

February 15, 2011

Honorable Doug Domenech
Virginia Secretary of Natural Resources
P.O. Box 1475
Richmond, VA 23218

Re: Chesapeake Bay TMDL Phase II WIP: Meeting Local Water Quality Goals

Dear Secretary Domenech,

We are writing to encourage you to make the preservation of local water quality and watershed ecological health a cornerstone for developing Phase II watershed implementation.

The Rivanna River Basin Commission, created by Virginia § 62.1-69.46, provides guidance for the stewardship and enhancement of the water and natural resources of the Rivanna River Basin and promotes activities by local, state, and federal governments, and by individuals, that foster resource stewardship for the environmental and economic health of the Basin.

The Rivanna River Basin Commission was established on the premise that watersheds the size of the Rivanna (760 square miles) could be protected through collaborative approaches between local governments that share the same watershed and that policies and practices for water quality protection and ecosystem conservation should be based on sound scientific and technical understanding. While there are other active basin commissions in Virginia, none operates at the scale of the Rivanna Commission, where elected and appointed officials from four localities and two SWCDs come together to develop strategies for maintaining the health of our local waters and the integrity of our green infrastructure.

While the Bay TMDL process focuses on nutrient and sediment reductions necessary to achieve the water quality and living habitat of the Chesapeake Bay, we are concerned that our local streams will not receive the same attention and resources in the face of the Commonwealth's regulatory requirement to achieve reductions in the major tributaries.

Therefore, we recommend the following in the Commonwealth's development of Phase II watershed implementation:

1. Require localities to develop Phase II plans to achieve local nutrient and sediment targets based on watersheds within their political subdivisions
2. Develop pollution reduction targets for local governments based on the watershed allocations as defined by the Bay Model's sub-segments (prior to aggregation into political sub-division).

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3. Continue to provide the resources to localities to develop TMDLs and Implementation Plans for all streams that do not meet water quality standards.
4. Provide tools to local governments that can be used to evaluate how best to dedicate scarce resources for achieving the Bay TMDL local targets *and* local water quality restoration and conservation.
5. Provide localities the resources necessary to identify *existing healthy streams* and the pollution prevention tools to protect the ecosystems of which they are an integral part.

As you know, the Rivanna River Basin Commission has served on your Stakeholder Advisory Group supporting the development of the Phase I Watershed Implementation Plan. The Commission has also taken a leadership role in the Piedmont Regional Pilot Project by informing local jurisdictions and local groups of affected stakeholders about the Bay TMDL.

We are convinced that communities like ours that are remote from the Bay and its tidewaters may only find the political will to work towards Chesapeake Bay restoration if the Commonwealth makes it a priority to also protect and restore these communities' local streams.

In closing, Rivanna River Basin Commission remains committed to continuing to working with our state partners to develop practical, cost effective, and scientifically sound strategies for achieving our mutual goals through the Phase II process of the implementing the Bay TMDL.

Sincerely,



David Brown, Chair
Rivanna River Basin Commission

Copy to:

Mr. Sean Garvin, EPA Regional Administrator, Region 3
Mr. Jim Edwards, Acting Director, EPA Chesapeake Bay Program
Mr. Anthony Moore, VA Asst. Secretary for the Chesapeake Bay
Mr. David Johnson, Director, VA DCR
Mr. David Paylor, Director, VA DEQ
Mr. Jack Frye, Director, Division of Soil and Water, VA DCR
Ms. Ellen Gilinsky, Director, Water Quality Division, VA DEQ