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April 29, 2013

Mr. Stuart Torbeck, Water Quality Data Liaison Virginia Dept. of Environmental Quality 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 (2014).

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.

This year our maps include previous nominations to help guide the 2013 selection process. We are cognizant of resource limitations are have selected three locations seeking to monitor stream reaches across the county under a variety of conditions. We have leveraged several data sources including state, county and citizen stream monitoring.

This year we utilized the state EDAS Family and Genus MS Access files with data available through Fall 2012. We observed that there were several occasions in 2010 through 2012 where there were either duplicate samples or analysis of VSCI scores based on both family and genus level analysis. We chose to aggregate data for each station for each sampling period (spring and fall) into one score. We support this approach after noting the relatively variability between duplicates and between family versus genus level identification. For each aggregated results, we have posted DEQ results on the maps.

We have also used the comprehensive DEQ-approved 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 (2008-2012). Based on the benthic assessments, as well as the habitat assessments, we have assembled a series of priority site nominations as attached.

The goal of our site 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.

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

This past spring, Loudoun Wildlife Conservancy prepared a summary of recent monitoring data (2008-2012). 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/Surface_Water_Quality_Monitoring_February_25_2013b.pd <u>f</u> . These are displayed as "LWC Potential Sites" in the attached site nomination maps.

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.

Attached are sites that we believe are priority locations for benthic monitoring in 2014. List from the top-most priority these segments include:

- 1. Sycolin Creek
- 2. North Fork Catoctin Creek
- 3. Goose Creek
- 4. Bull Run

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

Sincerely,

David Ward

Loudoun Watershed Watch

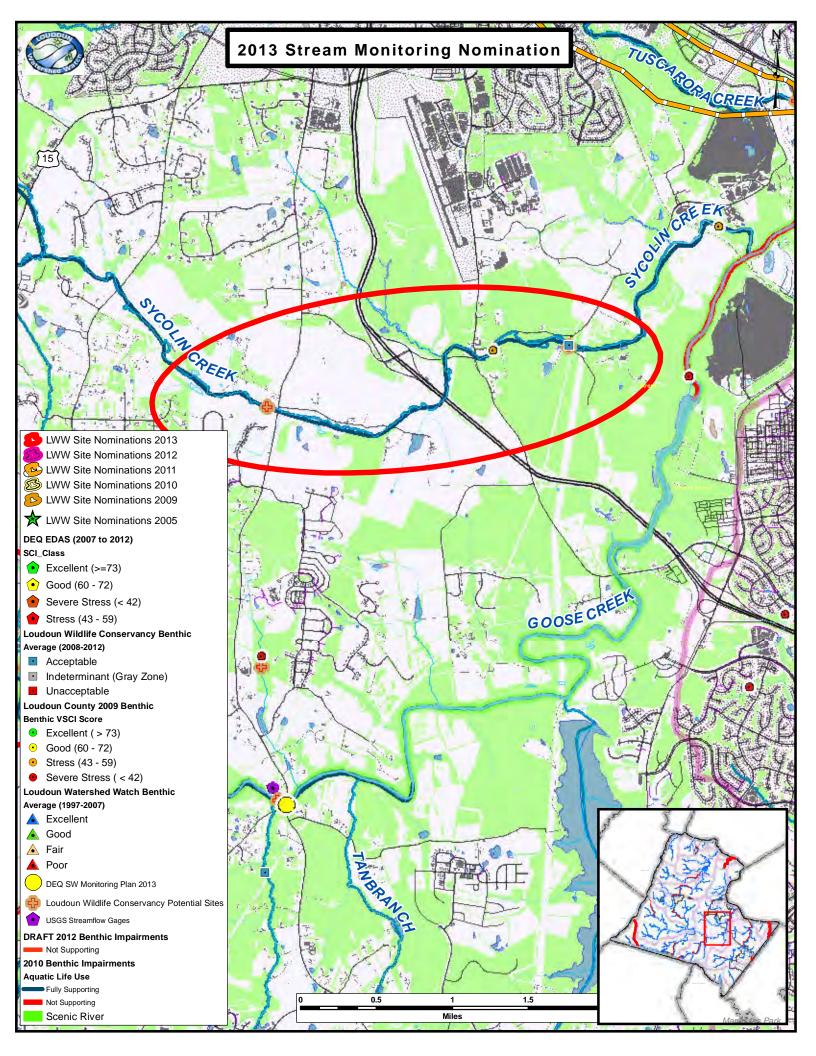
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City: Lovettsville	State: V	A	Zip:	20180
E-mail address: info@loudounwate	rshedwatch.or	·g		
Telephone: Home: <u>540-822-5092</u>	Business:	703-737-8670	Fa	x:
Geographic description of the water b	•			
(1) Name of the water body or segment proposed for monitoring: Lower Sycolin Creek, near Leesburg, anywhere between Evergreen Mills Road, Sycolin Rd or eastward.				
(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 was Sycolin Creek continues to experience detransition zone within Loudoun County.	levelopment pr	essure from both		
date there has not been any monitoring l				•

