PREFACE

The Draft Proposed TMDLs for the Little River watershed were reviewed during a public workshop held on 11 May, 2006. All comments received at the workshop and during the May 1 through 31 comment period were considered by DNREC. This report has been updated to address public comments by Mid-Atlantic Environmental Law Center (Sections 2.0, 4.0, 4.2, 6.1, 6.4 and 6.5)

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SECTION 1

INTRODUCTION

As required by the Federal Clean Water Act, the Delaware Department of Natural Resources and Environmental Control (DNREC) is responsible for implementing water quality monitoring and assessment activities in the State and also for establishing Total Maximum Daily Loads (TMDLs) on impaired State surface waters as indicated on the State's 303(d) List. In addition, the State of Delaware is under a court-approved Consent Decree (C.A. No. 96-591, D. Del 1996) that requires completion of TMDLs for certain impaired State waters by 2006.

In order to complete these TMDLs, DNREC has contracted with the environmental modeling firm (HydroQual, Inc.) to develop mathematical models of the Little River watershed to assist in developing the TMDLs. These mathematical models include a landside watershed model to calculate nonpoint source (NPS) runoff and quality, a hydrodynamic model to calculate the movement of water in the tidal reaches of the Little River, and a water quality model that is coupled to the hydrodynamic model to calculate water quality in the tidal reaches of the river.

As part of the Little River watershed model development, data compilation and analyses were completed in addition to model development, calibration and validation. The data compilation/analysis and model development is presented in the following technical memorandum and report:

- Little River Watershed TMDL Development, Data Analysis Technical Memorandum (HydroQual, 2005); and
- Little River Watershed TMDL Model Development (HydroQual, 2006).

A summary of some of the data and modeling information related to the Little River TMDL is presented below but detailed information relating to data and modeling are contained in these two references.

1.1 303(D) LISTED WATERBODIES

The water bodies listed on the State of Delaware's 1998, 2002, 2004, and 2006 Draft 303(d) Lists in the Little River Watershed are presented in Table 1. There are a total of 3 listed water segments: 2 tidal segments of the Little River and 1 freshwater stream segment. These segments are listed for nutrients, DO and bacteria with the most probable source of pollutants identified as NPS. The TMDL development in the Little River watershed was completed to address these water quality impairments and present TMDLs that are aimed at improving water quality in the listed segments.

Table 1. Little River Watershed TMDL Segments

Water Body ID	Segment	Size Affected	Description	Parameters	Probable Source
DE190-001-01	Lower Little River	2.9 miles	From the confluence of Upper Little River and Pipe Elm Branch with the Lower Little River to the mouth at Delaware Bay	Bacteria, DO, nutrients	NPS
DE190-001-02	Upper Little River	5.5 miles	From the headwaters to the confluence with Lower Little River	Bacteria, DO, nutrients	NPS
DE190-001-03	Pipe Elm Branch	2.1 miles	From the headwaters to the confluence with Little River	Bacteria, DO, nutrients	NPS

1.2 DESIGNATED USES

According to the "State of Delaware Surface Water Quality Standards (Amended July 11, 2004)", the designated uses that must be maintained and protected through the application of appropriate criteria are uses for: industrial water supply; primary contact recreation; secondary contact recreation; fish, aquatic life and wildlife including shellfish propagation; and agricultural water supply in freshwater segments only. These designated uses are applicable to the Little River and are achieved and maintained through the application of water quality standards and criteria as outlined in the next section.

1.3 APPLICABLE WATER QUALITY STANDARDS AND NUTRIENT GUIDELINES

According to the "State of Delaware Surface Water Quality Standards (Amended July 11, 2004)", water quality standards (WQS) for dissolved oxygen (DO) and *enterococcus* exist. The DO WQSs in freshwater are a daily average of not less than 5.5 mg/L (minimum of 4 mg/L) and in marine waters are a daily average of not less than 5 mg/L (minimum of 4 mg/L). The *enterococcus* WQS consists of two parts, a single sample value not to exceed and a monthly geometric mean. For primary contact recreation in freshwater, the *enterococcus* WQS is a single sample value of 185 colonies/100mL (col/100mL) and a monthly geometric mean of 100 col/100mL. For primary contact recreation in marine waters, the *enterococcus* WQS is single sample value of 104 col/100mL and a monthly geometric mean of 35 col/100mL.

For nutrients, some site-specific or basin-specific standards exist but acceptable nutrient levels are determined based on their ultimate effect on DO or algal levels through nutrient-algal-DO relationships (eutrophication) and/or threshold levels. The nutrient standards are currently in narrative form for controlling nutrient over enrichment and are stated as:

> "Nutrient over enrichment is recognized as a significant problem in some surface waters of the State. It shall be the policy of this Department to minimize nutrient input to surface waters from point sources and human induced nonpoint sources. The types of, and need for, nutrient controls shall be established on a site-specific basis. For lakes and ponds, controls shall be designed to eliminate over enrichment."

Although national numeric nutrient criteria have not been established in Delaware, DNREC has used threshold levels of 3.0 mg/L for total nitrogen (TN) and 0.2 mg/L for total phosphorous (TP) for listing water bodies on the State's 303(d) listings and 305(b) assessment reports and, therefore, will be used as the target nutrient levels for completing nutrient TMDLs in addition to considering nutrient endpoints such as DO and algal levels (chlorophyll-a). Nutrient related algal effects typically require sufficient time for impacts to be noticed (i.e., impacts are long term in nature rather than instantaneous), therefore, the nutrient targets will be assessed based on monthly average nutrient concentrations.

SECTION 2

MODELING FRAMEWORKS

The Little River watershed model was developed to complete nutrient, DO and bacteria TMDLs in the watershed. The model framework is comprised of three components: a landside model, a hydrodynamic model and a water quality model. The landside model characterizes the hydrology and NPS loadings within the watershed. The hydrodynamic model simulates the tidal motion of water due to freshwater flow, density driven currents, and meteorology confined by a realistic representation of the systems bathymetry and also calculates salinity and temperature. The coupled water quality model calculates nutrient mediated algal growth and death, dissolved oxygen (DO), the various organic and inorganic forms of nitrogen, phosphorus, and carbon (BOD). In addition, bacteria (*enterococcus*) kinetics (die-off) are also modeled.

