

**SUMMARY STATEMENT
RIVANNA CONSERVATION SOCIETY
SUBMITTED BY
ROBERTA (ROBBI) SAVAGE
MARCH 15, 2007**

**SUBJECT
THE RIVANNA RIVER
TOTAL MAXIMUM DAILY LOADS**

Mr. Chairman, my name is Robbi Savage. I am the Executive Director of the Rivanna Conservation Society. Clean water programs and the statutory and regulatory underpinnings of the state and local water quality programs comprise the totality of my professional career. As one who participated in the deliberations of the federal TMLD FACA (federal advisory committee act) as well as the negotiations on the TMDL regulations at the national level, I look forward to serving on the Rivanna River TMDL Steering Committee.

The Rivanna Conservation Society, a non profit organization of volunteers dedicated to the protection and care of the Rivanna River and its watershed, requests the opportunity to submit its comprehensive written statement for the record. If this /is agreeable, I ask for only a few moments to summarize the key points for your consideration.

Public Involvement is essential to the development of the Rivanna River TMDL and we appreciate the opportunity to appear before you this evening.

The RCS encourages the VA Department of Environmental Quality to counsel and regularly confer with members of the public and to assure that the information and data they provide is carefully reviewed and wherever appropriate, incorporated in the decision-making process for TMDL development and implementation.

StreamWatch: The RCS also encourages the VADEQ to take full advantage of the high quality data collected and made available by StreamWatch. This is citizen science at its best and we ask that it be considered to be “primary” data. RCS further encourages the state government to use the “family level” data compiled by StreamWatch to evaluate stream health in all segments and not just those impaired by bacteria. We further request that the TMDL development process use the StreamWatch family-level data to help identify stressors in all segments covered by the TMDL.

Implementation is essential to the credibility of the TMDL. The Commonwealth is to be congratulated for its vision and wisdom in moving beyond the federal 303(d) requirements to assure the implementation of VA developed TMDLS. The 1997 State Statute requiring implementation is critically important and needs to be fully complied with.

Bacteria Levels have been a topic of review and discussion as a part of the triennial review, with some suggesting a change in current protection criteria. RCS is very concerned to learn that such proposed changes could lower human health protection by elevating the amount of bacteria and fecal coliform that could be permitted to enter the waterways. Such reductions could easily be considered as “backsliding” and we urge the DEQ to defer any changes to the bacteria levels until full disclosure and public discussion/input can be arranged.

Thank you for this opportunity to provide comments on behalf of the Rivanna Conservation Society. I would of course be pleased to respond to any questions.

Contact: Robbi Savage, Executive Director Rivanna Conservation Society exec@rivannariver.org
434-985-1802 or 202-297-3563. This statement will be posted at www.rivannariver.org