

Turtle Creek Watershed TMDL

Union County, Pennsylvania

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DEPARTMENT OF ENVIRONMENTAL PROTECTION

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**TMDL
Turtle Creek Watershed
Union County, Pennsylvania**

Executive Summary

Turtle Creek is a tributary of the West Branch Susquehanna River in Union County, Central Pennsylvania (PA).

A Total Maximum Daily Load (TMDL) for sediment was developed to address impairments noted in Pennsylvania's 2004 Section 303(d) and Integrated Lists. The impairments were documented during biological surveys of the aquatic life present in the watershed (10/17/2001). Excessive siltation resulting from agricultural activities and small residential runoff has been identified as the cause of these impairments in the basin. Because Pennsylvania does not currently have water quality criteria for sediment, a TMDL endpoint for sediment was identified using a reference watershed approach. The existing sediment loading, taking in account all sources, in the Turtle Creek Watershed is 2,325,800 pounds per year (6,372 pounds per day). Based on a comparison to a similar, unimpaired watershed, Crooked Creek, the maximum sediment loading that should still allow water quality objectives to be met in the Turtle Creek Watershed is 1,687,137.1 pounds per year (4,622.3 pounds per day). Allocation of the sediment TMDL is summarized below:

Table 1. Summary of TMDL for Turtle Creek Watershed in lbs./yr. & lbs./day						
Summary of TMDL for the Turtle Creek Watershed (lbs./yr.)						
Pollutant	TMDL	WLA	MOS	LA	LNR	ALA
Sediment	1,687,137	16,871	168,714	1,501,522	110,000	1,391,552
Summary of TMDL for the Turtle Creek Watershed (lbs./day)						
Pollutant	TMDL	WLA	MOS	LA	LNR	ALA
Sediment	4,622	46	462	4,114	301	3,813

The Turtle Creek Watershed TMDL is allocated to nonpoint sources, with 10% of the TMDL reserved explicitly as a margin of safety (MOS). The waste load allocation (WLA) is that portion of the total load assigned to National Pollutant Discharge Elimination System (NPDES) permitted point source discharges. A search of the Pennsylvania Department of Environmental Protection's (Department) efacts permit database identified no permitted facilities, point source discharges within the Turtle Creek Watershed. The load allocation (LA) is the portion of the total load assigned to nonpoint sources, which are all sources other than NPDES permitted point sources. Loads not reduced (LNR) are the portion of the LA associated with nonpoint sources other than agricultural (croplands, hay/pasture), transitional land, and stream bank and is equal to the sum of forested, wetland and low intensity development loadings. The adjusted load allocation (ALA) represents the remaining portion of the LA to be distributed among agricultural, transitional land and stream bank uses receiving load reductions. The TMDL developed for the Turtle Creek Watershed established a 37.2% reduction in the current sediment loading.

Introduction

The Turtle Creek watershed has been assessed with an existing aquatic life use as Warm Water Fishery (WWF) (PA Code 25 § 93.91). The definition for Warm Water Fishes states: WWF - Maintenance and propagation of fish species and additional flora and fauna which are indigenous to a warm water habitat. As part of the greater West Branch Susquehanna River and Susquehanna River Basin drainage, it is considered a Migratory Fishery (MF). The definition for Migratory Fishes states: MF – Passage, maintenance and propagation of anadromous and catadromous fishes and other fishes which ascend to flowing waters to complete their life cycle.

This Total Maximum Daily Load (TMDL) calculation has been prepared for all segments in the Turtle Creek Watershed (Attachment A). Turtle Creek begins at its upstream end in Buffalo Township and flows downstream to its confluence with the West Branch Susquehanna River in East Buffalo Township, Union County. Tributaries to Turtle Creek begin at their upstream ends in Buffalo Township, Union Township and East Buffalo Township, Union County. Turtle Creek, including all headwater tributaries, makes up approximately 24.0 stream miles in length. The entire watershed basin area is approximately 12.7 square miles (1658.1 acres, 671.0 hectares) and 8.8 stream miles within the watershed are listed as impaired. Land use in this watershed is composed of forestland (45.6%), low intensity development (6.9%), wetland (0.3%), turf/grass (0.1%) and agriculture (47.1%) including croplands and hay/pasture.

The watershed is located in State Water Plan (SWP) Subbasin 10C and within Hydrologic Unit Code (HUC) 02050206-Lower West Branch Susquehanna. Turtle Creek is within the Ridge and Valley physiographic province with an elevation range of over 1100 feet to less than 450 feet above sea level over 24.0 stream miles including all tributaries. This steep slope in conjunction with the lack of conservation farming practices in the headwaters creates high velocity silt laden runoff during precipitation events, thus degrading the entire stream to the point of impairment. The TMDL was completed to address the impairments that first identified on Pennsylvania's 2002 303(d) and integrated list and has been relisted through 2010 for siltation from agricultural activities and road runoff. This TMDL, required under the Clean Water Act, and covers the listed segments summarized in Table 2 and shown in detail in Attachment D. The TMDL addresses siltation from all land uses, including croplands and hay/pasture lands.

Table 2. Integrated Water Quality Monitoring and Assessment Report Listed Segments				
State Water Plan (SWP) Subbasin: 10C				
HUC: 02050206-Lower West Branch Susquehanna				
Watershed – Turtle Creek				
Source	EPA 305(b) Cause Code	Miles	Designated Use	Use Designation
Agriculture	Siltation	3.47	WWF, MF	Aquatic Life
Agriculture	Siltation	0.34	WWF, MF	Aquatic Life
Agriculture	Siltation	0.78	WWF, MF	Aquatic Life
Agriculture	Siltation	0.64	WWF, MF	Aquatic Life
Agriculture	Siltation	1.31	WWF, MF	Aquatic Life
Agriculture	Siltation	2.00	WWF, MF	Aquatic Life
Agriculture	Siltation	0.25	WWF, MF	Aquatic Life

HUC= Hydrologic Unit Code

WWF= Warm Water Fishes

MF= Migratory Fishes

The use designations for the stream segments in this TMDL can be found in PA Title 25 Chapter 93.

