

David Ward Loudoun Watershed Watch 38659 Bolington Rd Lovettsville, VA 20180

Stuart Torbeck VA DEQ 629 East Main Street Richmond, VA 23219

Sent via E-mail: charles.torbeck@deq.virginia.gov

Subject: Citizen Nomination for Stream Monitoring

Dear Mr. Torbeck:

Loudoun Watershed Watch is pleased to provide several nominations for additional stream monitoring locations to be considered for inclusion in DEQ's Water Quality Monitoring plan in calendar year (2012).

We are aware that only about 30 percent of the stream miles in Loudoun County have been assessed for aquatic life use through benthic monitoring of the macroinvertebrate community in the streams. We understand that VA DEQ began stream monitoring in Loudoun County in 1994. Over the years the number in sites has grown to about a dozen sites wherein a site is typically monitored in both the spring and fall as VA DEQ requires that two benthic sampling be conducted to be used in the water quality assesssment. The site locations change around as DEQ seeks to maximize coverage and, in part, because of previous site nomination submitted by Loudoun Watershed Watch.

We are also very fortunate in Loudoun County to now have the results of the comprehensive Loudoun County Stream assessment, conducted in the spring of 2009 (http://www.loudoun.gov/streamassessment). This provides high-quality results using DEQ-approved protocol for 200 locations. Additionally in recent years two active partners of Loudoun Watershed Watch, specifically Loudoun Wildlife Conservancy and Goose Creek Association have provided additional locations and multi-year benthic assessments. Based on the benthic assessments, as well as the habitat assessments, we have assembled a series of priority site nominations as attached. We further recognize that VA DEQ is actively monitoring this calendar year although the specifics of the 2011 sampling plan have not been released at this time.

The goals of our nominations is to suggest stream reaches that in our opinion are strategic to support identification of both "healthy" and potentially "impaired" (for aquatic life use) segments. Based on the 2009 Loudoun County stream assessment, 78% of the streams are statistically under stress or severe stress and would be designated as impaired, however, even with 200 monitoring events from the spring of 2009, this comprehensive survey does not provide sufficient coverage of all streams in Loudoun as the goal of the study was an overall assessment and was not designed to analyze each and every segment. Furthermore, the sampling was a one-time event and VA DEQ requires at least two events during the sampling window of the assessment cycle.

In support of stream monitoring Loudoun Wildlife Conservancy has prepared a map of "pre-qualified" sites for citizens to monitor. Sites were windshield checked in order to ensure reasonable access, parking and general safety. The locations are generally at road crossings and we suggest that VA DEQ consider adopting these and are included in the attached maps.

http://maps.google.com/maps/ms?ie=UTF8&hl=en&msa=0&msid=200374612332408901915.000480d40 53b9bbc87516&z=10

This past spring, Loudoun Wildlife Conservancy prepared a summary of recent monitoring data (2008-2010). We suggest VA DEQ review these data in conjunction with the maps in which a single or average value of citizen monitoring data are presented.

http://www.loudounwatershedwatch.org/pdf/LWC_Spring_Stream_Monitoring_March_2011.pdf These are displayed as "LWC Potential Sites" in the attached site nomination maps.

In the attached maps we have included benthic data from VA DEQ EDAS 2008, 2009 and 2010 in which average of spring and fall VSCI scores are presented. The "Loudoun 2009 Benthic" is the single spring 2009 VCSI score. The Loudoun Wildlife Conservancy average VASOS values for 2008 and 2009 are also shown.

Regarding bacteria monitoring, we are not nominating any additional sites as we recognize that the odds are that 80-90 percent of all reaches within Loudoun County if sufficiently monitored would probably fail to meet the recreational use criteria established by VA DEQ. We further recognize that reduction of bacteria is a significant challenge as has been evidenced throughout the 2005-2009 in the Catoctin Watershed TMDL Implementation Project in Loudoun County. Rather than encouraging additional bacteria monitoring, we believe that our streams would be better served through state support of agricultural BMP, such as Dept of Conservation and Recreation's cost-share program and public education of dealing with pet waste.

