Response to Public Comment
Six Total Maximum Daily Loads for Bacteria in the Upper Coast
June 30, 2008

Tracking Number	Date Received	Affiliation of Commenter	Summary of Request or Comment	Summary of TCEQ Action or Explanation
001	5/20/08	League of Women's Voters; and Bayou Preservation Association	This organization supports clean water and feels our waterways should be safe for contact and non-contact recreation and for the consumption of oysters and other seafood. This organization has reviewed the above referenced report. The report was comprehensive and very well written. We are very pleased to see bacterial effluent limits for wastewater treatment plants. This assumes that the TCEQ is going to require frequent testing of the effluent to document that plants are meeting their limits. We understand the difficulty in reducing bacteria in storm water runoff due to the large volume of water but do support a bacteria reduction plan for this source including low impact development techniques.	No changes have been made based on this comment. The TCEQ appreciates the encouragement to restore water quality in the Upper Coast. The TCEQ looks forward to working with stakeholders and other state and federal agencies to bring the Upper Coast back into attainment with water quality standards.
002	5/20/08	League of Women's Voters; and Bayou Preservation Association	The report also says the TCEQ will be looking into repair/replacement program and the use alternative waste treatment systems for failing septic systems. We support this effort. This organization also supports the protection of stream buffers to reduce volume and improve storm water quality for un-permitted sources.	No changes have been made based on this comment. The TCEQ looks forward to working with stakeholders and other state and federal agencies to consider and adopt strategies to bring the Upper Coast back into attainment with water quality standards.
003	5/20/08	League of Women's Voters; and Bayou Preservation Association	We agree that the wildlife source should be documented but that this source should be considered background.	No changes have been made based on this comment. Wildlife is a valuable resource to the Upper Coast and will continue to be treated as an asset during implementation planning efforts.

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004	6/9/08	Dick Carter, Resident of League City	I believe we have left out one significant component. Much of the drainage area is draining into the Galveston Bay infrastructure area is agriculture still. We have livestock throughout the area, much of it is close to the water, runoff significantly and includes fecals. Throughout all of this project, there is no accounting for this input into the system. I think we have done the baseline work for this but we also need to include an agricultural and livestock component in it, truly account for it, and include it in the project so we can have realistic resolutions to remove it from the discharges. That is all I have.	No changes have been made based on this comment. Historical data review and assessment of the impairments did not indicate agricultural influence. Because of the localized nature of the impairments, if any focus areas are identified receiving agricultural contributions, those focus areas may be addressed during the implementation planning stage.
005	6/9/08	Paul Fannin Manager of Maritime Sanitation	I primarily represent a pump out company in the Clear Lake Galveston Bay area. We pump out approximately 249 boats on a regular basis and on occasion 661 in a month. We collect over 100,000 gallons of concentrated boater waste every year. That is only representing about 1% of all the boaters in Clear Lake. I think there is a tendency to under estimate the amount of boaters waste on your TMDL because there is no good way to account for the amount of waste that is being discharged directly into the lake. I know that we pump out very few boats for the percentage of the total. At the last count, the amount of boats was 6,738 wet slips and we are pumping out 249 boats on a regular basis. Not very many of those boats are pumping themselves out. There is no actual count of how many people actually use the pump out stations but have our office in front of a pump out station and we might see 5 or 6 boats a week come into the pump out station. I would like to put this into the record that our monthly count of pump out boats and gallons that we pump out is very concentrated waste. Boat toilets	No changes have been made based on this comment. TCEQ agrees that there is great difficulty in estimating the amount of waste that is being discharged directly into the water. However, the allocation allotted for boater waste is set at zero, meaning boaters are not allowed to discharge untreated waste into the bay system. The method of discouraging and eliminating such behavior will be a task for the implementation planning group. Texas Parks and Wildlife Department and other local law enforcement agencies are involved with enforcing boater discharges. The TCEQ agrees that additional compliance-related efforts may be necessary to achieve the TMDL goal for this discharge category.