See Attachments D & E, for more information on the listings and listing process.

Clean Water Act Requirements

Section 303(d) of the 1972 Clean Water Act requires states, territories, and authorized tribes to establish water quality standards. The water quality standards identify the uses for each waterbody and the scientific criteria needed to support that use. Uses can include designations for drinking water supply, contact recreation (swimming), and aquatic life support. Minimum goals set by the Clean Water Act require that all waters be “fishable” and “swimmable.”

Additionally, the federal Clean Water Act and the United States Environmental Protection Agency’s (EPA) implementing regulations (40 CFR 130) require:

- States to develop lists of impaired waters for which current pollution controls are not stringent enough to meet water quality standards (the list is used to determine which streams need TMDLs);
- States to establish priority rankings for waters on the lists based on severity of pollution and the designated use of the waterbody; states must also identify those waters for which TMDLs will be developed and a schedule for development;
- States to submit the list of waters to EPA every two years (April 1 of the even numbered years);
- States to develop TMDLs, specifying a pollutant budget that meets state water quality standards and allocate pollutant loads among pollution sources in a watershed, e.g., point and nonpoint sources; and
- EPA to approve or disapprove state lists and TMDLs within 30 days of final submission.

Despite these requirements, states, territories, authorized tribes, and EPA have not developed many TMDLs since 1972. Beginning in 1986, organizations in many states filed lawsuits against EPA for

failing to meet the TMDL requirements contained in the federal Clean Water Act and its implementing regulations. While EPA has entered into consent agreements with the plaintiffs in several states, many lawsuits still are pending across the country.

In the cases that have been settled to date, the consent agreements require EPA to backstop TMDL development, track TMDL development, review state monitoring programs, and fund studies on issues of concern (e.g., Abandoned Mine Drainage (AMD), implementation of nonpoint source BMPs, etc.).

Pennsylvania Clean Streams Law Requirements and Agricultural Operations

All Pennsylvania farmers are subject to the water quality regulations authorized under the Pennsylvania Clean Streams Law, Title 25 Environmental Protection, and found within Chapters 91-93, 96, 102 and 105. These regulations include topics such as manure management, Concentrated Animal Operations (CAOs), Concentrated Animal Feeding Operations (CAFOs), Pollution Control and Prevention at Agricultural Operations, Water Quality Standards, Water Quality Standards Implementation, Erosion and Sediment Control Requirements, and Dam Safety and Waterway Management. To review these regulations, please refer to <http://pacode.com/> or the Pennsylvania Water Quality Action Packet for Agriculture which is supplied by the County Conservation Districts. To find your County Conservation District's contact information, please refer to <http://pacd.org/> or call any DEP office or the Pennsylvania Conservation Districts Headquarters at 717-238-7223.

Integrated Water Quality Monitoring and Assessment Report, List 5, 303(d), Listing Process

Prior to developing TMDLs for specific waterbodies, there must be sufficient data available to assess which streams are impaired and should be listed in the Integrated Water Quality Monitoring and Assessment Report. Prior to 2004 the impaired waters were found on the 303(d) List; from 2004 to present, the 303(d) List was incorporated into the Integrated Water Quality Monitoring and Assessment Report and found on List 5. Please see Table 3 below for a breakdown of the changes to listing documents and assessment methods through time.

With guidance from EPA, the states have developed methods for assessing the waters within their respective jurisdictions. From 1996-2006, the primary method adopted by the Pennsylvania Department of Environmental Protection for evaluating waters found on the 303(d) lists (1998-2002) or in the Integrated Water Quality Monitoring and Assessment Report (2004-2006) was the Statewide Surface Waters Assessment Protocol (SSWAP). SSWAP was a modification of the EPA Rapid Bioassessment Protocol II (RPB-II) and provided a more consistent approach to assessing Pennsylvania's streams.

The assessment method required selecting representative stream segments based on factors such as surrounding land uses, stream characteristics, surface geology, and point source discharge locations. The biologist selected as many sites as necessary to establish an accurate assessment for a stream segment; the length of the stream segment could vary between sites. All the biological surveys included kick-screen sampling of benthic macroinvertebrates, habitat surveys, and measurements of

pH, temperature, conductivity, dissolved oxygen, and alkalinity. Benthic macroinvertebrates were identified to the family level in the field.

The listings found in the Integrated Water Quality Monitoring and Assessment Reports from 2008 to present were derived based on the Instream Comprehensive Evaluation protocol (ICE). Like the SSWAP protocol that preceded the ICE protocol, the method requires selecting representative segments based on factors such as surrounding land uses, stream characteristics, surface geology, and point source discharge locations. The biologist selects as many sites as necessary to establish an accurate assessment for a stream segment; the length of the stream segment could vary between sites. All the biological surveys include D-frame kicknet sampling of benthic macroinvertebrates, habitat surveys, and measurements of pH, temperature, conductivity, dissolved oxygen, and alkalinity. Collected samples are returned to the laboratory where the samples are then subsampled to obtain a benthic macroinvertebrate sample of 200 + or – 20% (160 to 240). The benthic macroinvertebrates in this subsample were then identified to the generic level. The ICE protocol is a modification of the EPA Rapid Bioassessment Protocol III (RPB-III) and provides a more rigorous and consistent approach to assessing Pennsylvania’s streams than the SSWAP.

After these surveys (SSWAP, 1998-2006 lists or ICE, 2008-present lists) were completed, the biologist determined the status of the stream segment. The decision was based on the performance of the segment using a series of biological metrics. If the stream segment was classified as impaired, it was then listed on the state’s 303(d) List or presently the Integrated Water Quality Monitoring and Assessment Report with the source and cause documented.

