Who are we?

DC Appleseed is a nonprofit “think and do” tank. We research legal and public policy issues important to the District of Columbia. For several years, we have been focused on ways we can help efforts to clean up the Anacostia River, which borders half of D.C.’s wards (Wards 5-8) and is so vital to D.C.’s economy and communities. The D.C. Department of Energy and Environment (DOEE), which is in charge of cleaning up contaminants in the Anacostia River, published a “Proposed Plan” which says how they want to do that. DOEE has provided DC Appleseed some funding to work with Volunteer Community Ambassadors – people with strong connections in the communities closest to the Anacostia – to share information about DOEE’s plans and encourage residents to comment on them.

What do we want?

Efforts to clean up the Anacostia have been going on for a long time. Most recently, DOEE published its Proposed Plan on December 27, 2019. While comments were officially due on March 2, you’re allowed to submit comments late – until March 31. Especially if you’re a small group or individual, we think that DOEE is likely to read and respond to your late comments. DC Appleseed and the Volunteer Community Ambassadors want to help you write and submit comments, to ensure that your voice is heard!

How can we help you?

Our ambassadors can give you background on the clean-up effort, which is called the Anacostia River Sediment Project (ARSP). They can also help you navigate the information that DOEE has posted on the website for the clean-up project, http://www.anacostiasedimentproject.com/.

We’re also happy to share all the work we’ve done to draft our own comments. We’ve included below a short summary of our comments.

If you have any questions, you can contact an ambassador or write to Danielle Burs, Counsel at DC Appleseed, at dburs@dcappleseed.org. We’ll be happy to help!

When you’re ready to submit your comments, you can do that online at: https://bit.ly/38oRHFg.

What is DC Appleseed saying about the Proposed Plan for the Anacostia River Sediment Project?

DC Appleseed thinks that the Proposed Plan needs to be improved, including with better explanations of the steps that DOEE will take to clean up the Anacostia. We’ve identified five areas where we think the Proposed Plan can be strengthened: 1) the approach to adaptive management; (2) the schedule for the steps in the cleanup, 3) Remedial Action Levels (RALs) for the pollution hot spots and DOEE’s method for estimating a 90% risk reduction, 4) standards and triggers for future actions, and 5) communicating with the public.

Even if you don’t agree with us on all or any of our points, it might be helpful to you to see the full version of our comments, which can be found on our website at https://bit.ly/39gILDb.
DC Appleseed will be happy to help you draft your own comments whether you agree with our comments or not. Our ambassadors have their own opinions, too, which may or may not be the same as DC Appleseed’s. What’s important to us is that everyone who wants to comment is able to do so, so all voices can inform the future of the Anacostia River.

1. Adaptive Management Approach

“Adaptive management” is an approach to managing environmental issues that happens in phases.

DOEE’s Proposed Plan identifies 11 areas that will be worked on with an adaptive management approach. DOEE proposes to select a preferred action for each site, implement the actions, and then conduct performance monitoring of key environmental indicators every 3 years.

DC Appleseed thinks that an adaptive management approach would be fine for this work, but it must have three important elements to be effective. Those three elements are: 1) expectations for each year of work, 2) a specific goal for the work at each site each year, and 3) steps that will be taken if yearly goals are not met. These elements are not included in DOEE’s Proposed Plan, supporting materials, or letters in response to our questions.

The Proposed Plan also doesn’t explain how cleaning up the 11 areas would clean up the rest of the River or how it would interact with other clean-up projects along the River.

2. Schedule

The Proposed Plan is not clear on several points that could allow the cleanup to move faster. For example, we don’t know why putting together a summary response to comments should take nine months and delay work in the River. The Plan is also not clear about why work in the 11 areas can’t be done at the same time or overlapping. Finally, it is not clear why more frequent reviews are not being proposed, since reviews every year would allow for faster correction if actions taken aren’t doing what we expect.

3. Remedial Action Level (RAL) and 90% Risk Reduction Estimate

DOEE’s February 21, 2020 letter to DC Appleseed provided the calculation method for how much the risk from eating fish might be reduced by different amounts of sediment cleanup. This is an important step for figuring out what the cleanup goal should be. We think that DOEE used a method that does not provide enough or accurate information. We’ve suggested other things that DOEE could do instead.

4. Standards and Triggers for Future Actions

DOEE has said that deciding what would cause them to take action if their work doesn’t meet the goals they’ve set should be done after the Proposed Plan is final. We disagree with this statement.

The Proposed Plan should make clear how the public can expect this process to proceed. Without the information, we and other public participants cannot meaningfully evaluate or comment on whether the Proposed Plan’s approach to cleaning the river is sound.

5. Communicating with the Public

Because the Proposed Plan is very short, people have to read supporting documents and letters to really understand it. We think all of those documents should be available in one place.

We also think DOEE should be as specific as possible about future opportunities for public participation. Will additional public meetings be held? Can the public expect to get information about deadlines, measurements, and any changes to actions? Will the public be informed of this information through an email list and/or the AnacostiaRiverSedimentProject.com website?
How to submit comments online

When you go to https://bit.ly/38oRHFg, there’s a form with five sections. Each one looks like this:

If you are submitting comments for just yourself, you can leave the “Organization” box blank, or type “None” there.

Under “Document Name,” type “Proposed Plan.”
(If you want to go deeper on something else, then just type the name of that document like “Feasibility Study” or “DC Appleseed ARSP Letter 3.”)

Under “Document Section/Page Number” you can type “General” to make a comment on the whole Proposed Plan, or enter information about a specific place in the Plan.

Under “Comment 1,” write what you want DOEE to know about your thoughts on the Proposed Plan.

You can repeat these steps five times on one form. If you have more to say, you can go back to https://bit.ly/38oRHFg and submit another form with the rest of your comments.

If you have any trouble at all with the comment form, you can contact an ambassador or Danielle Burs at dburs@dcappleseed.org.