Texas Commission on Environmental Quality (TCEQ)

These comments address the TCEQ's Draft 2012 Texas Integrated Report for Clean Water Act Sections 305(b) and 303(d) List and were submitted during the comment period beginning October 19, and ending November 19, 2012.

COMMENTOR: City of Arlington

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
0828A	*Village Creek (unclassified water body)*	The City of Arlington stated that Village Creek (0828A) was improperly listed as impaired for bacteria based on the following: - A minimum of 20 bacteria samples over the period of record was not temporally representative of water quality conditions in Village Creek. For the 2012 assessment, only twenty four samples taken at approximate quarterly intervals were considered for Village Creek. This was too few samples to accurately describe the water quality conditions in terms of bacteria for Village Creek. - Only one sampling site for the segment of Village Creek from Johnson County to Lake Arlington was considered in this assessment. There was a question as to whether this sampling site accurately represented the water quality over the seventeen miles of the creek. - Of the twenty four sampling points included in the dataset over the period of record, the four highest values were taken within a 48 hour period following a rain event in the Lake Arlington area. If these four data points were excluded, the geometric mean for bacteria would not exceed the surface water quality standards.	The number and spatial distribution of E. coli samples from Village Creek met the guidelines when it was first identified as impaired in the 2010 IR. Twenty seven samples were assessed in 2010 which exceeded the minimum of 10 samples. The Guidance for Assessing and Reporting Surface Water Quality in Texas states that a station can be located at the lower end of an assessment unit characterizing 25 miles upstream of that point. The monitoring station at the lower end of Segment 0828A met these requirements. Also, a review of the Coordinated Monitoring Schedule indicated that additional data will be available from station 10786 (further upstream in the watershed). A preliminary review of these data indicated that bacteria levels exceeded criteria at this station as well. E. coli data from station 10780 was collected as part of routine monitoring events. This type of data met current guidelines which does not exclude samples taken within a 48 hour period following a rain event. The TCEQ will reassess this segment in 2014 to include data from station 10786 and other information as available. No changes were made to the assessment outcome for Segment 828A based on this comment.

COMMENTOR: City of Austin

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
1403J	*Spicewood Tributary to Shoal Creek (unclassified water body)*	The City of Austin commented that since the TCEQ has initiated a bacteria Total Maximum Daily Load (TMDL) for Spicewood Tributary to Shoal Creek (1403J) the status of the bacteria impairments for these watersheds should be changed to category 5a.	The category for Spicewood Tributary to Shoal Creek (1403J) has been changed to 5a in the Draft 2012 IR due to the development of the TMDL for bacteria.
1403K	*Taylor Slough South (unclassified water body)*	The City of Austin commented as to why Taylor Slough South (1403K) was included as a delisting although the assessment identified it as a concern.	The integrated level of support for bacteria in assessment unit 1403K_01 was inadvertently changed from non-support to a concern. This will be changed to non-support and removed from the delisting report in the draft 2012 IR.
1403K	*Taylor Slough South (unclassified water body)*	The City of Austin commented that since the TCEQ has initiated a bacteria Total Maximum Daily Load (TMDL) for Taylor Slough South (1403K) the status of the bacteria impairments for these watersheds should be changed to category 5a.	The category for Taylor Slough South (1403K) has been changed to 5a in the Draft 2012 IR due to the development of the TMDL for bacteria.
1428B	*Walnut Creek (unclassified water body)*	The City of Austin commented that since the TCEQ has initiated a bacteria Total Maximum Daily Load (TMDL) for Walnut Creek (1428B) the status of the bacteria impairments for these watersheds should be changed to category 5a.	The category for upper Walnut Creek (AU 1428B_05) has been changed to 5a in the Draft 2012 IR due to the development of the TMDL for bacteria.
1429C	*Waller Creek (unclassified water body)*	The City of Austin commented that since the TCEQ has initiated a bacteria Total Maximum Daily Load (TMDL) for Waller Creek (1429C) the status of the bacteria impairments for these watersheds should be changed to category 5a.	The category for upper Waller Creek (AUs 1429C_02 and 1429C_03) has been changed to 5a in the Draft 2012 IR due to the development of the TMDL for bacteria.

COMMENTOR: City of Kennedale

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
0828A	*Village Creek (unclassified water body)*	The City of Kennedale stated that Village Creek (0828A) was improperly listed as impaired for bacteria based on the following: - A minimum of 20 bacteria samples over the period of record was not temporally representative of water quality conditions in Village Creek. For the 2012 assessment, only twenty four samples taken at approximate quarterly intervals were considered for Village Creek. This was too few samples to accurately describe the water quality conditions in terms of bacteria for Village Creek. - Only one sampling site for the segment of Village Creek from Johnson County to Lake Arlington was considered in this assessment. There was a question as to whether this sampling site accurately represented the water quality over the seventeen miles of the creek. - Of the twenty four sampling points included in the dataset over the period of record, the four highest values were taken within a 48 hour period following a rain event in the Lake Arlington area. If these four data points were excluded, the geometric mean for bacteria would not exceed the surface water quality standards.	The number and spatial distribution of E. coli samples from Village Creek met the guidelines when it was first identified as impaired in the 2010 IR. Twenty seven samples were assessed in 2010 which exceeded the minimum of 10 samples. The Guidance for Assessing and Reporting Surface Water Quality in Texas states that a station can be located at the lower end of an assessment unit characterizing 25 miles upstream of that point. The monitoring station at the lower end of Segment 0828A met these requirements. Also, a review of the Coordinated Monitoring Schedule indicated that additional data will be available from station 10786 (further upstream in the watershed). A preliminary review of these data indicated that bacteria levels exceeded criteria at this station as well. E. coli data from station 10780 was collected as part of routine monitoring events. This type of data met current guidelines which does not exclude samples taken within a 48 hour period following a rain event. The TCEQ will reassess this segment in 2014 to include data from station 10786 and other information as available. No changes were made to the assessment outcome for Segment 828A based on this comment.

