

Anacostia Riverkeeper • Audubon Naturalist Society • City Wildlife, Inc. • Clean Water Action  
DC Environmental Network • Earthjustice • Foundation Earth • Friends of the Earth  
Global Green • Natural Resources Defense Council • Potomac Riverkeeper Network  
Public Employees for Environmental Responsibility • Quiet Clean DC  
DC Chapter of Sierra Club • Trout Unlimited, National Capital Chapter  
Waterkeepers Chesapeake • Water Alliance • Wentworth Green Strategies

February 14, 2018

Department of Energy and Environment  
Water Quality Division  
1200 First Street NE, 5th Floor  
Washington, D.C. 20002

Re: DC Water Quality Standards

To Whom It May Concern:

We write to express our deep concern that DC Water and Sewer Authority (“DC Water”) has requested that the District Department of Energy and Environment (“DOEE”) conduct a “use attainability analysis” for the purpose of revising the designated water uses for the Anacostia River, Potomac River, and Rock Creek. Under EPA regulations, a ‘use attainability analysis’ is the process a state must complete to justify downgrading its existing uses or water quality standards. This alarming proposal is designed to weaken the District’s *E. coli* water quality standards to facilitate DC Water’s continued dumping of raw sewage into the District’s recreational waters during heavy rain events.

DC Water attempts to justify its proposed relaxation of the clean water requirements by claiming low-income communities in the District will be economically harmed if standards are not weakened. This rationalization rings hollow. Low-income residents deserve clean water without raw sewage and should not be unfairly burdened with the costs of the river clean-up. At this late stage DC Water should not be advocating for lower water quality standards to solve this affordability problem. That’s not fair to District residents or to our rivers and creeks. There are other ways for DC Water to address affordability issues including designing better low-income relief programs or a more equitable rate structure, and DC Water should explore these and other alternatives. DC Water owes it to low-income households to make the plan equitable.

DC residents have been deprived of the ability to safely enjoy the rivers that run through their communities for far too long. We urge DOEE to reject DC Water’s attempt to further increase its pollution allowance at the expense of public health. DOEE should be curbing, not increasing, DC Water’s raw sewage discharges into the District’s rivers.

Sincerely,

Jennifer C. Chavez  
Earthjustice  
[jchavez@earthjustice.org](mailto:jchavez@earthjustice.org)

Christopher P. Weiss  
DC Environmental Network  
Global Green  
[cweiss@globalgreen.org](mailto:cweiss@globalgreen.org)

Anna M. Sewell  
Earthjustice  
[asewell@earthjustice.org](mailto:asewell@earthjustice.org)

Rebecca Hammer  
Natural Resources Defense Council  
[rhammer@nrdc.org](mailto:rhammer@nrdc.org)

Erich Pica  
President, Friends of the Earth  
[epica@foe.org](mailto:epica@foe.org)

Brent Blackwelder  
President Emeritus, Friends of the Earth  
Vice-Chair of the Board, Foundation Earth  
[brentblackwelder@yahoo.com](mailto:brentblackwelder@yahoo.com)

Marchant Wentworth  
Wentworth Green Strategies  
[marchant\\_wentworth@msn.com](mailto:marchant_wentworth@msn.com)

Anne Lewis  
President, City Wildlife, Inc.  
[anne.lewis@citywildlife.org](mailto:anne.lewis@citywildlife.org)

Andrew Reichardt  
President, Trout Unlimited, National Capital  
Chapter  
[andrewreichardt88@gmail.com](mailto:andrewreichardt88@gmail.com)

Paul Schwartz  
Water Alliance  
[paulschwartzdc@gmail.com](mailto:paulschwartzdc@gmail.com)

Emily Franc  
Anacostia Riverkeeper  
[riverkeeper@anacostiariverkeeper.org](mailto:riverkeeper@anacostiariverkeeper.org)

Phillip Musegaas  
Potomac Riverkeeper Network  
[phillip@prknetwork.org](mailto:phillip@prknetwork.org)

Eliza Cava  
Audubon Naturalist Society  
[Eliza.Cava@anshome.org](mailto:Eliza.Cava@anshome.org)

Brent Bolin  
Clean Water Action  
[bbolin@cleanwater.org](mailto:bbolin@cleanwater.org)

Betsy Nicholas, Executive Director  
Waterkeepers Chesapeake  
[betsy@waterkeeperschesapeake.org](mailto:betsy@waterkeeperschesapeake.org)

Jeff Ruch  
Executive Director, Public Employees for  
Environmental Responsibility (PEER)  
[jruch@peer.org](mailto:jruch@peer.org)

Alan Cohen  
Quiet Clean DC  
[biopestman@gmail.com](mailto:biopestman@gmail.com)

Mark Rodeffer  
DC Chapter of Sierra Club  
[rodeffer@gmail.com](mailto:rodeffer@gmail.com)

Cc: DC Council, DC Water