The landside model used in the study is the Loading Simulation Program in C++ (LSPC). The LSPC model uses meteorological conditions (precipitation, evapotranspiration, air temperature, wind speed, dewpoint temperature, cloud cover and solar radiation) and land cover/use data to simulate flow, sediment transport, temperature variations, and water quality processes over the entire hydrologic cycle. Accumulation rates and limits used by LSPC as input parameters are tabulated by landuse in Appendix 4. The model results provide runoff flow and NPS loadings to the hydrodynamic and water quality models.

The hydrodynamic model used in the study is the three-dimensional, time-dependent, estuarine and coastal circulation model Estuary and Coastal Ocean Model (ECOMSED), which has been successfully applied in numerous studies, such as the South Atlantic Bight (NY/NJ), Hudson-Raritan Estuary (NY/NJ), Long Island Sound (NY/CT), Delaware River, Bay and adjacent continental shelf (NJ/PA/MD/DE), Chesapeake Bay (MD/DE), Massachusetts Bay and Boston Harbor (MA), Tar-Pamlico Estuary (NC), and St. Andrew Bay (FL).

The water quality model used in the study is a state-of-the-art eutrophication model Row Column Aesop (RCA) that is directly coupled with the hydrodynamic model, allowing computation of water quality within the tidal cycle. In addition, a sediment flux submodel is also included in the water quality model to allow calculation of sediment oxygen demand (SOD) and sediment nutrient fluxes in response to settled organic matter and its subsequent decay in the sediment. The coupled water quality/hydrodynamic model has been successfully applied in numerous studies including the Hudson-Raritan Estuary (NY/NJ), Long Island Sound (NY/CT), Chesapeake Bay (MD/DE), Massachusetts Bay and Boston Harbor (MA), Jamaica Bay (NY), Tar-Pamlico Estuary (NC), and the Upper Mississippi River (MN). The landside, hydrodynamic and water quality models were calibrated and validated with data collected by Delaware Department of Natural Resources and Environmental Control (DNREC), New Jersey Department of Environmental Protection (NJDEP) and University of Delaware. These data include ADCP data in the lower estuary, temperature, salinity and water quality (nitrogen, phosphorus, organic carbon, DO, chlorophyll-a, bacteria) data in the tidal Little River and non-tidal upstream areas of the watershed. The calibrated and validated landside, hydrodynamic and water quality models resulted in reasonable representation of both the complex mixing and circulation patterns observed in the study area and the observed nutrient, phytoplankton, organic carbon, DO and bacteria dynamics of the system.

The segments on the State of Delaware's 303(d) list were either modeled in the landside model or the tidal water quality model. Based on data availability, the year 2002 was chosen as the model calibration period. The calibrated landside, hydrodynamic and water quality models were then validated with data from the year 2003. The comparison of both the calibration and validation model results with available data shows that the calibrated models reasonably represent the hydrologic, hydrodynamic, and water quality processes present in the watershed.

The linked landside, hydrodynamic and water quality models were developed to complete the TMDLs in the Little River watershed. Calibration and validation of the models provide a consistent set of model coefficients that realistically represents the datasets in both modeling time periods. The calibrated and validated models are now used to develop TMDLs and load allocations for nutrients, DO and bacteria. Complete details of the models, development and application are presented in the report "Little River Watershed TMDL Model Development" (HydroQual, 2006).

2.1 MODEL SEGMENTATION/DELINEATION

The LSPC model was delineated into 9 sub-watersheds in the Little River watershed (Figure 1). Preliminary model segment delineation was performed based on Digital Elevation Model (DEM) data developed by the University of Delaware and the river reach file information from DNREC. Further refinement of the model segmentation was then completed by inclusion of the location of the water quality stations and flow gages and re-assessment of the DEM and river reach file information.

One hydrodynamic model was completed for the Blackbird Creek, Smyrna River, Leipsic River and Little River watersheds and portions of the Delaware River/Bay upstream and downstream from these watersheds. A marsh area north of the Smyrna River watershed and south of the Blackbird Creek watershed (approximately 9.5 mi^2) drains directly into the Delaware River and was excluded from the watershed, hydrodynamic and water quality models. Segmentation of the hydrodynamic model resulted in a 41x72x5 model grid that consisted of 1,114 water segments in the horizontal plane and 5 equal water segments in the vertical dimension, for a total of 5,570 water segments. Figure 2 presents the model segmentation of the hydrodynamic model. For the Little River watershed water quality model, water segments representing the Blackbird Creek, Smyrna River and Leipsic River watersheds were masked out of the above hydrodynamic grid to create a water quality model grid with only 160 water segments in the horizontal plane and 800 total with inclusion of the vertical dimension. The Little River watershed water quality model grid is shown in Figure 3. The hydrodynamic and water quality model segments were developed in the Little River and extended into Delaware River/Bay across the width from the lower river estuary and 5 miles in the upstream/downstream direction. The extension of the model grid into the bay is aimed at minimizing the bay boundary condition effects on the internal model calculations. Bathymetry data for the study area were obtained from NOAA GEODAS CDs (NOAA, 1998) and also DNREC ADCP data. Figure 3 presents the ADCP stations in the Little River. The bathymetry assigned for the segmentation at the most upstream reaches of the tidal river were determined based on the tidal range and a minimum water depth was assigned to avoid main channel segments from drying out at low tide. In addition, the hydrodynamic model represents the wetting and drying of marsh areas in the river. These areas were determined from USGS topographic maps and delineated marsh areas. This was completed to better represent tidal transport in the river. As the tide rises and falls, water flows into and out of the marsh areas. When the tide is low, some of the marsh area segments dry up, or contain no water, and are considered computationally inactive. When the tide rises, water fills these segments and computation continues as normal. Marsh loads are only input into the marsh segments when they are considered wet, or computationally active. Figure 3 shows the model segments that are available for wetting and drying and the delineated marsh areas.

