

January 1999

Re: NEPA Technical Inquiry 0447 - Status of NEPA Call-In's Activities Concerning

Dear NEPA User:

In response to your January 4, 1999 request, NEPA Call-In is providing you with the following information about our activities to date concerning GSA storm water management related to Chesapeake Bay Program initiatives.

SUMMARY

GSA Administrator Barram has signed the Environmental Protection Agency's (EPA) Chesapeake Bay Program initiatives, committing the National Capital Region (NCR), Region 2, and Region 3 to a proactive storm water management program. The goal of such a program is to move beyond basic compliance with Federal and State storm water regulations, such as the Clean Water Act, in an effort to restore and maintain the Chesapeake Bay and its tributaries. On September 9, 1998, representatives of NCR requested assistance and guidance from the GSA National Office in developing a program to address these Chesapeake Bay Program initiatives. This request is currently being carried out by the NEPA Call-In program staff.

THE CHESAPEAKE BAY PROGRAM

The Chesapeake Bay Program is the unique regional partnership that has been directing and conducting the restoration of the Chesapeake Bay since the signing of the historic 1983 Chesapeake Bay Agreement. The Chesapeake Bay Program partners include the state of Maryland and Commonwealths of Pennsylvania and Virginia; the District of Columbia; the Chesapeake Bay Commission, a tri-state legislative body; the Environmental Protection Agency, representing the Federal government; and participating advisory groups. GSA Administrator Barram has signed Several Federal initiatives under the Chesapeake Bay Program, committing NCR, Region 2, and Region 3 to take action.

AGREEMENTS AND SPECIFIC GSA COMMITMENTS

1. Special Tributaries Strategy for Federal Lands in the District of Columbia, signed March 1996

COMMITMENTS:

- Complete review of storm water pollution prevention plans for GSA lands and facilities in the District and comply with applicable District and EPA storm water permits by December 31, 1997;
- Review of nutrient management plans for GSA lands and facilities in the District;
- Participate in convening and attending workshop focusing on funding for activities under this strategy;
- Reducing the use of nutrients and pesticides and improving wildlife and habitat opportunities through innovative landscape design consistent with Presidential Memorandum on Environmentally and Economically Beneficial Practices on Federal Landscaped Grounds, April 26, 1994;
- Participate in convening and attending an annual workshop on technology transfer designed to assist agencies with improving urban nutrient management and storm water controls;
- Participate in a coordination and communication group of Federal and District of Columbia agencies to facilitate interagency cooperation to meet strategy goals; and

- Conduct and participate in at least one Federal facility site assessment per year through the year 2000. Assessments should follow the format of the federal Facility Site Assessment Protocol developed by the Federal Agencies Committee of the Chesapeake Bay Program.

2. Recommendations of the Special Panel on Combined Sewer Overflows and Storm water Management in the District of Columbia, September 1998 (Federal agencies were not required to sign document)

This document provides suggestions to Federal agencies to help abate the District of Columbia's combined sewer overflow (CSO) problem. The District of Columbia maintains a combined storm water and sewerage collection system that overflows into local water bodies during certain rainfall events. This problem is an indication of the need for improved storm water management in the urban environment, where an ever-increasing amount of pavement quickly channels storm water to the sewers. Section C of the document recommends the following measures be taken by GSA:

- Accelerate wet weather pollution prevention and control on Federal lands and at Federal buildings and associated facilities. This includes identifying regulatory requirements and evaluating compliance; completing storm water management plans; providing input for the District's long-term CSO control plan; and implementing new storm water controls. The following timeframe is provided:
 - Fall 1998 - Identify all regulatory requirements;
 - Fall 1998 - Identify Federal land and building owners and/or managers within the Rock Creek and Anacostia watersheds;
 - Fall 1998 - Respond to letter from EPA to assure existing regulatory requirements are fully understood;
 - Winter 1998/1999 - Identify information required by District of Columbia WASA to begin long term CSO control plan;
 - Winter 1998/1999 - The Federal workgroup, in cooperation with the Federal Agencies Committee of the Chesapeake Bay Program, should identify critical Federal buildings and buildings for improved storm water management. The workgroup should begin to provide assistance to these agencies while developing comprehensive storm water management plans;
 - FY 1999-2000 - Explore traditional and innovative budget and authority opportunities to implement improved storm water management techniques; and
 - Fall 2000 - Federal agency representatives could sign an implementation agreement to demonstrate their support for implementing the District WASA long term control plan.
 - Focus Federal financial support and other assistance on wet weather pollution prevention and control priorities; and
 - Participate in a Federal workgroup to facilitate communication and provide leadership.

3. Federal Agencies' Chesapeake Ecosystem Unified Plan, signed November 5, 1998

This agreement assigns specific tasks to the Federal agencies that signed. GSA's commitments include:

- Develop model lease provisions by September 30, 1999 for facilities, outleases, rights-of way, and other Federal actions to provide a means for Chesapeake Bay stewardship goals to be considered in the issuance of leases by or to Federal agencies within the watershed; and
- Encourage construction design that: a) minimizes natural area loss on new and rehabilitated Federal facilities; b) adopts low impact development and best management technologies for storm water, sediment and erosion control, and reduces impervious surfaces; c) utilizes energy efficient technologies; and d) considers the Conservation landscaping and Bayscapes Guide for Federal Land Managers.

The two obligations above are items for which GSA has been designated as the lead agency for implementation. The signed document also contains several more agreements, with other agencies acting as lead agencies, that GSA will be expected to make efforts to comply with.

ACTIVITIES PERFORMED BY NEPA CALL-IN TO DATE

1. Meetings

NEPA Call-In has arranged and participated in several meetings with key GSA NCR personnel since September 9, 1998. The purpose of the meetings is to define short and long-term program objectives and to develop strategies to accomplish the objectives. NEPA Call-In also arranged for a January 13, 1999 meeting between key GSA NCR personnel and the EPA Region 3 Representative to the District of Columbia for storm water management.

Through these meetings, NEPA Call-In has facilitated the identification of an overall strategy to comply with initial steps of the above commitments, especially Section C of the CSO Special Panel Recommendations. The strategy includes:

- Research applicable Federal and State storm water regulations and determine what GSA is obligated to do;
- Assess GSA's compliance with these obligations;
- Assign priority to facilities not in compliance with current storm water regulations and take corrective action;
- Develop a system to make storm water pollution prevention plans or other storm water assessments available to all GSA facilities in the program area, whether required by storm water regulations or not;
- Extend expertise gained into other regions of GSA.

NEPA Call-In also attended the November 17-18 Federal Storm Water Management Workshop hosted by the Army Environmental Center in Edgewood, Maryland in order to learn more about current and future Federal storm water management issues. NEPA Call-In will attend periodic Federal agency storm water workgroup meetings hosted by EPA.

1. Technical Research

NEPA Call-In conducts ongoing research of Federal and State storm water permitting regulations and presents the results in understandable language to GSA's NCR representatives. NEPA Call-In has also identified guidance on the National Pollutant Discharge Elimination System (NPDES) regulations and guidance for preparing individual storm water pollution prevention plans and presented this information to GSA's NCR representatives.

NEPA Call-In's factsheet, "Storm Water Pollution Prevention," November 1998, was used as handout material at a Federal agency storm water workgroup facilitated by the EPA Region 3 Representative to the District of Columbia for storm water management.

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Sincerely,

(original signed)

NEPA Call-In Researcher