



March 8, 2010

Mr. Andrew Sullivan
Water Quality Planning Division, MC 234
Texas Commission on Environmental Quality
P.O. Box 13087, Austin, TX 78711-3087
Fax: 512-239-4410

Re: Draft 2010 Texas Integrated Report for Clean Water Act Sections 305(b) and 303(d)

Dear Mr. Sullivan:

LCRA appreciates the opportunity to comment on the Draft 2010 Texas Integrated Report for Clean Water Act Sections 305(b) and 303(d). As a steward of the water quality of the Colorado River Basin, and a Clean Rivers Program partner, LCRA carefully reviews each listing to ensure the appropriateness of the assessment. LCRA generally agrees with the results of the assessment. Based on a review of Clean Rivers Program data and knowledge of the Colorado River basin, we have the following comments.

- 1) Four assessment units in segment 1404 (Lake Travis) were identified as a concern for depressed dissolved oxygen. The data used for Lake Travis includes profile measurements taken during late fall/early winter when the lakes turn over. Breakdown of stratification is a predictable, naturally occurring phenomenon in which anoxic waters are mixed with oxygenated water, resulting in lower dissolved oxygen throughout the water body. This naturally occurring event is temporary and does not impair the biological community.

The current method for determining the mixed surface layer in reservoirs is to use the depth at which there is a 0.5°C change in temperature from the surface. Although this method is straightforward, there is occasionally discordance between the rates of thermal change and oxygen depletion during the breakdown of stratification. This discordance can sometimes increase the depth of the mixed surface layer to include water from the anoxic zone; thereby resulting in depressed dissolved oxygen values.

We recommend that in future assessments, the Texas Commission on Environmental Quality (TCEQ) staff consider seasonal turnover affects when determining whether or not reservoirs support their aquatic life use designations.

- 2) Segment 1412B (Beals Creek) is listed as impaired due to high levels of selenium in water. This new listing is based on eight samples collected from two sites. It is currently in category 4c, suggesting that the impairment cannot be addressed by a Total Maximum Daily Load (TMDL) or other water quality processes because it is not caused by pollutants. To the best of our knowledge, there have been no studies or ground-truthing exercises that indicate potential sources of selenium in water in Beals Creek. Until potential sources are

identified, LCRA and the Colorado River Municipal Water District recommend placing it into category 5c. This will ensure that routine data will continue to be collected to accurately assess the segment.

- 3) Segments 1401 (Colorado River tidal) and 1501 (Tres Palacios River tidal) are listed as impaired for contact recreation based on elevated bacteria levels. They are currently in category 5a, indicating that a TMDL is underway or planned. According to the TCEQ TMDL team, there are no plans for projects on these segments. LCRA recommends placing them into category 5c. This will ensure that routine data will continue to be collected to accurately assess the segment.

Again, thank you for the opportunity to provide comments on the Draft 2010 Integrated Report. If you have any questions regarding these comments, please contact David Cowan at 473-3200 Ext. 2495.

Respectfully,



Lisa Hatzenbuehler, Manager
Water Quality Protection