Figure 1. LSPC Model Segmentation Little River Watershed

Figure 2. ECOMSED Grid

Figure 3. RCA Model Segmentation Little River Watershed

SECTION 3

WATERSHED CHARACTERISTICS

3.1 LANDUSE

Land use information for the year 2002 was obtained from DNREC and is presented in Table 2 and Figure 1. The Little River watershed is approximately 6,024 ha (23 mi^2) and is primarily non-urban (78%) with approximately 40% agricultural land use.

3.2 POINT SOURCES

In the Little River watershed, there are no existing point sources (PS). A septic nutrient load was assigned in the model based on septic distribution in the watershed as provided by DNREC. An animal bacteria load was assigned for forest landuses based on an estimated wild animal distribution, but animal operations were not considered and an animal bacteria load was not estimated on other landuses since no animal counts were available. Animal nutrient sources were subsumed in the overall land use unit loading values.

Table 2. Summary of Land Use in the Little River Watershed

Land Use	Area (ha)	% Total Area
Agriculture	2,390	39.7
Forest	227	3.8
Pasture/Rangeland	65	1.1
Urban/Built-up Land	1,352	22.4
Water	367	6.1
Wetland	1,594	26.4
Others	29	0.5
Total	6,024	100

SECTION 4

WATERSHED MONITORING

Monitoring in the Little River watershed has been on-going since the mid-1970s and is aimed at providing information to assess water quality in the watershed but also to assist in the development of TMDL models. The water quality and hydrologic data collected were sufficient to support development and calibration/validation of watershed, hydrodynamic and water quality models for the Little River, tributaries and ponds to establish TMDLs for nutrients, DO and bacteria.

The data provided by DNREC included DNREC water quality monitoring data, land use information, cross-sectional data, Acoustic Doppler Current Profiler (ADCP) data, National Pollutant Discharge Elimination System (NPDES) PS information, and datasonde data. In addition, flow data were obtained at available USGS flow gages from the USGS website. Figure 1 shows an overview of the watershed, USGS flow gages, dams, water quality stations, and NPDES PS locations. The following data were available.

- **DNREC Water Quality Monitoring Data** – This set of data includes temperature, salinity, pH, total suspended solids (TSS), turbidity, secchi depth, nutrients (nitrogen and phosphorus), DO, carbonaceous biochemical oxygen demand (CBOD), total organic carbon (TOC), dissolved organic carbon (DOC), chlorophyll-a (chla), and *enterococcus*. There are 5 stations in the Little River watershed as shown in Figure 1. The available data span from 1994 to 2003, but the majority of the data were collected between 2002 and 2003. All three models (landside, hydrodynamic and water quality) were calibrated with these data.

- **NPDES Point Source Data** – The point source database contains information on effluent limits and discharge monitoring data for NPDES permitted PSs located in Delaware. There are no NPDES permitted PSs located in the Little River watershed.

- **Cross-Sectional Data** – The cross-sectional data include cross-section width, depth, and velocity for a number of stations in the Little River watershed as shown in Figure 1. Although stations are shown along the main stem of the Little River, no actual data are available at these stations. Data are available for stations tributary to the main stem of the river. River geometry was developed for the landside and hydrodynamic models using these data.

- **ADCP Data** – The ADCP data contain tidal velocity, elevation and cross-section measurements conducted on August 3, 2005 for 3 sites in the estuary portion of the Little

River. The monitoring locations are presented on Figure 3. These data were used to help define river geometry and aided in calibration of the velocities and water depths in the hydrodynamic model.

- **Flow Data** – No USGS flow data were available for the Little River watershed. The watershed model inputs were based on work completed in the Blackbird Creek and St. Jones River watersheds where USGS gages were available for calibration/validation.

- **Datasonde Data** - The datasonde data contain tidal salinity, temperature, dissolved oxygen, pH and depth measurements collected between April 2002 and November 2003 for 3 sites in the Little River. The datasonde locations are presented in Figure 3. Temperature and salinity data were used to calibrate/validate the hydrodynamic model. Dissolved oxygen data were used to calibrate/validate the water quality model.

4.1 OVERALL WATER QUALITY ASSESSMENT

In general, the water quality data analysis in the Little River watershed indicates that the watershed experiences DO levels less than the State minimum WQS of 4 mg/L with elevated chlorophyll-a levels at many stations throughout the watershed. Potential oxygen demands include sediment oxygen demand (SOD), BOD oxidation, ammonia nitrification and/or algal respiration. These oxygen demands can originate from nonpoint sources but also potentially from wetland/marsh loading of organic material. The data indicate sufficient nutrient concentrations at most of the stations to support algal growth. Bacteria concentrations were also elevated at some stations (with maximum *enterococcus* levels above 2,000 #/100mL). Potential bacteria sources include storm water runoff and NPS derived bacterial inputs.

4.2 SOURCES OF POLLUTION

Nonpoint source pollution can be defined as pollution that occurs over large areas as a result of common practices and landuses. Unlike a point source that deposits pollution into a water body at a specific location, nonpoint sources will affect a waterbody at indefinite locations, such as ground water seepage or agricultural runoff along a given stream length. In order to quantify nonpoint sources in the Little River watershed, land areas were classified according to landuse and pollutant build-up and wash-off coefficients and groundwater concentrations. The landuse distribution in the Little River watershed was generalized into the groups shown in Table 2: agriculture, forest, pasture/rangeland, urban/built-up, wetlands and others. Each of these landuses has different possible sources of pollution that are deposited directly or indirectly to the water system. The "other" landuse includes transitional construction and inland natural sandy areas.

