

## **Enhance Watershed Monitoring to Assess Progress Toward the Chesapeake Bay TMDL Summary**

The Chesapeake Bay Program (CBP) is planning to expand the nontidal water-quality monitoring network to better track progress toward the Chesapeake Bay Total Maximum Daily Load (TMDL). The expanded network will:

- Increase monitoring in major source sectors (agricultural, urban, suburban areas) which are the focus of the new TMDL.
- Enhance monitoring in watersheds with increased BMP implementation in order to document water-quality improvements of priority BMPs; this information is critical to assess effectiveness of the BMPs.
- Increase monitoring sites in more local areas (less than 100 square miles), critical land use settings (urban and agricultural settings) and the Coastal Plain (which is under represented), in order to enhance the CBP watershed model for the 2017 TMDL re-evaluation.

The planned expansion of the network will address recommendations of the STAC Monitoring Realignment Action Team (MRAT) (2009) and recent findings of the National Academy of Scientists' (NAS) report that stated *"Targeted monitoring programs in representative urban and agricultural watersheds and subwatersheds would provide valuable data to refine BMP efficiency estimates, particularly at the watershed scale, and thereby improve Watershed Model predictions."*

The planned expansion will add 37 sites for a total of 120 sites in the Bay watershed by the end of 2012. In 2010, the shared cost of the network was \$3.7M, which is supported with funds from USEPA, USGS, the states, and local jurisdictions (supporting a portion of the stream gaging in the watershed). The additional 37 sites would be supported primarily by an additional \$2M of USEPA funds provided to the jurisdictions.

The purpose of this document is to provide the rationale for the expanded sites and detailed information on their proposed locations and estimated costs. The proposed expansion is going to be approved by the CBP Water-Quality Goal Implementation Team and discussed by the Management Board prior to implementation.

### **Justification for enhancements to the nontidal network**

The CBP is implementing a TMDL for the Chesapeake Bay and its tidal tributaries to meet water quality standards of dissolved oxygen (DO), water clarity and chlorophyll *a* necessary to support healthy living resource habitat. The TMDL will be achieved by having the states and federal government reduce nutrient and sediment loads from the Bay watershed. There will be three primary ways to track progress toward the TMDL:

- Monitor nutrients and sediment in rivers in the watershed to assess progress in reducing loads;
- Track implementation of nutrient and sediments reduction practices and use the CBP watershed model to estimate load reductions in each state;
- Monitor levels of DO, clarity/SAV and chlorophyll in the Bay and tidal tributaries to assess if water-quality standards are achieved.

This document focuses on ways to improve the monitoring of nutrients and sediment in the Bay watershed to help assess progress toward the TMDL by enhancing the CBP nontidal water quality monitoring network.

The USEPA, the six states in the watershed, and USGS established the current CBP nontidal monitoring network in 2004 to measure water-quality improvements to help states assess progress toward their tributary strategies for nutrient and sediment reduction across the Bay Watershed (Figure 1). The CBP plan for the network had 200 proposed sites, as of 2010, 88 sites have been implemented. This CBP network provides the only long-term, consistent, and coordinated monitoring effort across all jurisdictions in the Chesapeake Bay watershed. The majority of the current sites are on larger streams (drainage areas of greater than 600 square miles) to meet the original network objective to monitor the states' "tributary strategy" basins. Therefore, the current network does not adequately represent the monitoring needs of the new TMDL that requires an emphasis on monitoring in source sectors.

The need for monitoring in smaller areas in individual source sectors (primary agricultural and urban/suburban lands) was stated both through the STAC review of the monitoring program (2009) and the recent National Academy of Scientists' (NAS) evaluation of the CBP's nutrient reduction program and strategy. The NAS stated:

*"Targeted monitoring programs in representative urban and agricultural watersheds and subwatersheds would provide valuable data to refine BMP efficiency estimates, particularly at the watershed scale, and thereby improve Watershed Model predictions." (NAS 2011, 4)*

A 2009 review by STAC through the Monitoring Realignment Action Team (MRAT) process identified the following improvements that need to be made to address multiple objectives of the network including TMDL monitoring and assessment:

- Increase monitoring in major source sectors (agricultural, urban, suburban, etc.) that will be the focus of the new TMDL and USDA Farm Bill funding.
- Add monitoring sites in smaller watersheds to support development of more local aspects required in Phase II and III of the watershed implementation plans (WIPs).
- Increase monitoring sites in a variety of scales (county level), land use (especially urban/suburban) and physical settings (such as the Coastal Plain) in order to improve the CBP watershed model calibration for the 2017 TMDL re-evaluation.
- Monitor in watersheds with increased BMP implementation in order to document water-quality improvements of priority BMPs; this information is critical to assess effectiveness of the BMPs.

Additional TMDL monitoring needs include:

- Increase monitoring in each state in order to aid in accountability toward communicating progress toward achieving actions in the WIPs. This also addresses public comments on the TMDL that called for increased monitoring.
- Immediate implementation of sites is needed so there is adequate data (at least 5 years) for load and trend analysis to support assessment of Phase II WIPs and 2017 TMDL review and preparation of Phase III WIPs.