Attached are sites that we believe are priority locations for benthic monitoring in 2012. List from the top-most priority these segments include:

- 1. Upper Broad Run, south of Dulles Greenway, west of Dulles Airport
- 2. South Fork Broad Run, in the vicinity of Rt 50
- 3. Catoctin Creek, mainstem
- 4. Tuscorara Creek and/or Town Branch
- 5. Elklick Run

We look forward to your response and continued efforts to evaluate stream health in Loudoun County.

Sincerely,

David Ward

Loudoun Watershed Watch

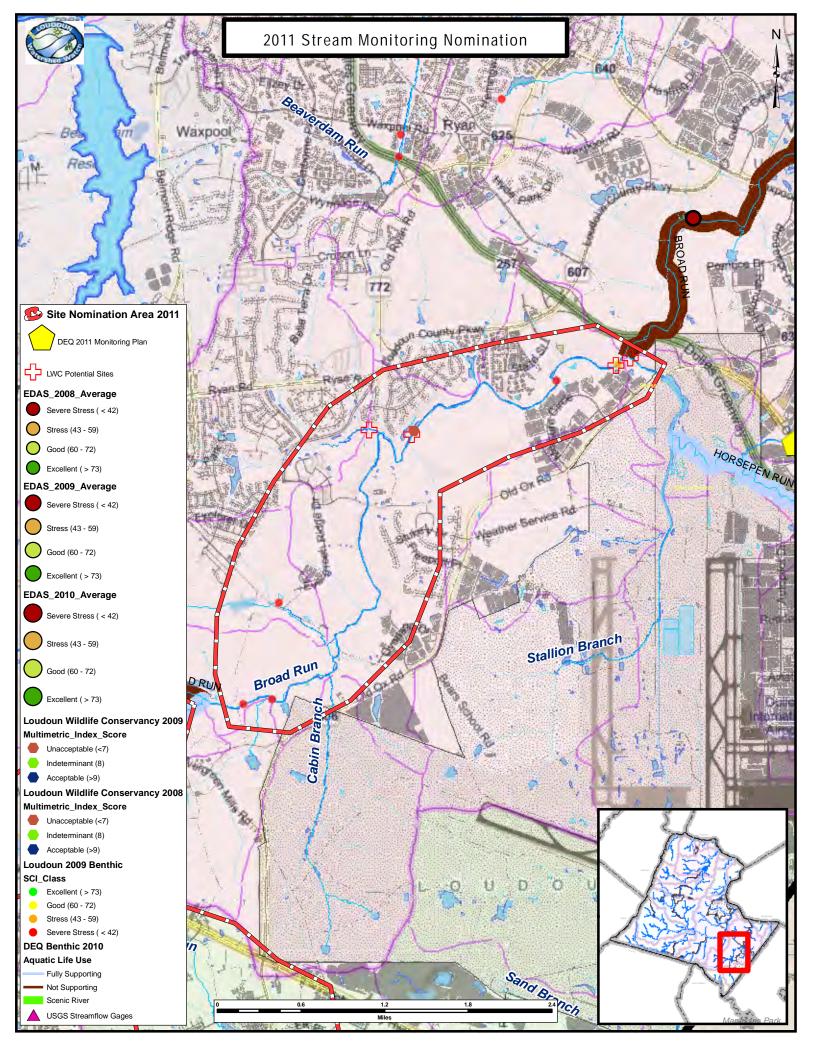
Name: David Ward, Loudoun Watershed Watch	Date: April 29, 2011		
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City: Lovettsville State: VA	Zip: 20180		
E-mail address: info@loudounwatershedwatch.org			
Telephone: Home: <u>540-822-5092</u> Business: <u>703-73</u>	37-8670		
Geographic description of the water body:			
(1) Name of the water body or segment proposed for monit	Č		
Upper Broad Run, south of Dulles Greenway, west of Dulles A	Airport.		
(2) Description of the upstream and downstream boundaries of the water body proposed for monitoring. Attach a map (preferably a photocopy of a 7.5 minute quad USGS topographic map) which delineates the boundaries:			
See attached map.			
(3) Reason for requesting that this water body be monitore	ed:		
There are benthic impairments above and below this reach. In			
housing and commercial development with more anticipated. In 2011-2012 Loudoun County is planning			

There are benthic impairments above and below this reach. In recent years there has been significant housing and commercial development with more anticipated. In 2011-2012 Loudoun County is planning to contract a comprehensive pilot watershed management plan (\$300K). In the 2009 Loudoun County Stream Assessment several sites were identified as 'stress' or "severe stress", therefore additional benthic monitoring at this site is important. Citizens have monitored Broad Run five times between 2008-2010 indicating potential impairment. This reach was previously submitted in 2008 and should be included in DEQ's plan.