COMMENTOR: City of Sulphur Springs

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
0303D	*Rock Creek (unclassified water body)*	The City of Sulphur Springs was concerned about the listing of Rock Creek (0303D) and would like time to review the listing.	The dataset for 24-hour average dissolved oxygen produced 3 exceedances of the 5.0 mg/L criterion out of 6 samples. The data were reviewed and found to be representative. The water body will be identified as nonsupport for dissolved oxygen in the Draft 2012 IR. The City of Sulphur Springs may review the listing and make comments as part of the 2014 IR process.

COMMENTOR: Coastal Bend Bays & Estuaries Program, Inc.

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
2483A	*Conn Brown Harbor (unclassified water body)*	The Coastal Bend Bays and Estuaries Program, Inc. (CBBEP) commented that they recently completed a TCEQ funded project evaluating water quality trends in Coastal Bend bays, including the Harbor, and realized an increased trend in copper in water for many of the bays over the past 5 years. In 2002 through 2004, the Center for Coastal Studies (CCS) at the Texas A&M University – Corpus Christi, performed a multiyear effort which collected water quality and sediment samples throughout the Coastal Bend bays. For metals in water, the study used the Environmental Protection Agency's (EPA) ultra clean method 1640 for sampling and analysis. Prior to the study, many of the bays showed copper levels above the criteria of 3.6 ug/l based on EPA method 200.7 for sampling and analysis. All of the copper samples from the study that used the EPA ultra clean method 1640 were recorded below the criteria for all bays. While there might be elevated copper levels in the Harbor, CBBEP recommended that additional water quality testing of copper in water using the EPA ultra clean method 1640 for sampling and analysis at the Harbor location. CBBEP further recommended that future copper sampling efforts in other bays use the EPA ultra clean method 1640 in order to accurately represent copper levels within the Coastal Bend.	The TCEQ re-evaluated this listing based on this comment. The data collected by the Center for Coastal Studies and analyzed using the EPA's ultra clean method 1640 was used in the re-assessment. The impairment for copper in water was removed and not included in category 5 of the Draft 2012 IR.

COMMENTOR: Guadalupe Blanco River Authority

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
1810	*Plum Creek*	The Guadalupe Blanco River Authority stated that they did not agree with listing AU 1810_02 as concerns for physical habitat and for macrobenthic community for the following reasons: a. A biological assessment was not conducted in 2004 or 2007 due to flood events; b. All data prior to 2007 were collected according to 1999 SWQM Procedures, not the current SWQM Vol. 2, 6/2007; c. Macrobenthic data from 2005 does not meet the minimum size criteria of either SWQM 6/1999, or SWQM Volume 2 6/2007; d. The Draft 2012 Integrated Report Guidance states that if greater than two biological events are considered, then the period of study should be greater than two years, with two or more events per year. Four events were assessed for 1810_02, but none of the four events are in same year and all events were conducted during critical period conditions; e. Macrobenthic data from 2006 at Station 12647 (1810_02) did meet 06/1999 SWQM guidance for a minimum of 100 organisms but did not meet the requirements for SWQM Volume 2 6/2007 (140 organisms) and should not be given same weight as more current samples; f. 2006 and 2009 biological events were collected during drought conditions. The recorded flow was below 2.0 cubic feet per second (critical low flow (7Q2) of USGS Station 08173000).	The TCEQ has evaluated all of the points made by the Guadalupe Blanco River Authority and as a result the biological data has been reassessed. There are no biological impairments included in category 5 for AU 1810_02. No changes were made to the Draft 2012 IR based on this comment.

COMMENTOR: Guadalupe Blanco River Authority

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
1810	*Plum Creek*	The Guadalupe Blanco River Authority stated that they did not agree with listing AU 1810_03 as not supporting for macrobenthic community for the following reasons: a. A biological assessment was not conducted in 2004 or 2007 due to flood events; b. All data prior to 2007 was collected according to the 1999 Surface Water Quality Monitoring (SWQM) Procedures, not the current SWQM Volume 2, 6/2007; c. If data prior to the publication of SWQM Volume 2 6/2007 is not assessed then AU 1810_03 fully supports as long as the Coefficient of Variability methods are used; d. Macrobenthic data from 2005 did not meet the minimum size criteria of either SWQM Procedures 1999, or SWQM Volume 2 6/2007 and should be excluded from the biological assessment for the AU; e. The 2012 Draft IR Guidance states that if greater than two biological events are considered, then the period of study should be greater than or equal to 2 years, with 2 or more events per year. Three events were assessed for AU 1810_03, but none of the three events are in same year and all the events were conducted during critical period conditions.	The TCEQ has evaluated all of the points made by the Guadalupe Blanco River Authority and as a result, the macrobenthic community data has been reassessed. AU 1810_03 will be changed from not supporting to no concern with limited data for macrobenthic communities.