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

acceptable conditions. The 2009 stream assessment survey indicates stressed benthic conditions.

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

Additional reports and interactive maps of 2009 comprehensive field surveys are presented at www.loudounwatershedwatch.org/maps.

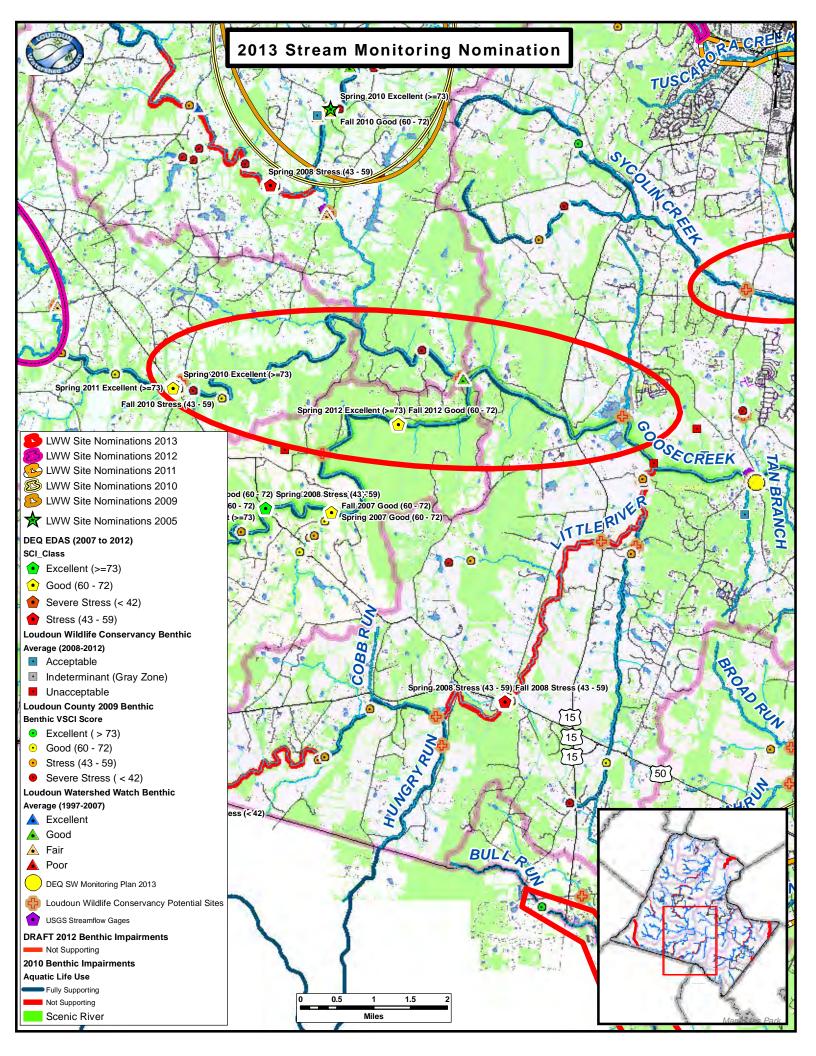


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Telephone: Home: <u>540-822-5092</u>	Business: 703-737-8670	Fax:		
Geographic description of the water bo	dy:			
(1) Name of the water body or segment proposed for monitoring:				
Goose Creek, south of Leesburg, at Rt 15 crossing or nearby location.				
(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:				
Goose Creek and Beaverdam Run are more citizen and 2009 stream assessment data b	nitored upstream with Good of			

