth

(signed) J. W. Forrer (date) 5-4-05

(title) Forest Mgt.

(agency) DOF

PROJECT # 05-122F

8/98

Document 124

If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

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OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

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MAY 31 2005
DEQ-Office of Environmental Impact Review

Charles H. Ellis III
CHARLES H. ELLIS III
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

No comments

(signed) Alice R.T. Ford (date) 5-26-05

(title) Chesapeake Bay Special Projects Coordinator

(agency) DCR - DCBLA

PROJECT # 05-122F 8/98

If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

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OFFICE OF ENVIRONMENTAL IMPACT REVIEW
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RICHMOND, VA 23219
FAX #804/698-4319

Charles H. Ellis III
CHARLES H. ELLIS III
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

No significant impact on the forest resources of the Commonwealth

(signed) J M Forema (date) 5-4-05

(title) Forest Mgt.

(agency) DOF

PROJECT # 05-122F

8/98

Document 124

7535 Little River Turnpike, Suite 100
Annandale, Virginia 22003-2937
www.novaregion.org

Voice: 703-642-0700
Fax: 703-642-5077
TDD: 703-642-8061

Northern Virginia Regional Commission

May 17, 2005

Mr. Charles H. Ellis III
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, VA 23219

Re: Federal Project 05-122F

The Northern Virginia Regional Commission staff has reviewed the application described above and has no comment on the proposal.

Thank you for this opportunity to participate in the intergovernmental review process.

Sincerely,

Katherine K. Mull

Katherine K. Mull
Senior Environmental Planner

Project: Water Treatment Residuals Management Process for the Washington Aqueduct
Sponsor: DOD/Army/Army Corps of Engineers

Ellis,Charles

From: Nee, Pamela [Pamela.Nee@fairfaxcounty.gov]

Sent: Thursday, May 26, 2005 9:59 AM

To: Ellis,Charles

Cc: Kaplan, Noel

Subject: FW: Washington Aqueduct (Balt. Corps of Engineers): EIS on "Water Treatment Residuals Management Process for the Washington Aqueduct" (DEQ-05-122F)

Mr. Ellis,

Fairfax County does not have any comments on this draft EIS. If you have any questions, please contact me.

Thanks,
Pam

Pamela G. Nee, Chief
Environment and Development Review Branch
Fairfax County Department of Planning and Zoning
(703) 324-1233 (direct)
(703) 324-1210 Planning Division receptionist
(703) 324-3056 (FAX)

Document 124

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MAY 19 2005

DEQ-Office of Environmental Impact Review

ARLINGTON
VIRGINIA

DEPARTMENT OF ENVIRONMENTAL SERVICES
Utilities and Environmental Policy Division
2100 Clarendon Boulevard, Suite 710 Arlington, VA 22201
TEL 703.228.4488 FAX 703.228.7134 www.arlingtonva.us

May 13, 2005

Mr. Charles H. Ellis III, Environmental Program Planner
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, VA 23219

Dear Mr. Ellis:

We have reviewed the Draft Environmental Impact Statement (DEIS) for the Dalecarlia water treatment facility modifications that are required to address new discharge permit requirements for dewatering and removal of water treatment residuals. The County is very impressed with the thoroughness of the report. We concur that Option E (Dewatering at East Dalecarlia Processing Site and Offsite Disposal by Trucking) appears to be the best overall solution environmentally. This option also provides the potential of using water treatment residuals in an environmentally beneficial manner.

The following comments are based on our review of the DEIS:

- We suggest that a 20-year lowest life cycle cost analysis be performed to determine the most appropriate equipment and to determine the best choice of materials for the construction of wetted materials. The County's experience with a major upgrade of it Water Pollution Control Plant indicates that selection of equipment and materials on this basis substantially reduces the overall long-term facility costs (capital, operations, and maintenance), minimizes down time, and provides better reliability.

- We furthermore suggest that onsite tests be performed on all equipment, including dewatering equipment, under controlled conditions to verify performance and to allow a valid net 20-year lowest life cycle cost analysis to be performed.

- We recommend site visits to other facilities that currently utilize any proposed equipment to ensure that the proper equipment is specified.

- We suggest that the assumptions in section 4.14.3 Impact Evaluation by Alternative and Option, table 4-8, page 4-83, for chemicals, labor, and

contract hauling costs be verified, as they appear somewhat low based on the County's experience.

- We suggest that Little Falls Road be analyzed to determine if it has the structural capability to handle the truck traffic modifications that are required to support the recommended option, and to determine if there are any additional costs for improvements

- The DEIS identifies the following redundancy levels to accommodate anticipated residual loading at the facility:

  - Gravity thickeners - one unit out of a total of four units.
  - Centrifuges, if selected, - two units out of a total of six units.
  - Transmission lines for conveying the residuals from remote locations – two lines, each sized to convey 100% of the normal loading.

  We believe that this level of redundancy is appropriate for this type of facility for both normal and peak loads.

Given the significant financial and operational impacts of the decision to discontinue the historical practice of discharging water treatment residuals to the Potomac River, the County appreciates the open and inclusive process that has been followed throughout the development of the Draft Environmental Impact Statement. Although there may still be concerns about neighborhood impacts of the proposed trucking operation, it seems clear from this comprehensive analysis that the recommended option is the best from both an environmental, as well as an economic perspective. We appreciate the efforts by the U. S. Army Corps of Engineers, and in particular, the staff of the Dalecarlia Water Treatment Facility, to produce the DEIS within a very challenging timeframe. The thoroughness and professionalism shown throughout this process reflects a genuine effort to respond to community and customer concerns and we appreciate this effort.

Sincerely,

John Mausert-Mooney

John Mausert-Mooney
Director

Cc: Randy Bartlett, Director, Department of Environmental Services

Document 125

THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION
Office of the Chairman, Montgomery County Planning Board

June 1, 2005

Thomas P. Jacobus, P.E.
General Manager
Washington Aqueduct
U.S Army Corps of Engineers
5900 MacArthur Boulevard, N.W.
Washington, D.C. 20016-2514

Dear Mr. Jacobus:

Thank you for the opportunity to review with you and the Planning Board on May 19, 2005 the *Draft Environmental Impact Statement for a Proposed Water Treatment Residuals Management Process for the Washington Aqueduct, April 2005.*

As you are aware, the Planning Board discussed the lack of complete information on which to form a reasoned judgment on selecting a preferred alternative from the DEIS, citing many unanswered issues, including additional alternatives for piping residuals to private sites for processing in other areas of the region, including Montgomery County.

On motion of Commissioner Robinson, the Board voted 4-0, Commissioner Perdue absent, the following points recommended for your consideration:

- Piping residuals to a private industrial site for processing and hauling 125-1-BB
- Prepare a more formal haul dispersion plan 125-2-GC
- Provide quantification of truck impacts on local road surfaces with methods of local reimbursement. 125-3-GD

We strongly recommend that the Washington Aqueduct consider additional alternatives taking into account the points identified by the Board.

In regard to Montgomery County, the Commission's Community-Based Planning Division can offer planning assistance in locating sites for the dewatering facilities and pipeline routes. Should you determine to pursue this initiative, we recommend that you also contact the Montgomery County Department of Environmental Protection for advice on any modifications to Montgomery County's Comprehensive Water and Sewerage

Systems Plan, as they are the lead agency for identifying elements of water treatment systems in the county.

Much discussion also arose about the haul routes through Montgomery County and the actual number of trucks that would transit on local roads on any given day. We offer assistance in identifying additional haul routes and parameters of usage, including any necessary road improvements, through our Transportation Planning staff.

The Planning Board recognizes the extremely challenging sites proposed for dewatering currently considered in the DEIS. We strongly urge the Washington Aqueduct to reconsider and seek a location more proximate to the Capital Beltway, where piped-in residuals may be processed, so that truck traffic through local neighborhoods will be reduced.

In the event that no prudent alternative can be found—other than the sites currently in the DEIS—we believe use of the East Dalecarlia site requires much greater minimizing in the final EIS, to protect adjacent properties from operational and truck noise and disruption.

If you have any questions or need some further assistance on the contents of this letter, please contact Jorge A. Valladares, P.E., Chief of Environmental Planning at (301) 495-4545.

Sincerely,

Derick P. Berlage
Chairman

DPB:JV:ss

cc County Executive
County Council
Charles Loehr, M-NCPPC
Andy Brunhart , WSSC
Jim Caldwell, DEP

M-NCPPC

MONTGOMERY COUNTY DEPARTMENT OF PARK AND PLANNING

THE MARYLAND-NATIONAL CAPITAL
PARK AND PLANNING COMMISSION

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MCPB
Item # 4
5/19/05

Montgomery County Planning Board

From: Countywide Planning Division (301/495-4545)

May 13, 2005

Subject: Draft Environmental Impact Statement for a Proposed Water Treatment Residuals Management Process for the Washington Aqueduct. Mandatory Referral # 05002-DA-1.

STAFF RECOMMENDATIONS:

- Support Alternative E.
- Multiple haul routes should be established and selected on a trip-by-trip basis depending upon the destination to minimize total truck travel. Trucks should only use haul routes in Montgomery County for travel to destinations either in Montgomery County or other Maryland jurisdictions north of Montgomery County.

125-4-GD

- Haul Route "C" is not recommended as a suitable route because the portion of Little Falls Parkway incorporated in the haul route has a posted restriction prohibiting commercial vehicle use.
- Either Haul Route "A" or Haul Route "B" would be acceptable for trips traveling into Montgomery County.

Truck trips should be concentrated during off-peak travel times during weekdays between 9:30 a.m. and 4:00 p.m.

The Planning Board recommendations are to be sent to the U.S. Army Corps of Engineers, Baltimore District prior to 5:00 p.m., June 6, 2005.

125-5-GK

PART I. BACKGROUND

The purpose of this briefing is to present staff recommendations on the *Draft Environmental Impact Statement for a Proposed Water Treatment Residuals Management Process for the Washington Aqueduct*, April 2005. Readers may refer to the website at http://washingtonaqueduct.nab.usace.army.mil/aqueduct.htm for a full DEIS text.

Please refer to the Executive Summary, attachment # 1, for a synopsis of this proposed project. In brief, the U.S. Army Corps of Engineers is under an order to comply with its National Pollutant Discharge Elimination System (NPDES) permit within the Federal Facilities Compliance Agreement (FFCA) deadlines, for its potable water treatment facility at Dalecarlia. In the past, the Washington Aqueduct was allowed to discharge its water treatment process residuals back into the Potomac River. Their new permit rescinds that practice forcing the residuals to be disposed in a different manner.

PART II. ALTERNATIVES

The proposed action is to develop, design and construct a permanent residuals management system to satisfy NPDES requirements within the agreed upon deadline.

The following five alternatives are those that have been carried forward in the DEIS. Refer to attachment # 2 for a project area map.

SPECIFIC ALTERNATIVES

Alternative A: Dewatering at northwest Dalecarlia processing site (Montgomery County) and disposal by monofill in D.C.

Alternative B: Dewatering at northwest Dalecarlia processing site and disposal by trucking.

Alternative C: Thickening and piping to Blue Plains advanced wastewater treatment plant.

Alternative D: No Action Alternative. Maintained as a NEPA requirement. This alternative would continue residuals discharge to Potomac River, a de facto violation of the new NPDES permit.

Alternative E: Dewatering at east Dalecarlia processing site (in D.C.) and disposal by trucking. Following processing, the dewatered residuals would be contract hauled to a permitted offsite disposal facility. Up to 20 truck trips per weekday of dewatered residuals are expected to be transported from the processing site on average. Higher numbers of truck trips, as defined in Volume 4- Engineering Feasibility Study Compendium-, would be required during peak residuals production periods. Some haul routes are through Montgomery County. Table 2-1 provides the basis for residuals estimates.

TABLE 2 - 1
Washington Aqueduct Basis for Residuals Quantities

Residuals	Daily Generated Volume (Cubic Yards)[a]		Truck Trips/Day[b]			
			22 Cubic Yards/ Truck		11 Cubic Yards/ Truck	
	Current Average	Design Year Average	Current Average	Design Year Average	Current Average	Design Year Average
Water Treatment	94	120	7	8	13	18
Forebay	22	28	2	2	3	4

[a] Based on 7 days per week production.
[b] Based on hauling to a final disposal site 5 days per week.

SELECTION OF THE PREFERRED ALTERNATIVE

Each of the alternatives evaluated (with the exception of the No Action Alternative) necessitate developing infrastructure in an urban setting, characterized by important natural and man-made resources. All five of the alternatives (including the No Action Alternative) evaluated to meet this federally mandated action will carry some degree of impact. Of particular concern is the ability of an alternative to meet the project's purpose and need, while minimizing impacts to the communities surrounding the potential operations, no matter where they be located. Particular emphasis was naturally placed in evaluating impacts near the Dalecarlia Reservoir, Dalecarlia Water Treatment

Plant (WTP), Georgetown Reservoir, and Blue Plains Advanced Wastewater Treatment Plant (AWWTP) facilities, as well as intermediate conveyance areas potentially impacted by Alternative C, the pipeline alternative. The preferred alternative for the DEIS should be the alternative that best meets the objectives of the project, as stated in the Notice of Intent (published in the *Federal Register* on January 12, 2004).