#### **Proposed enhancements to nutrient and sediment monitoring in the watershed in 2011-12**

The USEPA worked with the six states, the District of Columbia, USGS and other major monitoring organizations throughout the watershed to recommend 41 suitable sites for

potential expansion of the network. Further prioritization selected 37 sites to improve the existing nontidal network in its ability to track changes in water quality over time to support TMDL monitoring. Most of these sites are new sites and a few are existing sites (“secondary sites”) that are scheduled for an upgrade in monitoring frequency (to become “primary sites”) and therefore will be less expensive to implement. The map shows 37 sites identified by the major monitoring organizations for inclusion in the network (Figure 2). Each of the sites was chosen to address one or more of the monitoring needs listed above. Collectively the sites provide:

- Improved assessment of changes in major source sectors (agricultural, urban, suburban, etc.).
- Increased sites in smaller watersheds to provide improved information for local governments and watershed groups.
- Improved information in areas lacking monitoring (such as the Coastal Plain) to improve future calibration of the CBP watershed model.
- Monitoring in watersheds with increased BMP implementation to show effect of management actions.
- Increased monitoring in each state to help assess progress toward meeting their allocations.

Currently funding for the network (see partnerships section for more details) is about \$3.7M of which about \$916,000 is provided by the EPA CBP.

#### **Funding Details**

Current funding: EPA CBP program: \$916,000/yr;

Cost assumptions: New gage- one time cost \$15,000; Secondary site upgraded to primary site- \$20,000/yr-36,000/yr; New primary site- \$46,000/yr

#### **Proposed increase FY2011 (Table 1): \$987,100**

- 19 new primary sites (Figure 2)
  - including 1 secondary site upgraded to primary site and 11 out-of-network existing monitoring sites with stream gages
- 7 new stream flow gages
- Sites funded for FY11 were given priority if they were in small to moderately small watersheds (18 sites). Sites were also chosen to improve assessment of changes in major source sectors (7 new ag sites, 9 new urban sites), and watersheds with a large degree of BMP implementation, and will provide data in areas lacking monitoring to improve future calibration of the CBP model (i.e. Coastal Plain- 9 new sites)
- Brings District of Columbia online as a monitoring partner and increases monitoring coverage in Maryland, Pennsylvania, Virginia and West Virginia

#### **Proposed increase FY2012 (Table 2): \$951,100**

- 18 new primary sites (Figure 2)
  - including 4 secondary sites upgraded to primary sites and 4 out-of- network existing monitoring sites with stream gages
- 10 new stream flow gages
- Sites were chosen to improve assessment of changes small watersheds (4 sites), in major source sectors (8 new ag sites, 2 new urban sites), watersheds with a large degree

of BMP implementation, and will provide monitoring in areas lacking monitoring to improve future calibration of the CBP model (i.e. Coastal Plain – 3 new sites)

- Increased monitoring coverage in Maryland, New York, Pennsylvania, and Virginia
- New combined additional funding for FY2011-2012: \$1,938,200 (Table 1 and 2).

#### **Partnerships that fund the network**

The current network has been funded using a combination of Federal and regional partner funding sources. Since 2004, the EPA, states, and USGS collaborated to fund the network, which include costs for measuring stream flow, collecting water-quality samples, and maintaining the data. In 2010, the total shared cost of the network was approximately \$3.7M. This figure is based on a cost per site for the 71 primary sites as \$46,000 per year and 17 secondary sites at a cost of \$26,000 per year. EPA CBP provided \$916,000 (25% of total cost), USGS provides \$897,000 in stream-gage monitoring at each site (24% of total cost), the states and other monitoring organizations provide \$554,000 in general and special funds (15% of total cost), EPA 106 grants provides \$217,000 (6% of total cost). The remaining 30% of total annual nontidal network monitoring network support is provided by other local sources of funds (\$1,100,000) (Figure 4). The proposed additional funding of \$2,000,000 will pay for an additional 37 sites.

#### **Funding expectations of the expanded network**

The new network will include 120 sites including 108 primary sites and 12 secondary sites (Figure 3 and Appendix) for a total cost of around \$5.3 million/year maintenance. Table 3 summarizes the total CBP investment by jurisdiction for existing and proposed new sites. These enhancements to the network will allow for better measurement of nutrient and sediment load changes for major sources sectors (with a focus on agricultural and suburban areas), in more local areas, and support re-evaluation of the TMDL and refinement of watershed implementation plans in 2017.

The majority of the implementation of the nontidal network was accomplished by using existing funds from multiple partners. While this fact makes the network less susceptible to budget fluctuations within any particular agency, it presents challenges for the long-term maintenance of the nontidal network. The network is vulnerable to budget shortfalls, in particular cuts to the continuous funding needed for discharge gage operations and salary loss of experienced staff to carry out the monitoring. Therefore, a multi-agency commitment to maintaining the network is necessary to ensure the network can be utilized to its highest potential by resource managers. In order for this network to thrive in its primary goal to assess the status, trends, and loads of nutrients and sediment throughout the watershed, a commitment to maintain funding for this network is necessary as trend and load calculations require consistency in monitoring. First priority for future funding should be to maintain funding and backfill where funding may be lost to ensure continuity in monitoring in the current network.

