



David Ward
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February 22, 2017

MWEOC
ATTN: K. Ellis
PO Box 129, Mt. Weather, VA 22611

Sent via E-mail: comments437EA@fema.dhs.gov

Subject: Proposed Construction at Mt. Weather Emergency Operations Center

Dear K. Ellis:

Loudoun Watershed Watch is concerned about the proposed construction at Mt. Weather Emergency Operations Center (MWEOC) and the possible stormwater runoff and sediment discharge that may impact on local streams. We have observed past actions at MWEOC has seriously impacted local streams in 2009 and express concerns this may happen again.

We understand that Department of Homeland Security has placed legally-required public notices in area newspapers seeking comments on a major expansion project at the Mt. Weather Emergency Operations Center. The deadline for public comments is February 22.

The project involves the construction of a 30,000-sq. ft. structure known as Building 437 on the footprint of a building demolished in 2014, the demolition of an old warehouse building, the paving of a new gravel parking lot – to provide space for 45 cars, and the modification of a road at the complex.

In Chapter 3 water resources are discussed.

Water Resources

Development in the 900 Area will introduce additional impervious surfaces to the overall MWEOC campus, but is not expected to alter drainage patterns. Stormwater runoff from the 900 Area will continue to flow westward towards the existing retention basin, which functions as a way for stormwater to percolate into groundwater resources. In terms of the overall MWEOC, as older buildings are replaced with newer ones, the new buildings will reduce the overall amount of impervious surfaces from pavements and rooftops by increasing the amount of under roof square footage. In addition, sustainable design features would be included, such as rain water reclamation. These sustainable design features that address stormwater runoff would also apply to facilities developed within the 900 Area, as well as to the Proposed Action (see Section 2.1.2).

Due to the stormwater and wastewater management measures throughout MWEOC, the Proposed Action along with other foreseeable developments will not cumulatively affect groundwater supply and quality. Roadway runoff can contain vehicle fluids (gasoline and motor oil) and heavy metals, as well as surplus nutrients from fertilizer used throughout the campus for landscape maintenance. However, greater use of sustainable designs and retention basins, which will be part of future developments in MWEOC, will help to filter pollutants from runoff before discharging into groundwater. These measures will maintain the quality of the groundwater resource.

http://brleader.com/wp-content/uploads/2017/02/MWEOC-EA_Chapter-3.pdf

On June 8, 2009 the below images in and around Jeffries Branch downstream of Mt Weather were provided by members of Goose Creek Association. The soil erosion from Mount Weather was very heavy. The photographs show the muddy stream that feeds into Jeffries Branch and one of two ponds that is on Jeffries Branch. The huge bare ground on Mount Weather is clearly visible and it is the likely cause of the silting.