Once a stream segment is listed as impaired, a TMDL must be developed for it. A TMDL addresses only one pollutant. If a stream segment is impaired by multiple pollutants, all of those pollutants receive separate and specific TMDLs within that stream segment. In order for the TMDL process to be most effective, adjoining stream segments with the same source and cause listing are addressed collectively on a watershed basis.

Table 3. Impairment Documentation and Assessment Chronology

Listing Date	Listing Document	Assessment Method
1998	303(d) List	SSWAP
2002	303(d) List	SSWAP
2004	Integrated List	SSWAP
2006	Integrated List	SSWAP
2008-Present	Integrated List	ICE

Integrated List= Integrated Water Quality Monitoring and Assessment Report

SSWAP= Statewide Surface Waters Assessment Protocol

ICE= Instream Comprehensive Evaluation Protocol

Basic Steps for Determining a TMDL

Although all watersheds must be handled on a case-by-case basis when developing TMDLs, there are basic processes or steps that apply to all cases. They include:

1. Collection and summarization of pre-existing data (watershed characterization, inventory contaminant sources, determination of pollutant loads, etc.);
2. Calculate TMDL for the waterbody using EPA approved methods and computer models;
3. Allocate pollutant loads to various sources;
4. Determine critical and seasonal conditions;
5. Submit draft report for public review and comments; and
6. EPA approval of the TMDL.

TMDL Elements (WLA, LA, MOS)

A TMDL equation consists of a wasteload allocation, load allocation and a margin of safety. The wasteload allocation (WLA) is the portion of the load assigned to point sources (National Pollutant Discharge Elimination System (NPDES) permitted discharges). The load allocation (LA) is the portion of the load assigned to nonpoint sources (non-permitted). The margin of safety (MOS) is applied to account for uncertainties in the computational process. The MOS may be expressed implicitly (documenting conservative processes in the computations) or explicitly (setting aside a portion of the allowable load).

Future TMDL Modifications

In the future, the Department may adjust the load and/or wasteload allocations in this TMDL to account for new information or circumstances that are developed or discovered during the implementation of the TMDL when a review of the new information or circumstances indicate that such adjustments are appropriate. Adjustment between the load and wasteload allocation will only be made following an opportunity for public participation. A wasteload allocation adjustment will be made consistent and simultaneous with associated permit(s) revision(s)/reissuances (i.e., permits for revision/reissuance in association with a TMDL revision will be made available for public comment concurrent with the related TMDLs availability for public comment). New information generated during TMDL implementation may include, among other things, monitoring data, best management practice (BMP) effectiveness information, and land use information. All changes in the TMDL will be tallied and once the total changes exceed 1% of the total original TMDL allowable load, the TMDL will be revised. The adjusted TMDL, including its LAs and WLAs, will be set at a level necessary to implement the applicable water quality standards (WQS) and any adjustment increasing a WLA will be supported by reasonable assurance demonstration that load allocations will be met. The Department will notify EPA of any adjustments to the TMDL within 30 days of its adoption and will maintain current tracking mechanisms that contain accurate loading information for TMDL waters.

Changes in TMDLs That May Require EPA Approval

- Increase in total load capacity.
- Transfer of load between point (WLA) and nonpoint (LA) sources.
- Modification of the margin of safety (MOS).
- Change in water quality standards (WQS).
- Non-attainment of WQS with implementation of the TMDL.
- Allocation transfers in trading programs.

Changes in TMDLs That May Not Require EPA Approval

- Total loading shift less than or equal to 1% of the total load.
- Increase of WLA results in greater LA reductions provided reasonable assurance of implementation is demonstrated (a compliance/implementation plan and schedule).
- Changes among WLAs with no other changes; TMDL public notice concurrent with permit public notice.
- Removal of a pollutant source that will not be reallocated.
- Reallocation between LAs.
- Changes in land use.

TMDL Approach

The TMDL developed for the Turtle Creek Watershed addresses sediment. Because neither Pennsylvania nor EPA has water quality criteria for sediment, a method was developed to determine water quality objectives for this pollutant that should result in the impaired stream segments attaining their designated uses. The method employed for this TMDL is termed the “Reference Watershed Approach”.

Selection of the Reference Watershed

The reference watershed approach was used to estimate the appropriate sediment loading reduction necessary to restore healthy aquatic communities to the Turtle Creek Watershed. This approach is based on selecting a non-impaired, or reference, watershed and estimating its current loading rates for the pollutants of interest. The objective of the process is to reduce loading rates of those pollutants identified as causing impairment to a level equivalent to or lower than the loading rates in the reference watershed. Achieving the appropriate load reductions should allow the return of a healthy biological community to affected stream segments.

First, there are three factors that should be considered when selecting a suitable reference watershed: impairment status, similarity of physical properties, and size of the watershed. A watershed that the Department has assessed and determined to be attaining water quality standards should be used as the reference. Second, a watershed that closely resembles the impaired watershed in physical properties such as land use/land cover, physiographic province, elevation, slope and geology should be chosen. Finally, the size of the reference watershed should be within 20-30% of the impaired watershed area.

The search for a reference watershed that would satisfy the above characteristics was done by means of a desktop screening using several GIS shapefiles, including a watershed layer, geologic formations layer, physiographic province layer, soils layer, Landsat-derived land cover/use grid, and the stream assessment information found on the Department's Instream Comprehensive Evaluation Protocol (ICE) GIS-based website. The suitability of the chosen watershed was confirmed through discussions with Department staff as well as through field verification of conditions.

