

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
ENVIRONMENTAL APPEALS BOARD

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In re :  
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GOVERNMENT OF THE DISTRICT : Permit No. DC000021  
OF COLUMBIA, MUNICIPAL : Appeal No. 06-07  
SEPARATE STORM SEWER SYSTEM.:  
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1201 Constitution Avenue, NW  
Washington, D.C.

Friday, June 8, 2007

The HEARING in this matter began at  
approximately 10:01 a.m. pursuant to notice.

BEFORE:

ANNA WOLGAST

Hearing Officer

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ENVIR. APPEALS BOARD

2	<p>1 APPEARANCES:</p> <p>2 On behalf of District of Columbia:</p> <p>3 DAVID E. EVANS, ESQUIRE</p> <p>4 McGuireWoods, LLP</p> <p>5 901 East Cary Street</p> <p>6 Richmond, Virginia 23219-4030</p> <p>7 (804) 775-1000</p> <p>8 On behalf of Friends of the Earth and</p> <p>9 Defenders of Wildlife:</p> <p>10</p> <p>11 JENNIFER C. CHAVEZ, ESQUIRE</p> <p>12 Earthjustice</p> <p>13 1625 Massachusetts Avenue, NW., Suite 702</p> <p>14 Washington, D.C. 20036</p> <p>15 (202) 667-4500</p> <p>16</p> <p>17 On behalf of EPA Region III:</p> <p>18</p> <p>19 LORI G. KIER, ESQUIRE</p> <p>20 United States Environmental Protection Agency</p> <p>21 1650 Arch Street</p> <p>22 Philadelphia, Pennsylvania 19103-2029</p> <p>(215) 814-2656</p> <p>23</p> <p>24 ALSO PRESENT:</p> <p>25 CAROLINE BURNETT</p> <p>26 GEORGE HAWKINS</p> <p>27 HAMMID KARIMI</p> <p>28 NICOLINE SHILDEBRAND</p> <p>29 GARRISON MILLER</p> <p>30 DAVID McGUIGAN</p> <p>31 SILVIA HOROWITZ</p>	4
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3	<p>1 PROCEEDINGS</p> <p>2 HEARING OFFICER WOLGAST: Good</p> <p>3 morning. We're here today pursuant to the</p> <p>4 Board's order of April 12th of this year, and</p> <p>5 the purpose of this hearing is twofold:</p> <p>6 First, to hear with some specificity from the</p> <p>7 parties as to the current status of your</p> <p>8 settlement negotiations. And the second</p> <p>9 purpose is to help the Board determine</p> <p>10 whether or not an additional 90 days, as has</p> <p>11 been requested in the parties' seventh joint</p> <p>12 motion for stay, is likely to lead to a</p> <p>13 resolution of this matter.</p> <p>14 As you know, the petitions in this</p> <p>15 case were filed on April 12th and on April</p> <p>16 17th of last year. The petitions here</p> <p>17 challenge the District of Columbia's storm</p> <p>18 water permit that was issued in the year</p> <p>19 2004, which, of course, itself was an</p> <p>20 amendment to the storm water permit issued in</p> <p>21 2000. The petitions in this matter do raise</p> <p>22 significant issues about the existing 2004</p>	5
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1 permit. And as the District has related in

2 its water quality reports, storm water is a

3 major contributing factor to water impairment

4 in the District.

5 Given that, it seems that we have

6 an important subject matter in the District

7 of Columbia permit and we've had significant

8 issues raised in the two petitions. And so I

9 am anxious to hear what path we're on for

10 resolution because we are now almost 14

11 months past the filing of the petitions. And

12 while I understand from the joint status

13 reports that there have been certain

14 submissions and proposals for settlement, it

15 isn't clear whether continuing the current

16 course is going to lead to a resolution of

17 this matter short of litigation, so I'm

18 anxious to hear from the parties about that.

19 The way I would like to proceed is

20 to simply hear from the parties in turn,

21 starting with the Petitioners, the District,

22 and then the representative from Friends of

1 the Earth and Defenders of Wildlife, and then

2 from Region III. In your remarks, if you

3 could also let the Board know whether or not

4 you oppose WASA's pending motion for

5 withdrawal.

6 So shall we begin, Mr. Evans?

7 Thank you.

8 MR. EVANS: Good morning, Your

9 Honor. David Evans representing the

10 Government of the District of Columbia,

11 District of Columbia Water and Sewer

12 Authority. I have with me four

13 representatives from the District of Columbia

14 Government. I have Caroline Burnett, who is

15 serving as co-counsel for the District of

16 Columbia Government. She's an assistant

17 attorney general representing the District

18 Department of the Environment. I have Mr.

19 George Hawkins, who is the acting director of

20 the Department of Environment pending

21 confirmation by the Council. I have Mr.