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005 (cont.)			only use abut a gallon when they flush so a holding tank is really concentrated waste and is a lot more concentrated than what you get out of a household. I would like you to re-examine the boater waste on the TMDL. I don't know what input you can have with the laws. One reason people do it is because the law is unenforceable. It is against the law to pump out a boat in Galveston Bay or Clear Lake but there is no legal way for authorities to enforce that. You have to get a sample of it and get it analyzed and be there to see that they actually use the pump out stations provided. Thank you. (Note: Mr. Fannin provided a handout to include with the record).	
006	6/9/08	Bob Stokes Galveston Bay Foundation	We are a non-profit organization dedicated to preserving, protecting, and enhancing the natural resources of Galveston Bay. Galveston Bay is so valuable to the Galveston region. I would like to start off by saying that we are in support of the TCEQ's efforts of the TMDL and particularly supportive of some of the components in it. We have some different comments for instances that we like the idea of putting bacteria limits on the wastewater treatment plants and several other things as well.	No changes have been made based on this comment. The TCEQ appreciates the encouragement to restore water quality in the Upper Coast. The TCEQ looks forward to working with stakeholders and other state and federal agencies to bring the Upper Coast back into attainment with water quality standards.
008	6/9/08	Bob Stokes Galveston Bay Foundation	I want to echo some of what Mr. Fannin said about the boater waste. We are working right now with the Galveston Bay Estuary Program on a boater waste education program. There are some of our materials in the back of the room. One thing that we have been looking into, is even though it is illegal to discharge boater sewage that has not been treated in all parts of Galveston Bay and Clear Lake, we also want to look at the concept of making Galveston Bay an official	No changes have been made based on this comment. The TCEQ agrees that addressing illegal discharges is an important strategy that will require focus during the implementation phase of the TMDL. The no discharge option is on that should be discussed and considered by stakeholders.

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008 (cont.)			no discharge zone. Even treated sewage could not be discharged. This would be a better message for the whole community to know that Galveston Bay is a no discharge zone. We know that there are offshore areas in different parts of the country, New England and the West Coast that have no discharge zones in their Bays and even in portions of their oceans. We want the TCEQ to look at doing that. Again, not to confuse anyone – you cannot discharge untreated sewage into Galveston Bay – but we want to make sure there is no discharge of any type of sewage, treated or untreated. Otherwise, thank you for this opportunity. We appreciate you working on this effort and will be glad to drop off my comments.	
008	6/9/08	Bob Stokes Galveston Bay Foundation (letter)	Seafood production is an important part of the local economy in the Galveston Bay region. Galveston Bay waters should be suitable for harvesting seafood at all times. The proposed TMDL project will result in significant improvement of Galveston Bay waters. The Foundation fully supports the development of the referenced TMDL and looks forward to the opportunity to be involved in the execution of the implementation plan.	No changes have been made based on this comment. The TCEQ looks forward to working with stake-holders and other state and federal agencies to bring the Upper Coast back into attainment with water quality standards.
009	6/11/08	Rick Masters, Carol and Blackman, Inc., representing Trinity Bay Conservation District	On Page 37 of the TMDL, the wastewater treatment plant permit limit for fecal coliform is 200 colonies per mL, does not distinguish between mechanical wastewater plants and wetlands natural wastewater plants. Wetland wastewater plants have detention times of 60 to 90 days for ample disinfection. How-ever, they also have wetland cells that allow birds, nutria rats, so forth to inhabit those. The fecal coli-forms are generally discharged from those waste-water treatment plants are considered to be natural because of they generally don't have permit limits for	Rules state that wetland systems must detain human source wastewater for at least 21 days to guarantee complete disinfection of human source bacteria. The allocation table has been changed to reflect this rule. However, if a wetland system permit contains addi-tional requirements, such as an extended period of detention, those requirements must be followed. This source can be examined during implementation to determine if additional requirements are necessary to reduce the bacteria load.

