



Friends of Sligo Creek  
P. O. Box 11572  
Takoma Park, MD 20913

January 27, 2025

Dear Director Monger, Director Conklin, Director Dise, Director Figueredo, and General Manager and CEO Powell,

***I am writing to deliver a tough message on behalf of Friends of Sligo Creek (FOSC), a nonprofit community organization dedicated to protecting, improving and appreciating Sligo Creek, the surrounding park and watershed.***

***Despite your great success in providing safe travel conditions throughout Montgomery County in bad weather and the various Salt-Wise campaigns, your salt management is failing in its critical mission of environmental stewardship. Our testing suggests that winter salt treatment in Montgomery County and Prince George's County is degrading the water quality of our freshwater streams:***

- **Chloride levels measured by our 27 member FOSC Salt Monitoring Team<sup>1</sup> throughout Sligo and Long Branch Creeks jumped sharply when the January 5-6, 2025 winter storm pretreatment began. Readings persisted at extremely toxic levels for over two weeks - well above the EPA criterion for acute toxicity (860 parts per million or ppm). As of this writing, most sites have remained above the EPA chronic toxicity criterion of 230 ppm, although chloride levels for some sites have increased sharply again, following treatment for the January 19-20 winter storm event. Shockingly, we are measuring toxic levels of chloride *everywhere* throughout Sligo Creek - not just at spots that drain major highways or salt-treated areas around the many WSSC water main breaks. Of particular note, chloride readings have exceeded the 6000 PPM high test strip maximum at the Wheaton Branch Storm Water Ponds, the Takoma Branch, Forest Glen, and Blueridge Avenue (headwaters) sites. Many other spots have been above 2,000 ppm for an extended period.**
- **Conductivity has also been extremely elevated.** Consistent with the chloride strip test results, conductivity (a widely accepted proxy for salinity) has also been dangerously elevated over an extended period, as measured by our all-season testers, independent researchers, and the USGS via its real-time Monitoring Station on Sligo Creek in Takoma Park. Overall, the creek waters chronically exceed the EPA's proposed criterion for conductivity.
- **Excessive salt has been reported throughout the watershed.** FOSC has received numerous reports of excessive salt applications on both public and private property.<sup>2</sup> We suspect this problem is grossly underreported. Photos of examples are attached. **It has become clear that many applying salt have been anything but "Salt-Wise", including contractors working for public or private entities.**
- **Problems did not just occur over the past few weeks.** We also found toxic chloride levels last winter. In fact, according to IWLA's Salt Watch [Report](#) for 2023-24, our area and nearby spots were among a handful of places in their national network with toxic test results on average. Moreover, chloride levels have been trending up in

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<sup>1</sup> For the 4<sup>th</sup> consecutive season, FOSC has created its own Salt Monitoring Team as part of the Izaak Walton League of America's (IWLA) Salt Watch program. DEP is partnering with IWLA in this program. FOSC has chosen to augment the IWLA Salt Watch Program by purchasing and using high range Hach Quantab strips (300 to 6000 ppm chloride) when the normal range strips distributed by IWLA (0 to 600 ppm chloride) have maxed out.

<sup>2</sup> We have encouraged people to request salt removal through the County's 311 system or the SHA. It is not clear if this approach is working. Some requests may have been misinterpreted as salt addition, not removal.

Sligo and Long Branch Creeks over the longer run, as evident in our monthly testing and other data. Last year, we [wrote](#) to DEP, MCDOT, Parks, MDE and SHA to urge improvement. The situation is even worse this year.

We are extremely worried about the acute and chronic effects of excessive chloride levels and the longer run rise in salinity on our macroinvertebrates, salamanders, various fish species and other creatures that are integral parts of a healthy stream. Mortality events are not uncommon under these circumstances, according to the literature. (In fact, we had a salamander and fish kill from road salt several years ago in one of our highest quality tributaries.) Signs of degradation from previous excessive salt treatment may already be evident. Sligo and Long Branch Creeks' benthic macroinvertebrate surveys have revealed poor biological health for at least 18 years with no sign of improvement. While other factors may well have been involved, excessive salt most certainly has played a big role.