Forested areas account for nearly 4 percent of the watershed. The types of forest are deciduous, mixed and evergreen. Nutrients and bacteria from wild animals and organic material from plants are common sources of nonpoint pollution.

Wetland area account for more than 26 percent of the watershed area and are home to many species of plants and wildlife that produce organic, nutrient and bacteria wastes.

Approximately 40 percent of the Little River watershed was classified as agriculture, including cropland, farm related buildings, idle fields, and orchard and nursery landuses. Possible nonpoint sources of pollution from these areas include bacteria and nutrients from animal feed lots, organic material from plants, nutrients from industrial fertilizers, and particulate and dissolved nutrients in runoff. Landuse data indicates that a row crops are present in the northern portion of the watershed.

Pasture/rangeland comprises 1 percent of the watershed and includes pasture and herbaceous, brush and mixed rangelands. Nutrients and bacteria from animal grazing or production are common sources of nonpoint pollution.

Urban or built-up landuses often increase nonpoint pollution due to decreased perviousness and increased human development. The urban landuse contains roads, salvage yards, mixed urban, professional retail, single family dwellings, utilities and warehouses. Among the causes of pollution from urban landuses are nutrients and bacteria in runoff from impervious surfaces, nutrients and bacteria from septic systems, nutrients from residential fertilizers, industrial wastes and domestic pet wastes. Approximately 22 percent of the Little River watershed is urban or built-up.

Based on the land use data, the Little River watershed is primarily non-urban (78%) and, therefore, NPSs are an important source of pollution in the watershed. There are no NPDES permitted PSs in the watershed. Therefore, NPSs are the dominant source of pollution in the watershed.

In addition, the City of Dover is classified as an urbanized area and currently has associated MS4 stormwater permits. Urban area information was obtained from the US Census Bureau (2000 Census Urbanized Areas) and projected onto the Little River watershed area and LSPC model segmentation. Table 3 presents the 2000 Census urbanized areas by LSPC segment along with the modeled urban area. The calculated percent MS4 to LSPC urban area will be used to split the urban nonpoint source loads into MS4 point source loads. If the calculated percent was greater than 100 it was set to 100, which may be due to the 2002 land use data used to setup the LSPC model.

Table 3. MS4 Urban Areas in the Little River Watershed

LSPC Segment	Total Area (ha)	LSPC Urban Area (ha)	2000 Census MS4 Urban Area (ha)	%MS4 Urban Area
1	1081	393	582	100
2	910	473	251	53

SECTION 5

SCOPE AND OBJECTIVES OF THE TMDL ANALYSIS

DNREC has proposed TMDLs for nitrogen, phosphorous, DO and bacteria for the Little River watershed. The proposed TMDLs are the result of various load reduction analyses, which were conducted using the Little River Watershed Model as a predictive tool. The proposed TMDL is designed such that, when implemented, all segments of the Little River system will achieve applicable water quality standards and targets for TN, TP, DO and bacteria. Monitoring in the watershed should continue to assess the impact of load reductions and to determine the associated water quality improvements. In this manner, an adaptive management approach can be followed in the watershed.

In order to complete these TMDLs, mathematical models of the Little River watershed were developed. These mathematical models include a landside watershed model to calculate nonpoint source (NPS) runoff and quality, a hydrodynamic model to calculate the movement of water in the tidal reaches of the Little River, and a water quality model that is coupled to the hydrodynamic model to calculate water quality in the tidal reaches of the river.

As part of the Little River watershed model development, data compilation and analyses were completed in addition to model development, calibration and validation. The data compilation/analysis and model development is presented in the following technical memorandum and report:

- Little River Watershed TMDL Development, Data Analysis Technical Memorandum (HydroQual, 2005); and
- Little River Watershed TMDL Model Development (HydroQual, 2006).

In addition, baseline NPS loadings were developed (Figure 4 and Appendix 3) based on the calibration/validation period (2002-2003).

5.1 TOTAL MAXIMUM DAILY LOADS AND THEIR ALLOCATIONS

The calibrated and validated Little River models were used to determine TMDLs for the watershed. This effort involved completing various model load reduction scenarios to ultimately arrive at a load reduction scenario that meets water quality standards or targets. The following procedure was used to develop the load reduction scenarios, wasteload allocations (WLA) and load allocations (LA). An implicit margin of safety (MOS) will be used for the TMDL due to conservative assumptions used in the modeling.

In order to address NPS loadings within the watershed, various load reduction scenarios were completed for 20%, 40%, 60% and 80% NPS load reductions. These scenarios were coupled with the WLA loads presented in Table 4. The results of these NPS load reductions scenarios were used to establish the proposed NPS reduction goal for the Little River TMDL. In these analyses, meeting the water quality standards and/or targets reflect achieving the designated uses.

5.2 TMDL ENDPOINTS

For nutrients, the water quality targets were interpreted to represent monthly average nutrient targets of 3 mg/L TN and 0.2 mg/L TP. These targets were applied in both the freshwater and tidal reaches of the watershed. The monthly average approach was chosen because nutrient effects on algae are not immediate, that is sufficient time is required for the consumption of nutrients by algae in increasing their biomass. Given the nature of the streams, ponds and tidal reaches in the Little River watershed, a monthly time period was considered suitable for assessing nutrient related algal impacts for TMDL development.

For bacteria (*enterococcus*), the water quality standard is two-tiered. The Delaware standards are expressed as a single sample maximum and geometric mean without reference to a time period. Typically, bacteria standards are written in terms of a monthly time period and, therefore, the bacteria standards were applied on a monthly basis for TMDL development. In the freshwater reaches the *enterococcus* geometric mean standard is 100 #/100mL and in the marine reaches the geometric mean standard is 35 #/100mL. Compliance with these standards was based on the calculated maximum 30-day moving geometric mean that occurs in a calendar month.