The following sources of information were considered by Washington Aqueduct while selecting the proposed action from the five possible residuals alternatives:

- Information on the potential impacts revealed by the technical evaluation (detailed in Sections 3 and 4 of the DEIS),

- Ideas and concerns raised by the public during five open public meetings or submitted directly to Washington Aqueduct staff, and

- Consultations with regulatory authorities at the federal, state, and local levels (detailed in Section 4 of the DEIS).

Both Alternatives A (Dewatering and Disposal by Monofill) and C (Thickening and Piping to Blue Plains AWWTP) have beneficial elements that contribute to the objectives of the Clean Water Act and NEPA, by enabling the Washington Aqueduct to stop discharging residuals into the Potomac River, and prevent residuals-bearing trucks from traveling on local community roads nearest to the Dalecarlia WTP facilities. However, implementation of Alternatives A and C would not allow Washington Aqueduct to comply with the Federal Facility Compliance Agreement schedule issued by the U.S. Environmental Protection Agency (USEPA), and they both would have significant long-term adverse impacts on various natural and community resources.

More specifically, during the course of this NEPA process, it has been learned that the development of Alternative A is not consistent with the schedule for investigations of this site by the U.S. Army Corps of Engineers for its ongoing remediation efforts for the American University Experimental Station (AUES), Formerly Used Defense Site (FUDS) project. Further, Alternative C, like the other piping alternatives examined during the screening process, is not consistent with the District of Columbia Water and Sewer Authority's (DC WASA's) long-term plans for its Blue Plains AWWTP and is more than double the cost of each of the other alternatives. Both alternatives would have unacceptably large potential visual, cultural, forest habitat, and perhaps recreational, impacts.

Alternative D, the no-action alternative, cannot be selected by the Washington Aqueduct because it would place it in violation of the Federal Clean Water Act, the terms

of their NPDES permit, and the FFCA issued by USEPA. Throughout the DEIS preparation process, USEPA has confirmed that they would be unwilling to modify the NPDES permit to allow the Washington Aqueduct to return to a residuals disposal practice consistent with the No Action alternative, despite the Washington Aqueduct's consideration of it and a number of similar river discharge alternatives during this process.

The Washington Aqueduct selected between Alternatives B and E for the proposed action. Both alternatives can be implemented within the required timeframe with a much greater degree of certainty than is possible for either Alternative A or C. The costs of these alternatives are consistent with the project budget, which is wholly dependent for financial support from the three local wholesale water customers and the rate-paying public. Both alternatives, as did the other action ones, feature residuals processing with trucking, albeit to off-site disposal locations. They differ in the location of the processing facilities and the location in which the trucks enter the local roadways. Alternative B would construct the residuals processing facility at the northwest Dalecarlia WTP location in Montgomery County and the trucks would enter the local roadways at the existing facility entrance to MacArthur Boulevard. Alternative E would construct the residuals processing facilities at the east Dalecarlia WTP location in D.C. and trucks would enter the local roadways at the existing intersection of Little Falls Road and Dalecarlia Parkway. These differences form the basis of the tradeoffs between each alternative.

Alternatives B and E present equally feasible options, from an engineering perspective, for a residuals management program that eliminates residuals discharge to the Potomac River. Each would enable the Aqueduct to meet the conditions of the recent Permit No. DC 0000019 within the schedule put forth in its Federal Facilities Compliance Agreement with the USEPA. Alternative E offers advantages in the following areas:

Less visual impact to surrounding residential neighbors
Site topography allows impacts to be minimized
Less truck noise attributable to residuals trucks traveling on Loughboro Road
Greater distance between surrounding neighborhoods and proposed residuals processing facilities
Fewer apparent soils issues

Therefore, Alternative E—Dewatering at east Dalecarlia processing site and disposal by trucking is recommended as the Proposed Action for the DEIS.

PART III. PROPOSED RESIDUALS HAUL ROUTES

The Washington Aqueduct Residuals Management Project includes the dredging of the Dalecarlia and Georgetown Reservoirs, and the subsequent haulage of the residuals

to various sites, which are primarily accessible via the Capital Beltway (I-495). The proposed haulage operations would occur generally between 6:00 a.m. and 4:00 p.m., and be concentrated between 9:00 a.m. and 3:00 p.m., on weekdays only. The haulage activity would have a minimal impact on the morning peak period and would have no impact on the afternoon peak period, by restricting hauling to this timeframe.

All hauling routes analyzed, with the exception of southeastern route H, were considered previously by the Washington Aqueduct for dredging the Dalecarlia Reservoir. Prior to September 11, 2003, the southern routes were feasible for trucking residuals through the District of Columbia. New security measures adopted after September 11, 2003 have limited the roadways where trucks may travel making routes F and G infeasible. In response, a new haul route has been proposed that directs truck traffic from the Dalecarlia WTP to the south, ultimately connecting with I-395. This route has been designated Route H.

Eight potential haul routes (A to H), as illustrated in attachment # 3, have been evaluated within the DEIS. Five of those routes connect Dalecarlia to the Capital Beltway. The remaining three routes connect Dalecarlia to the Southeast/Southwest Freeway. The eight routes are as follows:

- Route A - To the north via MacArthur Boulevard—Loughboro Road—Dalecarlia Parkway—Western Avenue—Wisconsin Avenue (MD 355)—Capital Beltway (I-495).

- Route B - To the northwest via MacArthur Boulevard—Loughboro Road—Dalecarlia Parkway—Western Avenue—River Road (MD 190)—Capital Beltway (I-495).

- Route C - To the northwest via MacArthur Boulevard—Loughboro Road—Dalecarlia Parkway—Massachusetts Avenue (MD 396)—Little Falls Parkway—River Road (MD 190)—Capital Beltway (I-495).

- Route D - To the west via MacArthur Boulevard—Arizona Avenue—Canal Road—Chain Bridge Road (VA 123)—Dolley Madison Boulevard (VA 123) - Dulles Access/Toll Road - Capital Beltway (I-495).

- Route E - To the west via MacArthur Boulevard - Arizona Avenue - Canal Road - Chain Bridge Road (VA 123) - Georgetown Pike (VA 193) - Capital Beltway (I-495).

- Route F- To the southeast via MacArthur Boulevard-Loughboro Road-Dalecarlia Parkway-Massachusetts Avenue-23rd Street-Constitution Avenue-9th Street (Tunnel)-Southwest/Southeast Freeway (I-395).

- Route G-To the southeast via MacArthur Boulevard-Canal Road-Whitehurst Freeway-23rd Street-Constitution Avenue-9th Street (Tunnel)-Southwest/Southeast Freeway (I-395).

- Route H- To the southeast via MacArthur Boulevard-Loughboro Road-Dalecarlia Parkway-Massachusetts Avenue-Mount Vernon Square-New York Avenue-Southwest/Southeast Freeway (I-395) (In reverse direction, Southwest/Southeast Freeway (I-395)-2nd NW-Massachusetts Avenue-7th Street-Mount Vernon Square-Massachusetts Avenue-Dalecarlia Parkway-Loughboro Road-MacArthur Boulevard.

The DEIS evaluated all potential haul routes based on their functional and service characteristics. Key criteria included peak versus off-peak directional patterns, ADT/Lane Configuration and Level-of-Service relationships, vehicle classification characteristics, travel time - distance relationships, capacity/operational constraints, safety deficiencies and impacts on "sensitive" land uses.

A factor complicating evaluation of the haul routes is not knowing where the residuals ultimate destination or destinations will be located. Only routes passing through Montgomery County will be commented upon by staff.

Three haul routes, A, B and C pass through Montgomery County. Route A passes through Friendship Heights and Bethesda along Wisconsin Avenue, both very heavily traffic impacted areas. Route B misses Friendship Heights by turning along Western Avenue at River Road. Route C utilizes Little Falls Parkway, a major constraint.

The eight routes can be characterized in three groups, organized geographically as follows:

- Routes A, B, and C extend in a northwesterly direction toward the Capital Beltway in Montgomery County
- Routes D and E extend in a westerly direction toward the Capital Beltway in Fairfax County, Virginia
- Routes F, G, and H extend in a southeasterly direction toward the Southeast/Southwest Freeway in Washington, DC.

Each of the routes require travel on six to eight miles of local arterial roadway, so no one route or set of routes is clearly advantageous for all possible destinations. Staff finds that at least three haul routes should be established with one route selected from each of the three geographic groups described above. For each trip, the haul route chosen should be one that minimizes total travel distance to the destination. For destinations in Montgomery County, or Maryland jurisdictions north of Montgomery County, Haul Routes A and B would be suitable.

Staff finds that Haul Route C should not be recommended as a suitable route because it incorporates a portion of Little Falls Parkway between Massachusetts Avenue (MD 396) and River Road (MD 190) on which commercial vehicles are prohibited.

In Montgomery County, Haul Routes A and B consist of those portions of Wisconsin Avenue (MD 355) and River Road (MD 190), respectively, between the Capital Beltway and the District of Columbia. Staff finds that Haul Routes A and B are very similar in sharing the following characteristics:

- Approximately four miles in length between the Capital Beltway and the Washington DC boundary
- Classified as multilane, divided, Major Highways in the County's Master Plan of Highways
- No prohibitions on truck traffic
- Carry approximately 60,000 vehicles per day in the vicinity of the Capital Beltway
- Congestion levels prompted the Planning Board to seek initiation of State Highway Administration Development and Evaluation studies based on the July 2004 Annual Development Approval and Congestion Report

The differences between Wisconsin Avenue and River Road are primarily related to adjacent land uses, which have sensitivity to truck traffic for different reasons. Wisconsin Avenue serves the pedestrian-oriented central business districts of Friendship Heights and Bethesda. Based in part on the pedestrian activity, posted speed limits range from 25 MPH to 35 MPH. River Road serves lower density communities in the Bethesda-Chevy Chase planning area and is generally lined with residential and institutional uses, excepting the Westbard Sector Plan area. Posted speed limits range from 35 MPH to 45 MPH.

Staff finds that neither the pedestrian-oriented developments along Wisconsin Avenue nor the low-density residential communities along River Road to be clearly superior or inferior in determining the appropriateness of a haul route. Both routes carry in excess of 2,000 trucks per day near the Capital Beltway, so the effect of truck traffic anticipated by the proposed action (up to 40 vehicles per day on all haul routes combined) is not expected to be observable on either route. Staff therefore finds that either Haul Route A (Wisconsin Avenue) or Haul Route B (River Road) would be an appropriate designation.

Staff does not concur with the DEIS finding that Wisconsin Avenue and River Road operate at acceptable levels of service based on M-NCPPC standards. As described above, substandard congestion levels exist during peak periods along both candidate

routes as identified in the July 2004 Annual Development and Congestion Report. Staff therefore recommends that the truck trips be scheduled to occur after the end of the morning peak period and before the beginning of the evening peak period. Based on the peak period definitions in the Planning Board's Local Area Transportation Review Guidelines, the truck travel should be scheduled to occur between 9:30 a.m. and 4:00 p.m.

125-6-GK

Full Transportation Planning staff comments are in attachment # 4.

PART IV. COST

The potential cost to the customers represented by the proposed alternatives takes into consideration both initial capital costs and long-term operational and maintenance costs.

COST SIGNIFICANCE CRITERIA

No Impact

An alternative has no impact on cost if its capital cost (in 2004 dollars) is below the $50,000,000.00 capital budget allocation for the residuals project.

No Significant Impact

An alternative has no significant impact on cost if its capital cost (in 2004 dollars) is above the $50,000,000.00 capital budget allocation for the project but below an amount equal to 30 percent over the budget allocation, or $65,000,000.00.

Significant Impact

An alternative has a significant impact on cost if its capital cost (in 2004 dollars) is above $65,000,000.00.

IMPACT EVALUATION BY ALTERNATIVE AND OPTION

For this resource, impacts are described by alternative, rather than by both treatment facility and alternative. For each alternative, the initial capital cost and the estimated annual costs are used to calculate the present worth, or present value of the project, using a 20-year evaluation period. It is assumed that present worth costs have a directly proportional impact on the rates charged by the Washington Aqueduct's wholesale customers. For this reason, present worth costs are useful for comparing and ranking the alternatives from a life cycle cost perspective. Specific rate impacts for each alternative have not been prepared for the DEIS. Cost serves as only one of the decision variables used to select the preferred alternative.