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009, (cont.)			fecal coliform. And they typically are not equipped with disinfectant – no chlorine or gas or UV sterilization. They just discharge out of the last wetland cell. There should be a distinction between mechanical and wetland or natural wastewater plants that have natural disinfection. Potentially, they have 9 numerical concentration limits or maybe just monitoring the pathogens if the pathogens were the concern.	
010	6/11/08	Rick Masters, Carol and Blackman, Inc., representing Trinity Bay Conservation District	We feel there are less deer than 50 a square mile – especially in the marsh or wetlands. We feel the number is more like one or zero.	Table 8 has been removed from the document. Due to uncertainty involved in estimating populations, animals will only be listed as a contributing source to the bacteria load, rather than being parsed by species.
011	6/11/08	Rick Masters, Carol and Blackman, Inc., representing Trinity Bay Conservation District	I would just like to also comment that some of the bird numbers in the table in Bolivar Peninsula are questionable. The number also with ducks. Valid duck and waterfowl numbers can be obtained Sea Rim State Park and some of the biologists from Murphy's and Sea Rim State Park have a lot better data. The last name of the man we are thinking of is Sullivan. He runs the Sea Rim State Park and would have a lot better information than from the snapshot that the Audubon Society gave you.	No changes have been made based on this comment. TCEQ feels that the draft TMDL accurately notes that "Population estimates vary from year to year and these numbers are only estimates taken on one day of the year." As such, the numbers in Table 9-11 have no statistical significance. No statistical significance was intended nor suggested. The numbers were provided as a snapshot of what types of birds were identified and counted on one day of the year.
012	6/18/08	Texas Parks and Wildlife (TPWD)	We note that the Load Allocations Section states, "Discharging entities will not be held responsible for uncontrollable coliform discharges originating from wildlife… Nonpoint source runoff containing fecal coliform bacteria origin [sic] from animal and wildlife, at levels that do not result in exceedances of water objectives, does not constitute wastewater with characteristics of concern to beneficial uses.	Table 13 has been changed to remove the following, "While managing over-populations of wildlife remains an option available to local stakeholders." TCEQ recognizes that the existence of wild animals, wild birds, and aquatic animal life is both natural and desirable. Bacteria loads resulting from wildlife are a natural condition. Additionally, the source must be

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012 (cont.)			Therefore, animal and wildlife-associated discharges, in compliance with the conditions of this TMDL, do not constitute a violation of applicable discharge prohibitions." TPWD is not clear what this means. TPWD hope it means that TCEQ recognizes that the existence of wild animals, wild birds, and aquatic animal life is both natural and desirable. As such, bacterial loadings resulting from wildlife are a natural condition and that it is appropriate to consider such loadings as part of natural or ambient conditions. This interpretation seems to be supported by Table 13 which states under Direct Deposition into Segment, "While managing over-populations of wildlife remains an option available to local stakeholders, the reduction of wildlife or changing a natural background condition is not the intended goal of a TMDL." We would appreciate TCEQ clarifying its intention. TPWD would vigorously object to any recommendation arising from the TMDLs or their Implementation Plans that would negatively impact wildlife, including migratory birds, or impair the use of these wildlife areas.	recognized in the document as a contribution to the overall bacteria load. As stated on page 40 of the TMDL document, "neither TCEQ nor EPA is proposing the elimination of wildlife to allow for the attainment of water quality standards." Any optional managing of over-populations would necessarily take place within the structure of TPWD's hunting license requirements. TCEQ is not advocating the elimination of any game or non-game animal, such as feral hogs, without following TPWD's most current license and bag limit requirements.
013	6/18/08	Texas Parks and Wildlife	TPWD recognizes that water is the basis for a significant recreational resource in Texas that includes boating, fishing, swimming, sailing, diving, bird watching, and paddle sports. TPWD has established as one of its major goals to maintain improve water quality and quantity to support the needs of fish wildlife and recreation. We support TCEQ's efforts to improve and restore water quality through the TMDL process. Within the scope of its authority, TPWD is committed to assisting TCEQ and TSSWCB in their efforts to restore full use of water bodies for which the contact recreation use is	No changes have been made based on this comment. The TCEQ appreciates TPWD's willingness to assist rural and urban communities during the implementation phase of this project. Cooperation among agencies, communities, and stakeholders is a key element in our shared goal of improving water quality.

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013 (cont.)			impaired. Specifically, TPWD has resources to assist both rural and urban communities in the implementation phase. For rural areas, TPWD Wildlife Division Technical Guidance biologists are available to assist landowners concerning local wildlife population's habitat management. Staff can provide comprehensive wildlife habitat management plans for landowners wishing to improve wildlife populations and habitat on their property. These plans contain a comprehensive treatment of past and existing management and habitat conditions and recommendations that detail how to achieve goals on a specific parcel (TPWD 2008a). For urban areas, TPWD administers a park grants program that helps to build new parks and conserve natural resources (TPWD 2008B).	
014	6/18/08	Texas Parks and Wildlife	TPWD appreciates that TCEQ has made a distinction between "wildlife" and "unmanaged animals." In the Parks and Wildlife Code §1.101, the term "wild" means a species that normally lives in a state of nature and is not ordinarily domesticated. This definition does not include exotic livestock. The Agriculture Code §161.001(a)(4) defines "exotic livestock" as grass-eating or plant-eating, single hoofed or cloven-hoofed mammals that are not indigenous to this state and are known as ungulates, including animals from the swine, horse, tapir, rhinoceros, elephant, deer, and antelope families. Thus, certain exotic species, such as feral swine, axis deer, and sika deer do not fall within the scope of the Department's authority to protect or manage. We are not clear, however, what animals the term	No changes have been made based on this comment. "Unmanaged animals" refers to any animal that is not managed as wildlife by TPWD standards. We note that TPWD commented on and approved of this term in the Clear Creek TMDL that was recently released for public comment.

