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Copy posted at http://www.loudounwatershedwatch.org/subitem6_3.html

Subject: Comments on **Draft 2016 305(b)/303(d) Water Quality Assessment Integrated Report**

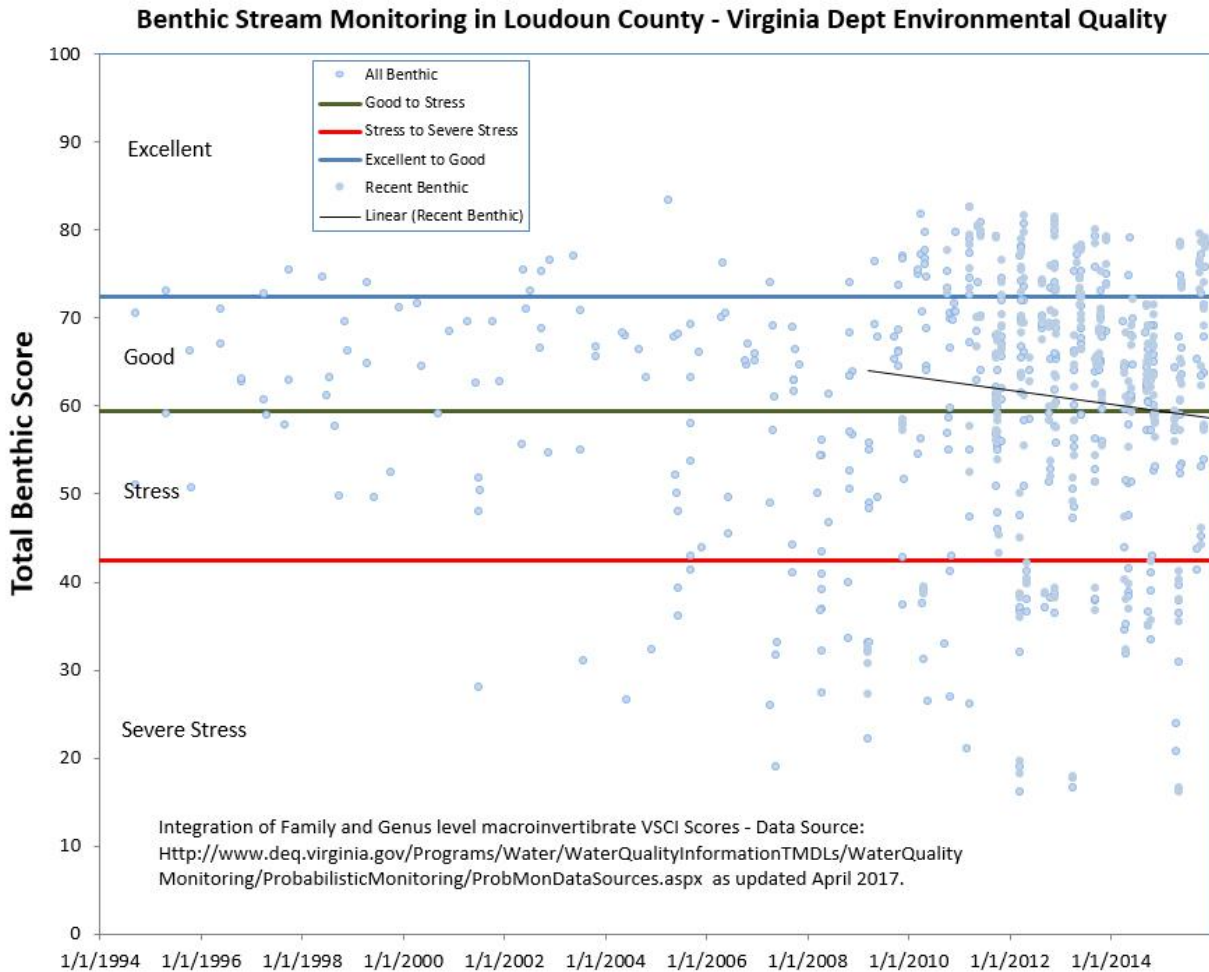
Loudoun Watershed Watch is pleased to submit comment on the DRAFT 2016 Water Quality Assessment Integrated Report appearing at <http://www.deq.virginia.gov/Programs/Water/WaterQualityInformationTMDLs/WaterQualityAssessments/2016305b303dIntegratedReport.aspx>

Specifically, we wish to comment on the “Delisting” in Loudoun County appearing in Appendix 3 http://www.deq.virginia.gov/Portals/0/DEQ/Water/WaterQualityAssessments/IntegratedReport/2016/ir16_Appendix3_Waters_Identified_for_Delist.pdf

There are several proposed delistings for aquatic life use (benthic) and recreational use (bacteria) in Loudoun County. We believe the benthic delisting for Little River maybe premature based on the following reasons.