Table 4-6 presents a summary of the construction costs for the four alternatives (excluding Alternative D—No Action Alternative) that are evaluated in detail in this DEIS. These figures are prepared at an order of magnitude level. Costs for sedimentation and residuals collection options are also summarized in Table 4-8. As was discussed in Section 4 of the Engineering Feasibility Study Compendium, previous cost estimates by Whitman Requardt and Associates for facilities such as residuals conveyance through the Georgetown Conduit, thickening, and dewatering were updated for inflation and used as the basis for this estimate. New construction cost estimates were developed for other facilities, such as the modifications to the sedimentation basins and the residuals collection equipment for the Georgetown Reservoir and the Forebay. For Alternative C—Thickening and Piping to Blue Plains AWWTP, it was assumed that a dewatering building, equivalent in cost to the one proposed for the Dalecarlia WTP, would need to be constructed at Blue Plains AWWTP. The cost for the monofill was based on the cost for a monofill of similar size, constructed in Northern Virginia in the mid-1990s for lime residuals. Actual bid costs were used as the basis for the estimate and were updated for inflation.

Based on the construction costs listed in Table 4-7, Alternative A would have no significant impact on cost because its cost is between $50,000,000.00 and $65,000,000.00. Alternatives B and E would have no impact on cost because their costs are each below $50,000,000.00. Alternative C has significant impact on cost because its cost is well above $65,000,000.00 and between 2.5 and 3.0 times the cost of the other three alternatives.

Table 4-7 presents preliminary present worth costs for each of the four alternatives evaluated in detail in the DEIS. Each alternative assumes that the existing Dalecarlia sedimentation basins will be retrofitted with residuals collection equipment and that new dredging equipment will be installed in the Georgetown Reservoir to collect residuals, along with a thickening and dewatering facility. The present worth cost was calculated for a 20-year project life at a discount factor (interest rate) of 3 percent.

Table 4-8 is a summary of the assumptions used to create the annual operations and maintenance (O&M) costs used in the evaluation. At this preliminary level of detail, the general conclusion is that Alternative A—Dewatering at Northwest Dalecarlia Processing Site and Disposal by Monofill has the lowest present worth cost. Onsite processing with hauling of dewatered residuals to an offsite location (Alternatives B and E) has the second lowest present worth cost, Alternative C—Thickening and Piping to Blue Plains AWWTP has the highest present worth cost.

The costs presented in this DEIS are preliminary. It is important to note that cost is only one of the factors considered in choosing the recommended alternative for

implementation. This DEIS evaluates other factors specifically pertaining to environmental and other impacts that will be used by Washington Aqueduct to choose the recommended alternative for implementation.

TABLE 4-6
Order-of-Magnitude Construction Cost Summary for the Selected Alternatives

Cost Item	Alternative A Dewatering at Northwest Dalecarlia Processing Site and Disposal by Monofill	Alternatives B and E Dewatering at Northwest or East Dalecarlia Processing Site and Disposal by Trucking	Alternative C Thickening and Piping to Blue Plains AWWTP
Retrofit of Existing Basins with Collection Equipment	$14,200,000	$14,200,000	$14,200,000
Dredging System at Georgetown	$2,400,000	$2,400,000	$2,400,000
Subtotal—Sedimentation and Residuals Collection			$16,600,000
Gravity Thickeners and Thickened Residuals Pump Station			$9,700,000
Dewatering Building	$19,700,000	$19,700,000	$19,700,000
Miscellaneous Support Facilities	$1,600,000	$1,600,000	$1,600,000
Subtotal—Collection and Processing Facilities			$47,600,000
Dalecarlia Monofill			—
Thickened Residuals Pump Station and Pipeline			$95,000,000
Total Construction Cost ($2004)	$54,300,000	$47,600,000	$142,600,000
Construction Cost Escalated to Mid-Point of Construction (July 2008)			$165,100,000

TABLE 4-7
Net Present Value for the Selected Alternatives

Residuals Process	Alternative A Dewatering at Northwest Dalecarlia Processing Site and Disposal by Monofill	Alternatives B and E Dewatering at Northwest or East Dalecarlia WTP Location and Disposal by Trucking	Alternative C Thickening and Piping to Blue Plains AWWTP
Capital Costs			
Collection and Processing	$47,600,000	$47,600,000	$47,600,000
Additional Facilities	$6,700,000	$0	$95,000,000
Total Capital Cost ($2005)			
Annual O&M Costs			
Labor (Thickening and Dewatering)	$374,000	$374,000	$374,000
Labor (Monofill Operation)	$69,000	$0	$0
Chemicals (Thickening and Dewatering)	$238,000	$238,000	$238,000
Power	$117,000	$117,000	$192,000
Other (Monofill-Specific Costs)	$79,000	$0	$0
Other (Contract Hauling)	$0	$1,194,000	$1,194,000
Total (Annual O&M Costs)			
Present Worth Costs			
Present Worth of Annual Costs	$13,100,000	$28,800,000	$29,700,000
Salvage Value	$0	$0	$0
Net Present Value	$67,400,000	$76,200,000	$172,300,000

TABLE # 4-8
Assumptions for the Preliminary Net Present Value Calculations

Category	Assumptions
Residuals Production	
Production	32 dry tons/day @ 30% dry solids; 109 wet tons/day
Average Operating Period	16 hours/day; 5 days/week; 52 weeks/year
Chemicals	
Polymer Use	8 to 10 Lbs. active material per ton of dry solids
Polymer Cost	$2.00 per pound of active material
Power	
Electrical Power Costs	$0.045 to $0.070 per kWh ($0.06/kWh was used for the evaluation)
Labor Costs	
Burdened Operations Labor Costs	$33.00 per hour
Burdened Managerial Labor Costs	$47.00 per hour
Managerial to Operations Ratio	1 to 6 (for thickening and dewatering only)
Thickening and Dewatering Labor	2 people; 16 hours/day
Landfill Labor	1 person; 40 hours/week
Contract Hauling	
Contract Hauling	$30.00 per wet ton
Net Present Value Calculations	
Discount Rate	3%
Present Worth Period	20 years
Salvage Value	None

Other Assumptions:

1. Maintenance costs for equipment and facilities are not included in the evaluation.
2. Annual costs for the monofill and costs for contract hauling are based on discussions with the Upper Occoquan Sewage Authority (Centreville, VA).
3. Costs for contract hauling will depend on the competitive environment and hauling distances.
4. Capital costs are not escalated to the mid-point of construction.
5. Cost calculations for assume that the capital and annual costs to thicken at the Dalecarlia WTP and dewater at Blue Plains are the same as an all-Dalecarlia WTP operation.

PART V. NEXT STEPS AND SCHEDULE

The Planning Board is expected to select its recommendations and forward them to the Washington Aqueduct no later than 5:00 p.m., June 6, 2005.

Attachments:

1 - Executive Summary from DEIS
2 - Project Area Map (In color, Planning Board only)
3 - Map of Potential Truck Haul Routes (In color, Planning Board only)
4 - May 11, 2005 Transportation Planning Memorandum
5 - CD for Planning Board Packet Only

D:PB Briefing-Washington Aqueduct Residuals Management DEIS.doc
11 May 2005

ATTACHMENT #1

Executive Summary

Purpose of the Document

The purpose of this Integrated Feasibility Study and Draft Environmental Impact Statement for Washington Aqueduct Water Treatment Residuals is to evaluate alternatives for managing its water treatment residuals for the next 20 years. This is necessary for the Washington Aqueduct to comply with its National Pollutant Discharge Elimination System (NPDES) NPDES Permit (Permit No. DC 0000019) within the Federal Facilities Compliance Agreement (FFCA) deadlines.

This Draft Environmental Impact Statement (DEIS) has been prepared in accordance with the National Environmental Policy Act (NEPA) and supporting regulations promulgated by the Council on Environmental Quality and the United States Army Corps of Engineers. Members of the public, regulatory agencies and other stakeholders are encouraged to review and comment on this draft document during the 45-day comment period following its publication. After this comment period has closed, a Final EIS (FEIS) will be prepared to address the comments received and to fully describe the environmental, social and economic consequences of implementing the preferred alternative and other feasible alternatives. The FEIS will be the evidentiary basis for the Record of Decision (ROD) developed by the Baltimore District of the Corps of Engineers that identifies the alternative to implement. During the public comment period, Washington Aqueduct will schedule, publicize and conduct a Public Hearing on this project.

Background and Project History

The Washington Aqueduct, a Division of the U.S. Army Corps of Engineers (USACE), Baltimore District, operates the Dalecarlia and McMillan Water Treatment Plants (WTPs) in Washington, DC, serving over 1 million persons in the DC and northern Virginia area with potable water. The treatment process removes solid particles (e.g., river silt) from the Potomac River supply water, treats and disinfects the water, and distributes the finished water to the metropolitan service area. The solids removed during the treatment process have historically been returned to the Potomac River, but the recently reissued version of the Washington Aqueduct's Permit No. DC 0000019 effectively precludes the discharge of water treatment solids (i.e., residuals) to the river.

Consequently, Washington Aqueduct has evaluated water treatment residuals management alternatives that minimize or eliminate the discharge of residuals to the river. Washington Aqueduct developed objectives for the proposed residuals management process with the intention of ensuring compliance with all permit and other legal mandates, and preserving or improving upon the safety, reliability, and efficiency of the current water treatment process. In addition, Washington Aqueduct incorporated into the objectives a concern for minimizing impacts to the human and natural environment.

The following objectives define the purpose and need for the proposed residuals management process assessment and were listed in the Notice of Intent, published in the *Federal Register* on January 12, 2004. (Measurement indicators in parentheses).

- To allow Washington Aqueduct to achieve complete compliance with NPDES Permit DC00000019 and all other federal and local regulations.
- To design a process that will not impact current or future production of safe drinking water reliably for the Washington Aqueduct customers. (Peak design flow of drinking water).
- To reduce, if possible, the quantities of solids generated by the water treatment process through optimized coagulation or other means. (Mass or volume of solids generated).
- To minimize, if possible impacts on various local and regional stakeholders and minimize impacts on the environment. (Traffic, noise, pollutants, etc.).
- To design a process that is cost-effective in design, implementation, and operation. (Capital, operations, and maintenance costs).

Proposed Action

The proposed action is to develop, design, and construct a permanent residuals management process that will cost-effectively collect, treat, and dispose of the water treatment residuals in conformance with the purpose and need stated in Section 1. The selected action must meet the Federal Facilities Compliance Agreement (FFCA) compliance deadlines. It must also address the management of projected residuals quantities for a period of at least 20 years. Table 2-1 lists the current and future volume of water treatment and Forebay residuals generated daily as estimated for the Engineering Feasibility Study (EFS) (Volume 4 of DEIS). This table also presents the number of truck trips associated with the residuals quantities, based on a 5-day week. Not all of the alternatives evaluated in detail in this DEIS use trucking for final disposal of dewatered residuals. The larger residuals values listed in the design year columns reflect the larger quantity of water demand anticipated 20 years in the future.

TABLE 2-1
Washington Aqueduct Basis for Residuals Quantities

	Daily Generated Volume (Cubic Yards)[a]		Truck Trips/Day[b]			
			22 Cubic Yards/ Truck		11 Cubic Yards/ Truck	
Residuals	Current Average	Design Year Average	Current Average	Design Year Average	Current Average	Design Year Average
Water Treatment	94	120	7	8	13	16
Forebay	22	28	2	2	3	4

[a] Based on 7 days per week production.
[b] Based on hauling to a final disposal site 5 days per week.

Development of Alternatives

The first step in the National Environmental Policy Act (NEPA) alternative identification process was to review the project history and compile a full range of possible alternatives that had the potential to meet the stated purpose and need. Washington Aqueduct has been evaluating residuals management approaches for a number of years due to changes in or expected changes in regulations. During that time many alternatives have been identified. Some of these alternatives are no longer consistent with the regulatory requirements defined in the April 2003 National Pollutant Discharge Elimination System (NPDES) permit and associated FFCA.

A total of 160 residuals management alternatives and eight options were identified and screened to determine if they could be carried forward for detailed evaluation in the DEIS. Twenty-six of these alternatives were identified from a combination of historical documentation and ideas provided by the public during an initial Scoping period in early 2004. The remaining alternatives were identified during subsequent opportunities for public input in the third and fourth quarter of 2004 and the first quarter of 2005.

All of the alternatives have been incorporated into the list of alternatives detailed in Volume 4 of this DEIS, the Engineering Feasibility Study Compendium, and summarized in the Section 2 of this report. The original objectives as published in the Notice of Intent have remained in effect.

To facilitate the screening process and to make it easier for the reader to cross-reference this document with the other DEIS volumes, the residuals alternatives were grouped into one of the following categories before they were screened:

- No Action Alternative
- Alternatives that do not require continuous trucking from the Dalecarlia WTP
- Alternatives with a discharge to the Potomac River
- Alternatives involving alternate uses of the Dalecarlia Reservoir
- Alternatives with facilities at the McMillan Water Treatment Plant (WTP)
- Alternatives with facilities at the Dalecarlia WTP (involving trucking from Dalecarlia WTP Complex)

These categories recognize the similarity of many of the alternatives, grouping alternatives by common critical components, such as method of dewatering or disposal, or location of processing facilities. Once categorized, all residuals alternatives and options were evaluated using the same screening criteria. Volume 4 of this DEIS provides detailed technical information on each alternatives, as well as a complete description of the screening evaluation and results.