The Crooked Creek Watershed was selected as the reference watershed for developing the Turtle Creek Watershed TMDL (see Figure 1 and Figure 2, page 12). The Crooked Creek Watershed was delineated from immediately upstream of Pennsylvania State Route 26. Crooked Creek begins at its upstream end Porter Township and flows through Walker Township before reaching State Route 26. Crooked Creek reaches its confluence with the Juniata River in Smithfield Township (downstream of the delineation point). The watershed is located in the Ridge and Valley physiographic province in State Water Plan (SWP) sub-basin 11B. Crooked Creek is identified in ICE as assessed and attaining its existing aquatic life use as Warm Water Fishery (WWF). The attainment of designated uses is based on biological sampling done by the Department. Table 4 compares the two watersheds in terms of size, location, and other physical characteristics.

Table 4. Comparison of the Turtle Creek & Crooked Creek Watersheds		
	Turtle Creek Watershed	Crooked Creek Watershed
Physiographic Province	Ridge and Valley	Ridge and Valley
Area (acres)	8,127	6,650
Land Use Distribution		
% Agriculture	47	29
% Forest	46	66
% Other	7	5
Soils		
Dominant Group		
% C	80	75
% B	20	25
Surface Geology		
% Sandstone	15	25
% Shale	55	40
% Carbonate	30	35
Average Rainfall (in.)	42.1, 23 years	40.1, 23 years
Average Runoff (in.)	3.4, 23 years	2.5, 23 years

The analysis of value counts for each pixel of the Multi-Resolution Land Characterization (MRLC) grid revealed that land cover/use distributions in both watersheds are similar. Agriculture and Forest Cover are the dominant land uses in the Turtle Creek Watershed. Forest Cover is the dominant land use category in both the Crooked Creek Watershed.

Turtle Creek and Crooked Creek lie within the Ridge and Valley Province. Surface geology in the both watersheds consists primarily of sandstone, shale and carbonate. The carbonate surface geology does have an effect on the loading rates to the watersheds and the carbonate composition is similar in the two watersheds.