#### **Collaborating with additional partners for future expansion of the network**

Future plans for network expansion beyond this proposal include incorporating additional non-traditional partner data into the network to improve the spatial scale of monitoring and local involvement in the watershed-wide network. Programs including city and county monitoring programs and selected citizen monitoring programs will be evaluated for potential incorporation into the nontidal network, including the potential for aligning their monitoring protocols with nontidal network protocols. These additional partner data would be likely used to determine the status of nutrient and sediment contamination in local areas to help target local and

regional watershed restoration and protection activities; trend information will likely be hard to assess at this level without additional CBP funding as the effort for monitoring sites to determine trends is generally a monitoring commitment that is larger than the capacity of many local organizations.

Figure 1. Existing 88 Nontidal Water Quality Monitoring Network Stations

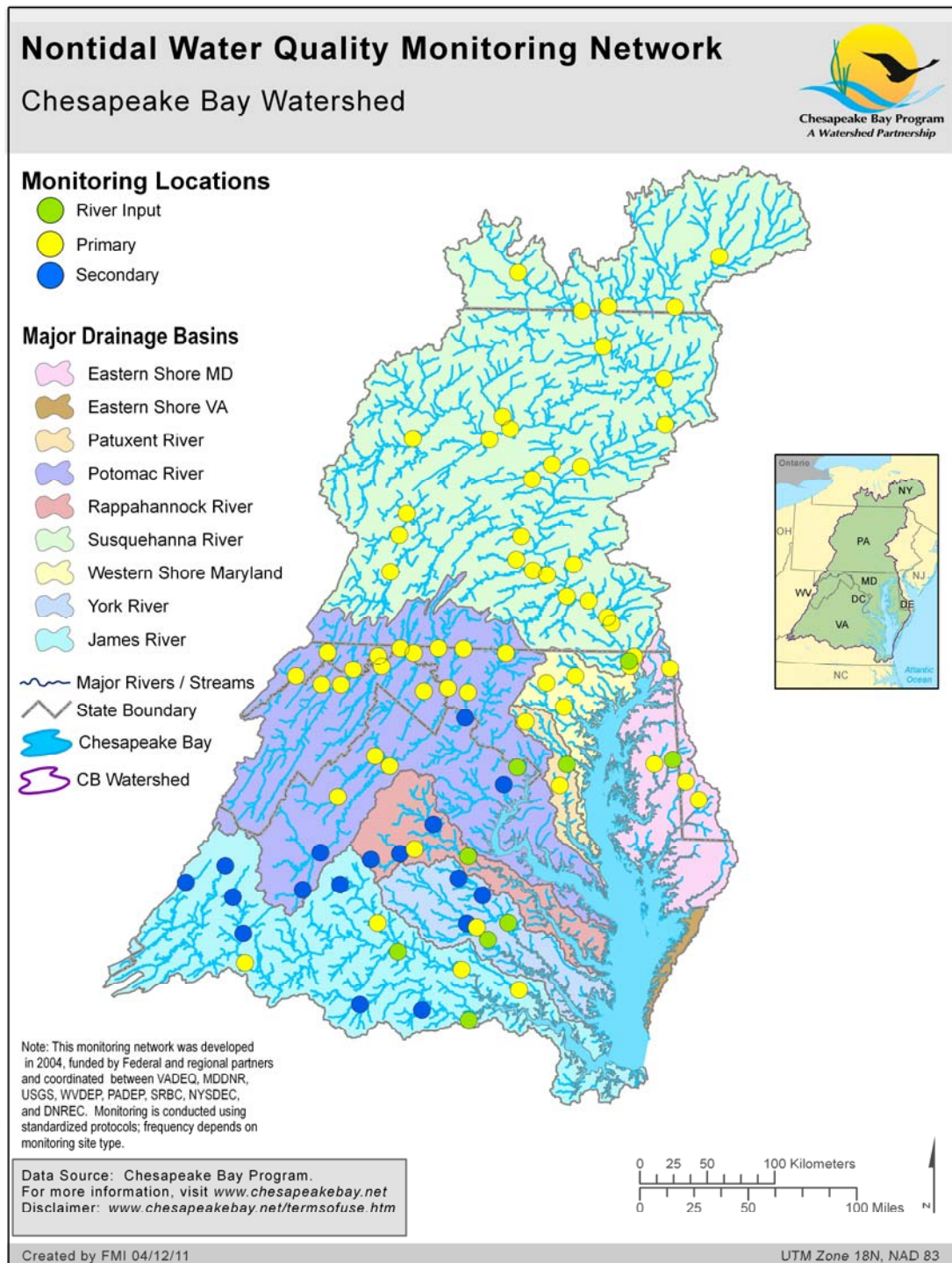


Figure 2. Proposed monitoring stations for FY 11 and FY12 funding, see tables 1 and 2 for more information about each site

