

Response to Public Comment
One Total Maximum Daily Load for Indicator Bacteria in Sycamore Creek

Tracking Number	Date Received	Affiliation of Commenter	Summary of Request or Comment	Summary of TCEQ Action, or Explanation
001	06/26/18	West Meadowbrook Neighborhood Association	<p>The commenter shared concerns regarding garbage along the railroad corridor and homeless camps along the creek. The commenter asserts that the camps and garbage are impacting the water quality of Sycamore Creek. The West Meadowbrook Neighborhood Association has worked with the City of Fort Worth and the railroads to remove massive amounts of garbage that have accumulated after storms. The neighborhood association is trying to improve the neighborhood, the creek, and the levels of <i>E. coli</i> in the creek.</p>	<p>The TCEQ agrees that rainfall runoff events and human activity can have an impact on bacteria concentrations in the TMDL project area. Best management practices for reducing bacteria concentrations should be considered throughout the project's watershed.</p> <p>The Coordination Committee for the Greater Trinity River Region TMDL I-Plan voted to add the Sycamore Creek watershed to their implementation efforts. The approved <i>Implementation Plan for Seventeen Total Maximum Daily Loads for Bacteria in the Greater Trinity River Region</i> includes "Implementation Strategy 7.0: Ongoing stormwater public education participation and inclusion of bacteria-specific materials." The TCEQ encourages the commenter to actively attend and participate in work groups for the I-Plan and assist in developing and implementing best management practices in this project's watershed. No changes were made to the TMDL based on this comment.</p>

Tracking Number	Date Received	Affiliation of Commenter	Summary of Request or Comment	Summary of TCEQ Action, or Explanation
002	06/26/18	Morningside Neighborhood Association	The commenter shared concerns regarding dumping in the neighborhood. The commenter was interested in information related to reporting and reducing illegal dumping in the neighborhood.	The TCEQ agrees that illegal dumping can have an impact on the water quality of Sycamore Creek. The Greater Trinity River Region I-Plan addresses improper disposal of liquid waste through "Implementation Strategy 1.7: Liquid waste management and liquid waste hauler program expansion." The TCEQ encourages the commenter to actively attend and participate in the I-Plan's work groups and assist in developing and implementing best management practices in this project's watershed. TCEQ encourages the commenter to call the TCEQ Region 4 Dallas/Fort Worth office at (817/588-5800) or City of Fort Worth Code Compliance (311) to report illegal dumping. No changes were made to the TMDL based on this comment.

Tracking Number	Date Received	Affiliation of Commenter	Summary of Request or Comment	Summary of TCEQ Action, or Explanation
003	07/9/18	City of Fort Worth Code Compliance Department - Environmental Quality	<p>(1) The commenter shared information related to the implementation of “Wet Weather” and “Capacity Management and Operation Maintenance (C-MOM)” programs to address sanitary sewer overflows (SSOs). The City spends significant funds annually on these programs that aim to identify and eliminate sources of infiltration and inflow, identify and replace aging infrastructure, and actively identify and contain SSOs.</p>	<p>(1) The TCEQ agrees that SSOs and aging infrastructure can impact water quality and appreciates the City of Fort Worth’s effort to address these issues at the local level.</p> <p>The City of Fort Worth participated in the development of the Greater Trinity River Region I-Plan which includes “Implementation Strategy 1.1: Evaluation on non-participants in Sanitary Sewer Overflow Initiative (SSOI) and C-MOM programs” and “Implementation Strategy 1.5: Funding opportunities for repair/replacement of sanitary sewer lines.” TCEQ encourages the commenter to continue to attend and participate in the I-Plan’s work groups and the Coordination Committee to ensure local programs are considered. No changes were made to the TMDL based on this comment.</p>
			<p>(2) The commenter recommends removing the “Segment” column since Table 4 is a summary of SSOs for the entire watershed.</p>	<p>(2) Table 4 (Summary of SSO incidences reported in the Sycamore Creek Watershed from January 2009 - December 2016) provides a data summary for the Segment 0806E watershed. The segment column is provided for completeness. No changes were made to the TMDL based on this comment.</p>