Alternatives Evaluated in Detail in the DEIS

The alternatives screening process concluded that five of the 160 screened alternatives were consistent with the purpose and need of the project, or required by NEPA to be evaluated in detail. All of these remaining alternatives, except the No Action alternative, have several common residuals collection and unthickened liquid residuals conveyance facilities. The common facilities include new residuals dredge collection, pumping, and conveyance

facilities located at the Georgetown Reservoir and new residuals collection equipment, pumping, and unthickened conveyance piping located at the Dalecarlia WTP sedimentation basins. The five processing and disposal alternatives along the potential common facilities, have been evaluated in more detail in this DEIS to determine their impacts. While none of the action alternatives avoid all conveyance of residuals by truck, they do represent a mix of methodologies that potentially reduce, expand or alter the location and impact of any trucking.

The five alternatives to be evaluated in detail were designated alternatives A through E following the completion of the extended screening process as follows:

Alternative A: Dewatering at Northwest Dalecarlia Processing Site and Disposal by Monofill

Alternative A does not require continuous trucking from the Dalecarlia WTP site. With this alternative, residuals would be collected continuously from the Dalecarlia Sedimentation Basins, periodically dredged from the Georgetown Reservoir and pumped to new residuals thickening and dewatering facilities located on the Dalecarlia WTP at a site in the northwestern corner of the property designated the Dalecarlia WTP Northwest site. Following dewatering, the residuals would be trucked across MacArthur Boulevard and disposed of in a new monofill constructed in the Dalecarlia Woods area of the Dalecarlia WTP complex.

Residuals processing, including gravity thickening and dewatering would occur at the Dalecarlia WTP Northwest site with this alternative. Following processing, onsite trucks would haul the residuals across MacArthur Boulevard and up Little Falls Road to the monofill disposal site. On average, six (20-ton) trucks worth of water treatment residuals would be hauled to the monofill site each day.

As currently conceived the residuals disposal monofill would be approximately 50 ft tall on the Dalecarlia Parkway side and 80 ft tall on the Dalecarlia Reservoir side. The footprint of the monofill is anticipated to occupy approximately 30 acres.

Alternative B: Dewatering at Northwest Dalecarlia Processing Site and Disposal by Trucking

For alternative B, residuals are collected from the Georgetown Reservoir and the Dalecarlia WTP sedimentation basins and conveyed to the Dalecarlia WTP similar to Alternative A. Once dewatered, residuals are contract hauled to a final disposal site.

Residuals processing, including gravity thickening and dewatering would occur at the Dalecarlia WTP Northwest site with this alternative. Following processing, the dewatered residuals would be contract hauled to a permitted offsite disposal facility. An estimated eight truck trips per day (5 days per week) of dewatered residuals are expected to be transported from the Dalecarlia WTP site on average. Higher numbers of truck trips, as defined in Volume 4 -Engineering Feasibility Study Compendium, would be required during peak residuals production periods.

Alternative C: Thickening and Piping to Blue Plains AWWTP

Alternative C does not rely upon trucks to transport dewatered residuals from the Dalecarlia WTP but it does require transporting by truck from Blue Plains AWWTP. Residual processing at the Dalecarlia WTP site is limited to gravity thickening with this

alternative. Thickened residuals are then pumped through a dedicated pair of pipelines to the Blue Plains Advanced Wastewater Treatment Plant (AWWTP) for dewatering. Residuals disposal is accomplished via contract hauling and off-site disposal. The proposed route for the dedicated thickened residuals pipeline follows the west bank of the Potomac River to the Blue Plains AWWTP.

Alternative D: No Action Alternative

Although not consistent with the purpose and need of the project, Alternative D, the No Action Alternative, is retained as a NEPA requirement. This alternative assumes that residuals would continue to be discharged directly from the Dalecarlia WTP sedimentation basins and the Georgetown Reservoir to the Potomac River in the future. This practice would be in violation of the strict solids concentrations defined in the NPDES permit discharge limits.

Alternative E: Dewatering at East Dalecarlia Processing Site and Disposal by Trucking

This alternative is similar to Alternative B, except residuals processing is accomplished at a site on the eastern portion of the Dalecarlia WTP (and Reservoir) property designated as the East Dalecarlia Processing site. Following processing, the dewatered residuals would be contract hauled to a permitted offsite disposal facility. An estimated eight truck trips per day (5 days per week) of dewatered residuals are expected to be transported from the Dalecarlia WTP site on average. Higher numbers of truck trips, as defined in Volume 4—Engineering Feasibility Study Compendium, would be required during peak residuals production periods.

Evaluation of Impacts

The potential for and significance of environmental, social, and economic consequences associated with implementing any of the project alternatives is described in this DEIS. The specific resource areas evaluated are:

- Land use
- Air quality
- Aquatic resources
- Biological resources
- Cultural resources
- Hazardous, toxic, and radioactive substances
- Implementation uncertainty
- Soils, geology, and groundwater
- Infrastructure
- Land application
- Public health
- Transportation
- Visual resources
- Social and economic resources, including Environmental Justice and Protection of Children

Criteria for evaluating potential impacts and determining their significance were determined by the CEQ (40 CFR 1508.27). The regulations state that significance is determined by the intensity or severity of the impact and the context in which it occurs. Intensity criteria were based on the following:

- The degree to which the action affects public health or safety
- The degree of change to unique geographic characteristics, such as visual quality, prime agricultural land, archaeological sites, wetlands, or ecologically critical areas
- Potential for environmental or scientific controversy
- Known or unknown level of risk
- Potential for establishing a precedent for future actions or representing a decision in principle about a future consideration
- The relation of impact to other actions, individually insignificant but with cumulative impact
- The proximity of the action to resources that are legally protected by various statutes, such as wetlands, historic properties listed in the National Register of Historic Places, regulatory floodplains, and federally listed threatened or endangered species
- The potential for violating federal, state, or local laws or requirements in place to protect the environment

Using these criteria, the following levels of impacts were identified:

No Impact—implementation of the action has little or no effect upon the resource.

No Significant Impact—implementation of the action has an impact, either adverse or beneficial, but it does not meet the significance criteria for the given resource relative to intensity and context.

Significant Impact—the predicted impact, either adverse or beneficial, meets the significance criteria for the given resource. Significant impacts may be reduced to an insignificant level by implementing appropriate mitigation measures.

The cumulative impacts that could be associated with the implementation of the proposed action in concert with one or more other past, present, or reasonably foreseeable future actions or projects are also evaluated. Specifically, this evaluation is prepared in accordance with the requirements of the National Environmental Policy Act (NEPA) and guidance from the CEQ, *Considering Cumulative Effects Under the National Environmental Policy Act*.

Selection of the Preferred Alternative

Each of the alternatives evaluated (with the exception of the No Action Alternative) necessitates developing infrastructure in an urban setting, characterized by important natural and man-made resources. All five of the alternatives (including the No Action Alternative) evaluated to meet this federally mandated action will carry some degree of impact. Of particular concern is the ability of an alternative to meet the project's purpose

and need, while minimizing impacts to the communities surrounding the potential operations, no matter where they be located. Particular emphasis was naturally placed in evaluating impacts near the Dalecarlia Reservoir, Dalecarlia Water Treatment Plant (WTP), Georgetown Reservoir, and Blue Plains AWWTP facilities, as well as intermediate conveyance areas potentially impacted by Alternative C, the pipeline alternative. The **Preferred Alternative** for the DEIS should be the alternative that best meets the objectives of the project, as stated in the Notice of Intent (published in the *Federal Register* on January 12, 2004).

The following sources of information were considered by Washington Aqueduct while selecting the proposed action from the five possible residuals alternatives:

- Information on the potential impacts revealed by the technical evaluation (detailed in Sections 3 and 4 of this DEIS),
- Ideas and concerns raised by the public during five open public meetings or submitted directly to Washington Aqueduct staff, and
- Consultations with regulatory authorities at the federal, state, and local levels (detailed in Section 4).

Both Alternatives A (Dewatering and Disposal by Monofill) and C (Thickening and Piping to Blue Plains AWWTP) have beneficial elements that contribute to the objectives of the Clean Water Act and NEPA, by enabling the Washington Aqueduct to stop discharging residuals into the Potomac River, and prevent residuals-bearing trucks from traveling on local community roads nearest to the Dalecarlia WTP facilities. However, implementation of Alternatives A and C would not allow Washington Aqueduct to comply with the Federal Facility Compliance Agreement schedule issued by the U.S. Environmental Protection Agency (USEPA), and they both would have significant long-term adverse impacts on various natural and community resources.

More specifically, during the course of this NEPA process, we have learned that the development of Alternative A is not consistent with the schedule for investigations of this site by the U.S. Army Corps of Engineers for its ongoing remediation efforts for the American University Experimental Station (AUES) Formerly Used Defense Site (FUDS) project. Further, Alternative C, like the other piping alternatives examined during the screening process, is not consistent with the District of Columbia Water and Sewer Authority's (DC WASA's) long-term plans for its Blue Plains AWWTP and is more than double the cost of each of the other alternatives. Both alternatives would have unacceptably large potential visual, cultural, forest habitat, and perhaps recreational, impacts.

Alternative D, the no-action alternative, cannot be selected by the Washington Aqueduct because it would place it in violation of the Federal Clean Water Act, the terms of their NPDES permit, and the FFCA issued by USEPA. Throughout the DEIS preparation process, USEPA has confirmed that they would be unwilling to modify the NPDES permit to allow the Washington Aqueduct to return to a residuals disposal practice consistent with the No Action alternative, despite the Washington Aqueduct's consideration of it and a number of similar river discharge alternatives during this process.

The Washington Aqueduct selected between Alternatives B and E for the proposed action. Both alternatives can be implemented within the required timeframe with a much greater degree of certainty than is possible for either Alternative A or C. The costs of these alternatives are consistent with the project budget, which is wholly dependent for financial support from the three local wholesale customers and the rate-paying public. Both alternatives, as did the other action ones, feature residuals processing with trucking, albeit to off-site disposal locations. They differ in the location of the processing facilities and the location in which the trucks enter the local roadways. Alternative B would construct the residuals processing facility at the Northwest Dalecarlia WTP location and the trucks would enter the local roadways at the existing facility entrance to MacArthur Boulevard. Alternative E would construct the residuals processing facilities at the East Dalecarlia WTP location and trucks would enter the local roadways at the existing intersection of Little Falls Road and Dalecarlia Parkway. These differences form the basis of the tradeoffs between each alternative.

Alternatives B and E present equally feasible options, from an engineering perspective, for a residuals management program that eliminates residuals discharge to the Potomac River. Each would enable the Aqueduct to meet the conditions of the recent Permit No. DC 0000019 within the schedule put forth in its Federal Facilities Compliance Agreement with the USEPA. Alternative E offers advantages in the following areas:

- Less visual impact to surrounding residential neighbors
- Site topography allows impacts to be minimized
- Less truck noise attributable to residuals trucks travelling on Loughboro Road
- Greater distance between surrounding neighborhoods and proposed residuals processing facilities
- Fewer apparent soils issues

Therefore, Alternative E—Dewatering at East Dalecarlia Processing Site and Disposal by Trucking is recommended as the Proposed Action for the DEIS.

Agency and Public Participation

During the preparation of the DEIS, a public scoping period was held in early 2004. Also in 2004, four (4) additional public forums were hosted by the Washington Aqueduct to provide interested members of the public with an opportunity to better understand the project and the proposed alternatives. The Washington Aqueduct also consulted with numerous local and federal agencies and elected officials as well as participated by invitation in a variety of forums hosted by community groups to continue to describe the project and the alternatives being evaluated in the DEIS. The Aqueduct created and maintained a public web site devoted exclusively to this project.

Members of the public, elected officials, and regulatory agencies in the District of Columbia and Maryland used the public involvement process leading up to the publication of the DEIS to voice concerns, ideas and opinions about the project and its proposed alternatives.

A summary of major public concern on DEIS alternatives A through E communicated during this process is as follows:

Alternative A—Dewatering at Northwest Dalecarlia Processing Site and Disposal by Monofill

There was significant public concern about removing a 30-acre stand of mature, mixed hardwood forest and replacing it with a residuals monofill with a 20 year life span. Specific issues centered on the visual impact to nearby Maryland residences, operational impacts of light, noise and dust, the loss of biological resources that are currently protected from human activity, and the potential for the water quality in the reservoir to be affected. Some area residents characterized this alternative as creating a permanent impact (clearcutting the forest) for a temporary solution (a monofill with capacity for 20 years of disposal).