For DO, the water quality standard is also two-tiered to represent a daily average and daily minimum value. In the freshwater reaches the DO daily average value is 5.5 mg/L with a minimum of 4.0 mg/L. In the marine reaches the DO daily average value is 5.0 mg/L with a minimum of 4.0 mg/L. In the upstream freshwater reaches a steady-state, low-flow (7Q10) DO balance calculation was completed to determine the allowable loads that meet the daily average DO standard of 5.5 mg/L. This approach used the Streeter-Phelps DO deficit method to calculate DO as a function of oxygen demands (CBOD/NBOD from nonpoint sources, SOD) and the oxygen source from atmospheric reaeration. The approach used upstream geometry relationships (depth, velocity, width as a function of flow) to represent stream geometry at different flow rates. In addition, total flow calculated by LSPC at the end of a river reach was uniformly distributed along the length of the tributary under consideration. A CBOD and NH_3 decay rate of 2/day at 20°C was used along with a SOD of 1 $g/m^2/d$ at 20°C. Atmospheric reaeration at 20°C was calculated using the Tsivoglou equation (K_a = CUS, where C is a constant that depends on flow, U is the velocity and S is the slope). All of these rates were temperature corrected to a summer maximum temperature of 30°C. An initial DO deficit of 0-2 mg/L and $TBOD_u$ of 5 mg/L was assigned at the upstream end of the reach analyzed.

In order to test the approach against observed data, average NPS BOD and NH_3 loads during the summer months of June through October (2002 and 2003) were obtained from the calibrated LSPC model for the reach under consideration. The average stream flow during this period was also used to represent the average stream conditions for calculating stream geometry. The resulting DO calculation is presented in the top panel of the spatial DO figures in Appendix 1 along with the observed DO data. In general, the DO modeling approach reproduces the lower DO levels observed in Upper (non-tidal) Little River and Pipe Elm Branch. Since the stream flows during the summer of 2002 were at or below 7Q10 low flow conditions, a low stream flow of 0.5 cfs was used to assess whether the NPS load reductions improved DO levels to meet the standard of 5.5 mg/L. This was accomplished by reducing the headwaters $TBOD_u$ and stream SOD by 40%, assigning no upstream DO deficit and by removing the NPS $TBOD_u$ load since runoff at 7Q10 low flow conditions does not occur or is minimal. In other coastal Delaware watersheds, it was noted that many of the observed low DO values are reported as being collected in areas with no flow (stagnant, pooled reaches) or are located in headwater areas of small streams that may be dominated by groundwater with low DO levels. Therefore, monitoring of DO in these freshwater reaches should continue to either assess improvements due to the load reductions or to determine potential local sources of oxygen demand.

In the tidal reaches of the watershed, the RCA model output was used to assess instream DO standards. In these downstream tidal reaches of the watershed, background oxygen demands such as sediment oxygen demand (SOD), bay water quality and marsh loadings can cause DO levels to be periodically naturally depressed. Therefore, assessment of compliance with the marine DO standard was based on monthly average model output.

5.3 TMDL MODEL OUTPUT PRESENTATION

The model output for TN, TP, chlorophyll-a, DO and *enterococcus* is presented in a series of figures for comparing the load reduction scenarios to the water quality standards or targets. These model output figures are presented for the one (1) freshwater 303(d) listed segment (Appendix 1) and the two (2) tidal 303(d) listed segments (Appendix 2) at a number of monitoring locations. In the freshwater reaches, the steady-state, low-flow calculated DO as a function of distance is presented where a DO TMDL is required along with the associated DO deficit components. The current and TMDL loading conditions are also presented in this figure. For *enterococcus*, the current and TMDL model output are presented as probability distributions. Probability distributions are useful for presenting the mean and variation of a data set, and also provide a means for determining compliance (percent exceedance) from a given value (e.g., a water quality standard). The Delaware standards do not allow for a percent of samples exceeding the standard (e.g., 10%) and, therefore, the load reductions are aimed at maintaining the instream *enterococcus* levels below the geometric mean standard at all times. For nutrients, the model projection of monthly average concentrations was compared to the target values of 3 mg/L for TN and 0.2 mg/L for TP.

In the marine (tidal) reaches, monthly average DO is presented for both the current and TMDL loading conditions along with *enterococcus*. For *enterococcus*, the current and TMDL model output are presented as probability distributions in the same format as the freshwater reaches. For nutrients, the model projection of monthly average concentrations was compared to the target values of 3 mg/L for TN and 0.2 mg/L for TP. Chlorophyll-a is also presented as a monthly average for reference with a target concentration of 25 mg/L.

5.4 INTERPRETATION OF RESULTS

The load reduction scenarios were designed to determine the impact of various NPS load reductions on instream water quality in the freshwater and tidal reaches of the watershed in order to guide in selection of the final TMDL load reduction scenario. Based on the four (4) nutrient load reduction scenarios completed (20%, 40%, 60% and 80% NPS load reductions), a final nutrient NPS load reduction of 40% was selected. Results from this final scenario are presented in Appendix 1 for the freshwater reaches and in Appendix 2 for the tidal reaches.

The 40% nutrient NPS load reduction reduced all instream nutrient levels below their target levels and contributed to DO improvements in both the freshwater and tidal reaches through the associated carbon (BOD) and NH_3 reductions. Although the existing nutrient targets were close to or less than the targets in the freshwater reaches, additional decreases were necessary to meet the nutrient targets in the downstream tidal reaches. In addition, the marsh loading of organic carbon and its contribution to SOD was reduced by 35% in the TMDL model runs that also contributed to DO improvements in the tidal reach of the river. This reduced organic carbon load represents potential SOD reductions that may occur as a result of NPS controls in the watershed.

For bacteria, a 75% NPS load reduction is required to meet both the freshwater and marine geometric mean standards at all times. These NPS load reductions are greater than needed in the freshwater reaches but are necessary to attain the marine geometric mean standard in the tidal reach of the river.

Therefore, the final load reductions recommended are a 40% NPS reduction of nutrients (including carbon or BOD) loads and a 75% NPS reduction of bacteria (*enterococcus*). These load reductions will allow the instream nutrient targets, DO and bacteria standards to be maintained in the watershed.