COMMENTOR: Lloyd Gosselink Rochelle & Townsend

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
1255E	*Unnamed Tributary of Goose Branch (unclassified water body)*	Lloyd Gosselink Rochelle & Townsend, representing the Bosque River Coalition, requested any backup report or analysis that supports the proposed de-listing of the unnamed tributary of Goose Branch.	The historical impairment for this water body was due to exceedances of the single sample rather than the geometric mean criteria for E. coli. The impairment for bacteria in Segment 1255E will be included in Category 5 of the Draft 2012 IR. Since TCEQ is in concurrence with this comment there is no need to provide backup information.

COMMENTOR: Plum Creek Watershed Partnership

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
1810	*Plum Creek*	The Plum Creek Watershed Partnership stated that they did not agree with listing AU 1810_02 as concerns for physical habitat and for macrobenthic community for the following reasons: a. A biological assessment was not conducted in 2004 or 2007 due to flood events; b. All data prior to 2007 were collected according to 1999 SWQM Procedures, not the current SWQM Vol. 2, 6/2007; c. Macrobenthic data from 2005 does not meet the minimum size criteria of either SWQM 6/1999, or SWQM Volume 2 6/2007; d. The Draft 2012 Integrated Report Guidance states that if greater than two biological events are considered, then the period of study should be greater than two years, with two or more events per year. Four events were assessed for 1810_02, but none of the four events are in same year and all events were conducted during critical period conditions; e. Macrobenthic data from 2006 at Station 12647 (1810_02) did meet 06/1999 SWQM guidance for a minimum of 100 organisms but did not meet the requirements for SWQM Volume 2 6/2007 (140 organisms) and should not be given same weight as more current samples; f. 2006 and 2009 biological events were collected during drought conditions. The recorded flow was below 2.0 cubic feet per second (critical low flow (7Q2) of USGS Station 08173000).	The TCEQ has evaluated all of the points made by the Plum Creek Watershed Partnership and as a result the biological data has been reassessed. A review of flow data indicates that all samples were collected when flow was below the 7Q2 for 1810. Based on this, the concern for benthics will be removed, and 1810 will be evaluated as not assessed for benthics, or fish.

COMMENTOR: Plum Creek Watershed Partnership

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
1810	*Plum Creek*	The Plum Creek Watershed Partnership stated that they did not agree with listing AU 1810_03 as not supporting for macrobenthic community for the following reasons: a. A biological assessment was not conducted in 2004 or 2007 due to flood events; b. All data prior to 2007 was collected according to the 1999 Surface Water Quality Monitoring (SWQM) Procedures, not the current SWQM Volume 2, 6/2007; c. If data prior to the publication of SWQM Volume 2 6/2007 is not assessed then AU 1810_03 fully supports as long as the Coefficient of Variability methods are used; d. Macrobenthic data from 2005 did not meet the minimum size criteria of either SWQM Procedures 1999, or SWQM Volume 2 6/2007 and should be excluded from the biological assessment for the AU; e. The 2012 Draft IR Guidance states that if greater than two biological events are considered, then the period of study should be greater than or equal to 2 years, with 2 or more events per year. Three events were assessed for AU 1810_03, but none of the three events are in same year and all the events were conducted during critical period conditions.	The TCEQ has evaluated all of the points made by the Plum Creek Watershed Partnership and as a result, the macrobenthic community data has been reassessed. AU 1810_03 will be changed from not supporting to no concern with limited data for macrobenthic communities.

COMMENTOR: Sabine River Authority

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
0501	*Sabine River Tidal*	The name "Sabine lake" in the Assessment Unit (AU) descriptions should be corrected to "Sabine Lake".	The assessment unit description was changed from "Sabine lake" to Sabine Lake".
0501	*Sabine River Tidal*	The Sabine River Authority utilizes the U. S. Army Corps of Engineers (USACE) (April 1969) river mileage list. Sabine River Authority recommended changing AU lengths in Segment 0501 to match those of USACE.	The AU lengths in the Draft 2012 IR are based on the National Hydrologic Dataset (NHD) Geographic Information System (GIS) layer. While the USACE mileages are not provided in a GIS layer, the NHD mileages are comparable to those cited by USACE. The AU descriptions will be corrected prior to the 2014 IR. No changes were made to the 2012 Draft IR based on this comment.
0501	*Sabine River Tidal*	The Sabine River Authority provided a comment on the new recreation use impairment in AU 0501_01. This impairment was based on the geomean exceeding the criterion for Enterococcus. The Sabine River Authority commented that they also analyze for E. coli, when measured specific conductivity indicates freshwater conditions. The geomean for these samples is less than the criterion for E. coli. The Sabine River Authority maintains the current impairment is due to large migratory bird populations in the watershed. They plan to continue analyzing for both bacterial indicators. The Sabine River Authority did not request any specific changes in their comment.	Since Segment 0501 is a classified tidal water body in Appendix A of the Texas Surface Water Quality Standards, the required indicator bacteria is Enterococcus. TCEQ appreciates the value of side-by-side sampling of different bacteria indicators, and concurs that there can be reasonable concerns about non-human sources of bacteria and that the ratio of enterococcus in birds tends to be relatively high. The ongoing national evaluation of relative risk of elevated indicator bacteria due to non-human sources is continuing, and there is as yet no consensus on how to clearly identify or compensate for potential differences in risk from different animal sources. In accordance with our assessment procedures, the appropriate step at this point is to list the water body in 5c in order to facilitate re-evaluation with more monitoring – particularly as the additional sampling that is planned by the Sabine River Authority. No changes to the Draft 2012 IR were made based on this comment.