**What can be done to address this salt challenge? Is the degradation of our freshwater streams the inevitable price of safety?**

**Going forward, we strongly encourage all of you to work even more closely together to address the situation, with urgency. We suggest the following:**

#### **Short Term Solutions**

- **Enhance Excessive Salt Removal Operations and Publicize Your Excessive Salt Removal Reporting System to the Public.** At the end of winter, release a record of requests and agency responses to the public. Include requests and responses by SHA.
- **Increase Contractor Oversight; Issue Fines and Citations.** Increase supervisory oversight of winter storm treatment through on-site assessment and the follow up of excessive salt reports made via the County's 311 system. Effective immediately, issue fines or citations for entities (including contractors) that apply excess salt, consistent with enforcement tools. Address excessive salt issues on commercial properties to the extent legally possible. Seek greater enforcement tools, as needed. As you all well know, **salt distributed unevenly and in clumps does not ensure safety.**
- **Working Closely with WSSC Water Now, Figure Out How Public Safety Can Be Protected** without hurting the environment and storm water drainage system in the event of a winter water main problem.<sup>3</sup>
- **Do Targeted Analysis Plus Public Reporting, Starting This Winter Season.** Our data points to a big problem, but the rising salinity situation is not well enough understood. To improve policy responses, **more targeted policy-based analysis is needed:**
  - (1) **Determine and rank the importance of: (a) sources of rising salt levels** (e.g., winter salt management for impervious surfaces, WSSC water main and sewage pipe breaks, natural sources); **(b) entities responsible for winter salt application** (government, commercial, other); and **(c) impervious surface sources of salt runoff** (multilane highways, numbered roadways, residential streets, parking lots, residential impervious surfaces, commercial sidewalks, etc.). Target new initiatives accordingly.
  - (2) **Provide an Annual Public Report** on your analysis and how you plan to address problems.

#### **Longer Term Solutions**

- **Dramatically Improve Contractor and Subcontractor Salt Training.** The County's "Smart Salt Applicator Training" has fallen short. In view of the problems we face, some sort of certification requirements may be necessary.

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<sup>3</sup> Many water main breaks and leaks drained into Sligo Creek in January. WSSC Water applied salt around these areas for safety. Salt surely drained into our Creek and elevated chloride levels. With our resources, however, we cannot analytically separate effects of water main breaks from other winter storm-based treatment. It is important to figure this out.

- **Alter Contractor and Supervisory Incentives.** Increase incentives to achieve more “Salt-Wise” applications by contractors. Also, offer positive incentives for private organizations that hire and supervise salt applicators to improve Salt-Wise performance metrics (HOA’s, property managers, including parking lots).
- **Change Formulations for Winter Storm Treatment Product Mix and Application** to reduce environmental damage, if safety can be maintained.
- **Adopt Alternative Treatments and Other Effective Best Practices.** Continue to explore whether alternative treatments are available, including the use of different products. Would any of the Best Practices described in the IWLA’s report last year (particularly for training and certification) improve the situation?  
<https://www.iwla.org/water/stream-monitoring/salt-watch/road-salt-best-practices>

**This is a wake-up call for all of us. We are coming to the conclusion that a dramatic change in salt treatment practices is necessary to save our streams, groundwater and soils. Change cannot be done by just one of your agencies. We strongly urge you to accelerate your cooperation not only within the County but also across County lines to address this tough challenge. We also want to help.**

Thank you for your consideration. We will be sending similar letters to your counterparts at Prince George’s County’s DoE, DPW&T, PG Parks; the City of Takoma Park’s DPW; and MDE and SHA.

Sincerely,

Elaine Lamirande, President  
 Friends of Sligo Creek  
[president@fosc.org](mailto:president@fosc.org)

To: Jon Monger, Director, DEP, Chris Conklin, Director, MCDOT, David Dise, Director, DGS, Montgomery County; Miti Figueredo, Director, Montgomery Parks; Kishia Powell, General Manager and CEO, WSSC Water  
 cc: Stan Edwards, Amy Stevens, Steve Martin, Ryan Zerbe, Jodi Rose, Steven Shofar, DEP; Richard Dorsey; Frank Kingsley, Jeffrey Knutsen, Daniel King, MCDOT; Gregory Boykan, DGS; Matt Harper, Andrew Frank, Montgomery Parks; Aklile Tesfaye, WSSC Water.