22 Hammid Karimi, who is deputy director of the

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1 District Department of Environment, and  
 2 Nicoline Shildebrand, who is a water quality  
 3 specialist with the District Department of  
 4 Environment. And I think that certainly  
 5 exhibits the District's interest in these  
 6 proceedings before you.

7 In response to your request, from  
 8 the District's and WASA's perspective, there  
 9 has been a concerted effort on the part of  
 10 all parties to settle this case as we have  
 11 indicated in prior status reports. There  
 12 have been a number of exchanges. There have  
 13 been a number of telephone conferences to  
 14 discuss the issues. There have been a number  
 15 of face-to-face meetings.

16 Over the last seven or eight  
 17 months, there have been several exchanges.  
 18 The first involving a proposal, a written  
 19 settlement proposal from Earthjustice on  
 20 behalf of its clients, that (off mike) set  
 21 forth a number of specific commitments that  
 22 they wanted the District and WASA to make

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1 with respect to the implementation of their  
 2 storm water program, very, very specific  
 3 detailed commitments having to do with a  
 4 variety of elements of the storm water  
 5 management program. And that was last fall.

6 Soon after that was submitted, the  
 7 District of Columbia Government and WASA  
 8 responded to that with a response and a  
 9 counterproposal. Although we did not in the  
 10 near term receive any response back from  
 11 Earthjustice to that proposal, it certainly  
 12 became clear to us in ensuing conferences  
 13 that we had with them, principally by  
 14 telephone, that they were disappointed in the  
 15 response. And at that point, frankly, we  
 16 felt that there appeared to be very, very dim  
 17 prospects of settling the case.

18 We understanding that -- I  
 19 certainly understand. I was not personally  
 20 involved in it, but following that, beginning  
 21 in the early part of this year, there were  
 22 some face-to-face meetings between

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1 Earthjustice and representatives of its  
 2 clients and the mayor's office, the city  
 3 administrator's office with respect to these  
 4 issues to see if the new administration that  
 5 we had coming on board with the District  
 6 government might be interested in meeting  
 7 Earthjustice's demands. Again, there were a  
 8 number of verbal exchanges associated with  
 9 that.

10 That was followed in the spring of  
 11 this year with a fairly detailed proposal  
 12 from the Department of the Environment,  
 13 which, I might add, followed a subsequent  
 14 written communication from Earthjustice. We,  
 15 just in the last few days, have received  
 16 correspondence back from Earthjustice in  
 17 response to our earlier submission this  
 18 spring, indicating that they were pleased  
 19 with -- at least pleased with what they  
 20 believe to be progress and more specific  
 21 proposals coming forth from the District.  
 22 But, nevertheless, expressed continuing

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1 unhappiness and dissatisfaction with where we  
 2 were, at least in terms of what the District  
 3 was willing to offer up in the way of  
 4 specific proposals.

5 So certainly from our perspective  
 6 there has been some progress made over the  
 7 last several months. I think that, again,  
 8 from our perspective, it largely reflects a  
 9 concerted effort on the part of the District  
 10 of Columbia to at least try to meet the  
 11 Earthjustice halfway if not more than  
 12 halfway. And, frankly, we're somewhat  
 13 encouraged by the fairly positive response  
 14 we've gotten back from them.

15 I would say to you, Your Honor,  
 16 that had we held this status conference two  
 17 months ago I would tell you that the  
 18 prospects for settlement were so small that  
 19 it probably would not be worth our time and  
 20 effort to continue with the negotiations. We  
 21 don't feel that way now. I would tell you  
 22 that we still have a long way to go. I think

