

**Government of the District of Columbia**  
**ADVISORY NEIGHBORHOOD COMMISSION 3F**  
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**RESOLUTION RECOMMENDING APPROVAL OF ALTERNATIVE 2 WITH  
MODIFICATIONS FOR SOAPSTONE VALLEY PARK SEWER REHABILITATION AND  
URGING DC WATER TO TAKE NEEDED STEPS OUTSIDE THIS EA**

July 23, 2019

WHEREAS, on June 4, 2019, the National Park Service (NPS) released a SOAPSTONE VALLEY PARK SEWER REHABILITATION ENVIRONMENTAL ASSESSMENT (EA) for which NPS is lead agency and the District of Columbia Water and Sewer Authority (DC Water or DCW) is proponent agency — setting August 2, 2019, as deadline for submission of written comments by anyone, including Advisory Neighborhood Commissions (ANCs), under the National Environmental Policy Act of 1969 (NEPA), and

WHEREAS, the District of Columbia (DC) owns sanitary sewers & manholes as well as storm water sewers & outfalls in Soapstone Valley (SV) between Connecticut Avenue and Broad Branch, all in ANC 3F, and has entrusted management, operation, and maintenance of these Assets to DCW; and

WHEREAS, sanitary sewage from most homes and businesses in ANC 3F and storm water from their properties and neighborhood streets flow through these DCW Assets; and

WHEREAS, this EA's issues, which have concerned DCW since 2009, led it to establish its Soapstone Valley Creek Bed Sewer Rehabilitation Project (Creek Bed Project), issuing a Sewer Assessment - March 15, 2011 (DCW 2011), prepared by Greeley and Hansen and Delon, Hampton Associates; and

WHEREAS, in 2010 and 2011 DCW partially inspected interiors of its Assets, including some manholes and video-camera inside most pipes; and

WHEREAS, DCW's Soapstone Valley Sewer Rehabilitation Project (Valley Project) grew out of its Creek Bed Project, and DCW will be responsible for design and construction of its proposed Valley Project; and NEPA process; and

WHEREAS, NPS must review, approve, and permit DCW's proposed Valley Project because it is located (in large part) on NPS-administered land; therefore, an EA must be developed to comply with NEPA; and WHEREAS, these DCW Assets are on land managed by NPS and on nearby DC owned rights of way (ROWS) managed by the District Department of Transportation (DDOT); and

WHEREAS, although NPS serves as lead federal agency during the NEPA process, DCW is assisting NPS throughout that process, including development of this EA; and

WHEREAS, the EA finds [pages 1-2]:

“The primary purposes of DC Water’s proposed Soapstone Valley Sewer Rehabilitation Project are:

- To repair, rehabilitate, improve, and/or replace aging 18-inch-diameter sanitary sewer pipes within the Soapstone Valley sewer system while maintaining the functions of and limiting disturbance within the Soapstone Valley Park.

- To improve structural integrity of the sanitary sewer infrastructure, including pipes and manholes, while maintaining adequate hydraulic capacity.
- To reduce stream and groundwater infiltration into the sanitary sewer pipes and reduce potential for sanitary sewer overflows (SSOs).
- To eliminate exposed sanitary sewer pipes and manholes to the extent possible.
- To meet the regulatory requirements of the DC Municipal Separate Storm Sewer System (MS4) permit.

“The rehabilitation is needed because the sewer infrastructure in the Soapstone Valley sewer system has exceeded its design life and has multiple defects throughout the system including pipe and manhole cracks, fractures, root intrusion into pipes, and stream and groundwater infiltration. Over time, the condition of the sewers is expected to continue to deteriorate. The resulting diminished performance of the system would exacerbate local pollution and increase the frequency of structural failures and emergency repairs, which are environmentally destructive and costly.

“The Soapstone Valley Rehabilitation Sewer Project includes approximately 6,200 linear feet (LF) of sanitary sewer pipes, much of which is defective, 29 defective manholes, and six exposed stream crossings. These defects result in the potential for stream and groundwater infiltration and leaks. Groundwater and stormwater infiltration can increase the potential for SSOs which contaminate surface waters and impact public health. Additionally, exposed pipelines and manholes are subject to damage from stream and/or stormwater elements, which can lead to leaks into and out of the pipe.

