Texas Commission on Environmental Quality (TCEQ)

These comments address the Commission's Draft 2010 Texas Integrated Report for Clean Water Act Sections 305(b) and 303(d) List and were submitted during the comment period beginning February 5, and ending March 8, 2010.

Segment ID and Name:		Summary of Request or Comment:	Summary of Action or Explanation:
COMMENTOR: BRAZOS RIVER AUTHORITY			
1209	Navasota River Below Lake Limestone	Assessment units 1209_02-03, and 1209_05 are assigned to Category 5a. We are not aware of TMDL activities on this segment. If RUAAs are being conducted, we would assume 5b would be the appropriate category.	The category has been changed to 5b based on a RUAA project currently in progress.
1209C	Carters Creek (unclassified water body)	We believe the primary factor for impairment in this water body is point source discharge (PSD). If the order of sources listed has any significance, PSD should be first.	The order of sources does not have any significance.
1209E	Wickson Creek (unclassified water body)	This stream is listed as a Concern for dissolved oxygen. It is a small stream that generally only flows during rain events. We strongly question the appropriateness of using the presumed 5.0 mg/L criterion, especially when there is inadequate flow to buffer high temperatures experienced during summer and fall.	The portion described in Appendix D of the 2000 Water Quality Standards is upstream of the station with monitoring data used to develop the Integrated Report. EPA requires that a presumed High aquatic life use be assigned in absence of flow data.
1209E	Wickson Creek (unclassified water body)	This stream is a small prairie stream that has little to no flow for most of the year. Most of the water in the stream is from storm water runoff that is known to be high in bacteria. Due to these factors, bacteria and dissolved oxygen impairments will be common as low flows affect the capacity for the stream to buffer against high temperature conditions that create excessive algal growth and subsequent dissolved oxygen issues. A source of "Natural Conditions" should be added to the sources cited.	Natural Conditions have been verified and added to the sources for aquatic life and/or recreational use Concerns and/or impairments in Wickson Creek.

Segment ID and Name:		Summary of Request or Comment:	Summary of Action or Explanation:
COMMENTOR: BRAZOS RIVER AUTHORITY			
1209G	Cedar Creek (unclassified water body)	This stream is listed as a Concern for dissolved oxygen. It is a small stream that generally only flows during rain events. We strongly question the appropriateness of using the presumed 5.0 mg/L criterion, especially when there is inadequate flow to buffer high temperatures experienced during summer and fall.	The high aquatic life use presumption was based upon data from a flow survey submitted by BRA in 2001 that indicated perennial flow status. Sufficient additional flow data which indicates a different flow status can be submitted and considered for the 2012 Integrated Report.
1209G	Cedar Creek (unclassified water body)	This stream is a small prairie stream that has little to no flow for most of the year. Most of the water in the stream is from storm water runoff that is known to be high in bacteria. Due to these factors, bacteria and dissolved oxygen impairments will be common as low flows affect the capacity for the stream to buffer against high temperature conditions that create excessive algal growth and subsequent dissolved oxygen issues. A source of "Natural Conditions" should be added to the sources cited.	Natural Conditions was verified and added to the sources for aquatic life and/or recreational use Concerns and/or impairments in Cedar Creek.
1209H	Duck Creek (unclassified water body)	This stream is a small prairie stream that has little to no flow for most of the year. Most of the water in the stream is from storm water runoff that is known to be high in bacteria. Due to these factors, bacteria and dissolved oxygen impairments will be common as low flows affect the capacity for the stream to buffer against high temperature conditions that create excessive algal growth and subsequent dissolved oxygen issues. A source of "Natural Conditions" should be added to the sources cited.	Natural conditions have been verified and added to the sources for aquatic life and/or recreational use Concerns and/or impairments in Duck Creek.
1209H	Duck Creek (unclassified water body)	This stream is listed as a Concern for dissolved oxygen. It is a small stream that generally only flows during rain events. We strongly question the appropriateness of using the presumed 5.0 mg/L criterion, especially when there is inadequate flow to buffer high temperatures experienced during summer and fall.	The high aquatic life use presumption was based upon data from a flow survey submitted by BRA in 2001 that indicated perennial flow status. Sufficient additional flow data which indicates a different flow status can be submitted and considered for the 2012 Integrated Report.

