

Response to Public Comment
TMDLs for Sulfate and TDS in the EV Spence Reservoir
November 29, 2000

Tracking Number	Date Recd.	Affiliation of Commentor	Summary of Request or Comment	Summary of TNRCC Action or Explanation
001	09/28/00 (letter)	Concerned Citizen	Suggested numerous management practices to be enacted by the Texas Railroad Commission (TRC) such as ceasing all operations of salt water disposal wells located within ½ mile of any reservoir or river; regularly scheduled integrity tests required for all injection wells used for secondary recovery and all producing oil and gas wells within ½ mile of any reservoir or river; all abandoned oil or gas wells located within one mile of a reservoir or river should be considered candidates for plugging and all abandoned well sites plugged after 1965 which are located within one mile of rivers and reservoirs must be examined for leakage and a review of the well's plugging records must be performed. Also, the TNRCC and EPA must eradicate salt cedars statewide to eliminate excretion of salt into land and water; the legislature must provide additional funding for more RRC personnel, well plugging for several thousand wells and control of salt cedars.	The TMDL development process involves the preparation of two documents (1) a TMDL which determines the maximum allowable loading and allocates the load to pollutant sources, and (2) an implementation plan which is a detailed description and schedule of regulatory and voluntary management measures necessary to achieve the pollutant reductions identified in the TMDL. This comment deals with aspects of implementation and will be addressed in the implementation plan for E. V. Spence Reservoir. Preparation of implementation plans is critical to ensure water quality standards are restored and maintained. Preparation of the implementation plan for E. V. Spence Reservoir will be initiated immediately upon Commission approval of the TMDL. No changes have been made to the TMDL based on this comment.
002	10/09/00 (Letter) 10/12/00 (Verbal)	Colorado River Municipal Water District; Freese & Nichols, Inc.	Suggested that the TNRCC revise its TMDL report to be consistent with the Watershed Action Plan adopted by the EV Spence TMDL Steering Committee	The TNRCC TMDLs are largely consistent with the Watershed Action Plan adopted by the EV Spence TMDL Steering Committee. The major difference is the inclusion of additional load reductions from man-made nonpoint sources in the TNRCC TMDLs that are necessary to meet existing water quality standards. No changes have been made to the TMDL based on this comment.
002 (cont)			Requested correction regarding statements concerning Figures 15, 16, and 17 and whether they included only recommendations made by the Steering Committee. Requested clarification regarding statements concerning the definition of loading capacity. Requested use of loading capacity estimates present at least 80% of the time in the load allocation rather than annual average loads.	TNRCC will implement the CRMWD comments regarding figures, as well as those regarding loading capacity and the inappropriateness of annual average loads for the load allocation. This will have the effect of altering the raw loading capacity and percent reduction numbers in Tables 1-3, and will represent the loading distribution more consistently with the Steering Committee Watershed Action Plan.

Tracking Number	Date Recd.	Affiliation of Commentor	Summary of Request or Comment	Summary of TNRCC Action or Explanation
002 (cont)			Suggested that TNRCC address the appropriateness of water quality standards for the reservoir and requested that the Watershed Action Plan acknowledge that the water quality standards for TDS and sulfate may change.	Potential standards revisions will be addressed as part of the implementation section of the Watershed Action Plan, which is currently being developed. Any recommendations will be communicated to the Water Quality Standards Program. Under the existing procedures, Water Quality Standards are reviewed, and if necessary, changed triennially. No changes have been made to the TMDL based on this comment.
003	10/12/00 (letter)	Texas Parks & Wildlife	Supported the TNRCC in its efforts to address mineral concentration in EV Spence Reservoir and agreed, in general, with the approach of the TMDL document. TPW agrees with the statement in the TMDL that there are few regulatory controls available to restrict polluters in the watershed, and TPW assumes that statement refers only to nonpoint sources of pollution, noting this will be a key issue in the implementation of the TMDL.	The commission appreciates the commentor's support of the TMDL. TPWD is correct that the statement relating to few regulatory controls refers only to nonpoint sources of pollution. TNRCC agrees that this will be an issue to be resolved during implementation of the TMDL. No changes have been made to the TMDL based on this comment.
004	10/16/00 (letter)	Lower Colorado River Authority	Supported generally the methodology and conclusions in the TMDL document. Also, supports further investment into the TNRCC/TRC Upper Colorado River Salt-Water Minimization Project, and an aggressive investment in the oil field clean up program. LCRA does not support increasing the segment-specific criteria for E.V. Spence Reservoir in order to remove it from the list of impaired waterbodies.	The commission appreciates the commentor's support of the TMDL. No changes have been made to the TMDL based on this comment.
005	10/12/00 (written)	Texas State Soil & Water Conservation Board	Suggested clarification on certain phrasing and terminology within the TMDL document without any changes to the approach or result of the TMDL allocation.	TNRCC staff agrees with the commentor and will make the suggested changes to clarify the content of the TMDL document.