COMMENTOR: Sabine River Authority

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
0501	*Sabine River Tidal*	The Sabine River Authority commented on the new impairment in Segment 0501 based on a Department of State Health Services (DSHS) consumption advisory for elevated "PCBs in gafftopsail catfish". The impairment description included in the draft 2012 IR is "PCBs in edible tissue". The Sabine River Authority recommended identifying the impairment only for PCBs in edible gafftopsail catfish. The Sabine River Authority also stated the sample collection area was limited to Sabine Lake and results should not be extrapolated to the tidal portion of the river.	Staff followed the established practice included in TCEQ guidance for basing fish tissue listings on fish advisories in order to keep the list concise. With respect to extending the listing from Sabine Lake to the Sabine River Tidal, the current practice bases fish tissue listings on the same area as defined in DSHS notices. The notice in this case included all of Sabine Lake and “contiguous” waters. No changes to the Draft 2012 IR were made based on this comment.
0502A	*Nichols Creek (unclassified water body)*	The Sabine River Authority requested that the DO impairments for 24-hr average and minimum be identified as a carry forward and included in category 5 of the Draft 2012 IR for the following reasons. The water body was initially listed in 2002 for depressed dissolved oxygen (DO) based on grab samples. In 2006, sufficient 24-hr DO samples were assessed and superseded the results from the grab data. The number of 24-hr samples decreased with successive IRs and should have remained non-support carry forward, although it was never identified as a carry forward. In the 2012 Draft IR, the 24-hr data were identified as not being temporally representative and therefore not assessed, with no carry forward. The grab DO screening level and DO minimum were identified as superseded method/concern and adequate data/non-support, respectively. The Sabine River Authority also requested that the dissolved oxygen data be re-evaluated using the Eastern and Southern Texas Dissolved Oxygen Bedslope Regression Equation.	A complete 24-hour dataset (at least 10 samples) was required in order to supersede the grab dissolved oxygen data. Upon re-evaluation, the 24-hr data were identified as a carry forward non-support for dissolved oxygen (Category 5) in the Draft 2012 IR. This water body has a flow type of intermittent with perennial pools and a Minimal Aquatic Life Use, which has a presumed low flow (7Q2) of 0 cfs, therefore the regression equation was determined not to be an appropriate method for assessment. No changes to the Draft 2012 IR were made based on this the application of the regression equation.

COMMENTOR: Sabine River Authority

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
0503D	*Little Cow Creek (unclassified water body)*	The Sabine River Authority requested that ambient toxicity, habitat and biological data be considered for the Draft 2012 IR in support of removing Little Cow Creek from Category 5. The Sabine River Authority has been collecting these data to address previous ambient toxicity impairments in Little Cow Creek. These data indicated no adverse effects to biological communities or habitat. The biological data and reports were provided to TCEQ in June 2012. The field data was loaded into the SWQMIS database in July 2012. .	The period of record for the Draft 2012 IR ended on November 30, 2010. The biological and field data were collected outside of the evaluation period for this IR. These results will be considered as part of the development of the 2014 Integrated Report.
0505	*Sabine River Above Toledo Bend Reservoir*	The Sabine River Authority commented that two special study ambient toxicity samples from AU 0505_01 had been analyzed by the EPA Houston Lab, demonstrating no significant effects. Due to drought conditions, the remaining two ambient toxicity samples and companion biological monitoring have been postponed until normal ambient conditions return.	The impairment for ambient toxicity in AU 0505_01 will be reassessed when the complete dataset has been collected and submitted to the TCEQ.
0506	*Sabine River Below Lake Tawakoni*	The Sabine River Authority inquired about the use of confidence intervals (CI) for determining contact recreation use attainment. They specifically asked how it was applied for AUs 0506_01 and 0506_03.	Several E. coli values for AUs 0506_01 and 0506_03 were initially determined to have been collected at times of inadequate flow (below 7Q2) conditions and excluded from assessment, resulting in impairments. Upon review, 9 of 10 samples were found to be above the 7Q2 and assessed for 0506_01 and all (7) for 0506_03. This resulted in 0506_01 being changed to fully supporting and 0506_03 being changed to a concern based on application of the confidence interval approach.
0506A	*Harris Creek (unclassified water body)*	The Sabine River Authority commented that Harris Creek (0506A) has been listed for depressed DO since 2000. It was inadvertently included as a new listing in the Draft 2012 IR due to not being identified as a carry forward.	The impairment has been changed from a new listing to a carry forward in the Draft 2012 IR.