“The District Department of Energy and Environment (DOEE) has identified two stormwater outfalls within the Soapstone Valley Rehabilitation Project area that require repair per DC’s MS4 permit. Because of their proximity to the Soapstone Valley sanitary sewer system, the repair of the stormwater outfalls would be constructed simultaneously.” And

WHEREAS, on July 8, 2019, ANC 3F’s Standing Committee on Parks & Trails (Standing Committee) reviewed this EA and information provided at a Public Meeting on June 26, 2019, with participation by neighbors, DOEE, Casey Trees, and the Rock Creek Conservancy; and

WHEREAS, ANC 3F’s Standing Committee made recommendations reflected in this Resolution;

**(A) NOW, THEREFORE, IN REGARD TO THE EA, BE IT RESOLVED THAT ANC 3F:**

A.1 Supports Alternative 2 with modifications, including but not limited to those described in A.2 – A.6  
 — ANC 3F supports Alternative 2- Trenchless Alternative with modifications. This alternative will enable DC Water to repair its assets in Soapstone Valley Park while minimizing impacts to environment.

A.2 Requests that DC Water consider ultraviolet curing for the cured-in-place-pipe (CIPP) lining methods and provide additional justification for DC Water’s preferred choice  
 — DCW focused this EA on CIPP curing with steam or hot water and never mentioned ultraviolet (UV) curing techniques.

— UV may be superior environmentally for some or all of this CIPP in SVP (as well as in DDOT ROW).  
 — UV CPP might entail less heavy equipment (HE) and tree removal than UV.

— DC Water, SOAPSTONE VALLEY CREEK BED SEWER REHABILITATION PROJECT SEWER ASSESSMENT (March 15, 2011) recommended: “Rehabilitate approximately 4,000 feet of the buried 18” sanitary sewers inside Soapstone Valley National Park with UV CIPP or similar trenchless technology.”

A.3 DC water should provide as part of the EA artist renditions of how Soapstone Valley will look immediately after construction completion and artist rendition after 15 years and 30 years.

— ANC 3F is encouraged by initial reports at the June 26, 2019 Public Meeting of a comprehensive approach to managing restoration on federal property and supports such efforts.

— ANC 3F urges DC Water to provide artist renditions of the Valley from different vantage points after construction under its preferred alternative is complete. Artist renditions are vital for communication in this complex case as part of the NEPA process.

— ANC 3F needs more information on likely areas of closure to the public by NPS or DDOT during restoration.

A.4 Requests additional information be added to the EA regarding manhole repairs

— ANC 3F does not understand how DCW plans to rehabilitate 38-foot-deep Manhole M-9787 through which “most” of the sanitary sewage enters the SV system according to DCW’s June 26 Public Meeting presentation (70% in 2015) and has not learned whether DCW inspected this critical manhole. DCW 2011 log of manhole inspections did not include M-9787.

— ANC 3F does not understand to what extent DCW plans to rehabilitate each of its 29 defective manholes, the characterization of the manholes on NPS and district land, and what additional manhole rehabilitation measures (if any) DCW plans.

A.5 Requests additional information be added to the EA regarding particular CIPP segments

A.5.1.— Does DCW plan to rehabilitate, and if so how, an array of 15” pipe, sewer boxes, and four manholes laid in 1908 in a public alley opening only onto Connecticut Avenue (now between garages of two apartment buildings). Was this array inspected, and if so, what is the condition. DCW should share its rehabilitation ideas with ANC 3F.

A.5.2.— Plans to inspect and rehabilitate following pipes, which were not part of DC 2011 recommendations:

— 10” pipe laid in 1946 between M-9759 at Van Ness East and M-9761 in SVP.

— 10” pipe laid outside SVP in a public alley between Lenore Lane and M-10366 in a DDOT ROW.

— ANC 3F notes that DCW video-camera inspected but never planned CIPP lining for pipes delivering sanitary sewage at 29th Street and at Linnaean Avenue to 14” and 18” pipes in DDOT ROW.

A.6 DC Water should include in the EA a timetable for next steps including the procurement process, the design process, permitting, and the public engagement process.

A.7 Supports implementation of stormwater management along Albemarle Street NW as mitigation [EA pages 22, 24, Appendix C], and to protect critical DC Water Assets from risks due to future erosion, and to cut pedestrian flood safety risks.

— Past erosion permanently exposed over 50 feet of 72” stormwater pipe to events which caused a large fracture in its crown behind Outfall F-117; “extensive slope erosion of the banks surrounding the outfall to the north and east is visible, which affects water quality at the outfall and poses public safety and natural resource degradation concerns.” [Appendix E, pages 8-9]

A.8 Urges DC Water and/or NPS to consult with the DC Office of Zoning (DCOZ) to determine how the Forest Hills Tree and Slope Protection Overlay applies to and may govern current NEPA issues.