From an agency standpoint, the Corps of Engineers Baltimore Division leading the AUES FUDS environmental restoration project expressed concern that portions of the Dalecarlia Reservoir property, including the monofill footprint, fell within an area historically known as "Government Woods". They have reasonable suspicion that this property may have been associated with the AUES's World War One era research and testing activities. This suspicion has led to scheduled testing of portions of the Dalecarlia Reservoir property. This scheduled testing in 2008 and associated remedial actions, if any conflict with the Aqueduct's timetable for FFCA compliance.

Alternative B—Dewatering at Northwest Dalecarlia Processing Site and Disposal by Trucking

Public concern developed focused on the appearance of the processing facilities. Specifically its potential to impact the visual character of the immediate area and to be seen by residents of Maryland's Brookmont neighborhood downgradient of the site's western boundary, residents of Windward and Leeward Place overlooking the site's northern boundary, and users of the portion of the Capital Crescent Trail passing through the Aqueduct's WTP property. Nearby residents have also voiced concern about operational issues of noise, light pollution, and the potential for odors.

Beyond the immediate neighbors, this alternative attracts public concern about truck traffic on area roads, which is viewed as a congestion, pedestrian safety, and residential foundation hazard. Regulatory agencies have not voiced concerns specific to this alternative.

Alternative C—Thickening and Piping to Blue Plains AWWTP

Maryland and DC residents from the neighborhoods surrounding the Dalecarlia Reservoir and WTP have been largely supportive of this alternative because it involves the smallest amount of visibly-observed facility development in this geographic area and does not involve trucks carrying residuals on their area roads, which effort would instead be transferred to I-295 and Southeast D.C. Under this alternative, the potential operational impacts of the residuals processing facility would be transferred to the Blue Plains AWWTP approximately 12 miles away in the opposite corner of the District of Columbia.

Three regional offices of the NPS have expressed significant concern about the pipeline corridor as it passes through the C&O National Historical Park and Georgetown Historic District, and areas adjacent to the Lincoln Memorial, the Franklin Delano Roosevelt Memorial, and Thomas Jefferson Memorial.

The Washington Area Sanitation Authority (DC WASA) evaluated the prospect of hosting the residuals processing facility at their Blue Plains facility. They have determined that all potentially available site space must be reserved for planned facilities to accomplish greater wastewater nutrient removal and store and treat CSOs (see Engineering Feasibility Study Compendium—Volume 4 of the DEIS for more detail on this issue). As a result, they cannot host the Washington Aqueduct's facilities as part of this alternative.

Alternative D—No Action Alternative

A portion of the public dialog has focused on the need for the Washington Aqueduct to change its current and historical practice of Potomac River residuals disposal. There has been some public support for this alternative, with the argument that a new residuals management process creates a set of land-based impacts that are greater than the impacts associated with water-based disposal. Neither the impact balancing that occurred during this NEPA process, nor the stictures of the Clean Water Act support this argument.

From a resource agency perspective, the Washington Aqueduct received the current Permit No. DC 0000019, and entered into an FFCA following 9 years of research and detailed discussion over the need to alter the residual disposal process from river discharge to land application. An extensive administrative record was created by USEPA Region 3 to support this decision. Once made, the FFCA was needed to set forth a timetable for the Washington Aqueduct to meet Permit No. DC 000019. This permit for all practical purposes precludes continuation of river disposal. The failure to enter into the FFCA would have most likely resulted in USEPA revoking Permit No. DC 0000019, or USEPA entering a unilateral order and schedule.

Alternative E—Dewatering at East Dalecarlia Processing Site and Disposal by Trucking

This alternative is an outcome of the extended public comment period ending in mid-November 2004. It has the benefit of moving the facility further from the Brookmont neighborhood and will have better access to the Dalecarlia Parkway, reducing the local noise from the expected truck traffic. The building would be visible from the Westmoreland neighborhood that faces the reservoir, but it would be in the same sight line as the existing hospital high rise buildings. The topography of the site offers opportunities to minimize the visibility of the structures.

Conclusion

The alternatives screening criteria are linked to the project's purpose and need. Washington Aqueduct developed them subsequent to the issuance of the Notice of Intent.

The production of safe drinking water delivered with one hundred percent reliability to Washington Aqueduct's wholesale customers at a reasonable cost must be maintained during construction and operation of the selected alternative. This is the inherent duty of the Washington Aqueduct management.

The screening criteria were then applied to all of the alternatives – those that were initially developed by Washington Aqueduct staff and consultants and those that were suggested by

the public. Four alternatives met the screening criteria and their effects are evaluated in this DEIS.

A fifth alternative, the "no action" alternative is also included.

While "no action" is an alternative that must be evaluated in any environmental documentation accomplished under the National Environmental Policy Act, it cannot be the selected action in this case. The issuance of NPDES Permit DC 0000019 which itself was evaluated in a public process pursuant to EPA regulations, requires some kind of solids collection and disposal process as an alternate to the current method of flushing them to the Potomac River.

Alternative E—Dewatering at East Dalecarlia Processing Site and Disposal by Trucking is recommended as the Proposed Action for the DEIS bcauase it best meets the purpose and need of the project.

Document 125

ATTACHMENT # 2

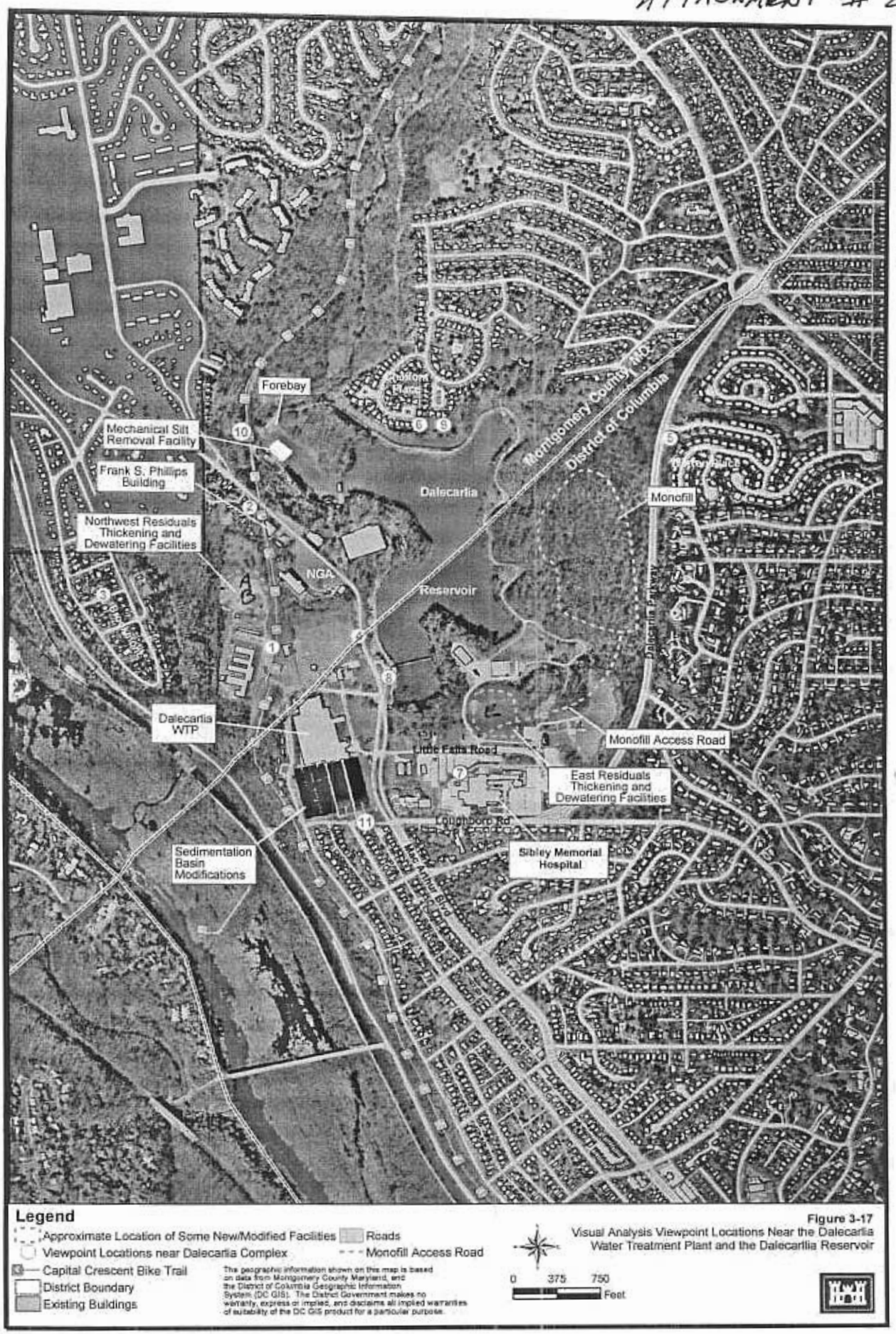

Figure 3-17
Visual Analysis Viewpoint Locations Near the Dalecarlia Water Treatment Plant and the Dalecarlia Reservoir

Document 125

ATTACHMENT # 3

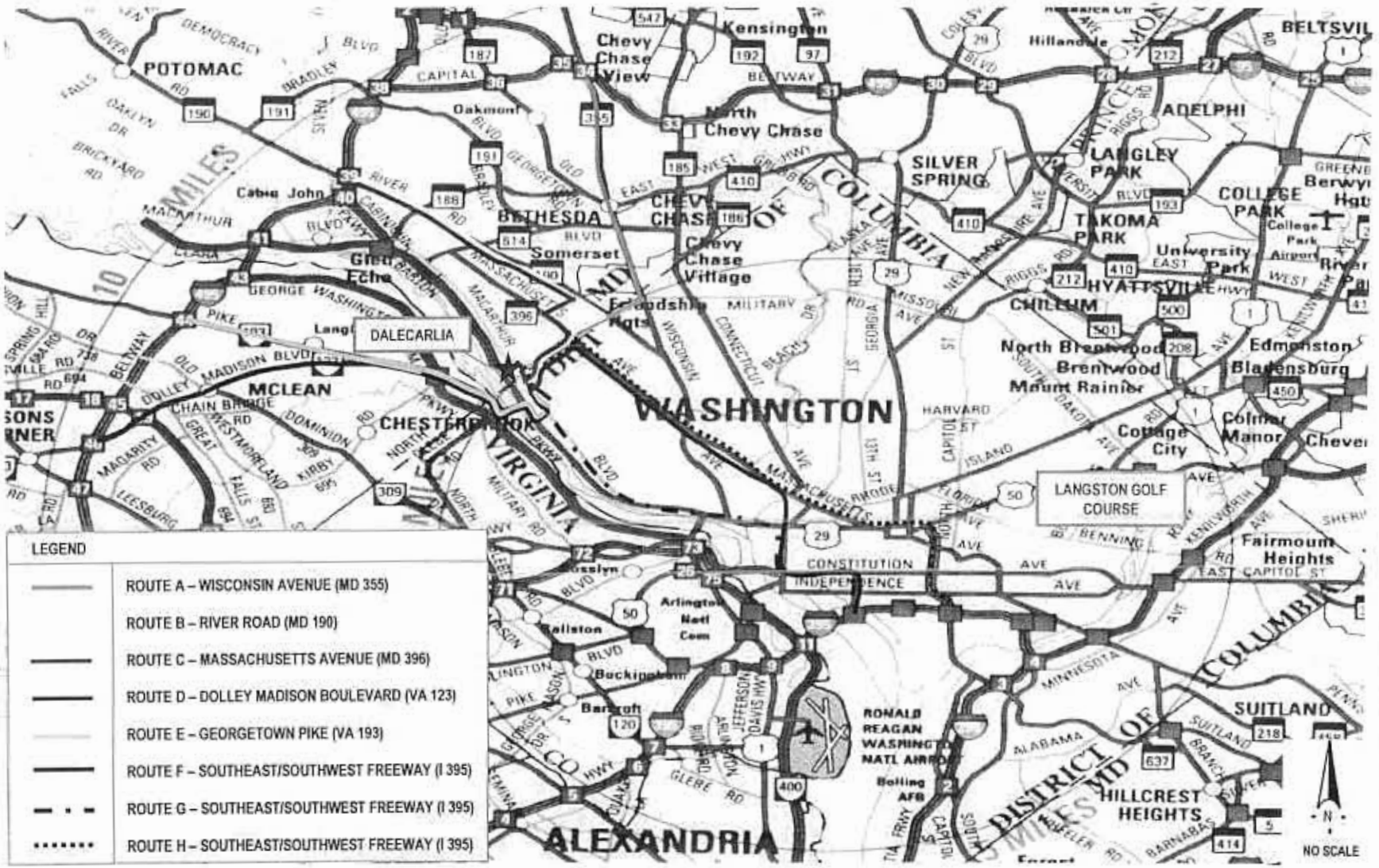

FIGURE 3-8
POTENTIAL TRUCK HAUL ROUTES

ATTACHMENT # 3

Document 125

ATTACHMENT #4

THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION
Montgomery County Department of Park and Planning

THE MARYLAND NATIONAL CAPITAL PARK AND PLANNING COMMISSION
RECEIVED
MAY 11 2005
ENVIRONMENTAL PLANNING DIVISION

May 11, 2005

MEMORANDUM

TO: Jorge Valladares, Chief
Environmental Planning

FROM: Daniel K. Hardy, Supervisor DKH
Transportation Planning

SUBJECT: Mandatory Referral No. 05002-DA-1
Washington Aqueduct Proposed Water Treatment Residuals Management Process
Bethesda/Chevy Chase Policy Area

This memorandum is Transportation Planning staff's review of the Draft Environmental Impact Statement (DEIS) prepared by the U.S. Army Corps of Engineers for the referenced action.