10	<p>1 that it's going to be very difficult to 2 resolve some of these issues. The level and 3 specificity of the commitments that the 4 Earthjustice on behalf of its clients is 5 seeking, frankly, certainly in our view, go 6 far beyond what could be reasonably expected 7 of the District and are not cost-effective 8 and not particularly productive. We 9 obviously agree with them on a number of 10 measures that they have proposed and we have 11 put forward.</p> <p>12 I think right now, at least from 13 our perspective, the issues really involve 14 whether going beyond what the District of 15 Columbia Government's put on the table in the 16 way of specific proposals that would involve 17 enhancements to its storm water program are 18 cost-effective. Again, obviously Ms. Chavez 19 will give her perspective on this, but from 20 our perspective the approach that they would 21 want us to take to the storm water management 22 program involves, in essence, just throwing</p>	12	<p>1 We're going to do those things. So at this 2 point, there have already been things put on 3 the table and committed to by the District 4 that I think that all the parties are in 5 general agreement that, yes, these things 6 need to be added to the program.</p> <p>7 Then there's a third layer and 8 that's really where the debate is, and that 9 is over whether you go even to that third 10 level and whether it makes sense, at least at 11 this point in time, before we have any data 12 or experience with the measures that we now 13 have and are additionally committed to, 14 whether those things make sense and whether 15 or not they're cost-effective.</p> <p>16 In other words, the District's 17 approach to this permit is we need to take an 18 iterative approach to it. And we think that 19 iterative approach and adaptive management 20 approach is reflected in EPA policy and 21 guidance. And we believe that the approach 22 that we're putting forth as part of these</p>
11	<p>1 money at projects and without knowing -- 2 having any reasonable expectation that we're 3 necessarily going to get a water quality 4 benefit from that.</p> <p>5 So there's a legitimate debate, I 6 believe, going on here at this point about -- 7 not about some very what we believe to be 8 cost-effective enhancements to the program, 9 which the District is already committed to, 10 but how far beyond them we go.</p> <p>11 And we essentially dealing with 12 three layers here. One is the program that 13 we now have in place that's a requirement of 14 the permit. Those are legal obligations that 15 the District is implementing those.</p> <p>16 We then have a level of enhancement 17 above and beyond that that, in essence, 18 involves measures that the District and I 19 think the Petitioners and EPA all agree, yes, 20 we should do these things. These things will 21 enhance the program that will improve water 22 quality. They appear to be cost-effective.</p>	13	<p>1 negotiations reflects the iterative, adaptive 2 management approach that EPA has encouraged 3 and fostered in its policy and guidance, and 4 that the Earthjustice on behalf of its 5 clients, in essence, is asking us to go 6 beyond that, in essence, to commit to 7 measures that really have no -- we have no 8 evidence or indication at this point would 9 necessarily be cost-effective or would 10 achieve a water quality benefit.</p> <p>11 So, I mean, that's where we are. 12 We think they're going forward. We do think 13 that while certainly there's no assurance at 14 all that we'll be able to settle the case in 15 the next 60 to 90 days, I do think it would 16 be productive to focus on that third layer of 17 measures that Earthjustice has put forth and 18 see whether or not there's room to compromise 19 or to find ways to resolve our differences 20 around that. I would say it's going to be 21 very difficult to do that, but from the 22 District's standpoint we think it would</p>