Segment ID and Name:		Summary of Request or Comment:	Summary of Action or Explanation:
COMMENTOR: BRAZOS RIVER AUTHORITY			
1209J	Shepherd Creek (unclassified water body)	This stream is listed as a Concern for dissolved oxygen. It is a small stream that generally only flows during rain events. We strongly question the appropriateness of using the presumed 5.0 mg/L criterion, especially when there is inadequate flow to buffer high temperatures experienced during summer and fall.	The High aquatic life use was not used to assess this water body. A flow status of Intermittent was assigned based routine on flow data. An aquatic life use of Minimal was assigned based on the flow type, which is the lowest aquatic life use possible. In the absence of a UAA, flow type was used to determine the presumed aquatic life use. Additional data collection in the form of a UAA is needed to address changes to the criterion.
1209J	Shepherd Creek (unclassified water body)	This stream is a small prairie stream that has little to no flow for most of the year. Most of the water in the stream is from storm water runoff that is known to be high in bacteria. Due to these factors, bacteria and dissolved oxygen impairments will be common as low flows affect the capacity for the stream to buffer against high temperature conditions that create excessive algal growth and subsequent dissolved oxygen issues. A source of "Natural Conditions" should be added to the sources cited.	Natural Conditions have been verified and added to the sources for aquatic life and/or recreational use Concerns and/or impairments in Shepard Creek.
1209K	Steele Creek (unclassified water body)	This stream is a small prairie stream that has little to no flow for most of the year. Most of the water in the stream is from storm water runoff that is known to be high in bacteria. Due to these factors, bacteria and dissolved oxygen impairments will be common as low flows affect the capacity for the stream to buffer against high temperature conditions that create excessive algal growth and subsequent dissolved oxygen issues. A source of "Natural Conditions" should be added to the sources cited.	Natural Conditions have been verified and added to the sources for aquatic life and/or recreational use Concerns and/or impairments in Steele Creek.
1210A	Navasota River above Lake Mexia (unclassified water body)	This stream is a small prairie stream that has little to no flow for most of the year. Most of the water in the stream is from storm water runoff that is known to be high in bacteria. Due to these factors, bacteria and dissolved oxygen impairments will be common as low flows affect the capacity for the stream to buffer against high temperature conditions that create excessive algal growth and subsequent dissolved oxygen issues. A source of "Natural Conditions" should be added to the sources cited.	Natural Conditions have been verified and added to the sources for aquatic life and/or recreational use Concerns and/or impairments in the Navasota River above Lake Mexia.

Segment ID and Name:		Summary of Request or Comment:	Summary of Action or Explanation:
COMMENTOR:	**BRAZOS RIVER AUTHORITY**		
1211A	Davidson Creek (unclassified water body)	This stream is listed as a Concern for dissolved oxygen. It is a small stream that generally only flows during rain events. We strongly question the appropriateness of using the presumed 5.0 mg/L criterion, especially when there is inadequate flow to buffer high temperatures experienced during summer and fall.	A High aquatic life use was not used to assess this water body. This water body is assigned an Intermediate aquatic life use in Appendix D of the 2000 Water Quality Standards. A 4.0 mg/L criteria included in Appendix D was used in the assessment.
1211A	Davidson Creek (unclassified water body)	This stream is a small prairie stream that has little to no flow for most of the year. Most of the water in the stream is from storm water runoff that is known to be high in bacteria. Due to these factors, bacteria and dissolved oxygen impairments will be common as low flows affect the capacity for the stream to buffer against high temperature conditions that create excessive algal growth and subsequent dissolved oxygen issues. A source of "Natural Conditions" should be added to the sources cited.	Natural Conditions have been verified and added to the sources for aquatic life and/or recreational use Concerns and/or impairments in Davidson Creek.
1214	San Gabriel River	Assessment units 1214_01 is assigned to Category 5a. We are not aware of TMDL activities on this segment. If Recreational Use Attainability Analyses are being conducted, we would assume 5b would be the appropriate category.	No RUAA is currenlty planned for assessment unit 1214_01, thus category 5a is appropriate. The TCEQ considered conducting a RUAA on the San Gabriel River in 2009; however, during the project notification process, the Brazos River Authority indicated that an RUAA on the San Gabriel River was inappropriate since it was a high use primary contact recreation water body. As a result of this local information, a RUAA is not planned for this segment.
1214	San Gabriel River	We believe the source of the chloride impairments to be water softeners that the local wastewater treatment systems are unable to remove.	"Water Softeners" are not available as a choice to assign as a source. "Municipal Point Sources" had been chosen since this most closely reflects the source associated with water softeners.

Segment ID and Name:		Summary of Request or Comment:	Summary of Action or Explanation:
COMMENTOR: BRAZOS RIVER AUTHORITY			
1217	Lampasas River Above Stillhouse Hollow Lake	This stream is a small prairie stream that has little to no flow for most of the year. Most of the water in the stream is from storm water runoff that is known to be high in bacteria. Due to these factors, bacteria and dissolved oxygen impairments will be common as low flows affect the capacity for the stream to buffer against high temperature conditions that create excessive algal growth and subsequent dissolved oxygen issues. A source of "Natural Conditions" should be added to the sources cited.	Natural Conditions have been verified and added to the sources for aquatic life and/or recreational use Concerns and/or impairments in the Lampasas River Above Stillhouse Hollow Lake.
1217	Lampasas River Above Stillhouse Hollow Lake	Assessment unit 1217_04 has been incorrectly listed since 2002 because the data used represented only one year. Also, the site does not meet the requirements for site selection. We recommend removing the listing.	TCEQ concurs that these data are not temporally reprehensive and does not reflect the current assessment guidance. Segment 1217 will be removed from Category 5.
1217B	Sulphur Creek (unclassified water body)	1217B_02 is currently listed for dissolved oxygen and our records show no exceedances of the criteria for grab or 24-hour monitoring.	Special study data collected by the BRA support the non-support and Concern status for dissolved oxygen. dissolved oxygen data used in the assessment was provided. The TCEQ will work with the Brazos River authority to incorporate this data into the database.
1217D	North Rocky Creek (unclassified water body)	This stream is a small prairie stream that has little to no flow for most of the year. Most of the water in the stream is from storm water runoff that is known to be high in bacteria. Due to these factors, bacteria and dissolved oxygen impairments will be common as low flows affect the capacity for the stream to buffer against high temperature conditions that create excessive algal growth and subsequent dissolved oxygen issues. A source of "Natural Conditions" should be added to the sources cited.	Natural Conditions have been verified and added to the sources for aquatic life and/or recreational use Concerns and/or impairments in North Rocky Creek.
1221	Leon River Below Proctor Lake	We do not understand why there is a Concern for dissolved oxygen in 1221_01. Our data indicate one exceedance in seven years. Were data from the continuous monitoring site used. In 1221_07, there is a 4.5% exceedance rate. Please re-assess this assessment unit.	The carry forward Concern was removed. Continuous monitoring data was not considered in the assessment.