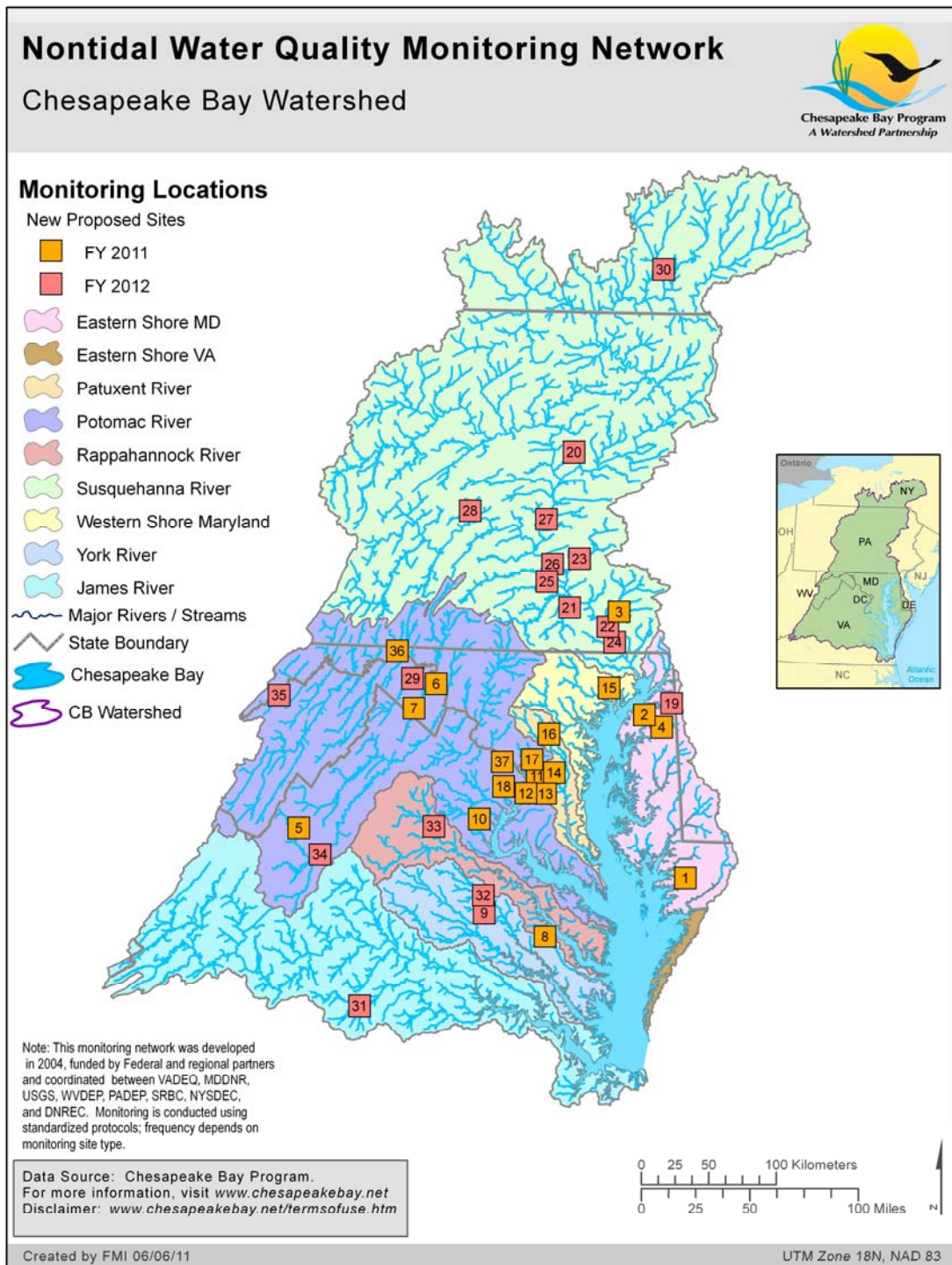




Figure 3. Enhanced 120 Nontidal Water Quality Monitoring Network Stations

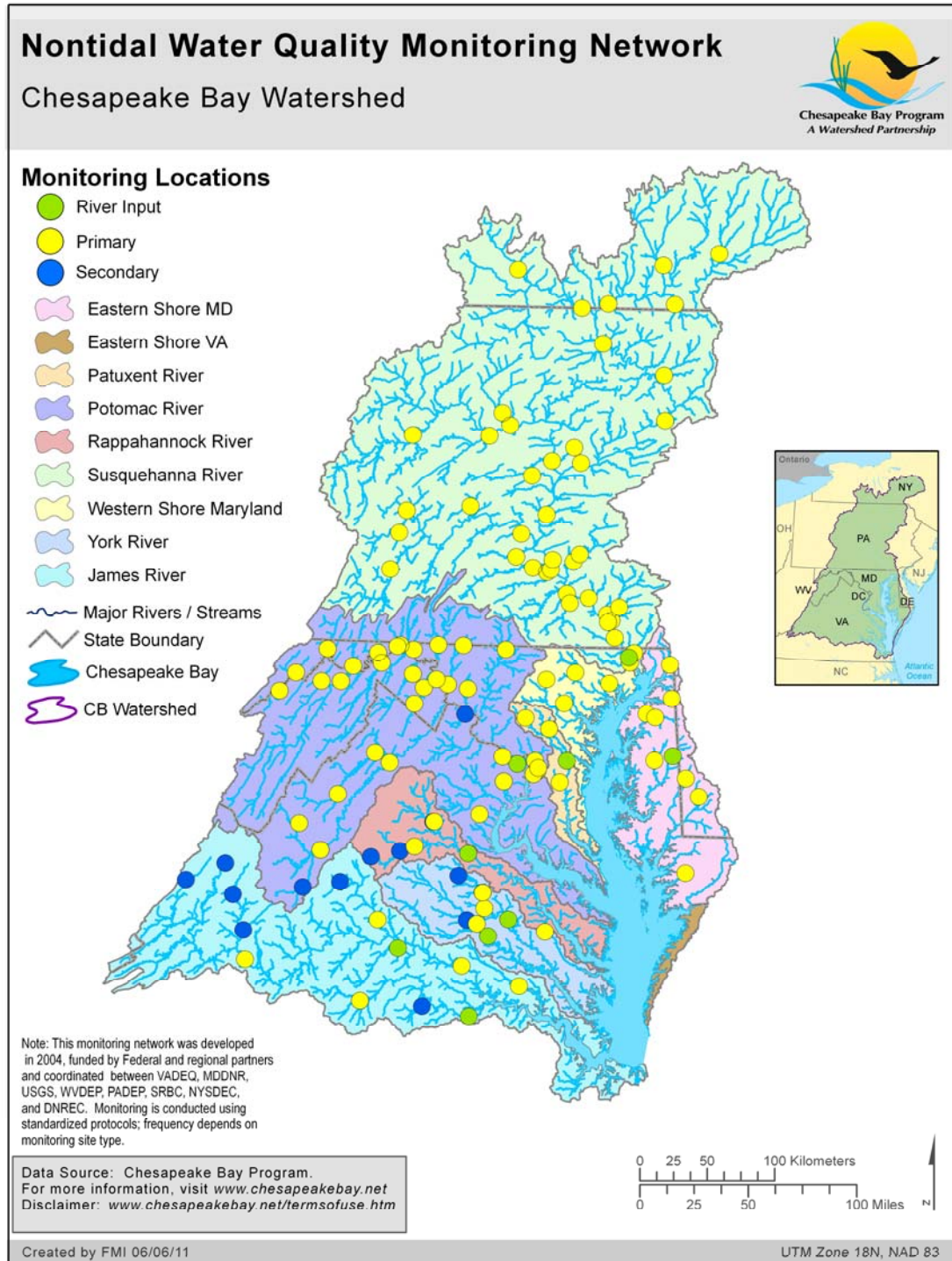




Figure 4. Funding sources for the Nontidal Water Quality Monitoring Network FY 2010

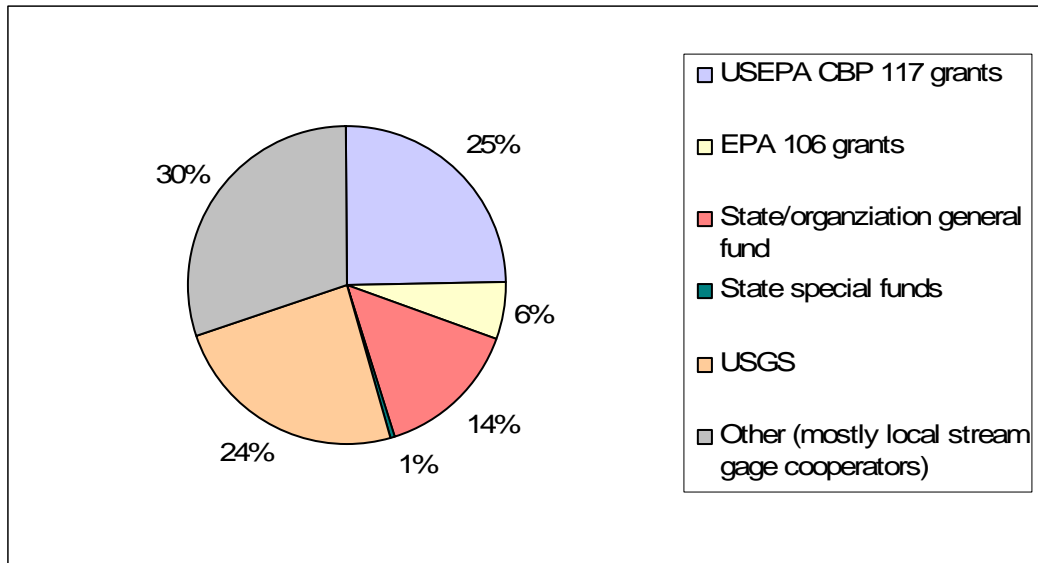


Table 1. Characteristics of 19 proposed new sites for funding in FY11. Sites were given high priority if they were in small watersheds, their predominate land use influence was agricultural or urban, if they were in the coastal plain and if they had ongoing or potential BMP implementation within their watershed

