



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

January 14, 2002

Mr. Eric Pineiro
Ohio Environmental Protection Agency
Division of Surface Water-Modeling and Assessment Section
P.O. Box 1049
Columbus, OH 43216-1049

Re: Review and Comment on Sugar Creek Basin TMDL Report

Mr. Pineiro:

The Ohio Farm Bureau Federation (OFBF), a grassroots organization of more than 214,000 members in the state of Ohio, would like to thank you for the opportunity to review and submit comments on the draft Sugar Creek Total Maximum Daily Load (TMDL) Report. As the largest voluntary nonprofit agricultural organization in the state, our members produce virtually every kind of agricultural commodity. 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 December 14, 2001 Public Notice, we have performed our review and our comments follow:

1. It is encouraging to see on page 11 of the Sugar Creek TMDL report your recognition that any proposed remediation measures to be implemented in the basin must take into account both environmental benefits and possible economic impact on the agricultural community. The Ohio Farm Bureau Federation supports the use of scientifically based and economically sound conservation practices to protect surface and ground water resources that are delivered in a flexible and voluntary manner. We support and encourage our members to become involved in the implementation of state water quality initiatives such as the TMDL program. We feel it is crucial to the success of the program that Ohio EPA reaches out to ensure that local stakeholders are involved in the development of any implementation plans that are developed for this basin.

2. The Sugar Creek TMDL report states that the most significant causes of aquatic life use impairment in the Sugar Creek basin are sediments/siltation, habitat alteration and nutrient enrichment. It goes on to state that the measure of attainment of water quality standards will be based on numeric biocriteria not numeric chemical criteria. In addition, habitat assessment (QHEI scores) will be used as a surrogate for total suspended solids. A review of Figure 12 on page 48 reveals that only 4 out of 36 habitat assessment scores are at or above the established TMDL target value of 60. Has Ohio EPA conducted a restorability rating factor analysis for all of these streams? Is a QHEI target value of 60 appropriate? Has the correct aquatic life use designation been assigned?
3. Appendix F of the 2000 Water Resource Inventory indicates that there is a high likelihood that several of the assessed streams in the Sugar Creek basin will not have their aquatic life restored to an acceptable level. How has this been factored into the TMDL development process? Can biocriteria serve as the measurement of success if restorability based on the observed Qualitative Habitat Evaluation Index (QHEI) values is not likely?
4. The QHEI is a multi-metric tool used to evaluate the quality of a stream's habitat. Six variables evaluating both the stream and the riparian zone are scored and combined to obtain a numeric value for the overall health of the stream. Investigation of the scores for each of the individual metrics can be a useful tool to help in the identification of the principal factors limiting habitat quality. The analysis would also lead to the identification of the types of possible remediation actions that could take place. For example, if the riparian/erosion metric scores low, then the proposed remediation actions should focus on stream bank erosion control and riparian buffer establishment. Has such an analysis been conducted for the streams in the Sugar Creek basin? If so, how has it been factored into the establishment of the TMDL targets?
5. The stated goal of the Sugar Creek TMDL is the attainment of appropriate aquatic life uses. For the majority of the sampled locations in the basin, stream habitat quality (QHEI scores of less than 60) is the most limiting factor to reaching this goal. Initial restorability analysis raises the question of assignment of appropriate aquatic life use designations. The established target values for nutrients are based on protection of warmwater habitat (WWH) biological criteria. If the stream has a low restorability rating for WWH, a more appropriate aquatic life use designation should be assigned. When this occurs, the target values for nutrients in the TMDL calculations will need to be adjusted accordingly. Has Ohio EPA established a process in which to review and reassign appropriate aquatic life use designations based on the stream's restorability rating?

Once again, thank you for the opportunity to provide comments and feel free to give Dr. Larry Antosch of our staff a call, at 614-677-8773, if you have any questions regarding these comments.

Sincerely,

John C. Fisher
Executive Vice President

JCF/lma