Response to Public Comment:
One Total Maximum Daily Load for Indicator Bacteria in Hillebrandt Bayou

Tracking Number	Date Received	Affiliation of Commenter	Summary of Request or Comment	Summary of TCEQ Action, or Explanation
001	3/22/21	Terry D. Stelly President, Southeast Texas Clean Air & Water, Inc.	(1) The commenter asked why a TMDL for only Hillebrandt Bayou was developed when TMDL stakeholder meetings for Neches River Tidal and Hillebrandt Bayou were held jointly.	The Neches River Tidal TMDL is under development and is on a different timeline for public release than the Hillebrandt Bayou TMDL. No changes have been made to the TMDL document based on this comment.
002	3/24/21	Terry D. Stelly President, Southeast Texas Clean Air & Water, Inc.	(1) The commenter noted the importance of the entire length of Hillebrandt Bayou and downstream Taylor Bayou for recreation, fish consumption, and wildlife habitat.	Hillebrandt Bayou (Segment 0704) is defined in Appendix A of the *Texas Surface Water Quality Standards* as a freshwater stream with a primary contact recreation 1 use. TMDLs are developed to address water quality impairments for portions of water bodies designated by TCEQ as assessment units (AUs). The primary contact recreation 1 use is supported in AU 0704_01, so it was not considered in the TMDL analysis. No changes have been made to the TMDL document based on this comment.
			(2) The commenter recommended that statements be added to the TMDL document concerning the flood/saltwater intrusion (F/SI) control gates located on Taylor Bayou and how those gates affect flow in the Hillebrandt Bayou TMDL AU.	This TMDL addresses Hillebrandt Bayou AU 0704_02. The F/SI control gates are located 16.77 river miles downstream of AU 0704_02 and may have minimal impacts during low flows. However, due to the distance between the gates and AU 0704_02 and the fact that bacteria TMDLs are developed to address the median loading of the high-flow regime, the gates were not considered in the TMDL analysis. No changes have been made to the TMDL document based on this comment.

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			(3) The commenter asked if the F/SI gates allow/promote flooding in low lying areas during rainfall events in AU 0702_02 and if the gates extend the time flood waters spend over flooded land, possibly picking up additional bacterial contaminants as waters recede above, in, and below AU 0702_02.	Overbank flooding and the routing of flood flows through the drainage system are beyond the scope of this TMDL project. No changes have been made to the TMDL document based on this comment.
			(4) The commenter asked if there were F/SI control structures in the drainage area ratio (DAR) method surrogate watersheds used to estimate the streamflow for the TMDL watershed.	The surrogate watersheds do not have F/SI control structures. No changes have been made to the TMDL document based on this comment.
			(5) The commenter noted that the DAR method was relied on to estimate the streamflow, and the TMDL document has no suggestion for installing streamflow monitoring stations to aid in determining flow contributions during different flow conditions.	The DAR method meets the requirements of the federal Clean Water Act and is standard practice to develop TMDLs in watersheds with no available flow gauges. Suggestions for additional data collection may be discussed at TMDL Implementation Plan (I-Plan) meetings for potential inclusion in the I-Plan. No changes have been made to the TMDL document based on this comment.

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			(6) The commenter noted that the TMDL document points to the need to decrease the flow of stormwater into the AU through the use of more detention ponds and greenbelts around and within paved areas. Increasing the capacity of existing ponds and continuing to address the maintenance of sanitary sewer overflows may be a first alternative.	Suggestions for best management practices may be discussed at TMDL I-Plan meetings for potential inclusion in the I-Plan. No changes have been made to the TMDL document based on this comment.
			(7) The commenter noted there is a need to install streamflow measuring devices at key locations throughout the Hillebrandt Bayou/Taylor Bayou drainage area to improve management actions on decreasing bacteria loadings to the AU. During certain flow periods, Hillebrandt Bayou is likely approaching flows several magnitudes above its natural flow condition.	TCEQ acknowledges the comment related to the flow in Hillebrandt Bayou. Suggestions for additional data collection may be discussed at TMDL I-Plan meetings for potential inclusion in the I-Plan. No changes have been made to the TMDL document based on this comment.
			(8) The commenter noted that the monitoring information included data for pollutants but not flow.	The routine sampling of pollutant parameters provides snapshots of environmental conditions and does not represent the full range of flow conditions. The DAR method requires more rigorous continuous flow data to estimate the full range of flow regimes. No changes have been made to the TMDL document based on this comment.

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			(9) The commenter noted that installing flow measuring devices would allow improvements over the DAR method and better represent the local watershed conditions.	Suggestions for additional data collection may be discussed at TMDL I-Plan meetings for potential inclusion in the I-Plan. No changes have been made to the TMDL document based on this comment.