COMMENTOR: Sabine River Authority

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
0506G	*Little White Oak Creek (unclassified water body)*	The Sabine River Authority commented that two special study ambient toxicity samples from AU 0506G_01 had been analyzed by the EPA Houston Lab, demonstrating no significant effects. Due to drought conditions, the remaining two ambient toxicity samples and companion biological monitoring have been postponed until normal ambient conditions return.	The impairment for ambient toxicity in AU 0506G will be reassessed when the complete dataset has been collected and submitted to the TCEQ.
0507	*Lake Tawakoni*	The Sabine River Authority commented that AU 0507_04 (Cowleech Fork of Lake Tawakoni) was listed for high pH in 2008. This area of the reservoir has been monitored for more than 30 years and no significant changes in point or non-point sources have been observed. Lake Tawakoni experienced significant drought in 2005 and 2006, when many of the pH exceedances occurred. Sabine River Authority collected 12 bi-monthly pH measurements in a special study from September 2010 through July 2012. Preliminary results, to be included in the December 1, 2012 data upload to SWQMIS, support the removal of the listing.	The TCEQ understands that the Sabine River Authority will include the pH data from Lake Tawakoni in their December, 2012 data upload to the TCEQ. These data will be assessed as part of the 2014 Integrated Report.
0507G	*South Fork of Sabine River (unclassified water body)*	The Sabine River Authority commented that the water body was originally listed based on fecal coliform data and has been subsequently sampled for E. coli from 2008 to 2010. Numerous E. coli samples, collected following run-off events, contributed to the geomean exceeding the criterion. The Sabine River Authority also commented that there has been Recreational Use Attainability Analysis data collected at this station and the data indicate that the segment should be assessed as secondary contact recreation with a higher bacteria criterion. This comment did not include a specific request.	The E. coli samples collected in this water body from 2008 through 2010 were included as part of the Draft 2012 IR and superseded fecal coliform for assessment purposes. Since the samples were collected as part of routine monitoring events and did not specifically target any flow event (run-off events were not considered), they met temporal and spatial guidelines for assessment purposes. This water body will remain impaired for recreational use in the Draft 2012 IR. The TCEQ will consider the results of the Recreational Use Attainability Analysis when it is finalized.

COMMENTOR: San Antonio River Authority

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
1901	*Lower San Antonio River*	SARA commented that Station 17859-San Antonio River at North Riverdale Rd 15 KM West of Goliad Texas was identified in the Draft 2012 IR as being in AU 1901_02. SARA identified the station's location as being in AU 1901_03. SARA requested that data from station 17859 be re-assigned to AU 1901_03, and all data for AU 1901_02 and AU 1901_03 be reassessed.	Assessment unit 1901_02 was re-assessed using stations 12791 and 17858 only (17859 was not used). 1901_03 was re-assessed with station 17859 and 12793. No changes to the assessment outcomes were made to these AUs in the Draft 2012 IR based on this comment.
1901	*Lower San Antonio River*	SARA commented that assessment unit 1901_05 was identified as category 5a on the 2012 Draft 303(d) list. Category 5a designates that a TMDL is underway, scheduled or will be scheduled. A TMDL was completed and adopted by TCEQ and EPA in 2008. SARA requested that the TCEQ re-classify this AU as category 4a.	The category has been changed to 4a in the Draft 2012 IR to reflect the approval of the TMDL by EPA.
1901B	*Cabeza Creek (unclassified water body)*	SARA requested that the Draft 2012 IR documentation be changed for Cabeza Creek (1901B) from perennial to intermittent with pools based on documentation sent by SARA to TCEQ verifying the flow type.	Based on Stream Flow Status Forms submitted by San Antonio River Authority, the documented flow was changed from perennial to intermittent with pools. The aquatic life use designation was changed to Limited with a 24-hour average dissolved oxygen = 3.0 mg/l, and a dissolved oxygen minimum = 2.0 mg/l. The segment was re-assessed based on this information and the concern due to depressed dissolved oxygen was removed in the Draft 2012 IR.

COMMENTOR: San Antonio River Authority

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
1906	*Lower Leon Creek*	SARA commented that Station 12842 on Leon Creek, approximately 25 yards downstream Kelly AFB Outfall, was identified in the Draft 2012 IR as being in AU 1906_03. SARA identified the station's location as being in AU 1906_05. SARA requested that data from station 12842 be re-assigned to AU 1906_05, and all data for AUs 1906_03 and 1906_05 reassessed.	The 24-hour dissolved oxygen data from assessment unit 1906_05 was reassessed including station 12842. The 24- hour minimum data collected below the 7Q2 was eliminated at Station 12842 and included dissolved oxygen data back to 8/2003 from station 12841 to obtain 11 24-hour minimum dissolved oxygen samples. This resulted in two samples exceeding the 24-hour average (5.0 mg/l) and no samples exceeding the 24-hour minimum. The integrated level of support has been changed to fully supporting for minimum dissolved oxygen and aquatic life for the assessment unit.
1906	*Lower Leon Creek*	SARA commented that Station 12846 at Leon Creek at West Commerce Street in San Antonio was identified in the Draft 2012 IR as being in AU 1906_05. SARA requested that the station assignments be re-evaluated.	The TCEQ concurs that station 12846 is located in 1906_06. The station will be assigned to AU 1906_06 for the 2014 IR. No data was collected at station 12846 for the Draft 2012 IR period of record. Thus no change was made to the assessment outcome based on this comment.
1910	*Salado Creek*	SARA commented that AU 1910_03 was identified as a non-support for dissolved oxygen grab minimum with 130 samples in the Draft 2012 IR; however only one exceedance was identified. SARA questioned whether this listing was based on data that was being carried forward.	This assessment unit was first listed for depressed dissolved oxygen in 1996 based on grab samples. For the Draft 2012 IR, there was sufficient 24-hr dissolved oxygen data available to indicate that the assessment unit is now fully supporting for dissolved oxygen.The outcome from this method supersedes that of the dissolved oxygen grab minimum method. As a result, this assessment unit has been changed from nonsupporting to fully supporting for aquatic life use based on dissolved oxygen.