(4) Attach any water quality data that you have collected or compiled. Include the name of the organization/entity that generated the data.

Data, reports, maps, presentations and animations are presented at www.loudounwatershedwatch.org and www.loudounwatershed.org

Additional reports and interactive maps of 2009 comprehensive field surveys are presented at www.loudoun.gov/streamassessment.



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Telephone: Home: 540-822-5092	Business: 703-737-8670			
Geographic description of the water body:				
(1) Name of the water body or segment proposed for monitoring:				
South Fork Broad Run, in the vicinity of Rt 50. Suggested location is crossing at Evergreen Mills (RT				
621)				
(2) Description of the upstream and downstream boundaries of the water body proposed for monitoring. Attach a map (preferably a photocopy of a 7.5 minute quad USGS topographic map) which delineates the boundaries:				
See attached map.				

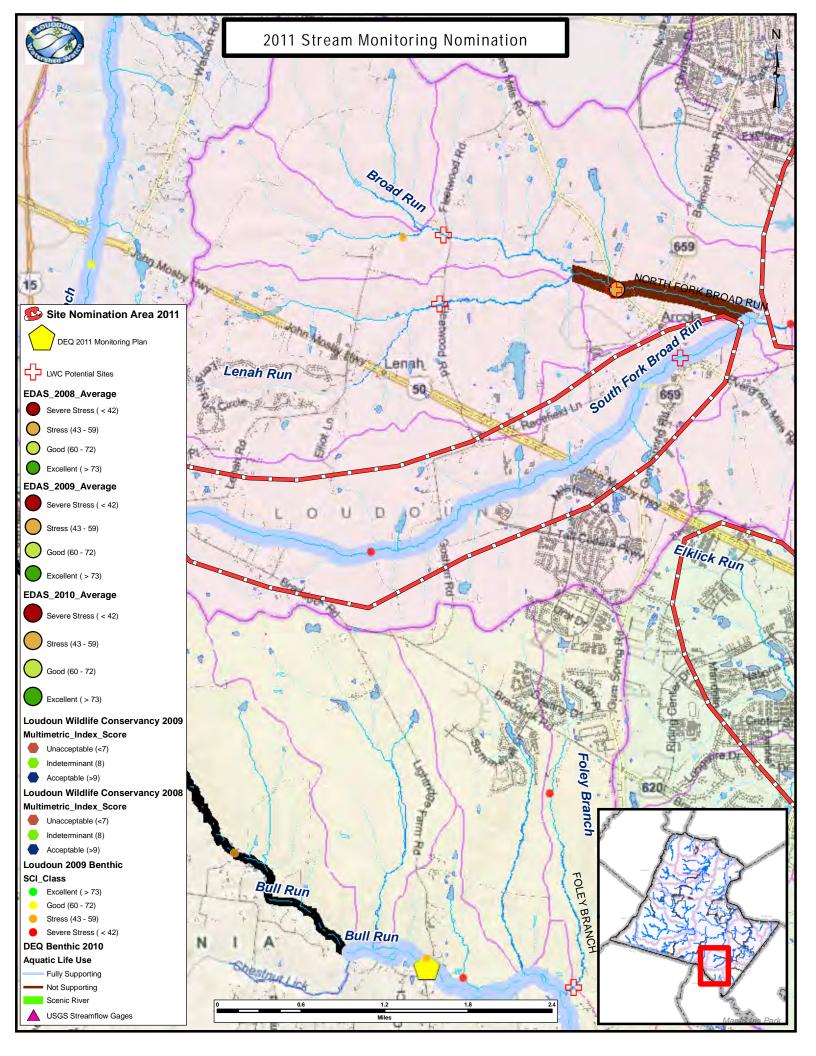
(3) Reason for requesting that this water body be monitored:

There is a benthic impairment on the North Fork of Broad Run. In recent years there has been significant housing and commercial development with more anticipated. In 2011-2012 Loudoun County is planning to contract a comprehensive pilot watershed management plan (\$300K). In the 2009 Loudoun County Stream Assessment one site in this reach was identified as "severe stress", therefore additional benthic monitoring at this site is important. Although this is a repeat of the nomination in 2010, we believe that it should, if not already be included in VA DEQ's plan.