1. There has not been a TMDP Implementation Plan, nor a watershed plan developed for Little River. There is a TMDL Action Plan appearing in the Loudoun County MS4 Permit Stormwater Management Plan.
2. We believe that construction and continued development (imperviousness) in this subwatershed of Goose Creek has increased over time which conflict with delisting.
3. The overall benthic scores within Loudoun County continues to decline overall and we would expect the same for the types of land use in Little River (See chart below).
4. The data for the 5-year data window is very limited and may not reflect the actual trend of Little River.
5. Examining data beyond the data window indicate that the period January 2009 to December 2014 we see that while scores in 2013 for 3 sites on Little River showed no impairment, the score in 2016 for one location showed the stream very close to the demarcation score of 60.

Using ProbMon data for Loudoun County as presented at <http://www.deq.virginia.gov/Programs/Water/WaterQualityInformationTMDLs/WaterQualityMonitoring/ProbabilisticMonitoring/ProbMonDataSources.aspx>, the VSCI scores were extracted from MS Access, values averaged when duplicate samples were taken and Family and Genus-level values integrated. The results are charted below with a linear trend for the 2009-2016 period.



Data are includes in Table 1 as attached to this letter

The text for the delisting on Little River are:

Potomac and Shenandoah River Basins

VAN-A08R_LIV01A00 Little River 6.41 Miles

Delisting Summary: Aquatic Life

PARTIAL DELIST 2016 - Benthic Macroinvertebrates - A08R-02-BEN, VAN-A08R-02 (CFL 1998)

During the 2014 cycle, this segment was assessed as not supporting the aquatic life use because biological monitoring events in 2008 (spring and fall) at station 1aLIV004.78 resulted in VSCI scores indicating an impaired macroinvertebrate community. Subsequent biological monitoring events (2) took place in 2013 (spring and fall) 0.01 mile upstream from this location at station 1aLIV004.79.

The 2013 events indicated a healthy aquatic community and support of the aquatic life use. The average VSCI score from the two most recent years of sampling also indicate support of the aquatic life use. It has been determined that this segment should be delisted for benthic macroinvertebrates based upon recent VSCI scores indicating a healthy benthic macroinvertebrate community.

VAN-A08R_LIV02B10 Little River 4.36 Miles

Delisting Summary: Aquatic Life

PARTIAL DELIST 2016 - Benthic Macroinvertebrates - A08R-03-BEN, VAN-A08R-02 (CFL 2010)

During the 2014 cycle, this segment was assessed as not supporting the aquatic life use because a biological monitoring event in 2008 (fall) at station 1aLIV012.12 resulted in VSCI scores indicating an impaired macroinvertebrate community. Subsequent biological monitoring events (2) took place in 2013 (spring and fall) at this location. The 2013 events indicated a healthy aquatic community and support of the aquatic life use. The average VSCI score from the two most recent years of sampling also indicate support of the aquatic life use. It has been determined that this segment should be delisted for benthic macroinvertebrates based upon recent VSCI scores indicating a healthy benthic macroinvertebrate community.

We appreciate the opportunity to comment on the water quality assessment and look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read "David Ward". The signature is fluid and cursive, with the first name "David" and last name "Ward" clearly distinguishable.