RECOMMENDATION

Transportation Planning recommends transmittal of the following comments:

1. Multiple haul routes should be established and selected on a trip-by-trip basis depending upon the destination to minimize total truck travel. Trucks should only use haul routes in Montgomery County for travel to destinations either in Montgomery County or other Maryland jurisdictions north of Montgomery County.

2. Haul Route "C" is not recommended as a suitable route because the portion of Little Falls Parkway incorporated in the haul route has a posted restriction prohibiting commercial vehicle use.

3. Either Haul Route "A" or Haul Route "B" would be acceptable for trips traveling into Montgomery County.

4. Truck trips should be concentrated during off-peak travel times during weekdays between 9:30 AM and 4:00 PM.

DISCUSSION

The proposed action is expected to generate up to 40 truck trips per day (20 trips in each direction), far less than the 30 vehicle trips per hour threshold for a Local Area Transportation Review study. The DEIS indicates that most truck trips will occur during midday hours on weekdays, so that peak period traffic operations and congestion levels will not be materially affected.

The Dalecarlia Water Treatment Plant (WTP) is located on MacArthur Boulevard in northwest Washington, DC, adjacent to and partially within Montgomery County. Under the proposed action, residual materials will be transferred by truck to a variety of receiving sites, currently unspecified, that are generally accessible via the regional interstate highway system. Vehicular transfer of residual materials by any route will necessarily include some travel on arterial roadways serving sensitive residential, commercial, or institutional communities that lie between the Dalecarlia WTP and the interstate highway system. The DEIS therefore identifies eight potential truck haul routes that would connect the Dalecarlia WTP to the interstate highway system, notably the Capital Beltway (I-495) in Virginia and Maryland and the Southeast/ Southwest Freeway (I-395) in Washington, DC.

The eight routes can be characterized in three groups, organized geographically as follows:

- Routes A, B, and C extend in a northwesterly direction toward the Capital Beltway in Montgomery County.
- Routes D, and E extend in a westerly direction toward the Capital Beltway in Fairfax County, Virginia.
- Routes F, G, and H extend in a southeasterly direction toward the Southeast/Southwest Freeway in Washington, DC.

Each of the route require travel on six to eight miles of local arterial roadway, so no one route or set of routes is clearly advantageous for all possible destinations. Staff finds that at least three haul routes should be established with one route selected from each of the three geographic groups described above. For each trip, the haul route chosen should be one that minimizes total travel distance to the destination. For destinations in Montgomery County, or Maryland jurisdictions north of Montgomery County, Haul Routes A and B would be suitable.

Staff finds that Haul Route C should not be recommended as a suitable route because it incorporates a portion of Little Falls Parkway between Massachusetts Avenue (MD 396) and River Road (MD 190) on which commercial vehicles are prohibited.

In Montgomery County, Haul Routes A and B consist of those portions of Wisconsin Avenue (MD 355) and River Road (MD 190) respectively, between the Capital Beltway and the District of Columbia. Staff finds that Haul Routes A and B are very similar in sharing the following characteristics:

- Approximately four miles in length between the Capital Beltway and the Washington DC boundary.
- Classified as multilane, divided, Major Highways in the County's Master Plan of Highways
- No prohibitions on truck traffic.
- Carry approximately 60,000 vehicles per day in the vicinity of the Capital Beltway.
- Congestion levels prompted the Planning Board to seek initiation of State Highway Administration Development and Evaluation studies based on the July 2004 Annual Development Approval and Congestion Report.

The differences between Wisconsin Avenue and River Road are primarily related to adjacent land uses, which have sensitivity to truck traffic for different reasons. Wisconsin Avenue serves the pedestrian-oriented central business districts of Friendship Heights and Bethesda. Based in part on the pedestrian activity, posted speed limits range from 25 MPH to 35 MPH. River Road serves lower density communities in the Bethesda-Chevy Chase planning area and is generally lined with residential and institutional uses, except the Westbard Sector Plan area. Posted speed limits range from 35 MPH to 45 MPH.

Staff finds that neither the pedestrian-oriented developments along Wisconsin Avenue nor the low-density residential communities along River Road to be clearly superior or inferior in determining the appropriateness of a haul route. Both routes carry in excess of 2,000 trucks per day near the Capital Beltway, so the effect of truck traffic anticipated by the proposed action (up to 40 vehicles per day on all haul routes combined) is not expected to be observable on either route. Staff therefore finds that either Haul Route A (Wisconsin Avenue) or Haul Route B (River Road) would be an appropriate designation.

Staff does not concur with the DEIS finding that Wisconsin Avenue and River Road operate at acceptable levels of service based on Maryland-National Capital Park and Planning Commission standards. As described above, substandard congestion levels exist during peak periods along both candidate routes as identified in the July 2004 Annual Development and Congestion Report. Staff therefore recommends that the truck trips be scheduled to occur after the end of the morning peak period and before the beginning of the evening peak period. Based on the peak period definitions in the Planning Board's Local Area Transportation Review Guidelines, the truck travel should be scheduled to occur between 9:30 AM and 4:00 PM.

DKH:gw

mmo to Valladares re 05002-DA-1 washington aqueduct ver2.doc

From:
Sent: Friday, June 10, 2005 4:51 PM
To: Peterson, Michael C WAD
Subject: Sludge processing plant

I totally oppose your proposal to bring a sludge processing plant with hauling trucks into our beautiful residential neighborhood. I think that the Sibley site is just atrocious and that will seriously and adversely affect our lovely Westmoreland Hills neighborhood. I believe that the fluids should be piped out of the neighborhood to an industrial site for processing. If that is absolutely impossible (which was not proven by you), I believe that you should stay on your "campus" and build any facilities that you need in that location. We all bought our homes knowing you were in that location. None of us ever thought you'd take over these beautiful neighborhoods with an industrial sludge processing facility, and trucks of sludge material running through our neighborhood streets.

I also believe that the Corp of Engineers has been duplicitous and deceitful throughout this whole process. Specifically you have been deceitful in your failure to properly advertise public meetings, failure to disclose critical information, your attempts to manipulate, divide and control citizen participation and dissent, the timing and location of your meetings designed to discourage participation, your filibustering and repressive rules and public meetings to stifle dissent, etc. This was not a full and fair public process as it should have been. You should all be ashamed of yourselves.

_____

From: GLEN SMITH [gsmith2@sha.state.md.us]
Sent: Monday, June 13, 2005 7:29 AM
To: Peterson, Michael C WAD
Cc: DENNIS YODER; MIKE HALEY; TERRANCE HANCOCK
Subject: Re: Washington Aqueduct DEIS comment period

Mr. Peterson,

The Maryland State Highway Administration has reviewed the DEIS and has no comments at this time. Please feel free to contact me if you have any questions, or need additional information.

Thank you,

Glen A. Smith
Regional Planner
Regional and Intermodal Planning Division
Maryland State Highway Administration
707 N. Calvert St - C-502
Baltimore MD 21202
410-545-5675
1-888-204-4828
Email: gsmith2@sha.state.md.us
Fax: 410-209-5025

>>> "Peterson, Michael C WAD"
<Michael.C.Peterson@wad01.usace.army.mil> 06/10/2005 4:33:29 PM >>>

Washington Aqueduct has extended the comment period for 30 days to allow the public to finalize any comments they wish to submit for consideration and inclusion in the Final Environmental Impact Statement (FEIS). The comment period will end on July 6, 2005.

Please forward your comments to us by mail at 5900 MacArthur Boulevard, NW, Washington, DC 20016-2514, attn: Michael Peterson, by e-mail to michael.c.peterson@usace.army.mil, or use the website comment form found at http://washingtonaqueduct.nab.usace.army.mil/aqueduct.htm.

Very Respectfully,

MICHAEL C. PETERSON
Environmental Engineer
Washington Aqueduct
5900 MacArthur Boulevard, NW
Washington, DC 20016-2514

michael.c.peterson@usace.army.mil
Phone: 202-764-0025

From:
Sent: Monday, June 13, 2005 10:31 AM
To: Peterson, Michael C WAD
Subject: RE: Washington Aqueduct DEIS comment period

Mr. Peterson:

My comments are basically the same as my testimony at the last public hearing.

The change in the proposed location of the waste processing plant from adjacent to the Washington Aqueduct's other facilities south of McArthur Boulevard to behind Sibley Hospital would have a detrimental impact on all of us who use Sibley due to the noise and air pollution caused by the plant and the trucks which would haul the waste away. This relatively recent change in proposed location of the plant has not received nearly as much time for public comment as the previously proposed site. If further opportunity were available for public testimony on the relative merits of the two sites, the site next to Sibley would receive far stronger objection. More importantly, the proposed change in location is inappropriate. A complete study, for which the time and effort should be taken, would show the previously proposed site to be more suitable, affecting far less people who are not ill as opposed to the many more hospitalized at Sibley who are. While Sibley Hospital has not objected to the proposed change in location of the processing plant, my understanding is that Sibley prefers the processing plant to be located at its previously proposed site as opposed to directly in back of the hospital. As we discussed before the last public hearing, the statement in your e-mail to me that Sibley supports the location of the processing plant next to the hospital was incorrect and should have been that while Sibley has no objection to the change in plant location, it prefers the previously proposed site.

Thank you for the opportunity to make my views known.

From: Peterson, Michael C WAD [mailto:Michael.C.Peterson@wad01.usace.army.mil]
Sent: Friday, June 10, 2005 4:33 PM
To: undisclosed-recipients
Subject: Washington Aqueduct DEIS comment period

Washington Aqueduct has extended the comment period for 30 days to allow the public to finalize any comments they wish to submit for consideration and inclusion in the Final Environmental Impact Statement (FEIS). The comment period will end on July 6, 2005.

Please forward your comments to us by mail at 5900 MacArthur Boulevard, NW, Washington, DC 20016-2514, attn: Michael Peterson, by e-mail to michael.c.peterson@usace.army.mil, or use the website comment form found at http://washingtonaqueduct.nab.usace.army.mil/aqueduct.htm.

Very Respectfully,

MICHAEL C. PETERSON
Environmental Engineer
Washington Aqueduct
5900 MacArthur Boulevard, NW
Washington, DC 20016-2514
michael.c.peterson@usace.army.mil
Phone: 202-764-0025

From:
Sent: Tuesday, June 21, 2005 2:02 PM
To: Peterson, Michael C WAD
Subject: opposition to Dalecarlia sludge plant

June 21, 2005

Dear Mr. Peterson,

We are writing to express our deeply held opposition to the proposed Army Corps of Engineers? sludge factory in the Dalecarlia area. This facility would greatly add to the already congested traffic, as well as significantly contribute to extensive wear & tear on our local roads. In addition, there are a variety of other options that would serve the purpose at least as well as this proposed site at Dalecarlia.

As lifelong residents of this community, we hope you will please note our strong opposition to this project.

