

Comment Response Document
Regarding the Total Maximum Daily Load of Fecal Coliform for the Extended Restricted Shellfish Harvesting Area of the Miles River Mainstem in Talbot County, Maryland

The Maryland Department of the Environment (MDE) has conducted a public review of the proposed Total Maximum Daily Loads (TMDLs) of Fecal Coliform for the Extended Restricted Shellfish Harvesting Area of the Miles River Mainstem in Talbot County, MD. The public comment period was open from April 27, 2009 through May 26, 2009. MDE received one set of written comments.

Below is a list of commentors, their affiliation, the date comments were submitted, and the numbered references to the comments submitted. In the pages that follow, comments are summarized and listed with responses.

List of Commentors

Author	Affiliation	Date	Comment Number
Ed Heikes	Citizen	May 15, 2009	1

Comments and Responses

1. The commentor states that attributing coliform bacteria to various sources based on land uses in the watershed is a flawed method in this case. While a large percentage of land area is agricultural, there is almost no manure generated or applied in the watershed. This can be easily verified through USDA /NRCS. The spike in coliform noted in Oct. Nov. Jan. coincides with the massive numbers of migratory Canada Geese utilizing the river as a roost and resting area during the winter months. Regulating agriculture will not yield attainment of your goal. I have lived here 50 years and watched water quality decrease along with the amount of farmland.

Response: In the report, we used bacteria source tracking (BST) as the source assessment method. BST data analysis includes a statistical comparison of known sources collected in the watershed with unknown source samples collected over the study period. The fecal coliform sources in water samples are unknown until matched with the library of known sources. The land use information in the report was used as additional information to estimate which of the sources are predominant in this watershed. The determination of the final source contributions is based on the results of the BST analysis.

The explanation of the bacteria spike due to migratory Canada Geese is a reasonable one. Elevated concentrations from this source would be included as part of the estimated average wildlife load.

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It is important to note that implementation of the TMDL will utilize all the information gathered in this watershed, especially information from local agencies and citizens. The information in this TMDL report will help to guide and focus those implementation efforts and provides the required pollutant reduction goals to protect water quality in the extended restricted shellfish harvesting area of the Miles River Mainstem.