<p style="text-align: right;">14</p> <p>1 certainly be worth the effort and worth an 2 additional 90 days.</p> <p>3 HEARING OFFICER WOLGAST: And are 4 there any issues that the parties have come 5 to closure on that are reflected in the 6 pending petitions?</p> <p>7 MR. EVANS: It's interesting, Your 8 Honor, because these petitions really arose 9 out of really one condition in the permit. 10 There's a compliance demonstration piece, 11 which is for height, a technical piece. I 12 don't think -- that's really not at the heart 13 of these negotiations and I think that 14 issues, frankly, will work itself out.</p> <p>15 But these two petitions, both our 16 petition and Earthjustice's petition, rose 17 out of language in the permit, which, in 18 essence, in our view, could be construed to 19 require immediate compliance of water quality 20 standards. And we challenged it. I think 21 Earthjustice challenged it because they 22 didn't feel it went quite far enough, so the</p>	<p style="text-align: right;">16</p> <p>1 individual issues.</p> <p>2 HEARING OFFICER WOLGAST: And do 3 you have a sense of what measures the parties 4 anticipate taking in the next 90 days to get 5 to resolution?</p> <p>6 MR. EVANS: Well, in fact, Your 7 Honor, we have scheduled a meeting, a 8 conference, among the parties immediately 9 after this, assuming that the Appeals Board 10 gives us additional time to negotiate.</p> <p>11 We've scheduled a meeting for the 12 purpose. And I don't know if we're going to 13 get into a detailed discussion of the merits 14 of the negotiations as they now stands, but 15 really to map out a plan of action, a meeting 16 schedule, for how we try to get this done in 17 whatever additional time the Board's willing 18 to give us.</p> <p>19 HEARING OFFICER WOLGAST: The joint 20 status conference mentioned the possibility 21 of invoking a third-party mediator.</p> <p>22 MR. EVANS: That's right, Your</p>
<p style="text-align: right;">15</p> <p>1 appeals really rose out of --</p> <p>2 HEARING OFFICER WOLGAST: The 3 dispute over Amendment No. 1, right.</p> <p>4 MR. EVANS: A fundamental dispute 5 about whether that permit has to contain 6 language requiring compliance of water 7 quality standards. And the parties agreed 8 early on in these negotiations that what we 9 would try to do is settle it and we would try 10 to settle it by substituting that language 11 for some very, very specific detailed 12 commitments for the District's program. And 13 Earthjustice told us early on, they said if 14 you will make commitments to do this, this, 15 this and this and this in the way of specific 16 requirements in your program, we would be 17 willing to give on our demand that there be 18 an absolute water quality standards 19 compliance obligation. So since the issue's 20 really framed around that, there's really not 21 been an opportunity to negotiate specific 22 language in the permit or to resolve</p>	<p style="text-align: right;">17</p> <p>1 Honor. We have retained a mediator, John 2 Bickerman, who has been involved in the 3 negotiations for the last 9 or 10 months. 4 And initially, all the parties agreed that 5 while we wanted John present and involved to 6 some extent in the negotiations, we really 7 wanted to see if we could resolve it without 8 him wading into it to a significant degree. 9 I think everybody's in agreement now that he 10 needs to become more actively involved in 11 this. And, in fact, I anticipate that what 12 we'll do going forward, if the Board agrees 13 to give us additional time to negotiate, 14 would be to set up face-to-face meetings and 15 telephone conferences around his availability 16 and have him actively involved in the 17 mediation process.</p> <p>18 HEARING OFFICER WOLGAST: I would 19 just mention if, for any reason, that doesn't 20 come to fruition, the Board also has a 21 mediation service in the event the parties 22 had any interest in invoking that. And</p>

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1 obviously it's not important to the Board  
 2 whether you use the Board's mediation  
 3 service, another mediation service, or work  
 4 things out among the parties without a  
 5 mediator. I just mention that in the case,  
 6 for any reason, that Mr. Bickerman was not  
 7 available or you couldn't move the case  
 8 forward in that manner. The Board's service  
 9 essentially involves a Board judge and  
 10 potentially senior attorneys, all of whom are  
 11 trained in mediation, who would act as a  
 12 third-party neutral, a confidential  
 13 third-party neutral, and who would not be on  
 14 the panel who would have anything to do with  
 15 the decision in this matter. In this case I  
 16 think that judge is Judge Scott Fulton. And  
 17 I just mention that for your information.  
 18 MR. EVANS: Thank you, Your Honor.  
 19 That's very helpful to know.  
 20 HEARING OFFICER WOLGAST: Thank  
 21 you.  
 22 MS. CHAVEZ: I'm sorry, Your Honor,

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1 I should have asked what order you'd like to  
 2 hear from us in.  
 3 HEARING OFFICER WOLGAST: Yes.  
 4 MS. CHAVEZ: My name is Jennifer  
 5 Chavez. I'm counsel for the Petitioners.  
 6 HEARING OFFICER WOLGAST: Yes,  
 7 thank you very much.  
 8 MS. CHAVEZ: Okay. As I said, my  
 9 name is Jennifer Chavez. I've recently  
 10 become involved in this case and so I'd like  
 11 to apologize in advance that I might not know  
 12 in as much detail as Mr. Evans the history of  
 13 the case, but Mr. David Baron has briefed me.  
 14 He wasn't able to come today because his son  
 15 is graduating from high school today.  
 16 As I understand the history of the  
 17 case, Mr. Evans has given a fairly complete  
 18 summary and I don't think there is much to  
 19 add except to clarify a few things. In our  
 20 most recent settlement communication, written  
 21 settlement communication, we did ask the  
 22 District to consider some very specific

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1 proposals and we think that the level of  
 2 specificity is necessary in order to reach  
 3 agreement on a settlement that we would find  
 4 is satisfactory in exchange for dropping the  
 5 challenge of the permit language. In the  
 6 District's most recent response we are  
 7 encouraged that it is moving in the right  
 8 direction. However, much of the response  
 9 simply lacks the level of specificity for us  
 10 to really have a good understanding of the  
 11 District's position. And without going into  
 12 too much detail of the substance, we have,  
 13 for instance, received some assertions that  
 14 some of the requests that we have made are  
 15 not cost-effective, but have not seen any  
 16 counterproposals or any further information  
 17 about why it's not cost-effective or what  
 18 would be cost-effective.  
 19 And so we do think that it may be  
 20 productive in the next 60 days -- we've  
 21 stated that we will give the process another  
 22 60 days. We think that it may be productive