Sincerely,

From:
Sent: Thursday, June 30, 2005 8:38 PM
To: Peterson, Michael C WAD
Cc: Councilmember.Denis@montgomerycountymd.gov; Councilmember.Floreen@montgomerycountymd.gov
Subject: DEIS-I oppose your proposal

Mr. Thomas P. Jacobus
General Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Blvd., N.W.
Washington, D.C. 200016

Michael.C.Peterson@usace.army.mil

Dear Mr. Jacobus and Mr. Peterson:

I am writing to express my outrage about the 80-foot industrial dewatering facility you are proposing near Brookmont (Alternative B) or behind Sibley Hospital (Alternative E) and the impact it will have on my neighborhood. I favor finding a piping solution that will send the residuals to a non-residential area closer to the beltway. I ask you to carefully review and respond to Concerned Neighbors' concerns that:

- The DEIS contains virtually no analysis of environmental impacts of the Corps' preferred option.
- The environmental impacts of the Corps' preferred "trucking alternative" are profound in a region that is already suffering from severe non-attainment under Clean Air Act standards and serious traffic congestion.
- The Corps' DEIS seriously mischaracterizes the true cost of the "trucking alternative" by failing to include the cost of operating large diesel trucks indefinitely.
- The entire process has been flawed, starting with the Corps' failure to involve the community when it started the scoping process for this project in January of 2004. The Corps pre-selected an outcome more than 10 years ago (trucking residuals through our neighborhoods) and crafted the NEPA process to fit their desired outcome.
- The Corps has looked at a limited range of alternatives, raising concerns that the NEPA process was not properly followed.
* The Corps has not adequately investigated a piping alternative

In addition, I am personally concerned about…
(customize the letter by writing about how one of these items will impact you)

- Environmental impact in region that is already classified as being in severe non-attainment under the Clean Air Act
- Air impact of trucking and potential increase in the number of asthma or cancer cases resulting from this volume of diesel emissions daily
- The safety implications of sending 132 trucks a day through Maryland and DC past at least 10 public and private schools
- Combined health and safety impacts of having trucks enter the dewatering facility at the same time Sibley Hospital is engaged in a major expansion of its facility

Sincerely,

Send copies to your Congressional representatives:

The Honorable Chris Van Hollen
1419 Longworth House Office Building
Washington, DC 20515
http://www.house.gov/writerep/

The Honorable Barbara Mikulski
503 Hart Senate Office Building
Washington, DC 20510
http://mikulski.senate.gov/contactme/mailform.html

The Honorable Paul Sarbanes
503 Hart Senate Office Building
Washington, DC 20510
http://sarbanes.senate.gov/pages/email.html

Councilmember Howard A. Denis
Montgomery County Council
100 Maryland Avenue
Rockville, MD 20850 Councilmember.Denis@montgomerycountymd.gov

Councilmember Nancy Floreen
100 Maryland Ave, 6th Floor
Rockville, MD 20850
Councilmember.Floreen@montgomerycountymd.gov

From:
Sent: Thursday, June 30, 2005 5:59 PM
To: Peterson, Michael C WAD
Cc: Councilmember.Floreen@montgomerycountymd.gov; Councilmember.Denis@montgomerycountymd.gov
Subject: Attached please find a letter to Mr.Thomas Jacobus

Attachments: 95896271-Jacobus letter.doc

June 30, 2005

Mr. Thomas P. Jacobus
General Manager
Washington Aqueduct
US Army Corps of Engineers, Baltimore District
5900 MacArthur Blvd., N.W.
Washington, DC 20016

Dear Mr. Jacobus:

I am writing to express my concern about the dewatering facility that you are planning to build either behind Sibley or near Brookmont, and the process that has been used to select these alternatives. I do not feel that all solutions have been considered fully and that no "out-of-the-box" thinking was done in creating these alternatives. I do not think that any of the piping variations were given fair consideration and a solution that pipes the residuals nearer the Beltway and to a non-residential should be re-evaluated. I ask that you carefully review and respond to Concerned Neighbors concerns that:

1) The DEIS contains virtually no analysis of the environmental impacts of the Corps' preferred option.
2) The environmental impacts of the Corps' preferred "trucking alternative" are profound in a region that is already suffering from severe non-attainment under Clean Air Act standards and serious traffic congestion.
3) The Corps' DEIS seriously mischaracterizes the true cost of the "trucking alternative" by failing to include the cost of operating large diesel trucks indefinitely.
4) The entire process has been flawed, starting with the Corps' failure to involve the community when it started the scoping process for this project in January of 2004. The Corps pre-selected an outcome more than 10 years ago (trucking residuals through our neighborhoods) and crafted the NEPA process to fit their desired outcome.
5) The Corps has looked at a limited range of alternatives, raising concerns that the NEPA process was not properly followed.

In addition, I am personally concerned about the safety and traffic implications of sending as many as 132 trucks a day through streets in MD and DC adjacent to the Dalecarlia facility. These trucks would pass schools and residential areas. These roads are already congested and were not designed to handle industrial traffic. I have seen no safety assessment nor an assessment of how road maintenance would be managed with

the DOT. These issues all add indirect costs and must be factored into the analysis of the preferred alternative. Again, this leads to me the conclusion that the NEPA process was not followed properly.

In summary, I think that the Corps has taken the path of least resistance and chosen the most logical and easiest to implement solution without giving careful consideration to the impacts on the surrounding areas. If the best, long term solution is to build the facility in one of the two proposed locations, I would accept that. But I am not convinced that all solutions were fully and fairly considered. The Corps should go back and reconsider from an unbiased perspective all alternatives.

Sincerely,

Cc:
The Honorable Chris Van Hollen
The Honorable Barbara Mikulski
The Honorable Paul Sarbanes
Councilmember Howard A. Denis
Councilmember Nancy Floreen

From:
Sent: Tuesday, July 05, 2005 6:59 AM
To: Peterson, Michael C WAD
Subject: Washington Aqueduct
Dear Mr. Peterson:

I am writing to express my concern about the 80-foot industrial dewatering facility you are proposing behind Sibley Hospital (Alternative E) and the impact it will have on my neighborhood. I favor finding a piping solution that will send the residuals to a non-residential area closer to the beltway. I ask you to carefully review and respond to Concerned Neighbors' concerns that:
• The DEIS contains virtually no analysis of environmental impacts of the Corps' preferred option.
• The environmental impacts of the Corps' preferred 'trucking alternative' are profound in a region that is already suffering from severe non-attainment under Clean Air Act standards and serious traffic congestion.
• The Corps' DEIS seriously mischaracterizes the true cost of the 'trucking alternative' by failing to include the cost of operating large diesel trucks indefinitely.
• The entire process has been flawed, starting with the Corps' failure to involve the community when it started the scoping process for this project in January of 2004. The Corps pre-selected an outcome more than 10 years ago (trucking residuals through our neighborhoods) and crafted the NEPA process to fit their desired outcome.
• The Corps has looked at a limited range of alternatives, raising concerns that the NEPA process was not properly followed.

In addition, I am personally concerned about…
(customize the letter by writing about how one of these items will impact you)
• Environmental impact in region that is already classified as being in severe non-attainment under the Clean Air Act
• Air impact of trucking and potential increase in the number of asthma or cancer cases resulting from this volume of diesel emissions daily
• The safety implications of sending 132 trucks a day through Maryland and DC past at least 10 public and private schools
• Combined health and safety impacts of having trucks enter the dewatering facility at the same time Sibley Hospital is engaged in a major expansion of its facility.

Sincerely,

From:
Sent: Monday, July 04, 2005 11:34 AM
To: Peterson, Michael C WAD
Subject: Alternative E of their Draft Environmental Impact Statement ('DEIS')
Mr. Thomas P. Jacobus
General Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Blvd., N.W.
Washington, D.C. 200016

Dear Mr. Jacobus:

I am writing to express my concern about the 80-foot industrial dewatering facility you are proposing behind Sibley Hospital (Alternative E) and the impact it will have on my neighborhood. I favor finding a piping solution that will send the residuals to a non-residential area closer to the beltway. I ask you to carefully review and respond to Concerned Neighbors' concerns that:
. The DEIS contains virtually no analysis of environmental impacts of the Corps' preferred option.
. The environmental impacts of the Corps' preferred 'trucking alternative' are profound in a region that is already suffering from severe non-attainment under Clean Air Act standards and serious traffic congestion.
. The Corps' DEIS seriously mischaracterizes the true cost of the 'trucking alternative' by failing to include the cost of operating large diesel trucks indefinitely.
. The entire process has been flawed, starting with the Corps' failure to involve the community when it started the scoping process for this project in January of 2004. The Corps pre-selected an outcome more than 10 years ago (trucking residuals through our neighborhoods) and crafted the NEPA process to fit their desired outcome.
. The Corps has looked at a limited range of alternatives, raising concerns that the NEPA process was not properly followed.

In addition, I am personally concerned about.
(customize the letter by writing about how one of these items will impact you)
. Environmental impact in region that is already classified as being in severe non-attainment under the Clean Air Act
. Air impact of trucking and potential increase in the number of asthma or cancer cases resulting from this volume of diesel emissions daily
. The safety implications of sending 132 trucks a day through Maryland and DC past at least 10 public and private schools
. Combined health and safety impacts of having trucks enter the dewatering facility at the same time Sibley Hospital is engaged in a major expansion of its facility

From:
Sent: Monday, July 04, 2005 12:02 PM
To: Peterson, Michael C WAD
Cc: Councilmember.Floreen@montgomerycountymd.gov; Councilmember.Denis@montgomerycountymd.gov
Subject: Sibley dewatering facility proposal

Mr. Michael C. Peterson
Environmental Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Blvd., N.W.
Washington, D.C. 20016

Dear Mr. Peterson:

Please forward this letter to Mr. Jacobus, General Manager.

I am writing to express my concern about the 80-foot industrial dewatering facility you are proposing behind Sibley Hospital (Alternative E) and the impact it will have on my neighborhood (Westmoreland Hills, Bethesda). I favor finding a piping solution that will send the residuals to a non-residential area closer to the beltway. I ask you to carefully review and respond to Concerned Neighbors' concerns that:

- The DEIS contains virtually no analysis of environmental impacts of the Corps' preferred option.
- The environmental impacts of the Corps' preferred 'trucking alternative' are profound in a region that is already suffering from severe non-attainment under Clean Air Act standards and serious traffic congestion.
- The Corps' DEIS seriously mischaracterizes the true cost of the 'trucking alternative' by failing to include the cost of operating large diesel trucks indefinitely.
- The entire process has been flawed, starting with the Corps' failure to involve the community when it started the scoping process for this project in January of 2004. The Corps pre-selected an outcome more than 10 years ago (trucking residuals through our neighborhoods) and crafted the NEPA process to fit their desired outcome.
- The Corps has looked at a limited range of alternatives, raising concerns that the NEPA process was not properly followed.

In addition, I am personally concerned about

- Environmental impact in region that is already classified as being in severe non-attainment under the Clean Air Act
- Air impact of trucking and potential increase in the number of asthma or cancer cases resulting from this volume of diesel emissions daily
- The safety implications of sending 132 trucks a day through Maryland and DC past at least 10 public and private schools
- Combined health and safety impacts of having trucks enter the dewatering facility at the same time Sibley Hospital is engaged in a major expansion of its facility

5223 Elliott Rd.
Bethesda, MD 20816

From:
Sent: Monday, July 04, 2005 12:20 PM
To: Peterson, Michael C WAD
Cc: Councilmember.Denis@montgomerycountymd.gov; Councilmember.Floreen@montgomerycountymd.gov
Subject: U.S. Army Corps of Engineers Draft Environmental Impact Statement ('DEIS') Alternative E

Michael.C.Peterson@usace.army.mil

Dear Mr. Peterson:

I am writing to express my concern about the 80-foot industrial dewatering facility the Army Corps of Engineers is proposing behind Sibley Hospital (Alternative E) and the impact it will have on my neighborhood. I am opposed to Alternative E of the U.S. Army Corps of Engineers Draft Environmental Impact Statement ('DEIS') and favor finding a piping solution that will send the residuals to a non-residential area closer to the beltway. I ask you to carefully review and respond to Concerned Neighbors' concerns that:

- The DEIS contains virtually no analysis of environmental impacts of the Corps' preferred option.
- The environmental impacts of the Corps' preferred 'trucking alternative' are profound in a region that is already suffering from severe non-attainment under Clean Air Act standards and serious traffic congestion.
- The Corps' DEIS seriously mischaracterizes the true cost of the 'trucking alternative' by failing to include the cost of operating large diesel trucks indefinitely.
- The entire process has been flawed, starting with the Corps' failure to involve the community when it started the scoping process for this project in January of 2004. The Corps pre-selected an outcome more than 10 years ago (trucking residuals through our neighborhoods) and crafted the NEPA process to fit their desired outcome.
- The Corps has looked at a limited range of alternatives, raising concerns that the NEPA process was not properly followed.

In addition, I am personally concerned about the safety implications of sending 132 trucks a day through Maryland and DC past at least 10 public and private schools. As well as the combined health and safety impacts of having trucks enter the dewatering facility at the same time Sibley Hospital is engaged in a major expansion of its facility.

Please focus on an alternative solution to your proposed Alternative E.

Thank you.

From:
Sent: Monday, July 04, 2005 2:10 PM
To: Peterson, Michael C WAD
Cc:
Councilmember.Denis@montgomerycountymd.gov;
Councilmember.Floreen@montgomerycountymd.gov
Subject: Washington Aqueduct

Mr. Michael C. Peterson
Environmental Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Blvd., N.W.
Washington, D.C. 200016

Dear Mr. Peterson:

I am writing to express our concern about the 80-foot industrial dewatering facility you are proposing behind Sibley Hospital (Alternative E) and the impact it will have on my neighborhood. We favor finding a piping solution that will send the residuals to a non-residential area closer to the beltway. We ask you to carefully review and respond to Concerned Neighbors? concerns that:

(1) The DEIS contains virtually no analysis of environmental impacts of the Corps' preferred option.
(2) The environmental impacts of the Corps' preferred 'trucking alternative' are profound in a region that is already suffering from severe non-attainment under Clean Air Act standards and serious traffic congestion.
(3) The Corps' DEIS seriously mischaracterizes the true cost of the 'trucking alternative' by failing to include the cost of operating large diesel trucks indefinitely.
(4) The entire process has been flawed, starting with the Corps' failure to involve the community when it started the scoping process for this project in January of 2004. The Corps pre-selected an outcome more than 10 years ago (trucking residuals through our neighborhoods) and crafted the NEPA process to fit their desired outcome.
(5) The Corps has looked at a limited range of alternatives, raising concerns that the NEPA process was not properly followed.