Segment ID and Name:		Summary of Request or Comment:	Summary of Action or Explanation:
COMMENTOR: BRAZOS RIVER AUTHORITY			
1221B	South Leon River (unclassified water body)	This stream is a small prairie stream that has little to no flow for most of the year. Most of the water in the stream is from storm water runoff that is known to be high in bacteria. Due to these factors, bacteria and dissolved oxygen impairments will be common as low flows affect the capacity for the stream to buffer against high temperature conditions that create excessive algal growth and subsequent dissolved oxygen issues. A source of "Natural Conditions" should be added to the sources cited.	Natural Conditions have been verified and added to the sources for aquatic life and/or recreational use Concerns and/or impairments in the South Leon River.
1221D	Indian Creek (unclassified water body)	This stream is listed as a Concern for dissolved oxygen. It is a small stream that generally only flows during rain events. We strongly question the appropriateness of using the presumed 5.0 mg/L criterion, especially when there is inadequate flow to buffer high temperatures experienced during summer and fall.	Routine flow severity data indicated that 1221D_01 (station 11818) is perennial in most years. The aquatic life use is presumed High based on this flow type. Additional data is needed to change the flow status of Indian Creek in future assessments. 1221D_02 is described in Appendix D of the 2000 Water Quality Standards as perennial, with an aquatic life use of Intermediate. In the absence of a UAA, the most recent designations in the Water quality Standards are used to determine aquatic life use for assessment. Additional data collection in the form of a UAA is needed to address changes to 1221D_02 aquatic life use criteria.
1221D	Indian Creek (unclassified water body)	This stream is a small prairie stream that has little to no flow for most of the year. Most of the water in the stream is from storm water runoff that is known to be high in bacteria. Due to these factors, bacteria and dissolved oxygen impairments will be common as low flows affect the capacity for the stream to buffer against high temperature conditions that create excessive algal growth and subsequent dissolved oxygen issues. A source of "Natural Conditions" should be added to the sources cited.	Natural Conditions have been verified and added to the sources for aquatic life and/or recreational use Concerns and/or impairments in Indian Creek.

Segment ID and Name:		Summary of Request or Comment:	Summary of Action or Explanation:
COMMENTOR: BRAZOS RIVER AUTHORITY			
1221F	Walnut Creek (unclassified water body)	This stream is a small prairie stream that has little to no flow for most of the year. Most of the water in the stream is from storm water runoff that is known to be high in bacteria. Due to these factors, bacteria and dissolved oxygen impairments will be common as low flows affect the capacity for the stream to buffer against high temperature conditions that create excessive algal growth and subsequent dissolved oxygen issues. A source of "Natural Conditions" should be added to the sources cited.	Natural Conditions have been verified and added to the sources for aquatic life and/or recreational use Concerns and/or impairments in Walnut Creek.
1222A	Duncan Creek (unclassified water body)	This stream is a small prairie stream that has little to no flow for most of the year. Most of the water in the stream is from storm water runoff that is known to be high in bacteria. Due to these factors, bacteria and dissolved oxygen impairments will be common as low flows affect the capacity for the stream to buffer against high temperature conditions that create excessive algal growth and subsequent dissolved oxygen issues. A source of "Natural Conditions" should be added to the sources cited.	Natural Conditions have been verified and added to the sources for aquatic life and/or recreational use Concerns and/or impairments in Duncan Creek.
1223	Leon River Below Leon Reservoir	This stream is a small prairie stream that has little to no flow for most of the year. Most of the water in the stream is from storm water runoff that is known to be high in bacteria. Due to these factors, bacteria and dissolved oxygen impairments will be common as low flows affect the capacity for the stream to buffer against high temperature conditions that create excessive algal growth and subsequent dissolved oxygen issues. A source of "Natural Conditions" should be added to the sources cited.	Natural Conditions have been verified and added to the sources for aquatic life and/or recreational use Concerns and/or impairments in the Leon River Below Leon Reservoir.
1223	Leon River Below Leon Reservoir	This stream is listed as a Concern for dissolved oxygen. It is a small stream that generally only flows during rain events. We strongly question the appropriateness of using the presumed 5.0 mg/L criterion, especially when there is inadequate flow to buffer high temperatures experienced during summer and fall.	A High aquatic life use is designeated in Appendix A of the 2000 Water Quality Standards. Additional data collection in the form of a UAA is needed to adjust the criteria for future assessments.

