



## **Loudoun Watershed Watch**

**Protecting the Water Resources of Loudoun County**

# **Citizen Checklist for TMDL Implementation Plan (IP) Development and Review**

## **1. TMDL IP Plan Development**

- Local Watershed Groups should be a member of the Steering Committee and the Environmental Working Group to help develop: (1) a detailed stream monitoring plan, and (2) a detailed educational plan that targets both stakeholders and the general community.
- DCR has a model TMDL IP they will want to use that is likely to be incomplete. Local Watershed Groups should work to insure that the IP has sufficient details regarding monitoring, education, ongoing assessment of the IP, and the role of local groups.

## **2. DCR/DEQ TMDL Implementation Plan Guidelines**

- Local Watershed Groups should review the DCR/DEQ Guidance Manual for TMDL Implementation Plans,” July 2003, to know what the IP should include. It is available at [www.deq.virginia.gov/tmdl/ipguide.html](http://www.deq.virginia.gov/tmdl/ipguide.html).
- Section 7.3 of Guidelines provides a “Reasonable Assurance” yardstick for assessing the adequacy of TMDL IP’s. The plan should be developed and reviewed to insure that this reasonable assurance burden is being met.
- The IP should include new initiatives to help provide reasonable assurance that the 90%+ reductions in NPS needed under the TMDL will, in fact, be accomplished. Relying on the same initiatives used by Soil and Water Conservation Districts and County Extensions in the past that have had marginal affect on changing attitudes and behaviors will likely not be sufficient.

## **3. Water Quality Milestones**

- DEQ uses different data sets for different assessments that result in different percentage violations. The baseline % violations in the IP may be different then the % violation reported in the TMDL report, or the last 303(d)/305(b) assessment prior to implementation. Determine which is used and why.
- The IP probably does not include a detailed Water Monitoring Plan, and it should under Section 7.1 of the Guidelines.

- DEQ has a few trend stations that are monitored bimonthly, and many ambient stations that are monitored only two out of every six years. Supplemental, ongoing monitoring by local agencies or groups will be needed. DCR may not want to spend money on this, but the monitoring plan should be in the IP to help justify citizen groups getting grant funds.
- DEQ data sets used to develop the IP may not reflect unfavorable pollution conditions, which is another justification for ongoing supplemental monitoring.
- The monitoring plan should include stream walks /stream surveys in targeted sections as provided in Section 7.1.3.3 of the Guidelines.
- Local agencies or citizen watershed groups should play a lead role in collecting ongoing monitoring data. These data do not need to meet DEQ approved data criteria since they will not be used to reclassify the stream but only to track progress. DEQ will conduct an official assessment after the TMDL IP is complete, but this will likely be too late to make any needed adjustments.

#### **4. Education Plan**

- The IP probably does not include a detailed educational plan, and it should.
  - EPA provides an excellent resource: **“Getting in Step – A Guide for Conducting Watershed Outreach Campaigns,”** December 2003, EPA 841-B-03-002 to aid local watershed groups in designing a plan.
  - The plan should include steps to develop or strengthen local citizen watershed group(s), and provide several doorways for citizen participation.
- Local citizen watershed groups should play a partnership or even a lead role in providing educational materials and organizing educational activities that target the community. DCR may not want to fund such educational initiatives, but the plan should be in the IP to help justify grant funding.

#### **5. Reassess TMDL and IP**

- The IP probably does not include a section that details how and when a feedback assessment will be conducted as provided in Section 7.5 of the Guideline, and it should. The purpose is to re-open the TMDL and make adjustments during the implementation phase (in first 5 years) if monitoring results show that water quality milestones are not being met.
- Local citizen monitoring groups should play a partnership role with DEQ in collecting ongoing monitoring data to track progress and in suggesting alternative strategies, as necessary.

#### **6. Local Watershed Group Roles and Responsibilities**

- The IP probably does not include a discussion of the roles and responsibilities of local citizen watershed groups during the life of the IP, and it should.

- It is recommended that local citizen watershed groups seek at least a partnership role in TMDL implementation along with state and local governmental authorities.
  - The willingness of the local Soil and Water Conservation District to collaborate with citizen groups will be an important factor.
  - The support from county authorities for citizen collaboration will also be important.
- The IP probably does not include funds for the local citizen watershed group to fulfill their partnership roles and responsibilities, but a citizen role should be included in the IP to help justify grant funding.