

APPENDIX F

RESPONSE TO PUBLIC COMMENTS

Public comments to the draft Big Spring Creek TMDL were accepted and are addressed through specific written response and through changes made to the draft document. At a public meeting in Lewistown on Jan 10th, several verbal comments were received and are addressed in the document. Written comments were received via email, and are included below. In addition, verbal comments and recommendations were received from state and federal resource management agencies and the city of Lewistown, and changes were made to the document in response to these comments.

Verbal Comments

The verbal comments below are paraphrased based on notes from public meetings. Verbal comments addressed the following issues:

- The need for additional monitoring data and to determine the relative contribution of a variety of rural, residential, and urban sources on water quality measured downstream from the city of Lewistown.
- The need to establish monitoring stations to accurately characterize water quality and water quantity immediately upstream of the city of Lewistown and upstream of the Lewistown wastewater treatment plant.
- PFC assessments may not be an appropriate water quality target. PFC assessments are not a translation of water quality standards.

Response to Verbal Comments

In response to the aforementioned comments, changes were made to the document in several sections.

- DEQ acknowledges that additional monitoring information is need to more accurately characterize the relative contribution of sediment and nutrient sources through the city of Lewistown, and adjustments were made to Monitoring and Assessment Strategies to accommodate for these data needs.
- DEQ acknowledges that PFC assessments are not a direct reflection of water quality standards, but are a surrogate for determining whether “reasonable land, soil and water conservation practices” are employed. PFC has been removed as a water quality target, and a comprehensive stream channel inventory is included in the Monitoring and Assessment Strategy in Section 5.1.5.

Written Comments

Comment: Has any data been collected on Total Phosphorous, Total Suspended Solids after Boyd Creek, Little Casino and Big Casino Creek have entered Big Spring Creek before the Lewistown WWTP?

Response: Data on Big Spring Creek in this reach is scant. TP data were collected in 1982, 1983 and 1987 just upstream from the WWTP. All summertime values were reported at 0.010 mg/L TP. Because the reporting limit for TP analysis was 0.010 mg/L results were rounded to the nearest 0.01 mg/L. Actual values may range from 0.014 mg/L to less than 0.010 mg/L. The DEQ recognizes the need to collect additional data in order to accurately characterize phosphorous loads from tributary sources and sources upstream from the WWTP so that accurate and defensible load allocations may be established for the WWTP. Changes have been made to Section 8.1.2 to reflect the uncertainties in estimating loads from upstream and tributary sources.

Comment: Has flow data been measured below the Broadway Canal take out point?

Response: Yes. Flows were recorded ten times during the summer months in 1983 and 1987, just upstream and downstream of the WWTP outfall. Flows ranged from 107 cfs to 170 cfs, with an average of 134 cfs. No recent flow data exists for this reach. Recent drought conditions have likely influenced flow conditions and it is expected that summertime flows through this stretch are lower than those recorded in the 1980s. Additional flow information is needed to more accurately characterize flow conditions through this reach.

Comment: How would the Department go about selecting a monitoring site? What would the criteria be for a site?

Response: Criteria for sampling site selection would be dependent on the sampling objectives. With respect to flows and TP concentrations in the segment of Big Spring Creek that flows through Lewistown, sampling sites should be selected so that flows and phosphorous loads from different sources (tributaries, WWTP, urban runoff, etc) can be determined. The DEQ recommends that additional sampling sites be established in order to accurately determine phosphorous loads from varying sources. A monitoring and assessment strategy is put forth in Section 8.1.5.

Comment: This document needs a more detailed summary that explains the main problems and discusses on-going and future solutions to these problems, such as how new sewage treatment plant in Lewistown will reduce nutrients in the lower creek.

Response: An updated executive summary is provided in the final document.

Comment: I doubt that flows exceeding 250 cfs are a rare event, even based on the data presented in the report.

Response: Changes were made to the final document that acknowledges this supposition, and additional flow information is presented (Section 5.1.2.1). Additionally, care was made to address the uncertainties inherent in the available flow data.