SECTION 6

PROPOSED TMDL LOAD REDUCTION

As stated, the proposed TMDL load reduction scenario is a 40% NPS reduction of nitrogen, phosphorus and carbon (BOD) and a 75% NPS reduction of *enterococcus*. These NPS load reductions are coupled with the WLAs presented in Table 4. In both the freshwater and marine (tidal) reaches of the watershed, the nutrient targets, DO and bacteria standards are attained at these TMDL loading levels. Table 5 presents the TMDLs for nitrogen, phosphorus and *enterococcus* for the final proposed load reduction scenario and Table 6 presents a summary of the NPS loadings by sub-watershed and landuse. Figure 4 highlights the sub-watersheds used in Table 6. Appendix 3 presents a summary of the baseline (calibration/validation 2002/2003) loads for nitrogen, phosphorus and *enterococcus*. These load reduction scenarios are meant as a guide in improving water quality in the Little River watershed and should be periodically revisited to determine whether they are still applicable. In addition, water quality monitoring should continue throughout the watershed to quantify the instream effects of the proposed load reductions and to monitor the calculated water quality improvement in the river.

6.1 CONSIDERATION OF THE IMPACT OF BACKGROUND POLLUTANTS

The Little River watershed TMDLs for nutrients, DO and bacteria were estimated using the results of calibrated/validated models (watershed, hydrodynamic and water quality). The models were developed using data collected in the field to represent model inputs and for calibration/validation of the models. The data collected in the field also reflected background pollutant conditions and Delaware Bay water quality in addition to tidal marsh loadings in the model. Therefore, the impact of background pollutants is accounted for in the model.

The impact of pollutant sources varies significantly according to location in the watershed. The three major sources of nutrients are NPSs, the downstream connection to Delaware River/Bay and marsh contribution of organic matter. The Delaware River/Bay impacts DO and nutrient levels closer to the mouth of Little River. Marshes have an influence on DO levels upstream of the river mouth and within the area of the tidal marshes. The upstream NPSs affect DO and nutrient levels minimally at the river mouth but show a generally increasing influence moving upstream (until dominating the nontidal portion of the creek). These three sources are the major causes of varying levels of background pollutants throughout the watershed and impact the model differently according to location.

Figure 4. Subwatershed Groupings - Little River Watershed

Table 4. Little River NPDES WLA (Loads)

Facility	Dover MS4s	Total Load (WLA)
TN (lb/d)	42.3	42.3
TP (lb/d)	4.5	4.52
Enterococcus (#/d)	6.61E+09	6.61E+09

Table 5. Proposed TMDLs For The Little River Watershed

Parameter	WLA	LA	TMDL
TN (lb/d)	42.3	59.2	101.5
TP (lb/d)	4.52	6.71	11.23
Enterococcus (#/d)	6.61E+09	4.48E+09	1.11E+10

6.2 CONSIDERATION OF CRITICAL ENVIRONMENTAL CONDITIONS

Low river flows during summer months coupled with high water temperatures represent critical conditions for PSs and also for nutrient related algal growth and DO assessments. High flow or wet weather conditions are also important for assessing NPSs. Since the Little River watershed does not have a continuous flow gage, flow calibration for the Little River watershed LSPC model was based on the calibrated and validated Blackbird Creek LSPC model where there was a USGS flow gage (#01483200). In the Blackbird Creek watershed, which borders the Smyrna River watershed to the north, the calibration year 2002 was a very dry year compared with the wetter year of 2003. The annual average flows at the Blackbird Creek USGS gage for these two years are 2.8 and 10.2 cfs, respectively. Likewise, in the St. Jones River watershed, which is located immediately south of the Little River and Leipsic River watersheds, a 7Q10 analysis was completed and indicates that the 7Q10 flow for the St. Jones River at Dover (USGS gage #01483700) is 0.7 cfs. The minimum average 7-day flow for year 2002 was 0.6 cfs at the St Jones River USGS gage, which is below the 7Q10 flow. Therefore, since the both the Blackbird Creek and St. Jones River watersheds suggest a dry year 2002 and a wet year 2003, the critical dry and wet weather conditions in the Little River watershed are included in the analysis.

6.3 CONSIDERATION OF SEASONAL VARIATIONS

Seasonal variations are considered in the Little River models since the models were calibrated/validated in a time-variable mode for the years 2002-2003. This time period reflects flow and watershed conditions during all four seasons in both a dry and wet year. Therefore, seasonal variations have been considered for this analysis.

Table 6. Little River NPS LA by Land Use and Watershed Group

Parameter	Urban	Agriculture	Pasture	Forest	Wetlands	Total
Lower Little River						
Area (acres)	129	1,475	30	39	778	2,450
TN (lb/d)	3.44	6.42	0.19	0.06	1.37	11.48
TP (lb/d)	0.37	0.38	0.01	0.01	0.77	1.54
Enterococcus (#/d)	5.37E+08	0.00E+00	0.00E+00	1.04E+05	0.00E+00	5.37E+08
Upper Little River						
Area (acres)	3	1,302	24	145	373	1,848
TN (lb/d)	0.07	5.67	0.13	0.22	0.66	6.75
TP (lb/d)	0.01	0.34	0.01	0.03	0.37	0.75
Enterococcus (#/d)	1.06E+07	0.00E+00	0.00E+00	3.87E+05	0.00E+00	1.09E+07
Pipe Elm Branch						
Area (acres)	653	491	19	50	151	1,363
TN (lb/d)	17.38	2.14	0.08	0.08	0.27	19.94
TP (lb/d)	1.86	0.13	0.01	0.01	0.15	2.15
Enterococcus (#/d)	2.71E+09	0.00E+00	0.00E+00	1.34E+05	0.00E+00	2.72E+09
Morgan Branch						
Area (acres)	1,168	578	118	133	238	2,235
TN (lb/d)	18.65	1.51	0.50	0.12	0.25	21.05
TP (lb/d)	1.99	0.09	0.04	0.02	0.14	2.27
Enterococcus (#/d)	1.22E+09	0.00E+00	0.00E+00	8.88E+04	0.00E+00	1.22E+09

6.4 CONSIDERATION OF MARGIN OF SAFETY

USEPAs technical guidance allows consideration for the margin of safety as implicit or explicit. The margin of safety can account for uncertainty about the relationships between pollutant loads and receiving water quality in addition to uncertainty in the analysis (USEPA, 2001). An implicit margin of safety is when conservative assumptions are contained in model development and TMDL establishment. An explicit margin of safety is a specified percentage of assimilative capacity that is kept unassigned to account for uncertainties, lack of sufficient data or future growth. An implicit margin of safety has been considered for the Little River TMDL analysis.