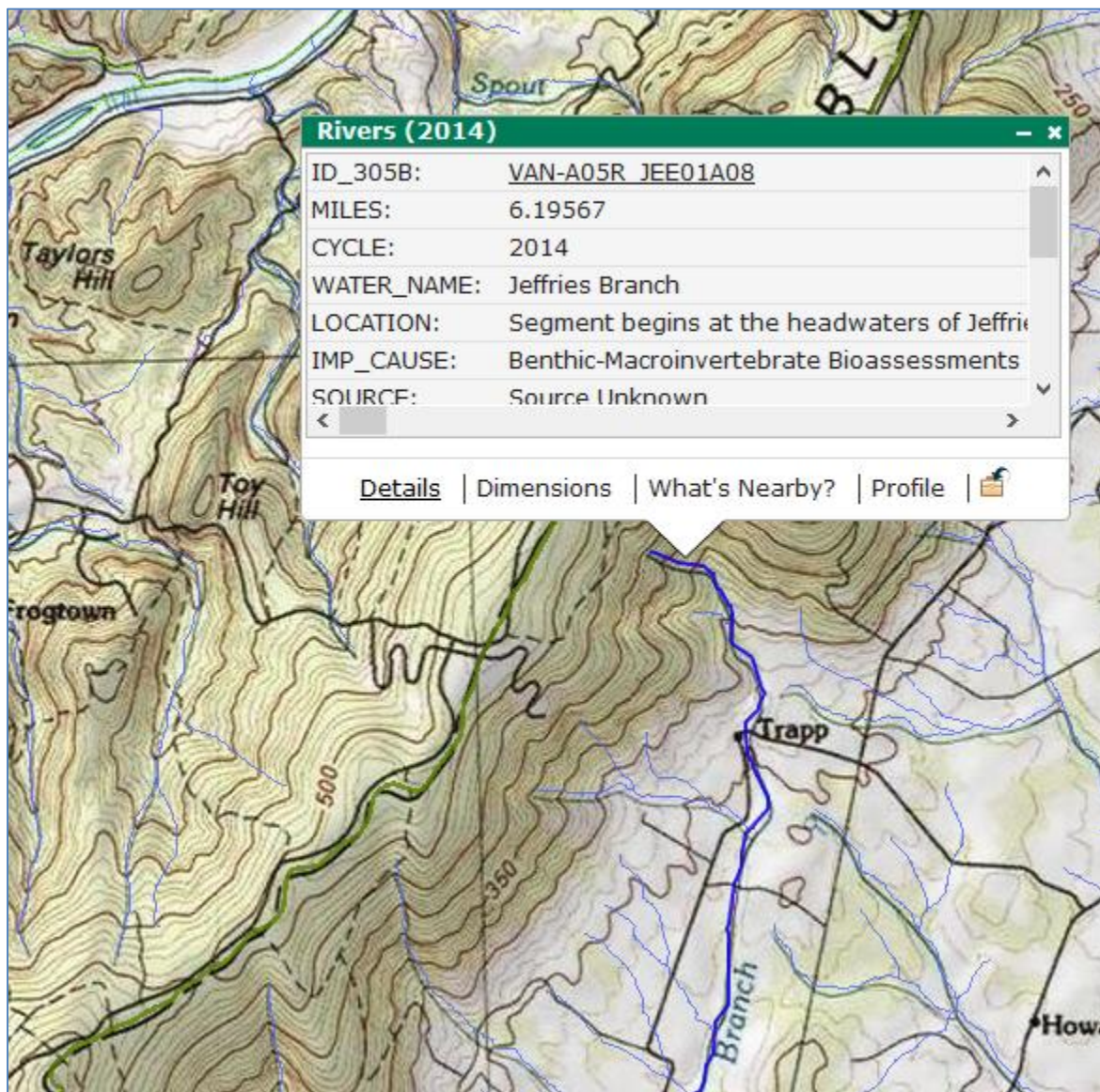


This sediment pollution lead to Virginia designation of a legal stream impairment. It was after Loudoun Watershed Watch and others requested VA Dept of Environmental Quality to monitor the stream that lead to a

stream impairment for aquatic life use. This means the poor benthic bugs in the streams were most likely impacted because of excessive sediment caused by stormwater abuse on Mt Weather in 2009.

In 2012 a Category 5a was assigned to Jeffries Branch

http://www.deq.virginia.gov/FS2014/FactSheets.aspx?id=VAN-A05R_JEE01A08&style=1 which states: ‘Four biological monitoring events (2010-2011) at station 1aJEE002.22, at Route 743, resulted in a VSCI score indicating an impaired macroinvertebrate community.’”



http://www.deq.virginia.gov/mapper_ext/?service=public/2014_adb_aquaticlife

DEQ is only required to assess the load and the reduction necessary in 2024, i.e. prepare the TMDL report. Therefore all we know at this time is that the stream is polluted and restoration, if any, will not evaluate for at least another decade or more from now!

Note that the stormwater abuse at MWEOC occurred after the issuance of Executive Order (EO) 13508 which was signed May 12, 2009. The Order calls for the development and implementation of a coordinated Federal strategy to expand and bring greater accountability for efforts toward the Chesapeake Bay's recovery.

It was not until five years after the sediment discharge that MWEOC staff allowed for a Public Meeting which was held on September 23, 2014 in Upperville.

In short our comment is that we believe the construction activities at MWEOC must meet and exceed all stormwater management practices for both design and sediment control during construction and that measures be taken, especially during construction phase, to ensure that muddy waters not flow down from the site to Jeffries Branch. We hope that MWEOC staff has learned from the events on July 2009 and will avoid making similar mistakes.

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