COMMENTOR: San Antonio River Authority

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
1910	*Salado Creek*	SARA requested that AUs 1910_05, 1910_06 and 1910_07 be reassessed considering the EPA's approval of the 2007 Salado Creek Use Attainability Analysis (UAA) as part of the 2010 Water Quality Standards. SARA also requested that the Assessment Units be redefined based on the UAA. Also SARA questioned the validity of the biological data included in the Draft 2012 IR for this segment considering the temporal distribution of the data collection events.	TCEQ reassessed the segment using the site specific criteria specified in the approved UAA. Consequently, the carry-forward non-support for fish and macrobenthic communities in AU 1910_07 was removed from the Draft 2012 IR. Since the biological data was determined not to be spatially representative, biological data from assessment units 1910 _05, 06, and 07 will not be included in the Draft 2012 Integrated Report. For the 2014 Integrated Report, Assessment Units 1910_05, 06, and 07, will be combined into a new segment.
1910	*Salado Creek*	SARA commented that AU 1910_02 was listed as non-support for dissolved oxygen grab minimum with 198 samples and only 2 exceedances in the Draft 2012 IR. SARA questioned whether this listing was based on data that is being carried forward.	This assessment unit was first listed for depressed dissolved oxygen in 1996 based on grab samples. For the Draft 2012 IR there was sufficient 24-hr dissolved oxygen data available to indicate that the assessment unit is now fully supporting for dissolved oxygen. The outcome from this method supersedes that of the dissolved oxygen grab minimum method. As a result. this assessment unit was changed from nonsupporting to fully supporting for aquatic life use based on dissolved oxygen. A concern based on dissolved oxygen grab samples will remain in the Draft 2012 IR since there were 27 exceedances of the 24-hour average based on individual grab samples.
1910A	*Walzem Creek (unclassified water body)*	SARA requested that TCEQ re-classify AU 1910_01 as category 4a since a TMDL has been completed and approved by EPA. AU 1910A_01 was identified as category 5c on the 2012 Draft 303(d) list.	The impairment has been reclassified as category 4a for bacteria to reflect the approval of the TMDL by EPA.

COMMENTOR: San Antonio River Authority

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
1911	*Upper San Antonio River*	SARA commented that Station 12885-San Antonio River at FM3444 near the community of Calaveras was identified in the Draft 2012 as being in AU 1911_05. SARA identified the station location in AU 1911_04. SARA requested that the data from 12885 be assigned to AU 1911_04, and all data for AU 1911_04 reassessed.	Assessment unit 1911_04 was re-assessed using stations 12885, 12883, 12884, and 12882. The re-assessment did not result in any changes to the assessment outcomes in AU 1911_04 in the Draft 2012 IR. Future Integrated Reports will include these stations in this assessment unit.
1911	*Upper San Antonio River*	SARA commented that Station 20355-Upper San Antonio River at Wilson County Road 125, was identified in the Draft 2012 IR as being in AU 1911_04. SARA identified the station in AU 1911_05. SARA requested that the data from 20355 be assigned to AU 1911_05, and all data for AU 1911_05 reassessed.	Assessment unit 1911_05 was re-assessed using stations 20355, 12886, and 12889. This re-assessment did not change any of the assessment outcomes for AU 1911_05 in the Draft 2012 IR. Future Integrated Reports will include these stations for this assessment unit.
1912A	*Upper Medio Creek (unclassified water body)*	SARA questioned the flow type for segment 1912A based on station 12735. SARA commented that this station should be identified as intermittent instead of perennial.	Based on verification of the flow type at station 12735, the Draft 2012 IR documentation was changed from perennial to intermittent (no perennial pools). In addition, the Aquatic Life Use was changed to minimal, the 24-hr average dissolved oxygen criteria changed to 2.0 mg/l, and the dissolved oxygen minimum was changed to 1.5mg/l. No changes were made to the assessment outcome based on this comment.
1913	*Mid Cibolo Creek*	Station 14212 is identified in the Draft 2012 IR as being in AU 1913_03. SARA identified the station location in AU 1913_02. SARA commented that the data from 14212 needs to be assigned to AU 1913_02, and all data for both AUs 1913_02 and 1913_03 reassessed.	Additional review of the station location determined that station 14212 is correctly located in AU 1913_03. No changes were made to the draft 2012 IR.