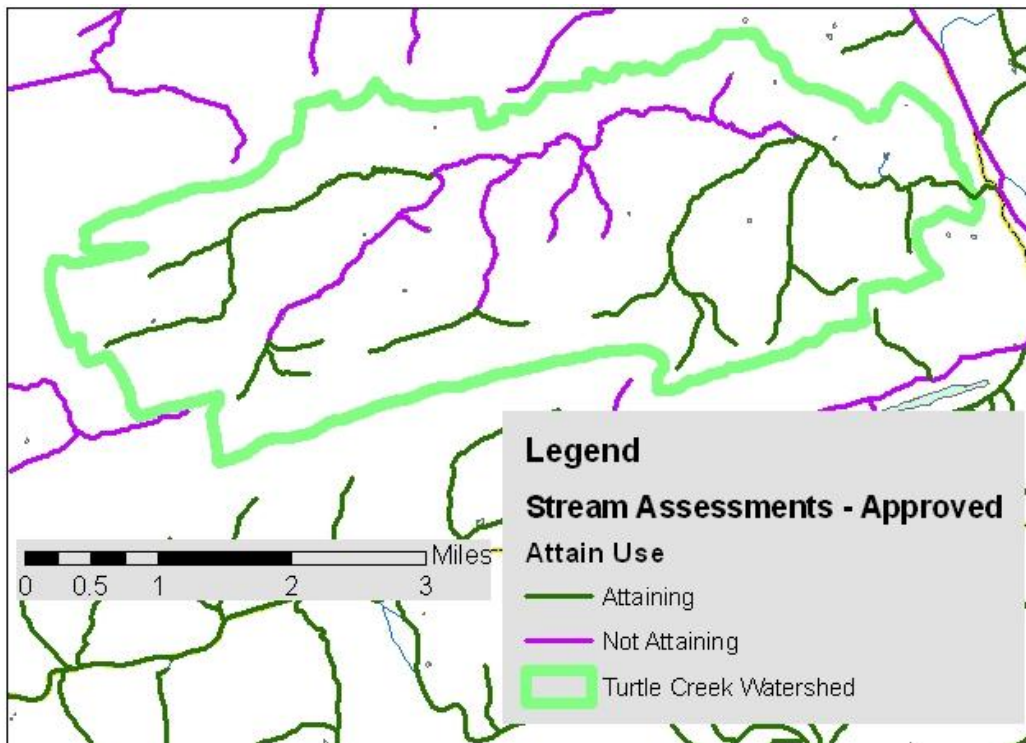


Figure 1: Impaired Turtle Creek Watershed

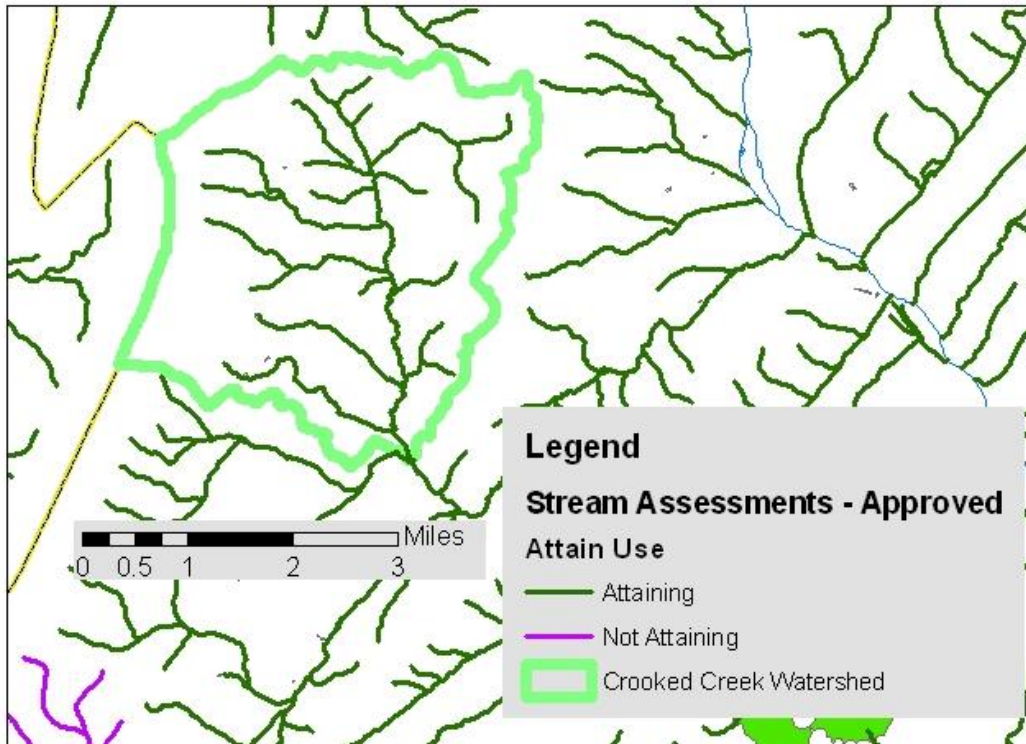


Figure 2. Reference: Unimpaired Crooked Creek Watershed

Hydrologic / Water Quality Modeling

Part 1. Model Overview & Data Compilation

The TMDL for this watershed was calculated using the ArcView Generalized Watershed Loading Function (AVGWLF) Interface for Windows, version 7.2.3. The remaining paragraphs in this section are excerpts from the GWLF User's Manual (Haith et al., 1992).

The core watershed simulation model for the AVGWLF software application is the GWLF (Generalized Watershed Loading Function) model developed by Haith and Shoemaker. The original DOS version of the model was re-written in Visual Basic by Evans et al. (2002) to facilitate integration with ArcView, and tested extensively in the U.S. and elsewhere.

The GWLF model provides the ability to simulate runoff and sediment load from a watershed given variable-size source areas (i.e., agricultural, forested, and developed land). It is a continuous simulation model that uses daily time steps for weather data and water balance calculations. Monthly calculations are made for sediment loads based on the daily water balance accumulated to monthly values.

GWLF is considered to be a combined distributed/lumped parameter watershed model. For surface loading, it is distributed in the sense that it allows multiple land use/cover scenarios, but each area is assumed to be homogenous in regard to various attributes considered by the model. Additionally, the model does not spatially distribute the source areas, but simply aggregates the loads from each source area into a watershed total; in other words there is no spatial routing. For sub-surface loading, the model acts as a lumped parameter model using a water balance approach. No distinctly separate areas are considered for sub-surface flow contributions. Daily water balances are computed for an unsaturated zone as well as a saturated sub-surface zone, where infiltration is simply computed as the difference between precipitation and snowmelt minus surface runoff plus evapotranspiration.

With respect to the major processes simulated, GWLF models surface runoff using the Soil Conservation Service Curve Number, or SCS-CN, approach with daily weather (temperature and precipitation) inputs. Erosion and sediment yield are estimated using monthly erosion calculations based on the Universal Soil Loss Equation USLE algorithm (with monthly rainfall-runoff coefficients) and a monthly composite of KLSCP values for each source area (i.e., land cover/soil type combination). The KLSCP factors are variables used in the calculations to depict changes in soil loss erosion (K), the length slope factor (LS), the vegetation cover factor (C), and the conservation practices factor (P). A sediment delivery ratio based on watershed size and transport capacity, which is based on average daily runoff, is then applied to the calculated erosion to determine sediment yield for each source area. Evapotranspiration is determined using daily weather data and a cover factor dependent upon land use/cover type. Finally, a water balance is performed daily using supplied or computed precipitation, snowmelt, initial unsaturated zone storage, maximum available zone storage, and evapotranspiration values.

For execution, the model requires two separate input files containing transport and weather-related data. The transport (transport.dat) file defines the necessary parameters for each source area to be

considered (e.g., area size, curve number, etc.) as well as global parameters (e.g., initial storage, sediment delivery ratio, etc.) that apply to all source areas. The weather (weather.dat) file contains daily average temperature and total precipitation values for each year simulated.

Since its initial incorporation into AVGWLF, the GWLF model has been revised to include a number of routines and functions not found in the original model. For example, a significant revision in one of the earlier versions of AVGWLF was the inclusion of a streambank erosion routine. This routine is based on an approach often used in the field of geomorphology in which monthly streambank erosion is estimated by first calculating a watershed-specific lateral erosion rate (LER). After a value for LER has been computed, the total sediment load generated via streambank erosion is then calculated by multiplying the above erosion rate by the total length of streams in the watershed (in meters), the average streambank height (in meters), and the average soil bulk density (in kg/m^3).

The inclusion of the various model enhancements mentioned above has necessitated the need for several more input files than required by the original GWLF model, including a “scenario” (*.scn) file, an animal data (animal.dat) file. Also, given all of the new and recent revisions to the model, it has been renamed “GWLF-E” to differentiate it from the original model.

As alluded to previously, the use of GIS software for deriving input data for watershed simulation models such as GWLF is becoming fairly standard practice due to the inherent advantages of using GIS for manipulating spatial data. In this case, a customized interface developed by Penn State University for ArcView GIS software (versions 3.2 or 3.3) is used to parameterize input data for the GWLF-E model. In utilizing this interface, the user is prompted to load required GIS files and to provide other information related to various “non-spatial” model parameters (e.g., beginning and end of the growing season; the months during which manure is spread on agricultural land, etc.). This information is subsequently used to automatically derive values for required model input parameters which are then written to the appropriate input files needed to execute the GWLF-E model. Also accessed through the interface are Excel-formatted weather files containing daily temperature and precipitation information. (In the version of AVGWLF used in Pennsylvania, a statewide weather database was developed that contains about twenty-five (25) years of temperature and precipitation data for seventy-eight (78) weather stations around the state). This information is used to create the necessary weather.dat input file for a given watershed simulation.