Segment ID and Name:		Summary of Request or Comment:	Summary of Action or Explanation:
COMMENTOR:	**BRAZOS RIVER AUTHORITY**		
1223A	Armstrong Creek (unclassified water body)	This stream is a small prairie stream that has little to no flow for most of the year. Most of the water in the stream is from storm water runoff that is known to be high in bacteria. Due to these factors, bacteria and dissolved oxygen impairments will be common as low flows affect the capacity for the stream to buffer against high temperature conditions that create excessive algal growth and subsequent dissolved oxygen issues. A source of "Natural Conditions" should be added to the sources cited.	Natural Conditions have been verified and added to the sources for aquatic life and/or recreational use Concerns and/or impairments in Armstrong Creek.
1229A	Squaw Creek Reservoir (unclassified water body)	There are Concerns for Total and Ortho Phosphorus on this segment that are unjustified. We have only six in the past seven years with no exceedances.	The 10-year period of record was included to increase sample size and confidence in assessment results. For OP, there were 8 of 10 exceedances and for TP, there were 11 of 11 exceedances.
1241	Double Mountain Fork Brazos River	1241_01-02 are listed for TDS. We have no data indicating there are exceedances of the criteria and no data for 1241_02.	TDS data used in the assessment is provided in the draft reports. These data indicate exceedances of the criteria.
1241A	North Fork Double Mountain Fork Brazos River (unclassified water body)	We believe the primary factor for impairment in this water body is point source discharge (PSD). If the order of sources listed has any significance, PSD should be first.	The order of sources does not have any significance.
1241C	Buffalo Springs Lake (unclassified water body)	We believe the primary factor for impairment in this water body is point source discharge (PSD). If the order of sources listed has any significance, PSD should be first.	The order of sources does not have any significance.
1242B	Cottonwood Branch (unclassified water body)	We believe the primary factor for impairment in this water body is point source discharge (PSD). If the order of sources listed has any significance, PSD should be first.	The order of sources does not have any significance.
1242C	Still Creek (unclassified water body)	We believe the primary factor for impairment in this water body is point source discharge (PSD). If the order of sources listed has any significance, PSD should be first.	The order of sources does not have any significance.

Segment ID and Name:		Summary of Request or Comment:	Summary of Action or Explanation:
COMMENTOR: BRAZOS RIVER AUTHORITY			
1242D	Thompsons Creek (unclassified water body)	This stream is a small prairie stream that has little to no flow for most of the year. Most of the water in the stream is from storm water runoff that is known to be high in bacteria. Due to these factors, bacteria and dissolved oxygen impairments will be common as low flows affect the capacity for the stream to buffer against high temperature conditions that create excessive algal growth and subsequent dissolved oxygen issues. A source of "Natural Conditions" should be added to the sources cited.	Natural Conditions have been verified and added to the sources for aquatic life and/or recreational use Concerns and/or impairments in Thompsons Creek.
1242D	Thompsons Creek (unclassified water body)	We believe the primary factor for impairment in this water body is point source discharge (PSD). If the order of sources listed has any significance, PSD should be first.	The order of sources does not have any significance.
1244	Brushy Creek	1244_03-04 are listed for bacteria. These assessment units are heavily influenced by wastewater discharges. Using the same criteria for this stream as for those not impacted by wastewater limits the streams ability to absorb additional loading from other urban and rural sources.	Recreational use criteria are applied regardless of the sources or causes of impairment. The intent of the TCEQ Water Quality Management Program is to protect instream water quality through the implementation of the Texas Surface Water Quality Standards.
1244	Brushy Creek	Assessment units 1244_03-04 are assigned to Category 5a. We are not aware of TMDL activities on this segment. If RUAAs are being conducted, we would assume 5b would be the appropriate category.	The category has been changed to 5b based on a RUAA project currently in progress.
1244	Brushy Creek	This is an effluent dominated stream and thus has nutrient Concerns.	Point Sources have been added as potential sources of pollution for the nutrient concern in Brushy Creek.
1244D	South Brushy Creek (unclassified water body)	This is an effluent dominant stream and thus has nutrient Concerns.	Point Sources have been added as potential sources of pollution for the nutrient concern on South Brushy Creek.

Segment ID and Name:		Summary of Request or Comment:	Summary of Action or Explanation:
COMMENTOR: BRAZOS RIVER AUTHORITY			
1250	South Fork San Gabriel River	This stream is a small prairie stream that has little to no flow for most of the year. Most of the water in the stream is from storm water runoff that is known to be high in bacteria. Due to these factors, bacteria and dissolved oxygen impairments will be common as low flows affect the capacity for the stream to buffer against high temperature conditions that create excessive algal growth and subsequent dissolved oxygen issues. A source of "Natural Conditions" should be added to the sources cited.	Natural Conditions have been verified and added to the sources for aquatic life and/or recreational use Concerns and/or impairments in the South Fork San Gabriel River.
1250	South Fork San Gabriel River	This stream is listed as a Concern for dissolved oxygen. It is a small stream that generally only flows during rain events. We strongly question the appropriateness of using the presumed 5.0 mg/L criterion, especially when there is inadequate flow to buffer high temperatures experienced during summer and fall.	A High aquatic life use is designeated in Appendix A of the 2000 Water Quality Standards. Additional data collection in the form of a UAA is needed to adjust the criteria for future assessments.
1253	Navasota River Below Lake Mexia	This stream is a small prairie stream that has little to no flow for most of the year. Most of the water in the stream is from storm water runoff that is known to be high in bacteria. Due to these factors, bacteria and dissolved oxygen impairments will be common as low flows affect the capacity for the stream to buffer against high temperature conditions that create excessive algal growth and subsequent dissolved oxygen issues. A source of "Natural Conditions" should be added to the sources cited.	Natural Conditions have been verified and added to the sources for aquatic life and/or recreational use Concerns and/or impairments in the Navasota River Below Lake Mexia.
1253	Navasota River Below Lake Mexia	This stream is listed as a Concern for dissolved oxygen. It is a small stream that generally only flows during rain events. We strongly question the appropriateness of using the presumed 5.0 mg/L criterion, especially when there is inadequate flow to buffer high temperatures experienced during summer and fall.	A High aquatic life use is designeated in Appendix A of the 2000 Water Quality Standards. Additional data collection in the form of a UAA id needed to adjust the criteria for future assessments.

