



**ROCKBRIDGE AREA CONSERVATION COUNCIL**

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January 21, 2015

Jon M. Capacasa, Director  
EPA, Water Protection Division  
Region III  
1600 Arch Street  
Philadelphia PA 19103-2029

RE: Goshen Dam, Rockbridge County VA

Dear Director Capacasa:

The Rockbridge Area Conservation Council (RACC) in Rockbridge County, VA requests your assistance. Our concern is impaired water quality in the Little Calfpasture River below Goshen (Hershey) Dam which impounds Lake Merriweather, a private recreational lake.

The Little Calfpasture River joins the Calfpasture River about a mile below the dam to form the Maury River, the source of our public water supply. All three rivers are in the Chesapeake Bay watershed.

The Goshen Dam is privately owned and operated by the National Capital Area Council of the Boy Scouts of America (BSA). In 2010, your division of EPA approved the Virginia Department of Water Quality's (DEQ) TMDL to address water quality issues originating at the Goshen Dam. We are including a copy of this decision for your reference.(1)

The TMDL is well researched and makes reasonable suggestions for improving water quality. It also supports previous Virginia Department of Water Quality and USACE orders to mitigate the discharge of sediment and oxygen deficient water. Even so, the actual solution for resolving the problem continues to be elusive. We assume you have a copy of the 2010 TMDL and that you have a basic understanding of the problem. However, since the situation has a long history and involves several agencies, we are enclosing a chronology. (2) If you have questions about any item, we'll be glad to furnish copies of the sources.

In summary, RACC would like would like EPA's help to:

- Protect our public drinking water intake on the Maury River and fully coordinate when changes in treatment may be required due to dam operations;
- Protect residents and anyone on the rivers downstream from Goshen Dam by having a reliable and effective warning system for significant discharges from the dam, and potential dam failure;

- Do what we can to help “Save the Bay” by cleaning up the Little Calfpasture and eliminating routine discharge of sediment and poor quality water from the Goshen Dam; and
- Protect Goshen Pass and the Maury River, including its recreational and wildlife management areas, from further degradation.

As you will see in the attached chronology, the problems associated with this facility have received the attentions of many state and federal agencies over the years; however, the fragmented nature of regulatory authorities has meant that no one entity has responsibility and expertise to address the full scope of the safety and water quality problems, so the issues continue to be addressed piecemeal over and over again – sometimes one undoing the progress of another.

We would like to ask that the EPA take an active role in helping to achieve permanent *comprehensive* solutions to the water quality problems that will protect the environment *and* public health and safety.

Sincerely,

Sandra W. Stuart, Co-Chairman  
RACC Watershed Committee

Barbara L. Walsh, Executive Director

4 enclosures, as referenced

cc: EPA: Jeff Corbin  
VA SNR: Russell Baxter  
DEQ, Tara Sieber  
DCR, Rob VanLier  
DGIF, Paul Bugas  
USACE, Jeanne Richardson  
JRA: Pat Calvert  
MSA: Jerry Higgins and Rick Allen  
Rockbridge County: Sam Crickenberger and Spencer Suter