

## **TMDL Comments**

## July 20, 2017

Although we are not in a position to evaluate the more technical aspects of the Accotink Creek TMDL, the Friends of Accotink Creek offer these general comments on Volume II, the Sediment TMDL. We address less the content of the document, but rather look ahead to how it will be implemented.

- Let's not ask the beleaguered streams to bear the brunt of TMDL implementation.
- Let's favor an approach that emphasizes upland runoff control and habitat restoration over focus on in-stream projects.
- Let's direct financial incentives to landowners for point-of-origin runoff controls. Tax bills are one means of
  distributing information to landowners about the need for action and incentives available to them.
- If discharge is reduced by controlling stormwater, the stream may be expected to modify its channel naturally, at
  no cost and with no ecological degradation.
- This discussion should inform thinking about in-stream projects as a primary option http://www.accotink.org/2016/StreamRestorationDiscussion.pdf

Where stream restoration is an appropriate approach:

- Let's not turn streams into a lasting artificial hardscape of standardized granite blocks, but work with Nature to seek individuality and blending with what came before.
- Let's generally discourage stream restoration projects in forested natural lands, instead directing restoration to truly degraded streams with concrete-lined and channelized banks.
- Fish passage in other that high-flow conditions is a neglected element of stream restoration designs. Macroinvertebrates need to share the stream with their vertebrate neighbors, too.

Measures to reduce sediment that also address the non-pollutant stressors of hydromodification and habitat modification should be considered priorities.

Let's incorporate TMDL and general watershed and environmental health considerations into all actions undertaken by all departments and agencies. Synergy and cost savings will result when responsible entities coordinate with one another, rather than engaging in duplicative efforts at cross purposes.

Constant nibbling at buffering habitat cover for otherwise worthy-seeming purposes may render futile all efforts directly focused on restoring stream health.

Fairfax County's Accotink Creek Watershed Plan should be consulted whenever adjacent activity is planned in this watershed to identify opportunities to accomplish mutually beneficial goals at reduced expenditure.

Advise proposers of private development of the issues and options regarding the goals of the TMDL. Even when there is no legal obligation upon the private entity, the educational effect may yield indirect benefits.

Time is sediment! MS4 permits may not mandate actions for some years, but all actors should act as if it were happening now.

Consider the stream and its buffering habitat as a whole – solutions that remove our limited remaining forested areas for the specific intended benefit of stream health should not be favored.

Impervious surface cover in the watershed must be reduced and infiltration rates increased using a system of Low Impact Developments as discussed in a recent Vermont Law School case study - <a href="http://www.accotink.org/2016/ManagingUrbanStreamSedimentation\_AccotinkCreek\_HannahSomers.pdf">http://www.accotink.org/2016/ManagingUrbanStreamSedimentation\_AccotinkCreek\_HannahSomers.pdf</a>

The Friends of Accotink Creek call for a paradigm-shifting "Accotink Project", aspiring to the inspirational effect of the Apollo Moon Project, where the Accotink and Chesapeake watershed communities collaborate, contributing their resources and dedication to resolve this complex challenge – failure is not an option, nor is the status quo.

"Every time there is a compromise, the loser is wildlife." - Peter Murrow