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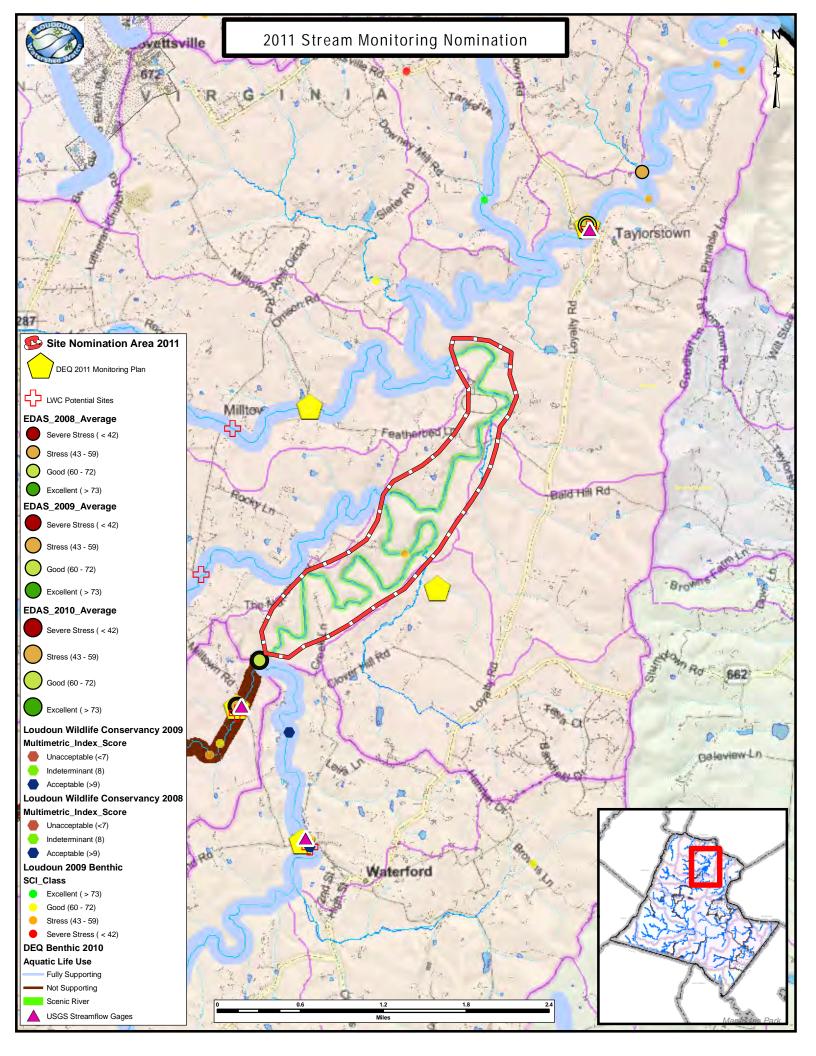
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Geographic description of the water body	y:			
(1) Name of the water body or segment p	roposed for monitoring:			
Catoctin Creek, mainstem, upstream of cross South Fork. There are numerous access point crossing at Cochran Mill Rd or down the fill Pavilion at Solitude Court SE.	ints from road crossings. The	e logical downstream site is the		
(2) Description of the upstream and downstream boundaries of the water body proposed for monitoring. Attach a map (preferably a photocopy of a 7.5 minute quad USGS topographic map) which delineates the boundaries:				
See attached map.				
(3) Reason for requesting that this water	body be monitored:			

There is a benthic impairment on North Fork Catoctin, upstream of this reach. There are numerous housing developments, although likely on larger lots. In the 2009 Loudoun County Stream Assessment one site in this reach was identified as "stress", therefore additional benthic monitoring at this site is important. This is a renomination from 2009 segment as we now suggest Featherbed Lane, not Cottage Grove Lane. This is along the Scenic portion of Catoctin Creek and the Scenic River Advisory Committee was reinstated in Jan 2011.

(4) Attach any water quality data that you have collected or compiled. Include the name of the organization/entity that generated the data.

