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

March 9, 2005

Elizabeth Wick  
Ohio EPA – Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402

Re: Review and Comment on Draft Old Woman & Chappel creek TMDL Report

The Ohio Farm Bureau Federation (OFBF) would like to thank you for the opportunity to review and submit comments on the draft Total Maximum Daily Load (TMDL) for the Old Woman Creek and Chappel Creek Watersheds.

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. 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 Public Notice, we have performed our review of the draft TMDL document and our comments follow:

1. Section 2.0 Loading Analysis – Siltation. The draft document presents a novel approach for conducting a load analysis for suspended sediment in the Old Woman Creek watershed. The use of a comprehensive, but somewhat dated, data set from 1984 and 1985 was incorporated into the modeling analysis to establish existing and future target suspended sediment loads. Using the suspended sediment load at the upstream sampling location (station 2) to establish the future suspended sediment loading target at the downstream location (station 8) has merit. However, the analysis described in the document contains a flaw in logic.

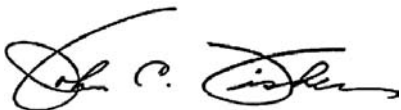
The future target suspended sediment load at station 8 was determined by using the stream flow values measured at station 8 multiplied by the suspended sediment concentrations measured at station 2. There is a large increase in drainage area between the two sampling locations. In fact, a large tributary enters from the east just above station 8. It is not logical to assume that with such a large increase in drainage area that the suspended sediment contribution will not change between station 2 and station 8. Some allowance for increased suspended sediment delivery needs to be incorporated into the calculation of the future target suspended sediment load.

One way to overcome this error would be to calculate a unit area load (pounds of suspended sediment per square mile of drainage area) for suspended sediment at the upstream site (station 2). The unit area load could be assumed to remain constant throughout the basin and used to calculate a future load at the downstream site (station 8). The use of a unit area load will provide a reasonable allowance of increased suspended sediment due to natural conditions and increased drainage area. The difference between the current suspended sediment load at station 8 and the one calculated using the determined unit area load would be the amount that should be reduced by the TMDL.

2. Page 21. Discussion in the first paragraph establishes an implementation process for sediment reduction that is prioritized by geomorphic region and land use. This focused approach to implementation is a departure from the usual “cookie cutter” implementation scenario found in past draft TMDL documents. It is a positive change and greatly enhances the document.
3. Habitat Alteration Results Pages 26 and 27. The use of the QHEI subcomponent scores in the habit alteration discussion helps to identify the principal factors limiting habitat quality. Investigation of the individual metric scores will help watershed managers identify those management practices that can make a difference. This also is a positive improvement to a TMDL addressing habitat alteration.

Once again, thank you for the opportunity to provide comments on this draft TMDL document. The Ohio Farm Bureau Federation feels that your consideration and incorporation of our comments into the document and enhancing the implementation strategy will increase the overall acceptability of the TMDL at the local level. 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