Segment ID and Name:	Summary of Request or Comment:	Summary of Action or Explanation:
COMMENTOR: CENTER FOR BIOLOGICAL DIVERSITY		
General	Texas has an obligation to list its ocean waters as impaired under section 303(d) of the Clean Water Act. The scientific evidence summarized here and enclosed with this letter documents that the addition of carbon dioxide to our coastal waters from human sources is significantly changing ocean chemistry and harming marine life. Ocean acidification is a threat to seawater quality, and the Clean Water Act requires the state to list waters and create a TMDL.	The TCEQ currently evaluates data to assess general uses for the Gulf of Mexico (Segment 2501) using ambient data collected throughout the period of record. The results from the Draft 2010 Integrated Report include no exceedances of the low pH criteria designated for the Gulf of Mexico which would represent increased acidity. The TCEQ will continue to monitor pH in this segment and evaluate attainment of general uses in future assessments.

Segment ID and Name:		Summary of Request or Comment:	Summary of Action or Explanation:
COMMENTOR: INTERNATIONAL BOUNDARY & WATER COMMISSION			
2302	Rio Grande Below Falcon Reservoir	2302_04 has a new bacteria impairment not included in the 2006 or 2008 but states the year first listed to be 1996 instead of 2010. The water body should be added to the "Water Bodies and Impairments Added to the Texas 303(d) List".	Impairments are stored and reported on the segment level versus the assessment unit level. An assessment unit within this segment was identified as a new impairment on the 303(d) List in 1996. As a result, the addition of assessment units within the same segment for the same impairment in subsequent years is not considered new and should not be included on the "Water Bodies and Impairments Added to the Texas 303(d) List".
2302	Rio Grande Below Falcon Reservoir	2302_07 carry forward Concern is incorrect. There is no Concern for dissolved oxygen.	The Concern for dissolved oxygen for Rio Grande Below Falcon Reservoir has been removed.
2304	Rio Grande Below Amistad Reservoir	2304_07 has a new bacteria impairment not included in the 2006 or 2008 but states the year first listed to be 1996 instead of 2010. The water body should be added to the "Water Bodies and Impairments Added to the Texas 303(d) List.	Impairments are stored and reported on the segment level versus the assessment unit level. An assessment unit within this segment was identified as a new impairment on the 303(d) List in 1996. As a result, the addition of assessment units within the same segment for the same impairment in subsequent years is not considered new and should not be included on the "Water Bodies and Impairments Added to the Texas 303(d) List".
2304B	Manadas Creek (unclassified water body)	Bacteria is listed twice as a Concern for 2304B.	The duplicate bacteria Concern on Manadas Creek has been removed.
2306	Rio Grande Above Amistad Reservoir	In assessment units 2306_01-06 of the segment, the source is listed as NPS Irrigated Crop Production. This should be removed as there is little agriculture near this stretch of the river. NPS Irrigated Crop Production should be added to 2306_07-08. IBWC also recommends adding NPS Urban Runoff/Storm Sewers to 2306_08 for bacteria. No sources are listed for TDS, chloride, and sulfate for 2306_08. We recommend adding the following: "NPS Irrigated Crop Production, Non-Point Source, and NPS Sources Outside State Jurisdiction.	The sources for the TDS, chloride, and sulfate impairments in Segment 2306 have been changed.

Segment ID and Name:		Summary of Request or Comment:	Summary of Action or Explanation:
COMMENTOR: INTERNATIONAL BOUNDARY & WATER COMMISSION			
General		Concerns are organized by assessment unit but other documents organize impairments by parameter. In future assessments, please consider a consistent organization to avoid confusion. Also consider combining the Index with the 303(d) List to avoid redundancy.	TCEQ staff revised the Concerns document. The Index combines all impairments in categories 4 and 5. The 303(d) List is a reporting element of the Integrated Report required by the EPA and must include only category 5 impairments.
General		Jurisdiction is misspelled in the Sources document.	The mispelling has been corrected.
General		The IBWC wishes to acknowledge that suggested corrections due to the "flipping" have been incorporated in the Draft released for public comment.	Comment noted.
General		The IBWC wishes to submit public comment to the fact that the TCEQ "flipped" some of the assessment units from upstream-downstream to downstream-upstream. The IBWC agrees with making the naming convention consistent but would like to advise stakeholders to the change.	Comment noted
COMMENTOR: LAMPASSAS RIVER WATERSHED PARTNERSHIP			
1217	Lampasas River Above Stillhouse Hollow Lake	The assessment guidance states that data may be used for a 10 year rather than 7 year period if needed to ensure minimum sample size requirements but also states at least half of the data must be from the most recent 7 year period and from at least 2 years of sampling. Segment 1217 data do not meet the guidance requirements. The LRWP requests segment 1217 be removed from the 2010 Draft 303(d) List based on non-representative data.	TCEQ concurs that these data are not temporally representative and does not reflect the current assessment guidance. Segment 1217 will be removed from the 303(d) List.