Attachments

## Attachments

### Attachment 1: Examples of Excessive Salt Applied to County-owned Parking Lot Dennis Health Center 2000 Dennis Avenue

Two Photos taken January 5, 2025

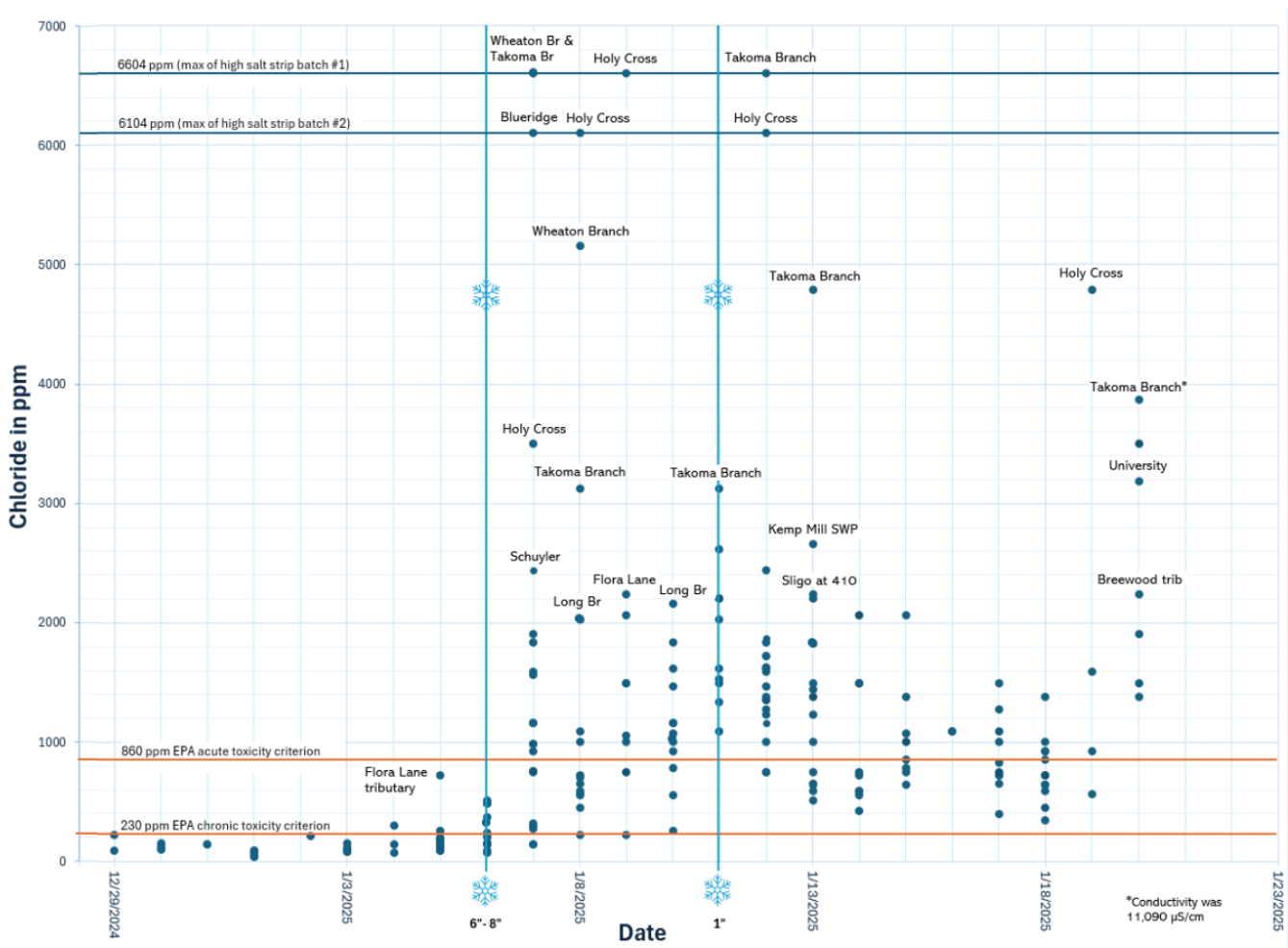


Three photos taken January 10, 2025



**SOURCE:** Photos taken and reported to FOSC by Maureen Mitchell, January 5 and January 10, 2025.

## Attachment 2: High Chloride Levels after Recent Snow Events in the Sligo Creek Watershed



Source: Data collected by the FOSSC Salt Monitoring Testing Team, part of the Izaak Walton League of America's Salt Watch program. Twenty-seven people test 30+ sites throughout Sligo Creek.