Site Name	Map Key	Small or Moderately Small Watershed? (<50 square miles) (Y)	Predominate Land use Influence	In the Coastal Plain? (Y)	Ongoing/potential for substantial BMP implementation? (Y)	Monitoring Agency	Gage Construction (Y)	Gage Operation (Y)	Secondary Site? (Y)	FY11 cost (\$)
Monokin Branch near Princess Anne	1	Y	Ag	Y		MDDNR		Y		46,000
Morgan Run (Chester River)	2	Y	Ag	Y	Y	MDDNR		Y		46,000
Big Spring Run	3	Y	Ag			PADEP/USGS		Y		46,000
Chesterville Branch nr Crumpton	4	Y	Ag	Y	Y	USGS		Y		46,000
Muddy Creek at Mount Clinton, Va	5	Y	Ag		Y	VADEQ				56,100
Rockymarsh Run / Potomac River	6	Y	Ag		Y	WVDEP		Y		46,000
Mill Creek / Opequon Creek	7	Y	Ag		Y	WVDEP	Y	Y		61,000
SF Quantico Creek nr Independent Hill	10	Y	Forest			USGS		Y		50,000
Dragon Run	8	Y	Forest	Y	Y	VADEQ		Y		48,000
Warm Springs	36	Y	Forested/Urban		Y	WVDEP	Y	Y		61,000
Fort Chaplin	11	Y	Urban	Y	Y	DDOE	Y	Y		61,000
Fort Dupont	12	Y	Urban	Y	Y	DDOE	Y	Y		61,000
Fort Stanton	13	Y	Urban	Y	Y	DDOE	Y	Y		61,000
Nash Run	14	Y	Urban	Y	Y	DDOE	Y	Y		61,000
Wheel Creek (Bush River)	15	Y	Urban		Y	MDDNR		Y		46,000
Little Patuxent River	16	Y	Urban		Y	MDDNR		Y		46,000
Anacostia River - Lower NW Branch	17	Y	Urban	Y	Y	MDDNR	Y	Y		61,000
Accotink Creek near Annondale	18	Y	Urban		Y	VADEQ		Y	Y	36,000
Difficult Run near Great Falls, Va	37	N is 56	Urban		Y	VADEQ		Y		48,000
<b>Total</b>		Y-18	A-7, F-3, U-9	Y-9	Y-16		Y-7	Y-18	Y-1	987,100

Table 2. Characteristics of 18 proposed new sites for funding in FY12. Sites were given high priority if they were in small watersheds, their predominate land use influence was agricultural or urban, if they were in the coastal plain and if they had ongoing or potential BMP implementation within their watershed

Site Name	Map Key	Small or Moderately Small Watershed? (<50 square miles) (Y)	Predominate Land use Influence	Is site in the Coastal Plain? (Y)	Ongoing/potential for substantial BMP implementation? (Y)	Monitoring Agency	Gage Construction (Y)	Gage Operation (Y)	Secondary Site (Y)	FY12 cost (\$)
Sassafras River Watershed	19		Ag	Y	Y	MDDNR	Y	Y		61,000
Chillisquaque @ Washingtonville	20		Ag		Y	PADEP/USGS	Y	Y		61,000
Codorus Ck nr Pleasureville	21		Ag		Y	PADEP/USGS	Y	Y		61,000
Pequea Ck at Strasburg	22		Ag		Y	PADEP/USGS	Y	Y		61,000
Quittapahilla Ck	23		Ag		Y	PADEP/USGS	Y	Y		61,000
Muddy Creek	24		Ag			SRBC	Y	Y		61,000
East Mahantango at Dalmatia	27		Ag			SRBC		Y		46,000
Kishacoquillas at Reedsville	28		Ag		Y	SRBC		Y		46,000
Tioughnioga at Itaska	30		Forest			SRBC		Y		46,000
Polecat Creek	9	Y	Forest	Y	Y	VADEQ	Y	Y		66,000
Appomattox River	31		Forest		Y	VADEQ		Y	Y	58,100
Mattaponi River	32		Forest	Y	Y	VADEQ		Y	Y	36,000
Rappahannock River at Remington	33		Forest		Y	VADEQ			Y	22,000
S.F. Shenandoah River	34		Forest		Y	VADEQ		Y	Y	36,000
Abrams Creek at Oakmont	35	Y	Forest		Y	WVDEP	Y	Y		61,000
Back Creek	29		Forested/some Ag			WVDEP		Y		46,000
Spring Cr nr Harrisburg, PA	25	Y	Urban			PADEP/USGS	Y	Y		61,000
Paxton Creek nr Harrisburg, PA	26	Y	Urban with Ag			SRBC	Y	Y		61,000
<b>Total</b>		Y-4	A-8, F-8, U-2	Y-3	Y-12		Y=10	Y-17	Y-4	951,100

Table 3. Summary by jurisdiction of current and proposed CBP nontidal network funding