As parents of a young child, we are particularly concerned about the safety implications of sending 132 trucks a day through Maryland and DC past at least 10 public and private schools.

In addition, as long time residents and users of Sibley Hospital we believe that the combined health and safety impacts of having trucks enter the dewatering facility at the same time Sibley Hospital is engaged in a major expansion of its facility represents a dangerous and unhealthy set of circumstances.

Sincerely,

c/c:

The Honorable Chris Van Hollen
1419 Longworth House Office Building
Washington, DC 20515
http://www.house.gov/writerep/

The Honorable Barbara Mikulski
503 Hart Senate Office Building
Washington, DC 20510
http://mikulski.senate.gov/contactme/mailform.html

The Honorable Paul Sarbanes
503 Hart Senate Office Building
Washington, DC 20510
http://sarbanes.senate.gov/pages/email.html

Councilmember Howard A. Denis
Montgomery County Council
100 Maryland Avenue
Rockville, MD 20850
Councilmember.Denis@montgomerycountymd.gov

Councilmember Nancy Floreen
100 Maryland Ave, 6th Floor
Rockville, MD 20850
Councilmember.Floreen@montgomerycountymd.gov

From:
Sent: Monday, July 04, 2005 5:00 PM
To: Peterson, Michael C WAD
Subject: proposed industrial sludge treatment facility near Sibley Hospital

I am absolutely appalled that the USACE would consider building this facility adjacent to a hospital and in the middle of residential neighborhoods. This site would not only be unsightly, but it will be unsafe. It puts your organization in a libelous position in transporting the effluent on major roads not built for heavy hauling through densely populated communities.

With the excavation around Sibley for World War I buried munitions and mustard gas, it is also possible that such construction would run into similar health and safety problems which would stall and possibly even halt this project, putting you back to square one.

Your initial presentation of a football field sized pile of effluent on the site adjacent to Sibley was a red herring, designed to instigate and focus community objection. You had to know that the munitions/mustard gas excavations would not be completed until well after you had to start your project. As the community focused on the unsightly and unhealthy prospect of our own huge mount trashmore, you were quietly going forward with your trucking plan under the community radar.

It is my belief that your organization did not consider carefully enough other remedies, including the piping solution which would send residuals to a non-residential area closer to the beltway. My guess is that the deadline crept up on you, and within the last several months, you are faced with making a quick and uninformed decision.

I hope your deadline can be postponed so you can consider other remedies less harmful to the community and the environment.

Thank you for your consideration.

Sincerely,

From:
Sent: Monday, July 04, 2005 7:09 PM
To: Peterson, Michael C WAD
Cc: lcropp@dccouncil.us; Councilmember.Denis@montgomerycountymd.gov
Subject: Alternative E opposition

- Dear Mr. Peterson:

  I am writing to express my concern about the 80-foot industrial dewatering facility you are proposing behind Sibley Hospital (Alternative E) and the impact it will have on my neighborhood. I favor finding a piping solution that will send the residuals to a non-residential area closer to the beltway. I ask you to carefully review and respond to Concerned Neighbors' concerns that:
  . The DEIS contains virtually no analysis of environmental impacts of the Corps' preferred option.
  . The environmental impacts of the Corps' preferred 'trucking alternative' are profound in a region that is already suffering from severe non-attainment under Clean Air Act standards and serious traffic congestion.
  . The Corps' DEIS seriously mischaracterizes the true cost of the 'trucking alternative' by failing to include the cost of operating large diesel trucks indefinitely.
  . The entire process has been flawed, starting with the Corps' failure to involve the community when it started the scoping process for this project in January of 2004. The Corps pre-selected an outcome more than 10 years ago (trucking residuals through our neighborhoods) and crafted the NEPA process to fit their desired outcome.
  . The Corps has looked at a limited range of alternatives, raising concerns that the NEPA process was not properly followed.

  In addition, I am personally concerned about.
  . Environmental impact in region that is already classified as being in severe non-attainment under the Clean Air Act
  . Air impact of trucking and potential increase in the number of asthma or cancer cases resulting from this volume of diesel emissions daily
  . The safety implications of sending 132 trucks a day through Maryland and DC past at least 10 public and private schools
  . Combined health and safety impacts of having trucks enter the dewatering facility at the same time Sibley Hospital is engaged in a major expansion of its facility

  Sincerely,

From: Andrea LaRue [andrea.larue@nuevavistagroup.com]
Sent: Monday, July 04, 2005 9:47 PM
To: Peterson, Michael C WAD
Cc: Councilmember.Floreen@montgomerycountymd.gov; Councilmember.Denis@montgomerycountymd.gov; Schwartz, Matthew D.
Subject: Dewatering facility

Mr. Thomas P. Jacobus
General Manager
c/o Mr. Peterson
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District 5900 MacArthur Blvd., N.W.
Washington, D.C. 200016

Dear Mr. Jacobus:

I am writing to express my concern about the 80-foot industrial dewatering facility you are proposing near Brookmont (Alternative B) or behind Sibley Hospital (Alternative E) and the impact it will have on my neighborhood. I favor finding a piping solution that will send the residuals to a non-residential area closer to the beltway. I ask you to carefully review and respond to Concerned Neighbors' concerns that:

- The DEIS contains virtually no analysis of environmental impacts of the Corps' preferred option.
- The environmental impacts of the Corps' preferred "trucking alternative" are profound in a region that is already suffering from severe non-attainment under Clean Air Act standards and serious traffic congestion.
- The Corps' DEIS seriously mischaracterizes the true cost of the "trucking alternative" by failing to include the cost of operating large diesel trucks indefinitely.
- The entire process has been flawed, starting with the Corps' failure to involve the community when it started the scoping process for this project in January of 2004. The Corps pre-selected an outcome more than 10 years ago (trucking residuals through our neighborhoods) and crafted the NEPA process to fit their desired outcome.
- The Corps has looked at a limited range of alternatives, raising concerns that the NEPA process was not properly followed.
* The Corps has not adequately investigated a piping alternative

In addition, I am personally concerned about the safety implications of sending 132 trucks a day through Maryland and DC past at least 10 public and private schools. This is particularly worrisome given the combined health and safety impacts of having trucks enter the dewatering facility at the same time Sibley Hospital is engaged in a major expansion of its facility.

I hope you will consider my views. Thank you.

Sincerely,

From:
Sent: Monday, July 04, 2005 10:17 AM
To: Peterson, Michael C WAD
Subject: industrial facility

The Corps plan E is outrageous. You cannot turn a residential neighborhood into an industrial one.
A large looming building to process water and trucks to haul the waste products are a
perverse form of Environmentalism. There must be a better way.

From:
Sent: Monday, July 04, 2005 8:40 AM
To: Peterson, Michael C WAD
Subject: 80-foot industrial dewatering facility proposed behind Sibley Hospital (Alternative E)

I am writing to express my concern about the 80-foot industrial dewatering facility proposed behind Sibley Hospital (Alternative E) and the impact it will have on my neighborhood. I favor finding a piping solution that will send the residuals to a non-residential area closer to the beltway. I ask you to carefully review and respond to Concerned Neighbors' concerns that:

. The DEIS contains virtually no analysis of environmental impacts of the Corps' preferred option.

. The environmental impacts of the Corps' preferred 'trucking alternative' are profound in a region that is already suffering from severe non-attainment under Clean Air Act standards and serious traffic congestion.

. The Corps' DEIS seriously mischaracterizes the true cost of the 'trucking alternative' by failing to include the cost of operating large diesel trucks indefinitely.

. The entire process has been flawed, starting with the Corps' failure to involve the community when it started the scoping process for this project in January of 2004. The Corps pre-selected an outcome more than 10 years ago (trucking residuals through our neighborhoods) and crafted the NEPA process to fit their desired outcome.

. The Corps has looked at a limited range of alternatives, raising concerns that the NEPA process was not properly followed.

In addition, I am personally concerned about.

. Environmental impact in region that is already classified as being in severe non-attainment under the Clean Air Act

. Air impact of trucking and potential increase in the number of asthma or cancer cases resulting from this volume of diesel emissions daily

. The safety implications of sending 132 trucks a day through Maryland and DC past at least 10 public and private schools

. Combined health and safety impacts of having trucks enter the dewatering facility at the same time Sibley Hospital is engaged in a major expansion of its facility

From: Camilla David [cdavidsite@yahoo.com]
Sent: Monday, July 04, 2005 9:11 AM
To: Peterson, Michael C WAD

I am writing to express my concern about the 80-foot industrial dewatering facility you are proposing behind Sibley Hospital (Alternative E) and the impact it will have on my neighborhood. I favor finding a piping solution that will send the residuals to a non-residential area closer to the beltway. I ask you to carefully review and respond to Concerned Neighbors' concerns that:

• The DEIS contains virtually no analysis of environmental impacts of the Corps' preferred option.
• The environmental impacts of the Corps' preferred 'trucking alternative' are profound in a region that is already suffering from severe non-attainment under Clean Air Act standards and serious traffic congestion.
• The Corps' DEIS seriously mischaracterizes the true cost of the 'trucking alternative' by failing to include the cost of operating large diesel trucks indefinitely.
• The entire process has been flawed, starting with the Corps' failure to involve the community when it started the scoping process for this project in January of 2004. The Corps pre-selected an outcome more than 10 years ago (trucking residuals through our neighborhoods) and crafted the NEPA process to fit their desired outcome.
• The Corps has looked at a limited range of alternatives, raising concerns that the NEPA process was not properly followed.

In addition, I am personally concerned about…
(customize the letter by writing about how one of these items will impact you)

• Environmental impact in region that is already classified as being in severe non-attainment under the Clean Air Act
• Air impact of trucking and potential increase in the number of asthma or cancer cases resulting from this volume of diesel emissions daily
• The safety implications of sending 132 trucks a day through Maryland and DC past at least 10 public and private schools
• Combined health and safety impacts of having trucks enter the dewatering facility at the same time Sibley Hospital is engaged in a major expansion of its facility

From:
Sent: Monday, July 04, 2005 10:01 AM
To: Peterson, Michael C WAD
Cc: Councilmember.Floreen@montgomerycountymd.gov; Councilmember.Denis@montgomerycountymd.gov
Subject: Dewatering Facility Proposal

Michael C. Peterson
Environmental Manager
Washington Aqueduct
U.S. Army Corps of Engineers, Baltimore District
5900 MacArthur Blvd., N.W.
Washington, D.C. 200016

Dear Mr. Peterson:

I am writing to express my concern about the 80-foot industrial dewatering facility you are proposing behind Sibley Hospital (Alternative E) and the impact it will have on my neighborhood. I favor finding a piping solution that will send the residuals to a non-residential area closer to the beltway. I ask you to carefully review and respond to Concerned Neighbors' concerns that:

- The DEIS contains virtually no analysis of environmental impacts of the Corps' preferred option.
- The environmental impacts of the Corps' preferred 'trucking alternative' are profound in a region that is already suffering from severe non-attainment under Clean Air Act standards and serious traffic congestion.
- The Corps' DEIS seriously mischaracterizes the true cost of the 'trucking alternative' by failing to include the cost of operating large diesel trucks indefinitely.
- The process has been compromised because the Corps failed to involve the community when it started the scoping process for this project in January of 2004. The Corps pre-selected an outcome more than 10 years ago (trucking residuals through our neighborhoods) and crafted the NEPA process to fit their desired outcome.
- The Corps has looked at a limited range of alternatives, raising concerns that the NEPA process was not properly followed.

In addition, I am personally concerned about:

- The environmental impact on a region that is already classified as being in severe non-attainment under the Clean Air Act.
- The safety implications of sending 132 trucks a day through Maryland and DC past at least 10 public and private schools.

Thank you for your attention to this very important issue.

Sincerely,

From:
Sent: Monday, July 04, 2005 7:55 AM
To: Peterson, Michael C WAD
Subject: (no subject)

Dear Mr Peterson and Mr Jacobus,

I am writing to express my deep concern about the 80-foot industrial dewatering facility you are proposing behind Sibley Hospital (Alternative E) and the impact it will have on my neighborhood. I favor finding a piping solution that will send the residuals to a non-residential area closer`to the beltway. I ask you to carefully review and respond to Concerned Neighbors' concerns that:

>The DEIS contains virtually no analysis of environmental impacts of the Corps preferred option

> The environmental impacts of The Corps' preferred 'trucking alternative' are profound in a region that is already suffering from severe congestion

> The Corps has looked at a limited range of alternatives.

In addition, I am personally concerned about the safety implications of sending a 132 rucks a day through Maryland and DC past at least 10 public and private schools.

Sincerely,