

**Comment Response Document
Regarding the Total Maximum Daily Load of Sediment in the Wills Creek
Watershed, Allegany and Garrett Counties, Maryland**

The Maryland Department of the Environment (MDE) has conducted a public review of the proposed Total Maximum Daily Load (TMDL) of Sediment in the Wills Creek Watershed, Allegany and Garrett Counties, Maryland. The public comment period for the TMDL document and its accompanying addendum was open from August 9, 2006 through September 7, 2006. MDE received 1 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.

Author	Affiliation	Date	Comment Number
Jennifer Schaafsma	Maryland Department of Agriculture	August 28, 2006	1

Comments and Responses:

1. The commentor claims that statistically speaking, the two highest measurements for embeddedness should not be seen as outliers. These are separate sites rather than multiple measurements of the same sites. The high measurements point out where the streambed is showing the greatest impairment, which is immediately downstream of the urbanized areas. All of the other measurements are within a reasonable range compared to the reference watersheds. The TMDL is supposed to highlight areas that need improvement, not gloss over them. Hence, this could be a water quality analysis that shows the north branch of the watershed is relatively unimpaired, while the southern branch shows impairment and needs remediation. Furthermore, the land use ratios for the two branches are very different. For example, the majority of the agricultural land use is in the less impaired portion of the watershed.

Response:

In reference to the points plotted as outliers, the intent was to only show them as more extreme values. MDE has revised the graphs so that these dots no longer appear and the "whiskers" extend to the most extreme values. It is correct that these high values indicate where the stream bed is showing the greatest impairment.

The commentor states that the "agricultural land use is in the less impaired portion of the watershed." It is important to recognize that the MBSS stations are randomly selected across first through third order stream segments with the purpose of averaging values to a primary sampling (watershed) unit scale. The

random stations captured most of the urban lands but did not capture the agricultural land in the northwest quadrant of the watershed. While it is correct that specific stations show acceptable water quality scores ($IBI \geq 3.0$) there may not enough information to delist all the tributaries in that upper portion of the watershed.

However, the watershed model includes all land uses within the watershed boundary and thus incorporates the relative effects of the urban and agricultural land. Therefore, in this TMDL, the watershed model loads compared to reference watershed loads indicate there is a sediment impairment with supporting information (distribution of MBSS results) confirming these results.