



*Forging a partnership between farmers and consumers. * Working together for Ohio's farmers.*

February 18, 2004

Ohio Environmental Protection Agency
Division of Surface Water
P.O. Box 1049
Columbus, OH 43216-1049
Attn: 303(d) Comments

Re: Review and Comment on 2004 Integrated Water Quality Monitoring and Assessment Report

To Whom It May Concern:

The Ohio Farm Bureau Federation (OFBF) would like to thank you for the opportunity to review and submit comments on the draft 2004 Integrated Water Quality Monitoring and Assessment Report.

OFBF is the largest voluntary nonprofit agricultural organization in the state of Ohio. Our members produce virtually every kind of agricultural commodity and as a result, OFBF is strongly interested in Ohio's TMDL program.

In an effort to ensure that Ohio agriculture is an active partner in watershed management activities, OFBF developed and launched the Agricultural Watershed Awareness and Resource Evaluation (AWARE) program. This program is designed to raise the comfort level of the agricultural community so that they will engage in watershed management discussions. We agree that without the involvement of all watershed stakeholders, the TMDL program is destined for failure.

The voluntary implementation of management practices by Ohio's agricultural producers is resulting in many positive impacts on air, soil and water quality. We encourage our members to continue to be good stewards of our natural resources.

As per the published January 12, 2004 News Release, we have performed our review of the 2004 Integrated Water Quality Monitoring and Assessment Report. OFBF supports the use of scientifically based data and information to develop and establish water resource management programs for the state of Ohio. We are encouraged by the general approach being used by Ohio EPA in the development of the Integrated Water Quality Monitoring and Assessment Report. Water quality assessment and reporting on a watershed basis has advantages when it comes to the development and implementation of watershed management plans.

The watershed monitoring and assessment process being utilized by Ohio EPA is dependent upon the use of a geometric monitoring site selection process to correctly characterize the surface water resources of each watershed assessment unit. This innovative approach to water resource assessment has only taken place in a limited number of watersheds in Ohio to date. A long-term commitment to the continuation of this monitoring strategy is necessary to ensure that all of Ohio's 331 watershed assessment units are evaluated consistently. Consistency in assessment and evaluation is a major concern to OFBF.

Our specific comments regarding the draft 2004 Integrated Water Quality Monitoring and Assessment Report follow:

1. OFBF would like to commend Ohio EPA for including in the report a more in-depth discussion of the procedure used to categorize Ohio's inland surface water resources. There is a marked improvement from the 2002 Report. Making the process more transparent removes the mystery around how an assessment unit moves through the decision-making process and gets placed into a particular reporting category.
2. Page 33, Section 7.1 Categories of Waters. It is encouraging to see that U.S. EPA guidance contains provisions to categorize waters where the cause of the impairment is not a pollutant as "waters not requiring a TMDL" (Category 4C). It was also encouraging to see that this provision was incorporated into the listing process developed and utilized by Ohio EPA (Figure 7-1, page 34). Given the fact that habitat modification and hydromodification were identified as a cause of impairment in 133 and 94 watershed assessment units respectively (Table 7-10, page 50) why is it that none of 225 assessed watershed assessment units were placed in Category 4C? What criteria must be met to include a watershed assessment unit in Category 4C?

Once again, thank you for the opportunity to provide comments and feel free to give Dr. Larry Antosch of our staff a call, at 614-246-8264, if you have any questions regarding these comments.

Sincerely,

John C. Fisher
Executive Vice President

JCF/lma