Segment ID and Name:		Summary of Request or Comment:	Summary of Action or Explanation:
COMMENTOR:	**LAVACA-NAVIDAD RIVER AUTHORITY**		
1602	Lavaca River Above Tidal	Segment 1602_02 was listed for 24 hour dissolved oxygen as a carry forward in the draft publication. This was an error because it wasn't listed previously for depressed dissolved oxygen and there are no 24 hour dissolved oxygen samples in the data set in the current assessment period of record, or previously. Current grab dissolved oxygen data indicate no dissolved oxygen issues in this assessment unit.	Segment 1602_02 was listed for 24 hour dissolved oxygen as a carry forward erroneously. There are no 24 hour dissolved oxygen samples in 1602_02 in the 2010 period or record and all grab dissolved oxygen data indicate fully supporting/no Concern status. Water body 1602_02 has been removed from the 303(d) List for dissolved oxygen.
COMMENTOR:	**LOWER COLORADO RIVER AUTHORITY**		
1401	Colorado River Tidal	The LCRA recommends changing the category to 5c from 5a as there are no TMDLs currently planned.	The 1401_01 bacteria impairment has been changed from 5a to 5c.
1404	Lake Travis	Four assessment units were identified as Concerns for dissolved oxygen. LCRA recommends the TCEQ consider lake turnover and how that may affect stratification when assessing the dissolved oxygen.	Natural conditions have been verified as the source for low dissolved oxygen.
1412B	Beals Creek (unclassified water body)	Beals Creek is listed with eight samples for Selenium and placed in Category 4c. LCRA recommends Category 5c until such time potential sources are identified. This will ensure sufficient routine samples to accurately assess the segment.	The Category will be changed to 5c.
1501	Tres Palacios Creek Tidal	The LCRA recommends changing the category to 5c instead of 5a as there are no TMDLs currently planned.	The 1501_01 bacteria impairment has been changed from 5a to 5c.
COMMENTOR:	**SABINE RIVER AUTHORITY**		
General		The Sabine River Authority welcomes the opportunity to provide comment on the Draft IR and commends the efforts of the agency in assessing water quality in the State of Texas.	Comment noted

Segment ID and Name:		Summary of Request or Comment:	Summary of Action or Explanation:
COMMENTOR: SAN JACINTO RIVER AUTHORITY			
1008B	Upper Panther Branch (unclassified water body)	SJRA requests TCEQ remove the copper impairment from the 303(d) List due to an EPA approved water effects ratio (WER) included in the SJRA WWTP permit (2003). Applying the WER to the existing instream data shows it to be fully supporting.	Copper was reassessed using a WER approved by EPA for the SJRA permit. The data qualifier and use support were changed to reflect fully supporting and this impairment has been removed from the 303(d) List.
COMMENTOR: SIERRA CLUB			
1004	West Fork San Jacinto River	The Houston Regional Group of the Sierra Club would like to request the water quality standards group partition the West Fork of the San Jacinto River to create a new segment between the north end of Lake Conroe to FM1791. This is primarily a natural area.	The TCEQ will consider this request in the 2013 revisions of the water quality standards.
1006	Houston Ship Channel Tidal	The Houston Regional Group of the Sierra Club would like to request the water quality standards group partition Greens Bayou to create a new segment between the Houston Ship Channel confluence and the Halls Bayou confluence. This is primarily a natural area.	The TCEQ will consider this request in the 2013 revisions of the water quality standards.

Segment ID and Name:		Summary of Request or Comment:	Summary of Action or Explanation:
COMMENTOR:	**TEXAS PARKS & WILDLIFE DEPARTMENT**		
1209H	Duck Creek (unclassified water body)	TPWD submitted water quality and biological data to the TCEQ in 2007 and 2008. Data are now in SWQMIS. Why is the data not included in the assessment?	All water quality data data submitted by TPWD for Duck Creek will be included in the final Integrated Report. In addition, TPWD biological data for Duck Creek were manually assessed and are the results will be included in the final draft of the Integrated Report.
1209P	Clear Creek (unclassified water body)	TPWD submitted water quality and biological data to the TCEQ in 2007 and 2008. Data are now in SWQMIS. Why is the data not included in the assessment?	All water quality data data submitted by TPWD for Clear Creek will be included in the final Integrated Report. In addition, TPWD biological data for Clear Creek were manually assessed and are the results will be included in the final draft of the Integrated Report.
1213B	Little Elm Creek (unclassified water body)	Why is Little Elm Creek assessed using Limited aquatic life use criteria?	All water quality data data submitted by TPWD for Little Elm Creek will be included in the final Integrated Report. In addition, TPWD biological data for Little Elm Creek were manually assessed and are the results will be included in the final draft of the Integrated Report.
1213C	Unnamed trib of Little Elm Creek (unclassified water body)	TPWD submitted water quality and biological data to the TCEQ in 2007 and 2008. Data are now in SWQMIS. Why is the data not included in the assessment?	All water quality data data submitted by TPWD for the unnamed tributary of Little Elm Creek will be included in the final Integrated Report. In addition, TPWD biological data for the unnamed tributary of Little Elm Creek were manually assessed and are the results will be included in the final draft of the Integrated Report.
1242O	Walnut Creek (unclassified water body)	TPWD submitted water quality and biological data to the TCEQ in 2007 and 2008. Data are now in SWQMIS. Why is the data not included in the assessment?	All water quality data data submitted by TPWD for Walnut Creek will be included in the final Integrated Report. In addition, TPWD biological data for unnamed tributary of Walnut Creek were manually assessed and are the results will be included in the final draft of the Integrated Report.
1247A	Willis Creek (unclassified water body)	TPWD submitted water quality and biological data to the TCEQ in 2007 and 2008. Data are now in SWQMIS. Why is the data not included in the assessment?	All water quality data data submitted by TPWD for Willis Creek will be included in the final Integrated Report. In addition, TPWD biological data for unnamed tributary of Willis Creek were manually assessed and are the results will be included in the final draft of the Integrated Report.