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1 to get some more specific information from  
 2 the District. However, we don't think that  
 3 -- we think that by the end of 60 days, it  
 4 will become apparent whether we are close to  
 5 settling or whether it's time simply to  
 6 reactivate the appeal. And so, as Mr. Evans  
 7 explained, we have tentative plans to meet  
 8 with Mr. Bickerman and go through some of the  
 9 specific measures that we've proposed.  
 10 I think that's all that I have to  
 11 add. Of course, there is WASA's outstanding  
 12 motion. And I confess that I haven't been  
 13 able to confer with Mr. Baron on this, but I  
 14 don't think we have any objection to that  
 15 motion. Do you have any questions for us?  
 16 HEARING OFFICER WOLGAST: So your  
 17 sense is that the parties will, hopefully,  
 18 engage in mediation and that within 60 days  
 19 you would have -- either know whether you're  
 20 getting to an agreement in principle or  
 21 whether that's not going to be possible. Is  
 22 that your sense?

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<p>1 MS. CHAVEZ: Yes, yes. I think 2 that the problem -- the barriers right now 3 lie just in a lack of specific information, 4 which is available and which we can, you 5 know, all share and work out within 60 days 6 or not. And I don't think it's a matter of 7 -- you know, we haven't yet really gotten to 8 the point where we're disagreeing on specific 9 proposals because we've been talking past one 10 another to some degree. But I think that we 11 are both at a point where we agree on what 12 needs to happen within the next 60 days, and 13 we think that's enough time to determine 14 whether by the end of that time it's going to 15 be fruitful and we'll only need a few more 16 weeks to wrap things up and put things on 17 paper or whether it's time simply to move 18 forward with the appeal. 19 HEARING OFFICER WOLGAST: Thank 20 you. 21 MS. CHAVEZ: Thank you. 22 HEARING OFFICER WOLGAST: Ms. Kier?</p>	<p>1 feel strongly that a negotiated result would 2 be better here than litigation. And that's 3 why we ask the Court's indulgence for 4 additional time to be able to do that. 5 And then as far as the motion for 6 WASA to be removed from the proceeding, we do 7 not oppose that. Do you have any other 8 questions? 9 HEARING OFFICER WOLGAST: And what 10 is your sense of the likelihood of 11 resolution, to come to an agreement in 12 principle, in the next 60 to 90 days? 13 MS. KIER: I think Mr. Evans was 14 correct when he said if you'd asked two 15 months ago I would have been very 16 pessimistic. But things have changed 17 recently and I am very, very optimistic that 18 with the help of our mediator we will get to 19 resolution in the next 60 to 90 days. 20 HEARING OFFICER WOLGAST: All 21 right, thank you. Well, the Board will take 22 the motion for stay under advisement and we</p>
23	25
<p>1 MS. KIER: Good morning, Your 2 Honor. Lori Kier, EPA Region III, and I'd 3 like to identify -- I've brought with me two 4 client representatives from the Region III 5 Water Division. I have both Garrison Miller, 6 who is the permit writer, and David McGuigan, 7 who is the NPDES branch chief. I've also 8 brought with me Sylvia Horowitz from the 9 Office of General Counsel. 10 I wanted to share the sentiments 11 that both Mr. Evans and Ms. Chavez expressed, 12 and just to add that it is in EPA's interest 13 that permittees be involved in helping 14 establish what control measures they're going 15 to use for storm water. EPA has recognized 16 in a number of guidance documents, and most 17 recently through a General Accounting Office 18 report, that storm water requirements do 19 impose financial burdens and other resource 20 burdens on communities and that communities 21 are in the best position to know what 22 controls are appropriate. And that is why we</p>	<p>1 will be back to you shortly about that. We 2 will also be issuing an order responding to 3 WASA's request to withdraw from this 4 proceeding. 5 If in the event the parties wish to 6 invoke the mediation services of the Board, I 7 would just ask that you contact Ericka Durr, 8 the court clerk. And otherwise, please feel 9 free to stay and use these facilities if you 10 would like to continue your negotiations at 11 this time. Thank you very much. 12 (Whereupon, at 10:27 a.m., the 13 HEARING was adjourned.) 14 * * * * * 15 16 17 18 19 20 21 22</p>



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