COMMENTOR: Tarrant County

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
0828A	*Village Creek (unclassified water body)*	Tarrant County stated that Village Creek (0828A) was improperly listed as impaired for bacteria based on the following: - A minimum of 20 bacteria samples over the period of record was not temporally representative of water quality conditions in Village Creek. For the 2012 assessment, only twenty four samples taken at approximate quarterly intervals were considered for Village Creek. This was too few samples to accurately describe the water quality conditions in terms of bacteria for Village Creek. - Only one sampling site for the segment of Village Creek from Johnson County to Lake Arlington was considered in this assessment. There was a question as to whether this sampling site accurately represented the water quality over the seventeen miles of the creek. - Of the twenty four sampling points included in the dataset over the period of record, the four highest values were taken within a 48 hour period following a rain event in the Lake Arlington area. If these four data points were excluded, the geometric mean for bacteria would not exceed the surface water quality standards.	The number and spatial distribution of E. coli samples from Village Creek met the guidelines when it was first identified as impaired in the 2010 IR. Twenty seven samples were assessed in 2010 which exceeded the minimum of 10 samples. The Guidance for Assessing and Reporting Surface Water Quality in Texas states that a station can be located at the lower end of an assessment unit characterizing 25 miles upstream of that point. The monitoring station at the lower end of Segment 0828A met these requirements. Also, a review of the Coordinated Monitoring Schedule indicated that additional data will be available from station 10786 (further upstream in the watershed). A preliminary review of these data indicated that bacteria levels exceeded criteria at this station as well. E. coli data from station 10780 was collected as part of routine monitoring events. This type of data met current guidelines which does not exclude samples taken within a 48 hour period following a rain event. The TCEQ will reassess this segment in 2014 to include data from station 10786 and other information as available. No changes were made to the assessment outcome for Segment 828A based on this comment.

COMMENTOR: Trinity River Authority

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
0828A	*Village Creek (unclassified water body)*	The Trinity River Authority commented that the listing of 0828A (Village Creek) was not valid for the following reasons. The bacteria listing in Village Creek was based on 24 samples collected quarterly from 1/21/2004 to 9/16/2010 at station 10780. No flow data were generated at the time the samples were collected. Based on information provided by the City of Arlington, the four highest sample values were collected within a 48 hour period following a rain event. If these samples were excluded, the geometric mean would not exceed the criterion. In addition, the site located at 10780 is not representative of the whole stream. 10780 is located under a bridge at the extreme lower end of 0828A right before entering the lake proper. The flow at this site is typically standing especially when the lake is full. Compounding this issue is the fact that the bridge is infested with birds which may be contributing to the elevated bacteria at this site.	The number and spatial distribution of E. coli samples from Village Creek met the guidelines when it was first identified as impaired in the 2010 IR. Twenty seven samples were assessed in 2010 which exceeded the minimum of 10 samples. The Guidance for Assessing and Reporting Surface Water Quality in Texas states that a station can be located at the lower end of an assessment unit characterizing 25 miles upstream of that point. The monitoring station at the lower end of Segment 0828A met these requirements. Also, a review of the Coordinated Monitoring Schedule indicated that additional data will be available from station 10786 (further upstream in the watershed). A preliminary review of these data indicated that bacteria levels exceeded criteria at this station as well. E. coli data from station 10780 was collected as part of routine monitoring events. This type of data met current guidelines which does not exclude samples taken within a 48 hour period following a rain event. The TCEQ will reassess this segment in 2014 to include data from station 10786 and other information as available. No changes were made to the assessment outcome for Segment 828A based on this comment.

COMMENTOR: Upper Guadalupe River Authority

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
1806	*Guadalupe River Above Canyon Lake*	The Upper Guadalupe River Authority commented as to why bacteria data associated with flows <0.1 cfs or flow severity of 1 were assessed. The Draft 2012 IR indicated that 74 samples were assessed for bacteria geomean for AU 1806D_01. Approximately half of these data points were collected between flows of 0.0 - 0.1 cfs. The commenter stated that according to TAC 307.9(e)(8)(B) aquatic recreation criteria should not be applied to intermittent streams when extremely dry conditions are present.	Assessment unit 1806D_01 is currently classified as intermittent with perennial pools. No samples were eliminated when the flow was 0 cfs. This is consistent with §307.8(a)(1)(A) of the 2000 Texas Surface Water Quality Standards. The portion of the 2010 Texas Surface Water Quality Standards concerning the elimination of bacteria data collected at low flows has not been approved by EPA and therefore not applicable to the 2012 Integrated Report.
1806	*Guadalupe River Above Canyon Lake*	The Upper Guadalupe River Authority commented that stations 12618 and 12619 are not included in the AU descriptions of the document "2012 Texas Water Quality Inventory Water Bodies Evaluated." They stated they these stations should be in AU 1806_07 and the associated data should have been assessed with this AU.	Segment 1806_07 was reassessed including stations 12618 and 12619. No changes to assessment outcomes in the Draft 2012 IR were made based on this comment.