The Little River bacteria, nutrient and DO models were constructed with several implicit, conservative assumptions built into the models. In addition, the models represented the complex watershed dynamics and tidal nature of the river as opposed to analyzing with a simple model framework not accounting for these complex processes that would include more uncertainty. As stated in the *Protocol for Developing Pathogen TMDLs* (USEPA, 2001), "trade-offs associated with using simpler approaches include a potential decrease in predictive accuracy and often an inability to predict water quality at fine geographic and time scales … and the advantages of more detailed approaches are presumably an increase in predictive accuracy and greater spatial and temporal resolution". The Little River models were also developed from a comprehensive water quality database that was collected over several years (as described in this TMDL Report, Data Memorandum and Modeling Report). This also reduces the uncertainty in the analysis based on a good understanding of water quality dynamics as determined from the available observed field data.

Furthermore for the TMDL scenarios, the reductions were applied to the entire watershed to satisfy the applicable water quality standards or targets at the most critical location rather than to specific reaches upstream of the critical location (i.e., downstream impacts were considered). This results in an implicit margin of safety in upstream areas since load reductions are applied to meet the standards/targets at the critical downstream locations.

It was also assumed that the load reductions required are to be achieved by solely altering practices within the Little River watershed. In the nutrient model this means that the downstream Delaware River/Bay boundary condition loadings are not reduced due to upstream Delaware River controls in the States of Delaware, Pennsylvania, New York and New Jersey not to mention coastal water quality. Since there is intrusion of water from Delaware River/Bay into the river and water quality of Delaware River/Bay will undoubtedly improve in the future, this adds an additional level of conservatism to the analysis since the boundary conditions were not changed for the TMDL analysis.

Finally, critical stream conditions were considered in the TMDL analysis. That is, low-flow and high temperature conditions were part of the period that controlled the establishment of the TMDL loads. These loads, although based on monthly average conditions, reflect the critical conditions that occur within this period. Particularly for discrete sources, the combination of low-flow, high temperature and maximum permit loading conditions represent a rare occurrence and, therefore, provide an additional level of conservatism and implicit margin of safety. For nonpoint sources, critical conditions are more driven by high-flow runoff events and these conditions are also represented in this TMDL analysis. Also, the BOD oxidation and SOD rates used in the freshwater reaches of the watershed for the DO assessment are on the high side of typical ranges and, therefore, also provide a level of conservatism and implicit margin of safety to the analysis.

Overall, the implicit margin of safety chosen reflects the complex modeling developed for the TMDL analysis, comprehensive database available for model development, conservative modeling assumptions chosen and the overall objective of DNREC to implement TMDLs in a phased, adaptive implementation strategy. The use of an implicit margin of safety allows water quality improvements to be realized within the adaptive management framework while not imposing unnecessary source reduction costs on local stakeholders until real world water quality improvements can be better correlated to economically feasible source controls.

6.5 CONSIDERATION OF MODEL CAPABILITIES AND LIMITATIONS

The Little River watershed model is a valuable tool for the assessment and prediction of water quality parameters (including dissolved oxygen, *enterococcus* and nutrients) in the tidal and nontidal portions of the river. However, just like any model, the Little River watershed model has limitations to go along with its capabilities. In the upstream nontidal reaches, the LSPC model has the ability to calculate instream concentrations at selected points in the river near water quality monitoring stations, lake inflows and outflows, confluences of reaches and other strategically selected locations. The driving functions for the model are the accumulation of pollutants on landuses and the delivery of pollutants to reaches through overland and groundwater flow. Currently, instream processes in LSPC are limited to deposition and first order decay. LSPC cannot calculate instream eutrophication or exchanges between the water column and sediment bed. Moreover, LSPC is a lumped parameter and landuse generalized model that is calibrated for whole watershed analyses and, therefore, LSPC's loading functions should not be used to assess the effects of a specific site on downstream water quality without further research and verification of accumulation rates and runoff concentrations at the site.

For the tidal reaches and estuaries of the Little River watershed, the coupled, three dimensional ECOMSED (hydrodynamic) and RCA (eutrophication, sediment flux and bacteria) models account for the factors that influence water quality in a tidal system. Given the increased complexity of a tidal water body, the ECOMSED and RCA models are well suited to simulate flow and water quality because of their capabilities. It should be noted that the coupled model is loaded with flows and pollutant loads from the LSPC model and is, therefore, influenced by the same factors that limit LSPC. ECOMSED tracks flow and transport according to freshwater flow, density driven currents, wind driven currents and other meteorological influences and can calculate flow, velocity, salinity and temperature at any three dimensional point in the tidal water body.

The RCA eutrophication model can calculate dissolved oxygen, nutrients, carbon and chlorophyll-a concentrations at any three dimensional point in the water body based on sediment interactions, upstream sources of pollution, tidal flow and chemical interactions. The model also incorporates a net flux of nutrients and carbon (not seasonally varied) from tidal marshes. That is, nutrient and carbon uptake and export from wetlands was not considered in the marsh load but rather represented as an annual average net flux to the river. The RCA bacteria model contains the same transport and loading mechanisms as the eutrophication model along with a first order die-off algorithm to allow for computation of *enterococcus* at any three dimensional point in the tidal Little River watershed. The bacteria model does not account for sediment fluxes or marsh loads to the water body. In general, the influence of nonpoint sources, point sources and boundary conditions from Delaware Bay/River on the water quality in the tidal water bodies of the Little River can be assessed using the RCA eutrophication and bacteria models.

