

**Ohio EPA Response to Comments**  
**Draft Loading Analysis Plan – East Fork Little Miami River**  
**February 2021**

The Draft East Fork Little Miami River Loading Analysis Plan was made available for stakeholder review and comment from November 25, 2020 to December 28, 2020. The Agency received comments from Little Miami Conservancy (LMC), and Ohio Scenic Rivers Association (OSRA).

The comments are summarized and grouped into categories with the name of the commenter following the comment in parenthesis.

**Overall/General Comments**

**Comment 1:** The Little Miami Conservancy (LMC) appreciates the efforts of Ohio EPA, the Clermont County Commissioners, and others to address the health of the East Fork Watershed and its restoration to full attainment of EWH and WWH criteria for the health of aquatic life, and as a source of clean drinking water and public recreation. (LMC and OSRA)

Response 1: Thank you for your comment.

**Comment 2:** LMC appreciates the wide geographical/land use scope, efforts required for thoughtful science-based solutions, and range of resources that will be needed and employed to return the streams of the East Fork Watershed to full ecological health. (LMC and OSRA)

Response 2: Thank you for your comment.

**Comment 3:** Regarding the East Fork LAP report, and its guidance for future water quality- related efforts in the subject watershed, particularly as those efforts effect the reservoir, LMC would like to focus its comments here on the East Fork mainstem below the dam.

As a result of concerted state and local efforts the aquatic health of this 20-mile segment has seen noticeable improvement over the past 40 years. Fish and macroinvertebrate health metrics have shown a restoration to full or near-full criteria levels notwithstanding the fact that the sampling year of 2012 was a particularly dry year. In those segments of the lower mainstem that were found to be in partial attainment of EWH criteria, we understand that the 2014 Ohio EPA report did not come to a definitive conclusion as to the cause(s) of this impairment. LMC would suggest that this matter be revisited in hopes of leading to a strategy to return the lower East Fork to full attainment in every segment. (LMC and OSRA)

Response 3: The sites listed with unknown causes on the mainstem of the East Fork Little Miami River downstream of the dam will be revisited during the next biological and water quality survey of the watershed.

**Comment 4: Unfortunately, the high level of IBI and ICI metric restoration is not reflected in the health metric of mussel populations which have suffered very significantly. This is not unique to the East Fork as we have noted similar declines throughout the Little Miami Watershed and elsewhere in Ohio and nationally, with the documentation of this condition documented by three mussel inventories over the past 30 years by Dr. Michael Hoggarth, work which LMC has been pleased to help co-fund with the Ohio DNR.**

**The appropriate strategy for restoring a healthy mussel population remains under active discussion with extensive research into the cause(s) of this decline. LMC would offer that additional research, monitoring and discussion is warranted before significant public funds and/or changes in management are expended to implement measures to address this issue.**

**In the meantime, LMC supports continuing instream monitoring of mussel and other aquatic life, and suggests that all parties are appropriate and indeed willing participants in same. (LMC and OSRA)**

Response 4: Ohio EPA is aware of and concerned with declines in mussel populations in Ohio watersheds. Ohio EPA is part of a larger mussel work group that includes Ohio Department of Natural Resources and U.S. Fish and Wildlife Service. This group was originally formed for the Big Darby Creek Watershed but is being expanded to include the Little Miami River watershed as well.

**Comment 5: By way of an update, in 2019 LMC has rolled out a new continuous Dissolved Oxygen monitoring program on the Little Miami mainstem which collects DO levels every 15 minutes round the clock throughout the August thru November time period. Through the generosity of YSI Xylem, EXO 1 Sondes with ODO, conductivity and temperature sensors have been sited at 9 locations on the Little Miami mainstem ranging from Oldtown downstream to Terrace Park. We are hopeful that this data will be helpful in tracking these metrics and permit timely and sound data to serve as an important measure of current stream health and indeed an important measure of success. We are pleased to report that the preliminary results of this monitoring on the Little Miami mainstem reflects the success of the historic reduction in dissolved phosphorus levels which was, we believe the data shows, at the root of past instream aquatic life deterioration. (LMC and OSRA)**

Response 5: Thank you for this information. Michelle Waller with Ohio EPA Southwest District Office's Water Quality Group provided technical assistance in the planning effort for this project. If resources allow, Ohio EPA will continue to provide technical assistance.

Comment 6: **LMC would respectfully recommend that public agencies in the East Fork, either individually or through the East Fork Collaborative, implement a similar continuous DO monitoring program on the East Fork mainstem from the dam to the East Fork mouth at Milford. LMC would be pleased to assist. (LMC and OSRA)**

Response 6: A presentation on the continuous DO monitoring project at an East Fork Collaborative meeting may be a first step in expanding the DO monitoring. Chris Nietch with U.S. EPA's Office of Research and Development facilitates the meetings. He can be reached at (513) 569-7460 or [Nietch.Christopher@epa.gov](mailto:Nietch.Christopher@epa.gov).

**End of Response to Comments**