

## Questions to ask as you review TMDL stage one reports

- 1) Are there “point sources” of pollution in the watershed? (such as sewage treatment plants, Concentrated Animal Feeding Operations (CAFO), industries, mining activities, urban areas covered under stormwater permits, construction sites ...) If so, do they discharge pollutants for which the TMDL is being designed?
  - a) If so, there should be a clear plan in the stage one report for assessing whether or not the discharge is contributing to the impairment, and more appropriate NPDES permit limits. This might include a plan for collecting additional data upstream and downstream of these discharges to determine impacts near the source.
  
- 2) Is there data available throughout the watershed? In some cases, TMDLs are developed using data at only one or two sites in the whole watershed. This cannot ensure that standards will be met throughout the watershed.
  - a) If there is limited data, make sure that the the stage one report calls for additional data collection.
  - b) This data collection should focus on identifying priority problem areas in the watershed.
  - c) If the waterbody is a lake/reservoir, data should also be collected in all the tributaries to the lake, not just within the lake, in order to identify tributaries with significant problems.
  
- 3) Have sources of pollution been adequately identified, and does the report include plans to identify necessary reductions from EACH source? Remember each individual source of pollution is a small portion of a large problem. Reductions will be necessary each contributor if the problem is to be solved.
  - a) Many reports will indicate that failing septic systems are contributing to the problem. Suggest that additional data be collected to determine specifically which systems are failing, and that mechanisms for addressing the problem be identified. (For example, are there state or local regulations that require better maintenance of these systems?)
  - b) If the report indicates that livestock concentrations are “relatively” low, this does not mean that their impacts should be ignored. If you know of areas where livestock have access to streams in the watershed, make sure that these areas are further monitored to determine localized impacts. Fencing and bridging can keep livestock out of streams while meeting farmers needs.
  - c) County-wide averages for different till practices are often used instead of determining the actual till practices in the watershed. Suggest that watershed specific numbers be obtained where possible.
  - d) Suggest that Conservation Reserve Program projects and other conservation projects and their locations are specifically identified. Reviewing this information along with the water quality data will be helpful in determining the effectiveness of such projects and in identifying good locations for future projects.
  
- 4) Does your organization have specific knowledge of problematic areas in the watershed? This might include areas where stream banks are being eroded, places

where livestock has access to the stream or its tributaries, areas with homes that have old septic systems, areas where extensive fertilizer is applied, etc.

- a) If so, identify these potentially problematic areas for the consultants in your comments and suggest that monitoring be conducted to determine relative impacts of these pollution sources. Indicate that your organization is willing and interested in conducting basic volunteer water quality monitoring to assist in targeting priority areas for restoration activities. Request more coordination between local volunteer water monitoring
- 5) IEPA has taken a position that they only develop TMDLs for pollutants for which they have numeric water quality criteria. This is not really consistent with the law. Because it is difficult to determine site specific targets for TMDL development, advocates haven't pushed this problem very hard.
- a) You should emphasize in your comments that local restoration activities should be prioritized by the positive impact they may have on all listed impairments. Therefore, available information on these impairments should be provided in the TMDL development process, and additional information should be collected to help prioritize such projects.
  - b) Also, if the TMDL is for dissolved oxygen problems, emphasize that they cannot do an adequate DO TMDL unless appropriate reduction in nutrient loadings are determined
- 6) Make sure that any watershed reports that you know exist are considered and the findings are incorporated into the TMDL.