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014 (cont.)			"unmanaged animals" includes. Does it refer solely to exotic species, or does it also include livestock and pets in rural areas? We recommend that TCEQ define the term "unmanaged animals."	
015	6/18/08	Texas Parks and Wildlife	TPWD staff have reviewed the information provided in the section "Wildlife Refuges and Direct Deposition," "Water Birds," "Linkage Analysis" Table 13 and "Load Allocations." We recognize the difficulties associated with attempts to model wildlife and unmanaged animal contribution to bacterial loading. First, one must identify what species exist in the watershed and analyze their potential for contributing to bacterial loads. Second, one must estimate the densities (#/unit area) of relevant species. Finally, one must estimate net bacterial loading, taking into account accumulation, decay, and washoff rates. Unfortunately, little or no data is available to support this process. With regard to densities, TPWD is aware only of data for white-tailed deer and a limited number of avian species. Wildlife and unmanaged animal species are mobile within their habitat and complicated sampling procedures are required to produce statistically valid results. Since it is labor-intensive and expensive to estimate population densities, surveys exist only for a few important game species. It is not clear to us how the "wildlife density numbers used in TMDL Table 8 (deer, waterfowl, other birds, opossum, raccoons and rodents) and Tables 9, 10 and 11 (birds) were derived. At this time, we are not aware of data that supports any of these values. Species-specific comments are given below.	TCEQ did not use a model for this TMDL. TCEQ agrees with TPWD staff regarding the difficulties in attempting to model wildlife and unmanaged animals in the Upper Coast. Because there is little or no data available to support such a model, modeling to characterize the impaired water bodies was removed as an option. After comparing the degree of complexity associated with the various inflows to the bay, bacteria levels at the mouth of inflows, and measured levels of bacteria in the project area, TCEQ concluded that modeling was not warranted for such a limited problem. Exceedances of the WQS are local, not bay-wide. Because of limited data availability, lists of wildlife density numbers used in Table 8 were based on estimates found in previously approved TMDL documents. Table 8 has been removed from the document.

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016	6/18/08	Texas Parks and Wildlife	It is also not clear that animals selected for this model are the largest contributors to the bacterial load in the watershed. Riparian areas are the heart of wildlife habitat in Texas and naturally support a tremendous diversity of species. To select a few species and label them as the biggest contributors to the bacterial load is not defensible. While deer are large mammals that are common along the riparian areas, it's not clear that they make the most significant contribution to bacterial loads. For example, it is possible that the biomass of rodents, including exotic species such as nutria is much greater than that of large mammals. If this is the case, then the overall rodent contribution to the bacterial loading could be significant. Additionally there is seasonal use of the trees by migratory song-birds. Colonial birds, such as herons, egrets and vul-tures, also have the potential for large contributions to bacterial loadings if roosts are located in a riparian corridor. None of this is quantifiable with existing information. Overall, it seems that the modeled species are serving as surrogates for all wildlife and unmanaged animals in the area. As such, it will be difficult in the implementation phase to make any specific management recommendations.	No changes have been made based on this comment. TCEQ did not use a model for this TMDL. TCEQ agrees that labeling any species as the biggest contributor based on a model would be inappropriate in this project. As stated earlier in these responses, using a model to characterize the impaired water bodies was removed as an option early in the process of developing this TMDL.
017	6/18/08	Texas Parks and Wildlife	Deer population. The deer population estimates used in Table 8 of the TMDL are significantly higher than densities found in recent TPWD surveys. The Gal-veston Bay watershed under study for these TMDLs is contained within TPWD Resource Management Units (RMUs) 12 and 19 in the Post Oak Savannah and RMUs 13 and 14 in the Pinewoods. TPWD does not have the resources to monitor deer populations at the watershed scale, but rather conducts monitoring	Table 8 has been removed from the document. Due to uncertainty involved in estimating populations, deer will only be listed as a contributing source to the bacteria load.

