William Matuszeski		**Chair, Anacostia Watershed Citizens Advisory Committee bmat@olg.com 3.1.5 and 3.1.**
Section/Table/Figure Nos.	**Page No.**	**WORK PLAN COMMENTS**
3.1.2	24	The discussion of Sources does not seem to treat the re-suspension of in situ legacy sediments as a source of the toxics under investigation. It may well be that a major source of the toxic sediments in any one place is depostion of these resuspended toxic materials after they have been stirred up by storms , dredging or other events. While the extent of this source and the nature in which it delivers these toxics is difficult to determine, it is important to establish its relative contribution as a source.
2.6	10	The discussion of Ongoing Activites should include a detailed discussion of the current effort by EPA and DCDOE to develop a new Total Maximum Daily Load for toxics in the Anacostia. Some of the monitoring and investigative efforts being carried out as part of the TMDL development could be useful to the RI and the FS. Furthermore, the TMDL should be identifying sources of the toxics and the resuspension of existing sediments bearing toxics may be a pathway. Ultimately, the Wasteload Allocation developed under the TMDL should be integrated with the remediation plan resulting from this RI/FS, and the desire and commitment to do that should be included here.
3.1.5 and 3.1.6	31-32	While the dominant transport medium may be downstream migration, as stated in 3.1.5, it is important to understand the extent to which the tidal Anacostia transport system for sediment is chronic versus event-driven. A system that is storm-event driven will obtain a larger share of its loadings from the disturbance of insitu sediments and from bank erosion. In contrast, if the movement is ongoing and not particularly variable with storm events, it may be easier to evaluate the rates and levels of material transport. The monitoring being done by EPA for the TMDL, for example, considers a one-half inch rain event as suffienct to measure the variability, but that may well be too small a storm to measure.
3.1.2	24	The discussion of Sources suggests that there may well continue to be toxic loadings entering the system from upstream tributaries, including the Northeast and Northwest Branches and Lower Beaverdam Creek. Since these are all in Maryland, it is important to indicate in the Workplan how and how soon DOE will be engaging coiunty and state officials to assure timely consideration of data needs and ultimately remedies.
10	95	It is essential that the schedlule for the RI /FS be revised to reflect the delays caused by non-professional reviews within the DC Government. Once that is done, the new schedule should include no time for such unnecessary reviews in the future and should set out an achievable set of dates. Efforts should be made to warn potential permit authorities of the anticipated need for permits as well as the importance of efficient handling of permit applications. In the past this has been a problem, especially with the National Park Service.
		THANK YOU FOR THE OPPORTUNITY TO COMMENT ON BEHALF OF THE ANACOSTIA WATERSHED CITIZENS ADVISORY COMMITTEE.