Part 2. GIS Based Derivation of Input Data

The primary sources of data for this analysis were geographic information system (GIS) formatted databases and shapefiles. In using the AVGWLF interface, the user is prompted to identify required GIS files and to provide other information related to “non-spatial” model parameters (e.g. beginning and end of growing season, manure spreading period, etc.). This information is subsequently used to automatically derive values for required model input parameters, which are then written to the TRANSPRT.DAT and WEATHER.DAT input files needed to execute the GWLF model. For use in Pennsylvania, AVGWLF has been linked with statewide GIS data layers such as land use/cover, soils, topography and physiography; and includes location-specific default information such as cropping practices. Complete GWLF-formatted weather files are also included for the seventy-eight weather stations around the state.

Table 5 lists GIS datasets and shapefiles used for the Turtle Creek TMDL calculations via AVGWLF and provides explanations of how they were used for development of the input files for the GWLF model.

Table 5. GIS Datasets	
DATASET	DESCRIPTION
county.shp	The county boundaries coverage lists data on conservation practices which provides C and P values in the Universal Soil Loss Equation (USLE).
padem	100 meter digital elevation model; this is used to calculate landslope and slope length.
palumrlc	A satellite image derived land cover grid which is classified into 15 different landcover categories. This dataset provides landcover loading rates for the different categories in the model.
physprov.shp	A shapefile of physiographic provinces. This is used in rainfall erosivity calculations.
smallsheds.shp	A coverage of watersheds derived at 1:24,000 scale. This coverage is used with the stream network to delineate the desired level watershed.
streams.shp	The 1:24,000 scale single line stream coverage of Pennsylvania. Provides a complete network of streams with coded stream segments.
PAgeo	A shapefile of the surface geology used to compare watersheds of similar qualities.
weathersta.shp	Historical weather files for stations around Pennsylvania to simulate flow.
soils.shp	A shapefile providing soil characteristics data. This is used in multiple calculations.
zipcodes.shp	This shapefile provides animal density numbers used in the LER calculation.

In the GWLF model, the nonpoint source load calculated is affected by terrain conditions such as amount of agricultural land, land slope, and inherent soil erodibility. It is also affected by farming practices utilized in the area. Various parameters are included in the model to account for these conditions and practices. Some of the more important parameters are summarized below:

Areal extent of different land use/cover categories: This is calculated directly from a GIS layer of land use/cover.

Curve number: This determines the amount of precipitation that infiltrates into the ground or enters surface water as runoff. It is based on specified combinations of land use/cover and hydrologic soil type, and is calculated directly using digital land use/cover and soils layers.

K factor: This factor relates to inherent soil erodibility, and affects the amount of soil erosion taking place on a given unit of land.

LS factor: This factor signifies the steepness and length of slopes in an area and directly affects the amount of soil erosion.

C factor: This factor is related to the amount of vegetative cover in an area. In agricultural areas, the crops grown and the cultivation practices utilized largely control this factor. Values range from 0 to 1.0, with larger values indicating greater potential for erosion.

P factor: This factor is directly related to the conservation practices utilized in agricultural areas. Values range from 0 to 1.0, with larger values indicating greater potential for erosion.

Sediment delivery ratio: This parameter specifies the percentage of eroded sediment that is delivered to surface water and is empirically based on watershed size.

Unsaturated available water-holding capacity: This relates to the amount of water that can be stored in the soil and affects runoff and infiltration. It is calculated using a digital soils layer.

Other less important factors that can affect sediment loads in a watershed are also included in the model.

The above parameter descriptions were taken from the *AVGWLF Version 7.1 Users Guide* (Evans et al., 2007).

Watershed Assessment and Modeling

The AVGWLF model was used to establish existing loading conditions for the Turtle Creek and the Crooked Creek Watersheds. All AVGWLF data and outputs have been attached to this TMDL as Attachment C. Department staff visited the Turtle Creek Watershed and the Crooked Creek Watershed to get a better understanding of existing conditions that might influence the AVGWLF model. General observations of the individual watershed characteristics included:

Turtle Creek Watershed (impaired)

- limited or absent riparian buffers in the agricultural areas
- conservation farming practices limited or absent
- livestock access to the stream

Crooked Creek Watershed (reference)

- forested riparian buffers
- tree plantings
- no till farming practices

Based on field observations adjustments may be made to specific parameters used in the AVGWLF model. These adjustments were as follows:

Turtle Creek Watershed

- No changes to the model were necessary for the Turtle Creek Watershed since field observations matched model defaults.

Crooked Creek Watershed

- No changes to the model were necessary for the Crooked Creek Watershed since field observations matched model defaults.