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0207A	Buck Creek (unclassified water body)	TSSWCB supports the delisting and considers this a restoration success story in collaboration with the TCEQ and EPA.	Comment noted.
0404O	Dragoo Creek (unclassified water body)	The data used for listing these segments may not meet temporal requirements. These water bodies will undergo RUAAs and therefore should be in Category 5b.	Though the samples were collected over two different years, they were collected in 12 consecutive months which represents only one year. The listing was removed from the 303(d) List because temporal requirements stated in the guidance were not met.
0404P	Unnamed Tributary to Tankersley Creek (unclassified water body)	The data used for listing these segments may not meet temporal requirements. These water bodies will undergo RUAAs and therefore should be in Category 5b.	Though the samples were collected over two different years, they were collected in 12 consecutive months which represents only one year. The listing was removed from the 303(d) List because temporal requirements stated in the guidance were not met.
0404Q	Unnamed Tributary to Tankersley Creek (unclassified water body)	The data used for listing these segments may not meet temporal requirements. These water bodies will undergo RUAAs and therefore should be in Category 5b.	Though the samples were collected over two different years, they were collected in 12 consecutive months which represents only one year. The listing was removed from the 303(d) List because temporal requirements stated in the guidance were not met.
0404R	Unnamed Tributary to Dragoo Creek (unclassified water body)	The data used for listing these segments may not meet temporal requirements. These water bodies will undergo RUAAs and therefore should be in Category 5b.	Though the samples were collected over two different years, they were collected in 12 consecutive months which represents only one year. The listing was removed from the 303(d) List because temporal requirements stated in the guidance were not met.
0603A	Sandy Creek in Jasper County (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
0604A	Cedar Creek (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.

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0608A	Beech Creek (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
0608B	Big Sandy Creek (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
0608C	Cypress Creek (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
0611A	East Fork Angelina River (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
0615A	Paper Mill Creek (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
0806E	Sycamore Creek (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
0810	West Fork Trinity River Below Bridgeport Reservoir	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
0810A	Big Sandy Creek (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
0810B	Garrett Creek (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
0810C	Martin Branch (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.

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0810D	Salt Creek (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
0822A	Cottonwood Branch (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
0822B	Grapevine Creek (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
0841E	Copart Branch Mountain Creek (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
0841F	Cottonwood Creek (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
0841G	Dalworth Creek (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
0841H	Delaware Creek (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
0841J	Estelle Creek (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
0841K	Fish Creek (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.

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0841N	Kirby Creek (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
0841U	West Irving Creek (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
1101	Clear Creek Tidal	Due to the assessment unit changes, it is unclear which assessment units are in Category 4a. The TMDL appears to apply to only three assessment units.	During the public comment period the assessment units were changed back to the 2008 descriptions and order. Category 4a now applies to all four assessment units.
1104	Dickinson Bayou Above Tidal	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
1113A	Armand Bayou Above Tidal (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
1209	Navasota River Below Lake Limestone	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
1217	Lampasas River Above Stillhouse Hollow Lake	The assessment guidance states that fecal coliform will be used to determine support if there is no other data. For segment 1217, the data are beyond the 7 year period of record and should be delisted.	TCEQ concurs that these data are not temporally representative. Segment 1217 will be removed from Category 5.
1218	Nolan Creek/ South Nolan Creek	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
1221	Leon River Below Proctor Lake	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.

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1221C	Pecan Creek (unclassified water body)	TSSWCB supports the delisting and considers this a restoration success story in collaboration with the TCEQ and EPA.	Comment noted.
1232A	California Creek (unclassified water body)	This appears to be a new bacteria listing for single sample only and should not be listed due to the decision not to list because of the concurrent standards revisions. Please clarify the listing.	The non-support has been corrected and the impairment removed from the 303(d) list.
1242F	Pond Creek (unclassified water body)	This appears to be a new bacteria listing for single sample only and should not be listed due to the decision not to list because of the concurrent standards revisions. Please clarify the listing.	This impairment has been changed.
1244	Brushy Creek	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
1803B	Sandies Creek (unclassified water body)	For this and similar cases where the bacteria geomean was between 126 and 206 cfu/100mL, it is recommended they are placed in 5b.	A recreational use attainability analysis project is not currently scheduled for Sandies Creek (1803B), thus the water body is to remain in category 5c.
1810	Plum Creek	1810_02 was first impaired in 2010, not 2004.	Impairments are stored and reported on the segment level versus the assessment unit level. This will be clarified on the final draft of the Integrated Report.
1810	Plum Creek	The TSSWCB supports the Plum Creek Category 4b revision. This is a good test case to support Watershed Protection Plans in lieu of TMDLs.	Comment noted.
1902	Lower Cibolo Creek	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
2004A	Aransas Creek (unclassified water body)	Our understanding from TCEQ staff is that a recreational use attainability analysis project will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.

