Compilation of Public Comments
East and West Forks of Six Mile Creek, Bundicks Creek and Lake, Fish Creek, Beckwith Creek, Bear Head Creek TMDLs for Dissolved Lead

Commenter	Date received	Waterbody Name	Summary of comments	Summary of LDEQ responses
Cynthia Goldberg, Gulf Restoration Network	2/8/02	Fish Creek, Six Mile Creek, Bundick Creek and Lake	LDEQ should provide documentation of expected natural background levels of dissolved lead in waters that are not exposed to human impact. There are few natural sources of lead, so the background levels should be zero.	Since lead is an element of the earth, it is expected that some lead will be detected in the environment, particularly with modern analytical instruments capable of quantifying at minute levels.
		Fish Creek, Six Mile Creek, Bundick Creek and Lake	Thoroughly investigate all historic and current land-use activities that may contribute to man-made nonpoint source pollution loads. These TMDLs only identify natural nonpoint sources of pollution, which should not account for the high levels documented during the 2000 water quality assessment.	LDEQ thoroughly researched its discharger inventory and permits files for potential wastewater dischargers of lead, and land use and mapping resources were utilized to determine other possible current sources of lead in preparing these TMDLs.
		Fish Creek, Six Mile Creek, Bundick Creek and Lake	Full consideration should be given to seasonal variation in the development of these TMDLs because they do not address potential critical conditions associated with high runoff during the months of April through August. Either more data needs to be collected or a model should be incorporated.	LDEQ determined through extensive review that there is not an identifiable seasonal variation of critical condition with respect to metals in ambient waters. Thus, the critical flow of 7Q10 was applied in the calculation of these TMDLs, in accordance with the Louisiana Water Quality Regulations (LAC 33:IX.1115.C) for application of the metals criteria to protect aquatic life and human health.

		Bundick Creek	Calculations for the proposed TMDL and associated allocations were done for Bundick Lake but not Bundick Creek. The TMDL should include rationale for this decision.	Since Bundick Creek flows into Bundick Lake, the TMDL was calculated for the lake as the receiving water of the loading from Bundick Creek. The TMDL applies to both as a "watershed" TMDL. Consequently, anthropogenic loading into Bundick Creek will be limited based upon the TMDL.
		Fish Creek, Six Mile Creek, Bundick Creek and Lake	No implementation plan can be easily developed based on this TMDL because values for reduction in pollutant loads were not included.	LDEQ determined that there are no point sources of lead in these watersheds that can be reduced, so reductions were not calculated.
		Bundick Lake	TMDL should require all three point sources to significantly reduce the amount of lead they are discharging through changes in their permits.	The permitted dischargers in the Bundick Lake watershed are already permitted based upon the water quality criterion for dissolved lead. The effluent limits are within the wasteload allocation and the TMDL, and no further reductions should be needed.
C.A. "Buck" Vandersteen, LA Forestry Assoc.	2/14/02	Calcasieu River, Six Mile Creek, Bundick Creek, Bundick Lake, Beckwith Creek, Bear Head Creek, Fish Creek	The proposed TMDL has little to do with man-made occurrences of lead. Natural levels of lead in the soil are the major factor in both cultivated and undisturbed areas.	Since there were no identifiable sources of lead discharging to these watersheds, other than the Bundick Creek watershed, LDEQ did not calculate percentage reductions for lead. The TMDLs were calculated and any future point source dischargers of lead in these watersheds would be permitted based upon the TMDLs. The permit limitations would be water-quality based, preventing any increases in lead in the streams.
		Calcasieu River, Six Mile Creek, Bundick Creek, Bundick Lake, Bechwith Creek, Bear head Creek, Fish Creek	Soil sample analysis from across Louisiana finds total lead content between 9 and 15 ppm. Since the 9-15 ppm naturally occurring range exceeds the lead standard it is questionable how useful a TMDL would be to reduce loading.	Same as above.