Figure 3. Stream Bank Erosion in the Turtle Creek Watershed



Figure 4. Limited buffer zone in the Turtle Creek Watershed



Figure 5. Extensive riparian buffer in the Crooked Creek Watershed

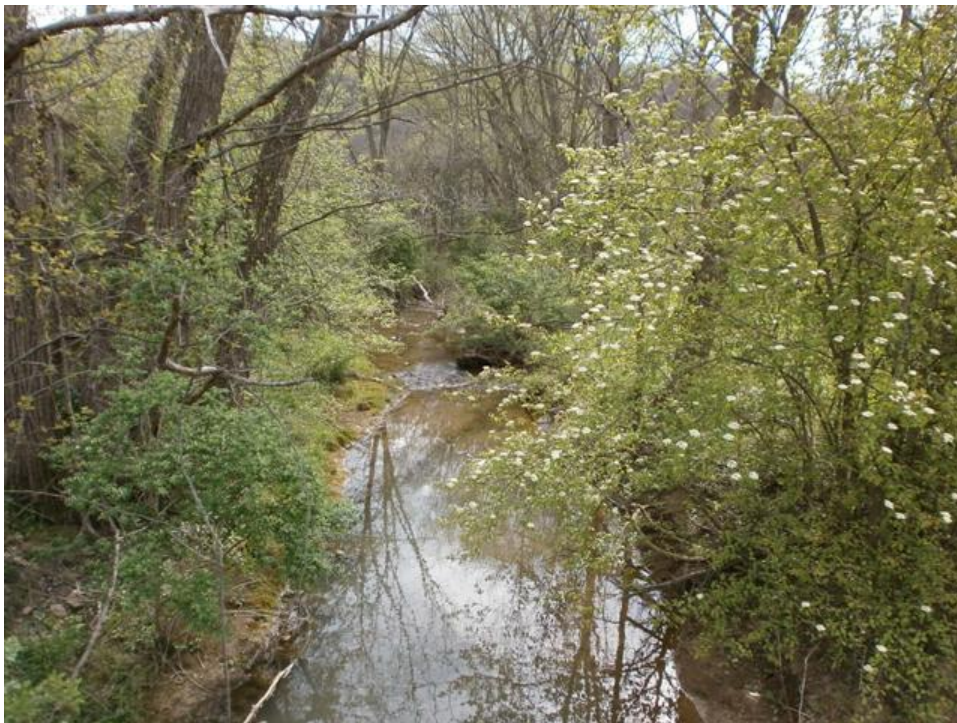


Figure 6. Extensive riparian buffer in the Crooked Creek Watershed

The AVGWLF model produced area information and sediment loading based on land use (Tables 6 and 7).

Table 6. Existing Loading Values for Turtle Creek (impaired)			
Source	Area (ac)	Sediment (lbs)	Unit Area Load (lbs/ac/yr)
HAY/PAST	1,378.8	77,400	56.1
CROPLAND	2,426.6	1,270,200	523.4
FOREST	3,709.0	80,800	21.8
WETLAND	27.2	0	0.0
TURF_GRASS	4.9	0	0.0
TRANSITION	19.8	35,000	1,767.7
LO_INT_DEV	560.9	29,200	52.1
Stream Bank		833,200	
TOTAL	8,127.2	2,325,800	286.2

Table 7. Existing Loading Values for Crooked Creek (reference)			
Source	Area (ac)	Sediment (lbs.)	Unit Area Load (lb/ac/yr)
HAY/PAST	1,811.3	413,000	228.0
CROPLAND	108.7	137,600	1,265.9
FOREST	4,376.2	405,400	92.6
WETLAND	22.2	0	0.0
COAL_MINES	12.4	600	48.4
LO_INT_DEV	318.8	38,400	120.5
Stream Bank		385,400	
TOTAL	6,649.6	1,380,400	207.6

For Tables 6 and 7 the “stream bank” sediment loads are calculated by AVGWLF’s stream bank routine. This routine uses stream bank (linear) miles rather than area.

Development of Sediment TMDL

The target TMDL value for the Turtle Creek Watershed was established based on current loading rates for sediment in the Crooked Creek reference watershed. Crooked Creek is currently designated as a Warm Water Fishery (WWF) and previous biological assessments have determined that the watershed is attaining its designated use for aquatic life. As part of the greater West Branch Susquehanna River and Susquehanna River Basin drainage, it is considered a Migratory Fishery (MF). Reducing the loading rates of sediment in the Turtle Creek Watershed to levels equal to or less than the reference watershed should allow for the reversal of current use impairments.

As described in the previous section, sediment loading rates were computed for the Crooked Creek Watershed using the AVGWLF model. The target TMDL value for sediment was determined by multiplying the unit area loading rates for the Crooked Creek Watershed by the total watershed area of the Turtle Creek Watershed (Table 8).

Table 8. TMDL Values for the Turtle Creek Watershed				
Pollutant	Loading Rate in Reference (lb/ac-yr)	Total Area in Turtle Creek Watershed (ac)	Target TMDL Value (lb/yr)	Target TMDL Value (lb/day)
Sediment	207.6	8,127.2	1,687,137*	4,622

* takes into account rounding in previous calculations

The target TMDL value was then used as the basis for load allocations and reductions in the Turtle Creek Watershed, using the following two equations:

1. $TMDL = WLA + LA + MOS$
2. $LA = ALA + LNR$

where:

TMDL = Total Maximum Daily Load
WLA = Waste Load Allocation (Point Sources)
LA = Load Allocation (Nonpoint Sources)
MOS = Margin of Safety
ALA = Adjusted Load Allocation
LNR = Loads Not Reduced

Waste Load Allocation

The waste load allocation (WLA) portion of the TMDL equation is the total loading of a pollutant that is assigned to point sources. There are no NPDES permitted facilities in the Turtle Creek Watershed; however, there was a bulk reserve allocation of 1.0% of the TMDL to account for the dynamic nature of permit activity. The bulk reserve accounts for a loading rate of 16,871 pounds of sediment per year (Table 9).

$WLA = \text{Flow (mgd)} * \text{mg/L (monthly average)} * 8.34 * 365 = \text{TSS lbs./yr.}$

Table 9. Waste Load Allocations for the Turtle Creek Watershed			
Name	NPDES Permit #	Loading Rate (lb/yr)	Loading Rate (lb/day)
Bulk Reserve	NA	16,871	46

Margin of Safety

The margin of safety (MOS) is that portion of the pollutant loading that is reserved to account for any uncertainty in the data and computational methodology used for the analysis. For this analysis, the MOS is explicit. Ten percent of the targeted TMDL for sediment was reserved as the MOS. Using 10% of the TMDL load is based on professional judgment and will provide an additional level of protection to the designated uses of Turtle Creek. The MOS used for the sediment TMDL was set at 168,714 lbs./yr.