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017 (cont.)			to detect changes in populations within an RMU, which may cover multiple counties, range sites, watersheds, etc. Assuming that the deer-survey transects are representative of their respective RMUs, then the population density for the RMUs should (i.e., 95% confidence) fall within the upper and lower confidence limits shown in the table below. However, if the TMDL study area is a subset within RMUs 12, 13, 14, and 19 we cannot be certain the 95% confidence level applies. Since the counts for the RMUs represent an average of several types of habitat, the values given may not be applicable for any single habitat type or sub-sample of habitat types. Nonetheless, the density estimates follow for the white-tailed deer populations in RMUs 12, 13, 14, and 19 (Lockwood 2008). Since a square mile is about 640 acres, one can multiply the values in the table above to approximate deer densities in a square mile. These results suggest that the values given in TMDL Table 8 substantially overestimate the actual deer populations.	
018	6/18/08	Texas Parks and Wildlife	Birds. There is considerable contrast in the way wildlife and water birds population estimates are presented. Estimates for wildlife and unmanaged animals seem to be based on some type of best professional judgment, while detailed lists with counts are provided for water birds. TPWD does not believe that either method provides an accurate representation of wildlife in the area. TPWD has population estimates for ducks. However, just as was the case for deer, TPWD does not have the resources to monitor populations at the "square mile" or watershed scale. The surveys are designed to	No changes have been made based on this comment. TCEQ agrees with the commenter, which is the reason that the draft TMDL accurately notes that, "Population estimates vary from year to year and these numbers are only estimates taken on one day of the year." As such, the numbers in Table 9-11 have no statistical significance. No statistical significance was intended nor suggested. The numbers were provided as a snapshot of what types of birds were identified and counted on one day of the year.

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018 (cont.)			estimate duck numbers at no scale lower than the Ecoregion. As it is labor-intensive and expensive to obtain accurate animal counts, these data are not available for other avian species. The data presented in Tables 9 – 11 depict data from the 2007 Annual Audubon Christmas Bird Counts. Due to seasonal migration patterns, these data likely reflect the highest bird counts of the year, with both resident and migrating species present. Outside the migratory periods, few of the species in these tables other than coots, gulls, herons, cattle egrets and cormorants are likely to be present in high numbers (Schlitter 2008). The draft TMDL accurately notes that, "Population estimates vary from year to year and these numbers are only estimates taken on one day of the year." As such, the numbers in Table 9-11 have no statistical significance.	
019	6/18/08	Texas Parks and Wildlife	The TMDL further notes that, During months when migratory populations are at their peak, a seasonal spike is noticeable in the bacteria concentrations for multiple stations." We acknowledge that migrating birds may play a role in this spike, but we wonder if causality has been established. Have any other mechanisms for seasonal spikes been explored, such as reduced circulation and flushing in the bays?	No changes have been made based on this comment. No specific load has been established as attributable to birds, only that the seasonal peaks and bird migrations can be temporally linked. Bird sources will continue to be listed as contributing to the load. If during implementation additional temporal explanations are identified, strategies can be tailored to address those causes. At this time, TCEQ has not identified other causes of seasonal spikes.
020	6/18/08	Texas Parks and Wildlife	Finally, we believe that seasonally high bird populations resulting from migration represent the success of avian and habitat management programs. There are national and international plans and mechanisms	No changes have been made based on this comment. TCEQ agrees that seasonally high bird populations resulting from migration represent the success of

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020 (cont.)			which are in turn the result of federal, state and conservation organization partnerships that strive to restore native populations of birds to more normal levels. These initiatives seek to restore habitat and natural ecosystem functions through various means. Most are funded through partnerships that begin at the federal level within the Departments of Interior and Agriculture. There are a number of individual bird plans including, but not limited to, the North American Waterfowl Management Plan, Water Bird Plan, Western Hemisphere Shorebird Plan, Partners in Flight Plan, and the North American Bird Conservation Initiative. These plans are delivered to the ground via habitat restoration to restore functioning ecosystems. Funding is provided by numerous conservation partners including Ducks Unlimited, Inc., American Bird Conservancy, Audubon, and many other conservation groups. Large sums of funding are provided by various programs of the federal government that encourage private and other public partners to leverage funds to do landscape scale habitat restoration. The North American Wetland Conservation Act, Grants from the National Fish and Wildlife Foundation, Grants from the Army Corps of Engineers, and many of the programs of the 2007 Federal Farm Bill and the U.S. Fish and Wildlife Service support restoration for native habitat for native wildlife. TPWD offers funding and staff support as partner in the Gulf Coast Joint Venture, Lower Mississippi Valley Joint Venture, Oaks and Prairies Joint Venture, Rio Grande Joint Venture, and Playa Lakes Joint Venture to assist our other conservation partners in habitat restoration projects for bird populations.	avian and habitat management programs. The exceptional bird populations are a symbol of the stewardship of habitat in the Upper Coast.