(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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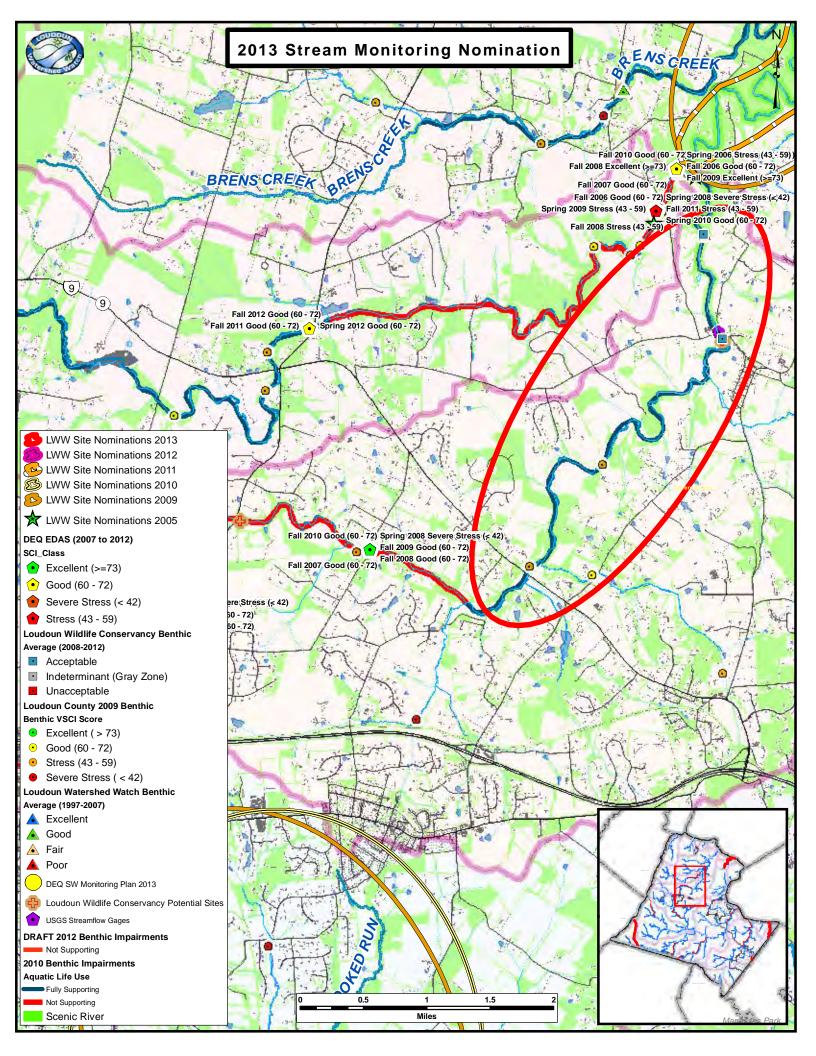


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Geographic description of the water bo	dy:				
(1) Name of the water body or segment proposed for monitoring:					
South Fork Catoctin Creek between Waterford and Rt 9.					
(2) Description of the upstream and downstream boundaries of the water body 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:					
South Fork Catoctin was delisted for benthic, however nearby land use and benthic conditions suggest that conditions may reverse in the future, but only if monitored routinely for benthic conditions.					

(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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Telephone: Home: <u>540-822-5092</u>	Business: <u>703-737-8670</u>	Fax:		
Geographic description of the water body:				
(1) Name of the water body or segment proposed for monitoring:				
Bull Run in southern Loudoun County.				
(2) Description of the upstream and dow	nstream boundaries of the	water body proposed for		
monitoring. Attach a map (preferably a		* 1 1		
which delineates the boundaries:				
(See attached map)				
(3) Reason for requesting that this water	body be monitored:			
Bull Run has limited access. A suggestion would be along the road crossing State Highway 705				
(Sanders Lane) as this is where the Occoquan Monitoring Lab monitors streamflow and water chemistry				
using an automated sampler at site ST60.		tant as this flows down to		
"Exceptional" water in Manassas Battlefield	ld Park.			

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