



***Chesapeake Bay TMDL Phase 3 Action Plan Public Comment and Response Table***

Commentor	Comment	Response and Action Taken	Action Taken
<p>Russell Bailey, Roy Byrd, Jeremy Flachs, Carter Flemming, Bill Gillespie, Kathie Hoekstra, Andrew Macdonald, Kurt Moser</p>	<p>Comments on Alexandria’s Draft Phase 3 Chesapeake Bay TMDL Action Plan for 100% Compliance We were all community member participants in the City staff-community consensus building groups on the Taylor Run proposed reengineering project. We welcome the City’s August 2024 Draft Phase 3 Chesapeake Bay TMDL Action Plan for 100% Compliance (“AP”). That plan shows that Alexandria is on track to well exceed the nutrient reduction requirements in its 2023-2028 MS4 general permit. The AP sets out specific measures that have been, or will be, implemented to meet the 100% compliance targets. Because total suspended sediment reductions have been dropped as a requirement, the plan focuses on reduction mechanisms for nitrogen and phosphorus. The AP describes the reductions that were reached through its Phase 1 and Phase 2 efforts as well as those that will be, or have been, reached as a result of its Phase 3 efforts. It is those later efforts that we address here. While Alexandria identifies a range of actions that can be taken to reduce TN and TP, the City details three major reduction measures: 1) the receipt of nutrient reduction credits due to bi-lateral trading with Alexandria Renew Enterprises, which will soon be operating a new waste water treatment system, 2) the reengineering of Lucky Run, and 3) Best Management Practices (BMP’s) that will be put in place as part of redevelopment projects in the City that will take place by the end of 2028. AP, pages 32-34. The plan does not include any stream reengineering beyond that done at Lucky Run and specifically states that previously proposed projects at Taylor Run and Strawberry Run have been removed as nutrient reductions options. AP, page 20. While several of the undersigned opposed the Lucky Run project, it is done. We appreciate the development of a compliance plan than achieves sufficient measurable nutrient reductions without undertaking additional stream projects. We look forward to working with the City on infrastructure fixes that may need to be undertaken at Taylor Run. Russell Bailey, Roy Byrd, Jeremy Flachs, Carter Flemming, Bill Gillespie, Kathie Hoekstra, Andrew Macdonald, Kurt Moser</p>	<p>The City confirms that the Phase 3 Action Plan focuses on the three major reduction measures described in the comments.</p>	<p>No Action Taken</p>
<p>Philip Mobilia, EPC Commissioner</p>	<p>1. p. E-4, 4th paragraph (and in numerous other sections further down the document): Reference is made to “Bi-lateral Trading project”. A brief description of what is meant by this would be helpful.</p>	<p>Bi-lateral trading is further detailed in Section 9, Means and Methods to Meet Target Reductions, section 9.12.</p>	<p>No Action Taken</p>

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Philip Mobilia, EPC Commissioner	2. Many of the tables show values for TN and TP removal rates. I saw no description of how the nitrogen and phosphorous were/will be removed. A brief discussion of the treatment methods used would be helpful.	Best management practices (BMPs), also known as Stormwater Management Facilities (SMFs), remove pollution by allowing rainwater and snowmelt to soak into the system which helps to filter out pollutants, such as nutrients and sediment, and allow ‘treated’ water to return to waterways. Each type of BMP (i.e., wet pond, green roof, infiltration practices, etc.) uses different processes engineered to treat stormwater and are defined in the Virginia BMP Clearinghouse. Each BMP type has a specific removal efficiency assigned to it based on several factors and the associated removals are calculated using the Virginia Runoff Reduction Method which is based on the acres treated, type of area draining to the BMP, and type of practice.	A text box was added to the Executive Summary on Page E-3.
	3. Figure 2 – Graphic Representation of Existing Nitrogen Loads, p. 7: There is no key to assist with interpreting what the graph represents. What does yellow represent? Red? Orange?	The gradient of the colors presented on the map represent the estimated intensity of nitrogen loads across the City with the darker, red color showing areas of more intense loading and lighter yellow color being less intense.	Additional information about Figure 2 was added to page 6, which highlights the difference between the different colors.
	4. p. 11, 1st paragraph (and in several other locations) reference is made to requirements for projects exceeding 1 acre. What about projects <1 acre? Exempt?	The regulations specific to grandfathered projects within Phase 1 outlined the requirement to identify and account for projects disturbing one acre or greater.	No Action Taken
	5. Several locations: “reduction credits” are discussed. What are these, how are they determined, how are they used?	Reduction credits are generated when a water quality BMP is installed under any of the strategies listed in the Action Plan. These BMPs reduce the amount of pollution in stormwater runoff. The amount of the reduced pollution or “reduction credits” is applied to the target reductions that are mandated by the MS4 general permit. So any BMP installed will provide reduction credits.	No Action Taken
	6. General: Is any actual water sampling conducted to verify the projected reductions or are we relying solely on calculations based on estimated values?	No, water sampling is not conducted. The City relies on the state guidance for calculating pollution reductions.	No Action Taken

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Philip Mobilia, EPC Commissioner	7. p. 24, Section 10: The opening paragraph of this section states, in part: “Each project or group of BMPs below was initially presented in the City’s Phase 1 Action Plan and is complete or is expected to be substantially completed by the end of the 2017-2018 permit year.” (emphasis added). This sounds like a “cut and paste” from a prior report. This should be updated to reflect the actual status of each item.	Please note that the Lake Cook project initially shown in Phase 1 was considered substantially complete in Phase 2. This update is reflected in the Final Phase 3 Action Plan.	Text on page 24 has been revised to indicate that the projects are complete and Lake Cook credits are taken in Phase 2. Text on page 29 also has been slightly revised as well for proper wording (Phase 2).
	8. Table titled: July 1, 2009 to June 30, 2014 BMP Calculation Table. There is a column heading: “TN BMP Efficiency*”, but there is no description of what the “*” refers to (none that I could find).	The Asterisk refers to the BMP removal efficiency utilized for the individual BMP which is shown as "Efficiency Method" in the last column of the table. However, each of the tables presented within Appendix B include the Efficiency Method so the Asterisk is not needed in this table.	The table has been updated to remove the Asterisk.