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021	6/18/08	Texas Parks and Wildlife	Raccoon population. No local data for raccoon populations is available. The highest raccoon density reported in the literature is about 630/sq. mi. (Lotze and Anderson 1979). Population densities varying from the 6/sq. mi. to 52/sq. mi. are more typical (Kennedy et al. 1985, Lehman 1980, Moore and Kennedy 1985). For comparison purposes, we note that raccoon densities tend to be high in urban parks of the eastern United States, where habitat, food, and water are abundant. For example, a density of 48/square miles has been reported in Washington DC urban parks (Riley et al. 1998). The value of 100 raccoons/sq. mi. for wetlands and forest areas seems high. A value of 50 raccoons/ sq. mi. for residential areas is within reported ranges for urban areas. Opossums. No information is available. Rodents. No information is available.	Table 8 has been removed from the document. Due to uncertainty involved in estimating populations, animals will only be listed as a contributing source to the bacteria load.
022	6/21/08	Bert Schroeder (letter)	Growth and increased urbanization in the Galveston Bay watershed is a fact of life, and I urge the TCEQ to use its influence and authority to insure that water quality standards are adhered to and that the Bay's ecosystem and its important natural and economic values are protected.	No changes have been made based on this comment. The TCEQ looks forward to working with stakeholders and other state and federal agencies to bring the Upper Coast back into attainment with water quality standards.
023	6/21/08	Bert Schroeder (letter)	With development comes both increased wastewater and non-source-point loading for the system. I have noticed applications for more WWTFs in the watershed, often smaller package plants with lower water quality standards imposed upon them than the larger facilities must meet, even though both empty into the same watershed. An example would be the Dickinson Bayou watershed, a major tributary to the Bay and proposed permit #WQ0014570001.	No changes have been made based on this comment. Wastewater capacity and planning will be an appropriate topic for stakeholder discussion during the implementation planning process.

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			I implore the TCEQ to seek a regional solution, using larger WWTFs which can be better monitored and which have the capabilities to treat effluent to a higher discharge standard. If necessary, consideration should be made for piping discharge further into the Bay, or perhaps even the Gulf, rather than into slow-moving estuarial bayous.	
024	6/21/08	Bert Schroeder (letter)	Additionally, I would request that the TCEQ work with TxDOT and other road and drainage entities to reconsider their approach to road drainage. The recent changes to FM518 East from FM 270 to SH 146, the FM 517 project trough Dickinson and other new roads have resulted in greater use of enclosed storm sewers which rush rainwater and contaminants directly into tributaries and the Bay without the mitigating benefits that open ditches or settlement ponds have previously provided. This will only get worse with urbanization. Proper long-term solutions to growth will require foresight, planning, and cooperation between the State, various Municipalities in the Watershed and Developers. It is far better to err on the side of higher standards now than to make reparations in the future.	No changes have been made based on this comment. Houston area storm water is regulated by a Phase I MS4 permit. Texas City and Galveston are receiving Phase II MS4 storm water permits that should address storm water discharge. Please note that the TMDL report (Table 12 of the revised draft) identifies bacteria reduction as an implementation effort for urban runoff permitted by MS4s. Opportunities may exist for stakeholder input for storm water strategies at the local level.
025	6/21/08	Rodrigo Carreon (fax)	We need to prohibit M.U.D. wastewaters being drained in Federal waters, to improve bacteria pollution. Prohibit wastewaters and fight droughts by watering farm grower to improve crops.	No changes have been made based on this comment. It is outside the scope and intent of this TMDL to prohibit specific wastewater discharge permits.
026	6/21/08	Rodrigo Carreon (fax)	More private septic sewer system can be used on small lots for resident homes and garden improvements to be green when water is being use for all landscapes. Our ground can filter all bacteria limits and restoring ground waters.	No changes have been made based on this comment. TCEQ does not recommend irrigating gardens with septic effluent. Aerobic systems may be used to irrigate landscapes. Please see 30 TAC Chapter 285 for additional information and standards.