



## UNITED FOR A HEALTHY GULF

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338 Baronne St., Suite 200, New Orleans, LA 70112  
Mailing Address: P.O. Box 2245, New Orleans, LA 70176  
Phone: (504) 525-1528 Fax: (504) 525-0833  
[www.healthygulf.org](http://www.healthygulf.org)

July 12, 2006

Ms. Emelise Cormier  
DEQ Office of Environmental Assessment  
Water Quality Assessment Division  
Post Office Box 4314  
Baton Rouge, Louisiana 70821-4314

**Re: TMDL for Biochemical Oxygen-Demanding Substances and Nutrients for the Bayou Pierre Watershed (subsegment 100606)**

Dear Ms. Cormier,

On behalf of the Gulf Restoration Network (GRN), I am submitting the following comments regarding the total maximum daily load (TMDL) for the above-mentioned water segment. The GRN is a diverse coalition of 50 local, regional, and national organizations committed to uniting and empowering people to protect and restore the resources of the Gulf of Mexico. Members of the GRN are located in each of the states along the Gulf of Mexico.

***Point Sources should be considered more in order to protect the entire watershed.***

We question the statement that “all of the dischargers located on this water body are small and need not be included in a model of this scale because it is unlikely that they are having an impact on the targeted water body due to the small load and/or the distance from the water body named in the 303(d) list.” We believe that the seven dischargers in this watershed should be included in the proposed TMDL plan. Specifically, we question the comments following each facility on Table 5, stating “modeling not needed-ample chance to recover.” This explanation needs elaboration. It must be clear what they are “recovering” from, and how this information was derived. If these point sources are releasing oxygen-depleting substances into waters of the larger Bayou Pierre watershed, they should be included in the plan to clean up the watershed. A bayou can only be as clean as the waters that flow into it, therefore if the permittees discharge into waters that end up in the mainstem of the impaired water, they should be considered point source polluters, not lumped into non-point.

Thank you for your consideration of these comments in the formulation of the TMDL that will be submitted to EPA Region 6 for final approval. We look forward to receiving your response on this very important matter.

Respectfully submitted,

Matt Rota  
Assistant Director, Water Resources Program  
Gulf Restoration Network

CC: Sunita Singhvi, EPA Region 6  
Michael Morton, EPA Region 6  
Ellen Caldwell, EPA Region 6