Jurisdiction	# Stations in existing network	Current CBP funding (approx. \$)	# New stations FY 11	# New gages FY 11	Proposed FY11 CBP funding (\$)	# New stations FY 12	# New Gages FY 12	Proposed FY 12 CBP funding (\$)	Monitoring or potential monitoring organization	Total cost to maintain network (\$/yr)
District of Columbia	0	0	4	4	244,000	0	0	0	DDOE, ICPRB, USGS	184,000
Maryland	18	139,589	6	1	291,000	1	1	61,000	MDDNR, USGS, SRBC	1,150,000
Pennsylvania	28	372,000	1	0	46,000	9	7	519,000	PADEP, USGS, SRBC	1,748,000
New York	5	62,000	0	0	0	1	0	46,000	SRBC	276,000
Virginia	31	254,500	5	0	238,100	5	1	218,100	VADEQ, USGS	1,416,000
West Virginia	4	80,000	3	2	168,000	2	1	107,000	WVDEP, USGS, WVDA	414,000
Delaware	2	8,000	0	0	0	0	0	0	DNREC	92,000
Total	88	916,089	19	7	987,100	18	10	951,100		5,280,000

**Appendix: Table of enhanced Nontidal Water Quality Network of 120 sites**

<b>Jurisdiction</b>	<b>Site Type</b>	<b>Site Name/Number</b>	<b>Justification for being in network</b>
DC	Primary	Fort Chaplin	New proposed site to meet needs of TMDL
DC	Primary	Fort Dupont	New proposed site to meet needs of TMDL
DC	Primary	Fort Stanton	New proposed site to meet needs of TMDL
DC	Primary	Nash Run	New proposed site to meet needs of TMDL
DE	Primary	01487000	Original network site - to cover large spatial area of watershed
DE	Primary	01488500	Original network site - to cover large spatial area of watershed
MD	Primary	Monokin Branch near Princess Anne	New proposed site to meet needs of TMDL
MD	Primary	Morgan Run (Chester River)	New proposed site to meet needs of TMDL
MD	Primary	Wheel Creek (Bush River)	New proposed site to meet needs of TMDL
MD	Primary	Little Patuxent River	New proposed site to meet needs of TMDL
MD	Primary	Anacostia River - Lower NW Branch	New proposed site to meet needs of TMDL
MD	Primary	Sassafras River Watershed Chesterville	New proposed site to meet needs of TMDL
MD	Primary	Branch nr Crumpton	New proposed site to meet needs of TMDL
MD	Primary	01491000	Original network site - to cover large spatial area of watershed
MD	Primary	01491500	Original network site - to cover large spatial area of watershed
MD	Primary	01495000	Original network site - to cover large spatial area of watershed
MD	Primary	01578310	Original network site - to cover large spatial area of watershed
MD	Primary	01578475	Original network site - to cover large spatial area of watershed
MD	Primary	01580520	Original network site - to cover large spatial area of watershed
MD	Primary	01582500	Original network site - to cover large spatial area of watershed
MD	Primary	01586000	Original network site - to cover large spatial area of watershed
MD	Primary	01589300	Original network site - to cover large spatial area of watershed
MD	Primary	01591000	Original network site - to cover large spatial area of watershed
MD	Primary	01594440	Original network site - to cover large spatial area of watershed
MD	Primary	01594526	Original network site - to cover large spatial area of watershed
MD	Primary	01599000	Original network site - to cover large spatial area of watershed
MD	Primary	01601500	Original network site - to cover large spatial area of watershed
MD	Primary	01619500	Original network site - to cover large spatial area of watershed
MD	Primary	01637500	Original network site - to cover large spatial area of watershed
MD	Primary	01639000	Original network site - to cover large spatial area of watershed
MD	Primary	01646580	Original network site - to cover large spatial area of watershed
NY	Primary	Tioughnioga at Itaska	New proposed site to meet needs of TMDL



NY	Primary	01502500	Original network site - to cover large spatial area of watershed
NY	Primary	01503000	Original network site - to cover large spatial area of watershed
NY	Primary	01515000	Original network site - to cover large spatial area of watershed
NY	Primary	01529500	Original network site - to cover large spatial area of watershed
NY	Primary	01531000	Original network site - to cover large spatial area of watershed
PA	Primary	Big Spring Run Chillisquaque	New proposed site to meet needs of TMDL
PA	Primary	@ Washingtonville	New proposed site to meet needs of TMDL
PA	Primary	Codorus Ck nr Pleasureville	New proposed site to meet needs of TMDL
PA	Primary	Pequea Ck at Strasburg	New proposed site to meet needs of TMDL
PA	Primary	Quittapahilla Ck	New proposed site to meet needs of TMDL
PA	Primary	Spring Cr nr Harrisburg, PA	New proposed site to meet needs of TMDL
PA	Primary	Muddy Creek East	New proposed site to meet needs of TMDL
PA	Primary	Mahantango at Dalmatia	New proposed site to meet needs of TMDL
PA	Primary	Kishacoquillas at Reedsville	New proposed site to meet needs of TMDL
PA	Primary	Paxton Creek nr Harrisburg, PA	New proposed site to meet needs of TMDL
PA	Primary	01531500	Original network site - to cover large spatial area of watershed
PA	Primary	01534000	Original network site - to cover large spatial area of watershed
PA	Primary	01536500	Original network site - to cover large spatial area of watershed
PA	Primary	01540500	Original network site - to cover large spatial area of watershed
PA	Primary	01542500	Original network site - to cover large spatial area of watershed
PA	Primary	01548005	Original network site - to cover large spatial area of watershed
PA	Primary	01549700	Original network site - to cover large spatial area of watershed
PA	Primary	01549760	Original network site - to cover large spatial area of watershed
PA	Primary	01553500	Original network site - to cover large spatial area of watershed
PA	Primary	01555000	Original network site - to cover large spatial area of watershed
PA	Primary	01556000	Original network site - to cover large spatial area of watershed
PA	Primary	01558000	Original network site - to cover large spatial area of watershed
PA	Primary	01562000	Original network site - to cover large spatial area of watershed
PA	Primary	01567000	Original network site - to cover large spatial area of watershed
PA	Primary	01568000	Original network site - to cover large spatial area of watershed
PA	Primary	01570000	Original network site - to cover large spatial area of watershed
PA	Primary	01571500	Original network site - to cover large spatial area of watershed
PA	Primary	01573560	Original network site - to cover large spatial area of watershed
PA	Primary	01574000	Original network site - to cover large spatial area of watershed
PA	Primary	01576000	Original network site - to cover large spatial area of watershed

