

**Comment Response Document
Regarding the Total Maximum Daily Load (TMDL) of Fecal Bacteria for the Non-Tidal
Conococheague Creek Basin, Washington County, Maryland**

The Maryland Department of the Environment (MDE) has conducted a public review of the proposed TMDL of Fecal Bacteria for Conococheague Creek. The public comment period was open from April 17, 2008 through May 16, 2008. 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 MDE's response.

List of Commentors

Author	Affiliation	Date	Comment Number
Julie Pippel	Washington County Division of Environmental Management	May 19, 2008	1

Comments and Responses

1. The commentor states: The referenced TMDL assigns 98% as the maximum practical reduction for bacteria for human, livestock, and domestic animal sources. I would like to comment that 98% seems too high for all three sources.

Response: The stated maximum practical reductions (MPRs) proposed in the TMDL are: 95% for human sources in all but one subwatershed (where the reduction is 55%); 75% for domestic animal sources; 75% for livestock; and 0% for wildlife. (See Tables 4.6.2 and 4.6.3 of the TMDL report.) However, since the TMDL analysis shows that water quality standards can not be achieved in any of the subwatersheds by implementing effluent limitations and cost-effective, reasonable BMPs to nonpoint sources under the constraints of the MPR scenario, a second scenario is provided showing the reductions necessary to meet the applicable standards in Conococheague Creek. It is this second scenario that allows reductions beyond the MPRs up to 98%, as needed to meet the water quality standards. In such cases where very high reductions are required, MDE proposes a staged approach to implementation, beginning with the maximum practicable reduction (MPR) scenario outlined in the TMDL report, with regularly scheduled follow-up monitoring to assess the effectiveness of the implementation plan. The MPR scenario initiates the first stage of an extensive implementation process.