David Ward
Loudoun Watershed Watch

Table 1

Row Labels	Stream Name	Spring 2009	Fall 2009	Spring 2010	Fall 2010	Spring 2011	Fall 2011	Spring 2012	Fall 2012	Spring 2013	Fall 2013	Spring 2014	Fall 2014	Spring 2015	Fall 2015	Spring 2016	Fall 2016	Ave_2010_2016
1ABEC004.76	Beaverdam Creek					79.58	72.21											75.90
1ABEM000.60	Beaverdam Run									50.48	37.99	38.32	35.07					40.46
1ABRB002.15	Broad Run							38.52	38.73									38.62
1ABRB006.97	Broad Run							41.27	38.70									39.98
1ABRB015.43	Broad Run							39.97	61.81									50.89
1ABSC000.45	Big Spring													39.57		33.59	52.50	41.88
1ABUL025.94	Bull Run											64.64	64.28	57.16	76.10			65.54
1ACAA007.34	Catharpin Creek					82.58	79.18											80.88
1ACAC000.16	Cattail Branch													37.86	57.53	22.14	56.82	43.59
1ACAX003.81	Catoctin Creek							64.07	74.12									69.10
1ACAX004.57	Catoctin Creek									77.99	79.27							78.63
1ACLK002.40	Clark's Run (Tributary to POT)					78.91	60.49											69.70
1ACRM004.09	Cromwells Run															67.69	62.61	65.15
1ACUB004.63	Cub Run	30.64	57.92	39.06														39.06
1ACUB011.25	Cub Run													16.38	45.22	28.44	63.15	38.30
1ACUB011.78	Cub Run															19.12	50.88	35.00
1ADRL001.00	Dry Mill Branch									67.66	79.00	64.27	62.93			28.91	72.35	62.52
1ADUT000.62	Dutchman Creek													63.09	63.46	53.19	66.49	61.56
1ADUT002.72	Dutchman Creek													58.98		45.34	69.61	57.98
1AELC001.39	Elklick Run							47.47	69.17									58.32
1AFRY000.85	Frying Pan Branch															29.75	58.10	43.92
1AGOO000.50	Goose Creek						44.30											44.30
1AGOO011.23	Goose Creek									68.86	63.88	69.97	71.47			44.97	53.55	62.12
1AGOO018.17	Goose Creek							78.15	68.72									73.43
1AGOO022.44	Goose Creek				75.25									78.44	77.24	48.40	69.64	69.79
1AGOO030.75	Goose Creek					70.18												70.18
1AGOO039.63	Goose Creek									77.14	65.15							71.15
1AGOO044.36	Goose Creek															70.60	77.06	73.83
1AHPR003.93	Horsepen Run									17.73	52.79	35.15	38.97					36.16
1AJAC000.74	Jack's Run															26.84	66.59	46.72
1AJEE000.23	Jeffries Branch									64.10	70.08	57.83	69.18		78.53			67.94
1AJEE002.22	Jeffries Branch					68.44	55.47			56.34	73.11	61.25	69.09	63.59	71.25			64.82
1AJEE004.34	Jeffries Branch													73.83	71.53			72.68
1ALII001.07	Little Bull Run													58.52		51.79	75.16	61.82
1ALIM001.16	Limestone Branch					74.53	65.71	58.32	73.33									67.97

Table 1

1ALIV004.78	Little River																60.52	61.20	60.86
1ALIV004.79	Little River									74.50	68.49								71.49
1ALIV012.12	Little River									72.47	65.22								68.84
1ANOB000.75	North Fork Beaverdam Creek									71.30	74.95	60.64	62.29				66.68	43.04	63.15
1ANOC000.42	N. Fk. Catoctin Creek					60.05							60.03						60.04
1ANOC004.38	N. Fk. Catoctin Creek					60.95	71.97	68.83					58.22						64.99
1ANOC009.37	N. Fk. Catoctin Creek					59.07							65.02						62.05
1APIA001.80	Piney Run						80.72	73.25				68.00	69.08						72.76
1APIA003.51	Piney Run				80.42	67.78													74.10
1ASAN000.34	Sand Branch																13.86	58.65	36.26
1ASAN001.45	Sand Branch																40.34	45.08	42.71
1ASIM000.42	Simpsons Creek																61.20	75.40	68.30
1ASOC002.93	South Fork Catoctin Creek																56.54	55.23	55.89
1ASOC007.06	S. Fk. Catoctin Creek					65.55	63.50	79.85											69.63
1ASOC010.09	S. Fk. Catoctin Creek					74.56	69.81	81.23											75.20
1ASOC011.70	S. Fk. Catoctin Creek					67.86	72.01	73.01											70.96
1ASOC013.05	S. Fk. Catoctin Creek					66.45	74.17	60.44											67.02
1ASOR000.59	S. Fk. Broad Run				55.00	56.67	37.04	59.16											51.97
1ASYC007.43	Sycolin Creek									66.30	59.66	43.85	66.34				48.48	65.02	58.27
1ATUS003.19	Tuscarora Creek						18.91	52.85											35.88
1AXJI000.38	X-Trib to Goose Creek																82.63		82.63
1AXOB000.17	UT to Bull Run																61.39	64.38	62.88