PA	Primary	01576754	Original network site - to cover large spatial area of watershed
PA	Primary	01576787	Original network site - to cover large spatial area of watershed
PA	Primary	01609000	Original network site - to cover large spatial area of watershed
PA	Primary	01610155	Original network site - to cover large spatial area of watershed
PA	Primary	01613095	Original network site - to cover large spatial area of watershed
PA	Primary	01613525	Original network site - to cover large spatial area of watershed
PA	Primary	01614500	Original network site - to cover large spatial area of watershed
PA	Primary	01619000	Original network site - to cover large spatial area of watershed
VA	Primary	SF Quantico Creek nr Independent Hill	New proposed site to meet needs of TMDL
		Muddy Creek at Mount Clinton, Va	New proposed site to meet needs of TMDL
		Dragon Run Difficult Run near Great Falls, Va	New proposed site to meet needs of TMDL
VA	Primary	Polecat Creek	New proposed site to meet needs of TMDL
VA	Primary	01631000	Original network site - to cover large spatial area of watershed
VA	Primary	01632900	Original network site - to cover large spatial area of watershed
VA	Primary	01634000	Original network site - to cover large spatial area of watershed
VA	Primary	01667500	Original network site - to cover large spatial area of watershed
VA	Primary	01668000	Original network site - to cover large spatial area of watershed
VA	Primary	01671020	Original network site - to cover large spatial area of watershed
VA	Primary	01673000	Original network site - to cover large spatial area of watershed
VA	Primary	01674500	Original network site - to cover large spatial area of watershed
VA	Primary	02024752	Original network site - to cover large spatial area of watershed
VA	Primary	02034000	Original network site - to cover large spatial area of watershed
VA	Primary	02035000	Original network site - to cover large spatial area of watershed
VA	Primary	02037500	Original network site - to cover large spatial area of watershed
VA	Primary	02041650	Original network site - to cover large spatial area of watershed
VA	Primary	02042500	Original network site - to cover large spatial area of watershed
WV	Primary	Rockymarsh Run / Potomac River	New proposed site to meet needs of TMDL
		Mill Creek / Opequon Creek	New proposed site to meet needs of TMDL
WV	Primary	Warm Springs	New proposed site to meet needs of TMDL
WV	Primary	Abrams Creek at Oakmont	New proposed site to meet needs of TMDL
WV	Primary	Back Creek	New proposed site to meet needs of TMDL
WV	Primary	01604500	Original network site - to cover large spatial area of watershed

WV	Primary	01608500	Original network site - to cover large spatial area of watershed
WV	Primary	01611500	Original network site - to cover large spatial area of watershed
WV	Primary	01616500	Original network site - to cover large spatial area of watershed
VA	Secondary	01628500	Original network site- upgraded to primary from secondary
VA	Secondary	01654000	Original network site- upgraded to primary from secondary
VA	Secondary	01664000	Original network site- upgraded to primary from secondary
VA	Secondary	01674000	Original network site- upgraded to primary from secondary
VA	Secondary	02039500	Original network site- upgraded to primary from secondary
VA	Secondary	01626000	Original network site - to cover large spatial area of watershed
VA	Secondary	01638480	Original network site - to cover large spatial area of watershed
VA	Secondary	01665500	Original network site - to cover large spatial area of watershed
VA	Secondary	01666500	Original network site - to cover large spatial area of watershed
VA	Secondary	01671100	Original network site - to cover large spatial area of watershed
VA	Secondary	01673800	Original network site - to cover large spatial area of watershed
VA	Secondary	02011500	Original network site - to cover large spatial area of watershed
VA	Secondary	02015700	Original network site - to cover large spatial area of watershed
VA	Secondary	02020500	Original network site - to cover large spatial area of watershed
VA	Secondary	02024000	Original network site - to cover large spatial area of watershed
VA	Secondary	02031000	Original network site - to cover large spatial area of watershed
VA	Secondary	02041000	Original network site - to cover large spatial area of watershed

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