

Response to Public Comment
One Total Maximum Daily Load for Bacteria in the Guadalupe River Above Canyon Lake
 April 20, 2007

Tracking Number	Date Received	Affiliation of Commentor	Summary of Request or Comment	Summary of TCEQ Action or Explanation
001	4/18/07 (letter)	Texas Parks & Wildlife	General: We note that bacterial sampling done at stations upstream of the Kerrville urban area (12621, 12620, 12678, 12618) does not show violations of the water quality standard. This suggests that wildlife populations in a natural setting do not contribute significantly to bacterial loadings in the Upper Guadalupe watershed.	No changes have been made based on this comment.
002	4/18/07 (letter)	Texas Parks & Wildlife	General: We note that the TMDLs identify wildlife and exotic species, such as feral hogs, as potential sources of bacterial loading. We believe that the species discussed in the text and included in the fecal source library sample inventory may not reflect the animals in the watershed that make the largest contribution to the riparian or in-stream bacterial load. As we noted in our comments to the Bacterial Task Force, “it is important to have a sense of the species in each watershed that may be contributing the largest bacterial load to the waterbody. In general, one would expect these to be the species that spend time on or near the water. These are not necessarily the largest species in the watershed, nor would they necessarily be the species with the greatest biomass in the watershed.” TPWD does not have inventories of various wildlife species, nor do we have resources to develop such inventories. That notwithstanding, our experts are available to assist TCEQ or their contractors in future TMDLs in estimating the species that are likely to make significant contributions.	No changes have been made based on this comment. The TCEQ appreciates TPWD’s willingness to assist in the estimation of species in the watershed. Wildlife species discussed in the text and included in the fecal source library sample inventory are a percentage of the nonpoint source load allocation (LA). Because TPWD does not currently have inventories of various wildlife species, these numbers are a general estimation of the overall potential load contribution. Differentiation in species at this phase of the project will not influence the LA or respective TMDL. Assistance from the TPWD in species identification is encouraged and appropriate for development of the respective Implementation Plan.
003	4/18/07	Texas Parks &	General: We are disappointed in the Bacteria Source	No changes have been made to the TMDL based

	(letter)	Wildlife	<p>Tracking (BST) results. An “indeterminate” classification of 46% suggests that the results are useful solely as “presence” or “absence” indicators. Appendix 4 of the third draft of the Bacterial Task Force report supports this interpretation, stating that, “BST does not tell you how much each source contributes to bacterial contamination, only the different kinds of sources.”</p> <p>Further, we note that many library samples were collected from dirt, concrete and grass, which allows for potential contamination by other bacterial strains. As we noted in our comments to the Bacterial Task Force, “Field sampling methods need to be improved. We understand that at least some samples have been collected from deposited fecal matter. This provides opportunity for contamination. The Department would recommend killing and gutting specimens to avoid the potential for contamination.” Finally, “It is not clear that the BST library sampling is adequate from a statistical design perspective. We believe that the library lacks adequate replication. With the information available to us now about bacterial strains and promiscuity, we would recommend that ten or more samples be collected for each species, e.g. ten samples of great blue herons, ten samples of American egrets, etc.”</p>	<p>on this comment.</p> <p>The TCEQ recognizes the limitations of BST. BST results were not utilized statistically to design the TMDL. The TCEQ agrees that current results are at best, merely useful as presence and absence indicators. TCEQ will consider recommended TPWD sampling collection methods for future BST collection.</p>
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