COMMENTOR: Upper Guadalupe River Authority

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
1806	*Guadalupe River Above Canyon Lake*	In their comment the Upper Guadalupe River Authority disagreed with the decision to list AU 1806_02 as a concern for impaired habitat or as not supporting for impaired macrobenthic community for the following reasons: a. A bioassessment was not conducted in 2004 or 2007 due to flood events; b. All data prior to 2007 was collected according to the Receiving Water Assessment Protocols - 06/1999 not the Surface Water Quality Monitoring (SWQM) Procedures Manual, Volume 2 - 6/2007 that is currently used. The Index of Biological Integrity calculations table changed significantly and may not yield the same values if calculated according to the SWQM Procedures Manual, Volume 2. Therefore, data collected prior to 2007 should probably not be given the same weight as more current sample events; c. If the data prior to the publication of the SWQM Procedures Manual, Volume. 2 - 06/2007 is not assessed then AU 1806_02 fully supports its designated uses for Fish Community and Macrobenthic Community as long as the standard deviation is utilized to extend the range of the mean. d. All of the data collected in 2005 was collected within 1 week of a fairly high flood pulse which may have affected the results of these sampling events. e. The macrobenthic community data from 2005 did not meet the minimum sample size criteria of either the Receiving Water Assessment Protocols - 06/1999 or the SWQM Procedures Manual, Volume 2 - 06/2007; f. The 2012 Guidance for Assessing and Reporting Surface Water Quality in Texas page 3 - 20 states that if more than two bioassessment events are considered, then the period of study should be two or more years, with two events or more samples per year. Four events were assessed for AU 1806_02, but none of the 4 events are within the same year. g. Both of the most recent bioassessment at station 15113 (AU 1806_02) from 08/18/2010 and 07/28/2011 showed that both the Fish community and the macrobenthic community were fully supporting its designated exceptional use with macrobenthic scores of 37 & 38 (need 36) and fish community scores of 55 & 53 (need 52).	The TCEQ evaluated all of the points made by the Upper Guadalupe River Authority and as a result re-evaluated the macrobenthic community data. A review of flow data from USGS gage 08166200, Guadalupe River at Kerrville indicated that all samples were collected during a period when flow was below the 7Q2 value given in Appendix B - Low Flow Criteria, in the Texas Surface Water Standards. Current Guidance for the Draft 2012 IR states that biological "Sample events are conducted at about one month apart and during periods of moderate to low flow but above the 7Q2." prior to being assessed. Based on this guidance, 1806_02 will be removed from the 2012 303(d) List, and evaluated as Not Assessed. The concern for physical habitat will remain since the comments provided relate to the assessment of the macrobenthic community data and do not impact the outcome of the physical habitat assessment.

COMMENTOR: Upper Guadalupe River Authority

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
1806	*Guadalupe River Above Canyon Lake*	In their comment the Upper Guadalupe River Authority did not agree with the decision to list AU 1806_07 as a concern for impaired habitat or as not supporting for impaired macrobenthic community, or as not supporting for impaired fish community for the following reasons: a. A bioassessment was not conducted in 2004 or 2007 due to flood events; b. All data prior to 2007 was collected according to the Receiving Water Assessment Protocols - 06/1999 not the SWQM Procedures Manual, Volume 2 - 6/2007 that is currently used. The Index of Biological Integrity calculations table changed significantly and may not yield the same values if calculated according to the SWQM Procedures Manual, Volume 2. Therefore, data collected prior to 2007 should probably not be given the same weight as more current sample events; c. If the data prior to the publication of the SWQM Procedures Manual, Volume. 2 - 06/2007 is not assessed then AU 1806_07 fully supports its designated uses for Fish Community and Macrobenthic Community as long as the standard deviation is utilized to extend the range of the mean. d. All of the data collected in 2005 was collected within 1 week of a fairly high flood pulse which may have affected the results of these sampling events and did prevent habitat data from being collected at station 15111 (AU 1806_07) because all transects were not wadeable. e. The macrobenthic community data from 2005 did not meet the minimum sample size criteria of either the Receiving Water Assessment Protocols - 06/1999 or the SWQM Procedures Manual, Volume 2 - 06/2007; f. The macrobenthic community data from 2006 at station 15111 (AU 1806_07) did meet the Receiving Water Assessment Protocols - 06/1999 minimum sample size of 100 specimens, but did not meet the criteria of 140 organisms in SWQM Procedures Manual, Volume. 2 - 06/2007 and should probably not be given the same weight in the assessment process as more current samples. g. The 2012 Guidance for Assessing and Reporting Surface Water Quality in Texas page 3 - 20 states that if more than two bioassessment events are considered, then the period	The TCEQ evaluated all of the points made by the Upper Guadalupe River Authority and as a result re-evaluated the macrobenthic community data. A review of flow data from USGS gage 08166200, Guadalupe River at Kerrville indicated that all samples were collected during a period when flow was below the 7Q2 value given in Appendix B - Low Flow Criteria, in the Texas Surface Water Standards. Current Guidance for the Draft 2012 IR states that biological "Sample events are conducted at about one month apart and during periods of moderate to low flow but above the 7Q2." prior to being assessed. Based on this guidance, 1806_07 will be removed from the 2012 303(d) list, and evaluated as Not Assessed. The concern for physical habitat will remain since the comments provided relate to the assessment of the macrobenthic community data and do not impact the outcome of the physical habitat assessment.

COMMENTOR: Upper Guadalupe River Authority

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
		of study should be two or more years, with two events or more samples per year. Four events were assessed for AU 1806_07, but none of the 4 events are within the same year. h. The most recent bioassessment at station 15111 (AU 1806_07) from 08/17/2010 showed that the macrobenthic community was fully supporting its designated exceptional use with macrobenthic scores of 37 (need 36) and fish community was very close to supporting with a score of 50 (need 52) .	
1806	*Guadalupe River Above Canyon Lake*	The Upper Guadalupe River Authority commented that AU 1806_06 was incorrectly included in category 5c for bacteria.	The impairment has been changed to category 4a to reflect the approval of the TMDL by EPA.