6.6 TMDL IMPLEMENTATION / PUBLIC PARTICIPATION

DNREC will implement the requirements of this TMDL through development of a Pollution Control Strategy. As with all Pollution Control Strategies, DNREC will engage stakeholders through extensive public education and review process. The draft Proposed TMDLs for the Little River watershed were reviewed during a public workshop held on 11 May, 2006. All comments received at the workshop and during the May 1 through 31 comment period were considered by DNREC. This report has been updated to address public comments by Mid-Atlantic Environmental Law Center (Sections 2.0, 4.0, 4.2, 6.1, 6.4 and 6.5). Considering these opportunities, it can be concluded there has been adequate opportunity for public participation.

SECTION 7

REFERENCES

HydroQual, Inc., 2005. Little River Watershed TMDL Development, Data Analysis Technical Memorandum (2005). Submitted to the Delaware Department of Natural Resources and Environmental Control.

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USEPA Bacteria Indicator Tool, 2000.

USEPA, 2001. Protocol for Developing Pathogen TMDLs, First Edition. USEPA Office of Water. EPA 841-R-00-002, January 2001.

APPENDIX 1

EXISTING & TMDL MODEL OUTPUT (FRESHWATER)

APPENDIX 2

EXISTING & TMDL MODEL OUTPUT (MARINE)

APPENDIX 3

LITTLE RIVER BASELINE LOADINGS

TABLE A1

Little River Baseline Point Source Loads

Facility	Dover MS4s	Total Load (WLA)
TN (lb/d)	70.5	70.5
TP (lb/d)	7.53	7.53
Enterococcus (#/d)	2.64E+10	2.64E+10

Baseline Loads For The Little River Watershed

Parameter	WLA	LA	TMDL
TN (lb/d)	70.5	94.6	165.1
TP (lb/d)	7.53	10.78	18.31
Enterococcus (#/d)	2.64E+10	2.22E+10	4.86E+10

TABLE A2

Little River Baseline NPS Loads by Land Use and Watershed Group

Parameter	Urban	Agriculture	Pasture	Forest	Wetlands	Total
Lower Little River						
Area (acres)	129	1,475	30	39	778	2,450
TN (lb/d)	5.73	10.70	0.31	0.10	2.28	19.13
TP (lb/d)	0.61	0.64	0.02	0.01	1.28	2.56
Enterococcus (#/d)	2.15E+09	0.00E+00	0.00E+00	4.15E+05	0.00E+00	2.15E+09
Upper Little River						
Area (acres)	3	1,302	24	145	373	1,848
TN (lb/d)	0.11	9.46	0.22	0.37	1.10	11.25
TP (lb/d)	0.01	0.56	0.02	0.05	0.61	1.26
Enterococcus (#/d)	4.22E+07	0.00E+00	0.00E+00	1.55E+06	0.00E+00	4.38E+07
Pipe Elm Branch						
Area (acres)	653	491	19	50	151	1,363
TN (lb/d)	28.96	3.56	0.14	0.13	0.44	33.24
TP (lb/d)	3.09	0.21	0.01	0.02	0.25	3.58
Enterococcus (#/d)	1.09E+10	0.00E+00	0.00E+00	5.34E+05	0.00E+00	1.09E+10
Morgan Branch						
Area (acres)	1,168	578	118	133	238	2,236
TN (lb/d)	31.09	2.52	0.84	0.20	0.42	35.08
TP (lb/d)	3.32	0.15	0.06	0.03	0.23	3.79
Enterococcus (#/d)	4.86E+09	0.00E+00	0.00E+00	3.55E+05	0.00E+00	4.86E+09

APPENDIX 4

LITTLE RIVER LSPC INPUTS

(ACCUMULATION RATES AND LIMITS)

TABLE A3

Little River Watershed LSPC Accumulation Rates (lb/acre/day) - Calibration Run

Pollutant	Agriculture	Forest	Pasture/ Rangeland	Urban Pervious	Urban Impervious	Wetlands	Other
BOD	5.0	2.5	3.5	15.0	0.2	2.5	5.0
Organic Nitrogen	2.00	1.00	1.40	6.00	0.08	1.00	2.00
Ammonia	0.750	0.045	0.150	0.100	0.015	0.045	0.100
Nitrite plus Nitrate	4.50	0.50	1.50	2.50	0.03	0.50	1.50
Organic Phosporus	0.400	0.200	0.280	1.200	0.016	0.200	0.400
Phosphate	0.0150	0.0075	0.0100	0.0250	0.0034	0.0070	0.0100
Enterococcus	0.00E+00	6.59E+07	0.00E+00	2.33E+08	2.33E+08	0.00E+00	0.00E+00

TABLE A4

Little River Watershed LSPC Accumulation Limits (lb/acre) - Calibration Run

Pollutant	Agriculture	Forest	Pasture/ Rangeland	Urban Pervious	Urban Impervious	Wetlands	Other
BOD	10.0	5.0	7.0	30.0	0.4	5.0	10.0
Organic Nitrogen	4.00	2.00	2.80	12.00	0.16	2.00	4.00
Ammonia	7.500	0.450	1.500	1.000	0.150	0.450	1.000
Nitrite plus Nitrate	45.00	5.00	15.00	25.00	0.30	5.00	15.00
Organic Phosporus	0.800	0.400	0.560	2.400	0.032	0.400	0.800
Phosphate	0.1500	0.0750	0.1000	0.2500	0.0160	0.0700	0.1000
Enterococcus	0.00E+00	1.19E+08	0.00E+00	4.19E+08	4.19E+08	0.00E+00	0.00E+00