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ANC 3/4G Resolution Requesting That DC Water and the District Department of Health Examine and, If Feasible, Implement Sewage Testing for COVID-19

1. The District is expanding its capability to test individual residents for COVID-19 infection and to conduct contract tracing. These are essential steps as the District begins to reopen businesses and recreation/religious/social facilities. The evidence is mounting, however, that testing for COVID-19 in sewage may be able to provide an early warning of community spread, and, if feasible, the District and DC Water should promptly implement such a program.

2. On May 27, 2020, the Water Science and Technology Board of the National Academies of Science, Engineering and Medicine's Water Science and Technology Board devoted its Spring meeting to "Wastewater Monitoring for COVID-19 Disease Surveillance" (recording available at https://bit.ly/378NHtA). National and international experts described steps that can be taken to identify COVID-19 from wastewater, either at a sewage processing facility or in the outflow from specific locations — e.g., nursing homes or prisons.

3. Researchers have determined that "the virus can be detected in untreated wastewater within days of infection and as much as two weeks before a person grows ill enough to seek medical care — that is, if symptoms ever materialize at all" (*Washington Post*, May 1, 2020, https://wapo.st/2zWTZQT).

4. Wastewater treatment utilities across the United States have begun programs to test sewage for COVID-19 as a means of identifying the spread of the virus before it appears in person-by-person tests or hospitalizations. For instance, on June 3,

2020, Virginia's Water/Wastewater Agency Response Network (a forum to provide utility-to-utility response during an emergency) sponsored a report on the program currently being implemented by the Hampton Roads Sanitation District (available at https://bit.ly/3cGCr8B). Experts from Yale University have prepared a paper summarizing the program in New Haven, Connecticut (available at https://bit.ly/2AKCR0s). Maryland has begun a pilot program to determine the effectiveness of sewage testing for COVID-19 (https://bit.ly/309zLOt, and the Miami-Dade County Water and Sewer Department has been testing waste samples for COVID-19 since March (https://hrld.us/3eS2Yl0). As part of its reopening strategy, Syracuse University "plans to routinely test sewage leaving each residence hall to spot signs of the virus before students even become sick. If the testing finds a sudden spike of virus in a dorm's sewage, SU can start testing students in that building to get a jump on a potential outbreak."[1]

5. Testing wastewater for COVID-19 could identify the extent of the virus' spread across all of those who might be contagious — asymptomatics, mild cases, serious cases, and survivors who continue to shed the virus for a period of time and might still be infectious. The analytical results can be available from some laboratories a day or two after sampling. Proponents of this kind of sewage testing effort contend that measurements of the virus in sewage could give decision makers a week or more advance warning over other epidemiological methods — e.g., person-by-person testing or hospitalization rates — that the virus is spreading or declining, thereby providing an enhanced opportunity to intervene to try to slow the spread.

6. DC Water initially indicated on May 14, 2020, that "there are multiple issues" with testing sewage for COVID-19:

    a. "Because our wastewater comes from Maryland, Virginia and DC, there is no possible use for determining if there is COVID concentrations in the water. It would be useful if we were a small water system with a very narrowly defined customer base.

    b. There is no federal or EPA guidance on whether this is a practical way to track or respond to the illness. Hospitalizations already tell us a lot.

    c. The DC Department of Health is in charge of the city's response and they have not asked us to try and generate any useful data.

    d. Other cities tell us they see little to no value in this process.

    e. Because of the great health risks associated with COVID our crews are focused on emergency work and we have no current way to launch a new

[1] "Syracuse University, [SUNY College of Environmental Science and Forestry] will test sewage dorm-by-dorm to track coronavirus spread," available at https://bit.ly/2Uk7BfJ.

water monitoring program. And then there is a cost of such a process, which takes us back to c above."

7. With regard to DC Water's first objection, we recognize that the District's sewage system is connected to our neighboring states, so that simple testing at the Blue Plains plant would not likely give the kind of pinpoint identification of affected neighborhoods that DC Health would find most useful. Nevertheless, the District has been working closely with neighboring jurisdictions to address the pandemic in a uniform way, and knowing whether our entire Capital region is getting worse or better would be valuable information. Moreover, it is possible to test elsewhere in the system so that results could be obtained on a neighborhood basis or from major facilities, such as prisons or retirement homes, thereby giving more advance notice of a developing situation warranting action. Once a testing protocol is in place, it would be useful through the entire period — perhaps years — that this virus poses a significant concern for the District.

8. The cost of periodic sampling should be modest, especially when compared to the savings achieved by preventing even a few residents from requiring hospitalization.

9. On May 31, 2020, DC Water advised the Commission that it "had decided to move ahead with a broad national look a this issue" and that there may be funding coming from the federal government. DC Water was invited to participate in the Commission's June 8 2020 meeting, but it was "not able to confirm anyone" to attend virtually. David Bardin, a former member of the DC Water Board of Directors and a former ANC Commissioner, made a presentation to the Commission at its June 8, 2020 meeting on wastewater testing at other utilities.

10. The District and DC Water should be leaders in developing methodologies and protocols to test wastewater for COVID-19. We urge the Mayor, the Council, the District Department of Health, and DC Water to initiate a prompt evaluation of a state-of-the-art wastewater testing program. This may be best undertaken jointly with other jurisdictions served by DC Water. Given the possibility of multiple waves of infections, the testing program should be initiated as soon as practicable. The evaluation should determine whether more granular tests — e.g., for the DC jail, nursing homes, university dormitories, or particular neighborhoods — will be effective and helpful to provide an early warning of COVID-19's spread.

11. The Commission appreciates the efforts of the Mayor, the Council, and the Department of Health to address the health emergency posed by COVID-19. As a further step to protect District residents, we urge the District government and DC Water to implement a program for sewage testing that may provide additional protection for our community.

Approved by ANC 3/4G after a discussion at its regularly scheduled and noticed June 8, 2020 meeting by a vote of 7 to 0 (a quorum being 4).

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Randy Speck, Chair Abe Clayman, Secretary

cc: Mayor Muriel Bowser
Council Chair Phil Mendelson
Councilmember Mary Cheh
Councilmember Brandon Todd
Councilmember Vince Gray
DC Water General Manager David Gatis
Director of the District Department of Health Dr. LaQuandra Nesbitt