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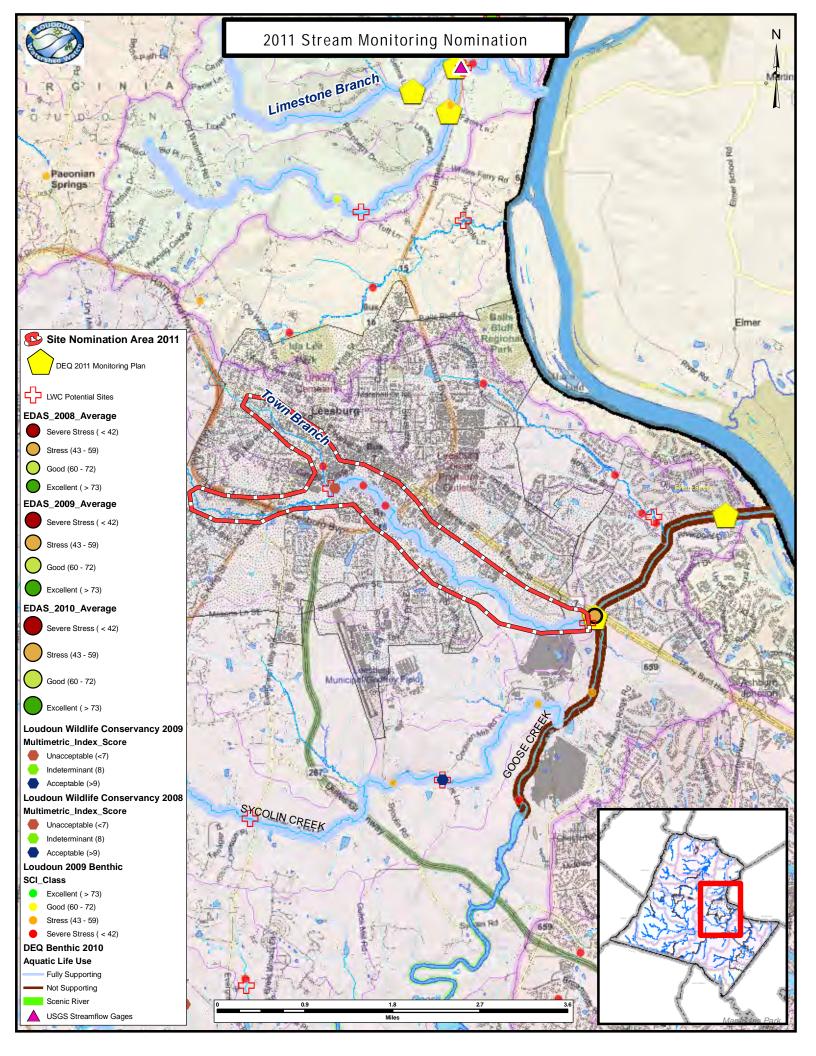
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Tuscorara Creek and/or Town Branch.	proposed for momenting.			
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See attached map.				
(3) Reason for requesting that this water body be monitored:				
There have been numerous housing devel				

There have been numerous housing developments and more anticipated along these reaches. In the 2009 Loudoun County Stream Assessment several sites in this reach was identified as "stress" or "severe stress", therefore additional benthic monitoring at this site is important. This reach is important to Loudoun County and Town of Leesburg Watershed Committee.

(4) Attach any water quality data that you have collected or compiled. Include the name of the organization/entity that generated the data.

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Geographic description of the water body:				
(1) Name of the water body or segment proposed for monitoring:				
Elklick Run, tributary to Cub Run. Suggested site location is the crossing at Braddock Rd.				
(2) Description of the upstream and downstream boundaries of the water body proposed for				
monitoring. Attach a map (preferably a photocopy of a 7.5 minute quad USGS topographic map) which delineates the boundaries:				
See attached map.				

(3) Reason for requesting that this water body be monitored:

Between RT 50 and Braddock Rd, the South Riding community has resulted in miles of stormwater pipes, numerous stormwater management ponds and an overall change in land use to "surban development". While these has not been any citizen monitoring, in the 2009 Loudoun County Stream Assessment several sites in this reach was identified as "stress", therefore additional benthic monitoring at this site is important. A baseline assessment is needed and possibly next year the adjacent drainage from Foley Branch will be nominated.

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