



Ms. Lenka Berlin
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July 27, 2015

Dear Ms. Berlin,

The Wissahickon Valley Watershed Association (WVWA) offers the following comments on the Proposed Total Phosphorus (TP) Total Maximum Daily Load (TMDL) for the Wissahickon Creek Watershed published by The US Environmental Protection Agency, Region III on May 20, 2015.

The Wissahickon Creek is one of the southeastern Pennsylvania's most recognizable and iconic watersheds originating in Montgomery Township in suburban Montgomery County and meandering 24 miles through 16 municipalities and into northwestern Philadelphia to the Schuylkill River. Its tributaries and mainstem have been impacted by suburban sprawl that has negatively impacted the hydrology and compromised the creek's ability to sustain and support aquatic life. Multiple Wissahickon stream segments have been identified as impaired due to sediments, nutrients and other nutrient related conditions. The draft TP TMDL for the Wissahickon Creek establishes waste load allocations and load allocations to reduce total phosphorus from both point and non-point sources. Reducing excessive nutrient concentrations in the Wissahickon Creek Watershed will restore the creek for aquatic life.

The WVWA supports the EPA's scientific-based approach to determine a TP endpoint for achieving the goal of attaining a Wissahickon Creek without impairments. We recognize that the TP endpoint establishes a measurable goal to be attained by any pollutant load reduction strategy to be determined by watershed stakeholders.

However, we also agree with the Pennsylvania Department of Environmental Protection's (DEP) assessment that the pollution controls that would be required to meet this TP endpoint may require wastewater treatment facilities to invest in expensive capital improvements and that the limits may be so stringent that one may question whether those goals are attainable. Additionally, we agree that the pollutants contributing to the Wissahickon impairment, nutrients and sediment, are interrelated in complex ways and would be best addressed by integrated strategies.

The WVWA believes that the factors contributing to the Wissahickon Creek's impairments and the currently promulgated sediment and nutrient TMDLs open the door to explore and develop alternative strategies that can improve the water quality of the Wissahickon Creek watershed. This approach is supported by EPA's **Long-Term Vision for Assessment, Restoration, and Protection under the Clean Water Act Section 303(d) Program (December 2013)**, which allows alternatives in addition to TMDLs *"that incorporate adaptive management and are tailored to specific circumstances where such approaches are better suited to implement priority watershed or water actions that achieve the water quality goals of each state, including identifying and reducing non-point source pollution."* We note that the Pennsylvania Department of Environmental Protection recognizes this opportunity with the ongoing TMDL Alternative Stakeholder Process, which began in earnest on March 5, 2015. As of June 12th, 95% of the Wissahickon permit holders, including municipalities and wastewater treatment facilities, have agreed to take advantage of the collaboration.



The WVWA supports the use of an alternative TMDL process that allows the Wissahickon Creek stakeholders to come together as a community to design a shared water quality improvement program. This program can be developed to incorporate a suite of improvements at various sources including wastewater treatment plant discharges, municipal separate storm sewer systems, and non-point sources. We strongly believe that this collaborative approach can and will advance the use of creative and equitable strategies for implementing, funding, monitoring and maintaining effective and long-lasting pollution control.

Sincerely,



Dennis O. Miranda
Executive Director