**(B) FURTHER, IN REGARD TO SOAPSTONE VALLEY BUT OUTSIDE THIS EA, BE IT RESOLVED THAT ANC3F:**

B.1 Urges DC Water to share design information as it is prepared

— ANC 3F constituents have many questions about impacts of Alternative 2. We urge DCW to share designs with the ANC and public as it prepares so that affected residents understand the project and its likely effects and can provide inputs.

B.2 Urges DCW to be proactive in providing frequent information to the neighbors and public regarding the project

— ANC 3F urges DCW to be persistent in contacting residents around Soapstone Valley to advise them of the project and unavoidable impacts to street access and sanitary sewer services. DCW should not rely only on occasional public meetings to relay crucial information to residents and property owners. DCW is required to contact residents and property owners by mail within 200 foot radius of the project and those that have a few of the park.

B.3 Requests DC Water to take immediate action at Albemarle and 32<sup>nd</sup> Streets NW

— ANC 3F supports DCW's plan to strengthen stormwater management at the intersection of Albemarle and 32<sup>nd</sup> Streets NW. We request DCW to tackle this project immediately as the existing inlet is already insufficient for the volume of stormwater and the resulting flooding has endangered pedestrians.

B.4 Additional information is needed regarding the restoration and maintenance for DDOT-managed areas

— ANC 3F supports NPS restoration plan concepts as described in the June 26 public meeting. The Commission requests NPS and DC Water to share further details of the plan as it is developed. As a significant portion of the project area is on DDOT property, we request DDOT to develop a similar plan with full funding by DC Water of a restoration and maintenance plan to meet or exceed standards of the NPS ROCR Resource Stewardship Strategy.

B.5 DC Water, in conjunction with DOEE, utilize stream rehabilitation techniques to slow down Soapstone Valley Stream.

— This will reduce erosion which will protect DC Water assets, reduce pollution and in general aid in restoring the eco-system in the Park.

B.6 Recommends DC water to engage in long-range storm and sanitary sewers planning

B.6.1— ANC 3F suggests DCW seek suitable, cost-effective ways to calm destructive effects of storm water rushing through and out of its existing 72" MS4 pipes into Soapstone Creek comparable to its panoply of techniques for slowing stormwater flows in combined sewers (for example, inflatable dams).

B.6.2— ANC 3F advises DCW to plan for after CIPP linings "wear out" in SV, including serious consideration of partial solutions (such as inserting plastic pipe inside lined pipe).

(C) "Great weight" or due consideration:

— ANC 3F's foregoing advice and recommendations are entitled to "great weight" by DCW, DDOT, and DOEE and to all due consideration by NPS.

On May 21, 2019, in anticipation of an EA, ANC 3F made several requests of DCW. Some of ANC 3F's requests were satisfied but others not, including:

— That DCW inform ANC 3F of its estimated "worst case" releases of sanitary sewage to the SV environment; DCW has not responded.

— That DCW inform ANC 3F as to average and peak flows of sanitary sewage through the SV sewer pipes; DCW has not responded.


— That DCW meet with ANC 3F's Standing Committee as soon as possible to discuss (a) unavoidable impacts of its SV Project on trees and trails in SV, (b) to discuss aspects of its SV Project on DDOT land, (c) to discuss generic technology and policy issues not limited to NPS land or SV, (d) to discuss aspects of the SV Project that DCW would implement only after NPS issues a finding of no significant impact (FONSI), assuming NPS will do that (such as procurement process and actual construction practices); DCW has declined to meet with the Standing Committee during the public review period for the EA.

(D) Improving NEPA processes:

— ANC 3F suggests that in future NEPA matters NPS adopt ways and means to further transparency and cooperation in its communications with the public, including ANCs, while striving for more timely decisions in the spirit of NEPA. ANC 3F believes that NPS can improve its NEPA processes based on friendly, open-minded discussions with DC Water.

BE IT FURTHER RESOLVED, that Commissioner Dickinson, Rutenberg, and Keubler are authorized to speak on behalf of ANC 3F in regard to this matter.

ANC 3F adopted this resolution at its meeting on July 23 2019, which was properly noticed and at which a quorum was present, by a vote of 4 in favor, 0 opposed, and 0 abstaining

  
David Dickinson  
Chair, ANC 3F

