



MEMORANDUM

TO: Board Members
City of Austin Environmental Board

FROM: Robert B. Botto
Environmental Planner
Watershed Protection Department

DATE: September 30, 2010

SUBJECT: Gilleland Creek Bacteria Total Maximum Daily Load and Implementation Plan

This memo briefly describes the Gilleland Creek Bacteria Total Maximum Daily Load (TMDL) and Implementation Plan (I-Plan). The first attachment depicts the watershed areas affected by the TMDL and I-Plan.

Planning for the TMDL and I-Plan began shortly after the Texas Commission on Environmental Quality (TCEQ) placed Gilleland Creek on its 2006 303(d) List. TCEQ listed Gilleland Creek because one or more of its stream segments exceeded the State of Texas' standard for *E. coli* bacteria in waters with a designated contact recreation use. Since then, representatives from the Watershed Protection Department (WPD) and the Austin Water Utility (AWU) have been working with the TCEQ, Lower Colorado River Authority and other watershed stakeholders to develop a TMDL and I-Plan for Gilleland Creek.

A TMDL is a technical analysis that TCEQ uses to:

- 1) Calculate a pollutant load, and
- 2) Estimate by how much to reduce that load in order to comply with the State of Texas' water quality standards.

Water bodies with an approved TMDL often require an I-Plan. I-Plans outline specific management measures or control actions that watershed stakeholders like the City of Austin implement to achieve a water quality target specified by a TMDL for that water body. Management measures and control actions may vary among stakeholders and change over time, while monitoring, a plan component, is used to help measure an I-Plan's effectiveness.

TMDLs can affect municipal separate storm sewer system (MS4) and municipal wastewater permits. According to our discussions with TCEQ staff, and as outlined in the draft I-Plan, MS4

permittees such as the City of Austin who have implemented their storm water management programs (SWMPs), which are part of an MS4 permit, will be in compliance with the Gilleland Creek Bacteria TMDL and I-Plan. This means that the I-Plan management measures are, at present, voluntary and that we do not expect any significant changes to our current operations. The control action specified in the I-Plan is regulatory and has become part of AWU's wastewater permit requirements. The second attachment summarizes the six management measures and one control action from the I-Plan and describes how those may affect WPD and AWU operations.

The TCEQ Commissioners may approve the I-Plan as early as December. In the meantime, TCEQ staff asked stakeholders to provide them with a letter of support. The third attachment is a draft of that letter.

WPD staff briefed the Board last November about the TMDL and I-Plan, and met with a Board subcommittee earlier this month to discuss certain aspects of the plan. Staff will provide periodic updates as the plan progresses.

Thank you for your continued interest in this matter and please do not hesitate to contact me with your questions or comments.

Sincerely,

Robert B. Botto

Attachments:

- 1) Watershed Areas Affected by the TMDL and I-Plan
- 2) Voluntary and Required Activities for the Gilleland Creek Implementation Plan
- 3) Draft Letter of Support