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003, continued			<p>(3) The commenter observed that the TMDL states the entire project watershed is served by a centralized wastewater collection and treatment system. The commenter pointed out that there are very few onsite sewage facilities (OSSFs) within the municipal boundary of the City of Fort Worth but that about 1.1 percent of the southern portion of the watershed located outside the municipal boundary is not served by a wastewater collection and treatment system and includes an estimated 222 OSSFs.</p>	<p>(3) TCEQ recognizes that although the service area of the Village Creek Waste Water Treatment Facility includes the entire Sycamore Creek watershed, OSSFs may still be located within a service area. In response to the comment, TCEQ changed the TMDL to include the OSSF data from North Central Texas Council of Governments (NCTCOG).</p>
			<p>(4) The commenter requests that the TMDL reflect a review of the most recent dataset, and in light of the OSSF data from NCTCOG, the commenter requests a review of the determination of failing OSSFs as a source of bacteria loading in the project watershed.</p>	<p>(4) TCEQ recognizes that failing or improperly maintained OSSFs can be a source of bacteria to nearby water bodies. OSSFs are broadly accounted for in the wasteload allocation. TCEQ reviewed the data suggested by City of Fort Worth and agrees that the OSSF data from NCTCOG more accurately characterizes OSSF density in the project watershed. Therefore, the TMDL was changed to indicate that OSSFs are a potential source of bacteria loading.</p>
			<p>(5) The commenter requests that Figure 8 in the TMDL document be updated based on more recent OSSF data.</p>	<p>(5) TCEQ agrees with the recommendation and updated Figure 8 of the TMDL with the OSSF data obtained from the NCTCOG.</p>

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003, continued			<p>(6) The commenter notes that City of Fort Worth Code of Ordinances allow livestock and fowl within the municipal boundary. Portions of the Sycamore Creek watershed within the City of Fort Worth have areas with densities of livestock that inhabit small parcels. The City requests that the TMDL include the estimates for Tarrant County livestock from the United States Department of Agriculture's <i>Census of Agriculture</i>.</p>	<p>(6) The TCEQ recognizes that local ordinances may provide opportunities for livestock to inhabit urbanized areas. The TMDL was changed to include estimated livestock populations based on county level data obtained from the 2012 <i>Census of Agriculture</i>. The numbers were reviewed by the staff of the Texas State Soil and Water Conservation Board and are broadly accounted for in the wasteload allocation. The Greater Trinity River Region I-Plan includes "Implementation Strategy 4.1: Ordinance evaluation for livestock waste management, stocking rates, and related measures." TCEQ encourages the commenter to continue to attend and participate in the I-Plan work groups and Coordination Committee to ensure local programs are considered.</p>
			<p>(7) The commenter requested additional review of the stream width used in TMDL. The TMDL estimate differed significantly from the City of Fort Worth's estimate using aerial photography.</p>	<p>(7) TCEQ has reviewed the estimated stream width for Sycamore Creek (0806E_01). The stream width estimate of 30.3 feet was not based on aerial imagery. The estimate was based on more than ninety stream width measurements taken on Sycamore Creek in 2009 and 2010 as part of a recreational use attainability analysis. The TMDL was changed to correctly characterize the method used.</p>

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003, continued			<p>(8) The commenter requests that a more precise stream length of 5.09 miles for assessment unit 0806E_01 be used in the calculation for unregulated stormwater in the TMDL. The commenter requests that TCEQ consider utilizing the main stem stream length above AU 0806E_01 in the calculation for unregulated stormwater in the watershed.</p>	<p>(8) The Sycamore Creek segment (0806E) and the only assessment unit for Sycamore Creek (0806E_01) are identically described in the Texas Integrated Report of Surface Water Quality as, “Five mile stretch of Sycamore Creek running upstream from confluence with the W. Fork of Trinity River to confluence with Echo Lake Tributary in Fort Worth.” TMDL reports use the documented stream lengths for waters (when available). No changes were made to the TMDL based on this comment.</p> <p>TMDLs generally do incorporate a watershed approach to characterize the regulated and unregulated stormwater loads. The load allocation (LA) component of the TMDL corresponds to the direct deposition of indicator bacteria that may occur on the impaired stream identified in the TMDL. An LA for direct deposition occurring on AUs in the watershed will be determined if additional TMDLs are warranted. No changes were made to the TMDL based on this comment.</p>
			<p>(9) The commenter states that given the unknown contribution of unregulated and unmanaged sources, the City of Fort Worth acknowledges the need for iterative adaptive management to address stormwater discharges and is committed to implementing stormwater controls as necessary to protect water quality.</p>	<p>(9) The TCEQ agrees that iterative adaptive management is needed to address stormwater discharges. TCEQ appreciates the City of Fort Worth’s continued participation in the Coordination Committee for the Greater Trinity River Region TMDL I-Plan. The I-Plan outlines the strategies determined by the local stakeholders to reduce bacteria loads to nearby streams. No changes were made to the TMDL based on this comment.</p>