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2202	Arroyo Colorado Above Tidal	Our understanding from TCEQ staff is that an recreational use attainability analysis will be conducted on this water body. This should be moved to Category 5b.	The category was changed to 5b based on a recreational use attainability analysis project.
2202B	Unnamed Drainage Ditch Tributary (B) to S. Arroyo Colorado (unclassified water body)	Our understanding from TCEQ staff is that an RUAA will be conducted on this water body. This should be moved to Category 5b.	The Unnamed Drainage Ditch Tributary (B) to South Arroyo Colorado (2202B) is an existing impairment for which a recreational use attainability analysis is yet to be scheduled and thus the water body is to remain in category 5c.
General		TSSWCB supports the use of Enterococcus as the applicable indicator for high saline inland waters but the proposed standards define these with conductivity values ≥ 9000 µΩ. The guidance considers waters to be tidally influenced at specific conductance > 3077 µS, and inland waters > 10,000 µS too saline for the use of E. coli as an indicator. TCEQ should explain the disparity between the values and establish consistency for high saline waters.	The TCEQ will propose revised guidance to the advisory workgroup as part of the development of the 2012 Integrated Report.
General		TSSWCB seeks input on the development of the TMDL schedule as joint administrators of the Nonpoint Source Management Program.	The final draft schedule will be compiled based upon the input from both agencies prior to release to EPA.

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COMMENTOR: TEXAS STATE SOIL AND WATER CONSERVATION BOARD		
General	TSSWCB contends that the minimum of 10 samples is insufficient. The guidance establishes an expectation that monthly or quarterly sampling is conducted. Over the period of record 28 to 84 samples would be collected. Ten samples over a seven year period is not temporally representative. This is especially disconcerting with respect to bacteria. TCEQ uses Category 5c for water bodies with uncertain status where the minimum dataset requirement was met but there is doubt that the existing data accurately characterize the stream. The harm impairing a water body on a limited dataset where indicating that more data are needed to "verify" the impairment is that the 13-year timeframe for addressing impairments begins with the listing. The dynamic nature of bacteria in the water column confounds the ability of low frequency monitoring to characterize conditions. The TCEQ/TSSWCB joint Task Force on Bacteria TMDLs recommend biweekly or monthly data over a two-year period providing 24 data points at a minimum for developing load duration curves for TMDLs. The minimum, especially for bacteria, should be set at a monthly frequency over the period of record with a 90% completeness goal that would translate to a minimum of 25 data points. This should include high flow and low flow exclusions.	The minimum sample recommendations included in the draft 2010 assessment guidance represent values that have been proposed and considered by a diverse stakeholder group as part of the process for developing the Integrated Report. Changes to the existing guidance can be facilitated through this group during the development of the 2012 Integrated Report. This will provide a means to include input from all stakeholders and develop recommendations that consider all possible options.
General	The URL on page 3-48 of the guidance should be changed to http://www.dshs.state.tx.us/seafood/classification.shtm#maps.	The guidance has been changed to reflect this correction.
General	The issues with bacteria impairments are related to the designation of appropriate recreation use and associated criteria. The number of impaired waters compared to the low incidence of reported illness resulting from ingestion of water clearly indicates something is askew with the current water quality standards. TSSWCB strongly supports use of only the geometric mean for standards attainment and supports the use of single samples for beach monitoring and permitting. We also support the decision to not list new bacteria impairments between 126 and 206 cfu/100mL and single sample exceedances on the 303(d) List due to the concurrent revisions of the standards.	Comment noted.

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COMMENTOR: TEXAS STATE SOIL AND WATER CONSERVATION BOARD		
General	The IR was formerly known as the Texas Water Quality Inventory and 303(d) List. We suggest doing something to reduce the confusion regarding the new name.	The TCEQ's assessment of ambient water quality data required by the Clean Water Act is currently referred to as the Draft 2010 Texas Integrated Report for Clean Water Act Sections 305(b) and 303(d). The report represents a compendium of several draft documents (including the list of impaired waters or 303(d) List) that are submitted to the EPA every two years. EPA provides guidance for this submission and refers to this document as the Integrated Report. Previous water quality assessments are still referred to as the Texas Water Quality Inventory and 303(d) List.
General	The guidance section describing Category 4b should be strengthened to include a description and reference to the EPA Region 6 Process for Review of Watershed-Based Plans in Lieu of TMDLs.	The TCEQ will address this as part of the development of the guidance for the 2012 Integrated Report and include this as an item for consideration by the guidance advisory workgroup.
General	Page 3-26 of the guidance defines the assessment as "two to five years". It should state seven years.	The guidance has been changed.