$MOS = 1,687,137 \text{ lbs./yr. (TMDL)} * 0.1 = 168,714 \text{ lbs./yr.}$

or

$MOS = 4,622 \text{ lbs./day (TMDL)} * 0.1 = 462 \text{ lbs./day}$

Load Allocation

The load allocation (LA) is that portion of the TMDL that is assigned to nonpoint sources. The LA for sediment was computed by subtracting the MOS value and the WLA from the TMDL value. The LA for sediment was 1,501,552 lbs./yr.

$$\text{LA} = 1,687,137 \text{ lbs./yr. (TMDL)} - 168,714 \text{ lbs./yr. (MOS)} - 16,871 \text{ lbs./yr. (WLA)} = 1,501,552 \text{ lbs./yr.}$$

or

$$\text{LA} = 4,622 \text{ lbs./day (TMDL)} - 462 \text{ lbs./day (MOS)} - 46 \text{ lbs./day (WLA)} = 4,113.8 \text{ lbs./day}$$

Adjusted Load Allocation

The adjusted load allocation (ALA) is the actual portion of the LA distributed among those nonpoint sources receiving reductions. It is computed by subtracting those nonpoint source loads that are not being considered for reductions (loads not reduced (LNR)) from the LA. While the Turtle Creek Watershed TMDL was developed to address impairments caused by agricultural activities, hay/pastureland (Hay/Past) and Cropland, they were not the only land uses considered for reductions. Stream banks noted in the Turtle Creek Watershed were believed to also be a contributor to the sediment load in the watershed. Land uses/source loads not reduced (LNR) were carried through at their existing loading values (Table 10).

Table 10. Load Allocations, Loads Not Reduced and Adjusted Load Allocations		
	Sediment (lbs./yr.)	Sediment (lbs./day)
Load Allocation	1,501,522.0	4,113.8
Loads Not Reduced:		
Forest	80,800	221
Low Intensity Development	29,200	80
Adjusted Load Allocation	1,391,552.0	3,812.5

TMDL Summary

The sediment TMDL established for the Turtle Creek Watershed consists of a Load Allocation (LA) and a Margin of Safety (MOS). The individual components of the Turtle Creek Watershed TMDL are summarized in Table 11.

Table 11. TMDL Components for the Turtle Creek Watershed		
Component	Sediment (lbs./yr.)	Sediment (lbs./day)
TMDL (Total Maximum Daily Load)	1,687,137	4,622
WLA (Waste Load Allocation)	16,871	46
MOS (Margin of Safety)	168,714	462
LA (Load Allocation)	1,501,552	4,114
LNR Loads Not Reduced)	110,000	301
ALA (Adjusted Load Allocation)	1,391,552	3,813

Calculation of Sediment Load Reductions

The adjusted load allocation established in the previous section represents the sediment load that is available for allocation between Hay/Pasture, Cropland, Transition land and stream banks in the Turtle Creek Watershed. Data needed for load reduction analyses, including land use distribution, were obtained by GIS analysis. The Equal Marginal Percent Reduction (EMPR) allocation method, Attachment B, was used to distribute the ALA between the three land use types and stream banks. The process is summarized below:

1. Each land use/source load is compared with the total allocable load to determine if any contributor would exceed the allocable load by itself. The evaluation is carried out as if each source is the only contributor to the pollutant load to the receiving waterbody. If the contributor exceeds the allocable load, that contributor would be reduced to the allocable load. This is the baseline portion of EMPR. For this evaluation no contributor was in excess of the adjusted load allocation (ALA).
2. After any necessary reductions have been made in the baseline, the multiple analyses are run. The multiple analyses will sum all of the baseline loads and compare them to the total allocable load. If the allocable load is exceeded, an equal percent reduction will be made to all contributors' baseline values. After any necessary reductions in the multiple analyses, the final reduction percentage for each contributor can be computed. For this evaluation the allocable load was exceeded. The equal percent reduction, i.e., the ALA divided by the summation of the baselines, worked out to a 37.2% reduction for all land uses/sources.

Tables 12 and 13 contain the results of the EMPR for Hay/Pasture, Cropland, Transition land and stream banks in the Turtle Creek Watershed. The load allocation for each land use is shown along with the percent reduction of current loads necessary to reach the targeted LA.

Table 12. Sediment Load Allocations/Reductions for Land Uses and Stream Banks in the Turtle Creek Watershed (Annual Values)						
		Current Loading	Allowable Loading	Current Load	Load Allocation	
Land Use	Acres	(lbs./acre/yr.)	(lbs./acre/yr.)	(lbs./yr.)	(lbs./yr.)	% Reduction
Hay/Pasture	1,378.8	56.1	35.3	77,400	48,608	37.2
Cropland	2,426.6	523.4	328.7	1,270,200	797,703	37.2
Transitional	19.8	7,142.9	4,485.8	35,000	21,981	37.2
Stream Banks				833,200	523,261	37.2

Table 13. Sediment Load Allocations/Reductions for Land Uses and Stream Banks in the Turtle Creek Watershed (Daily Values)

		Current Loading	Allowable Loading	Current Load	Load Allocation	
Land Use	Acres	(lbs./acre/day)	(lbs./acre/day)	(lbs./day)	(lbs./day)	% Reduction
Hay/Pasture	1,378.8	0.2	0.1	212	133	37.2
Cropland	2,426.6	1.4	0.9	3,480	2,185	37.2
Transitional	19.8	19.6	12.3	96	60	37.2
Stream Banks				2,283	1,434	37.2

Consideration of Critical Conditions

The AVGWLF model is a continuous simulation model, which uses daily time steps for weather data and water balance calculations. Monthly calculations are made for sediment loads, based on daily water balance accumulated in monthly values. Therefore, all flow conditions are taken into account for loading calculations. Because there is generally a significant lag time between the introduction of sediment to a water body and the resulting impact on beneficial uses, establishing this TMDL using average annual conditions is protective of the water body.

Consideration of Seasonal Variations

The continuous simulation model used for this analysis considers seasonal variation through a number of mechanisms. Daily time steps are used for weather data and water balance calculations. The model requires specification of the growing season and hours of daylight for each month. The model also considers the months of the year when manure is applied to the land. The combination of these actions by the model accounts for seasonal variability.

Consideration of Background Contributions

The AVGWLF model accounts for all land uses within the watershed and their respective contributions to the sediment load. The only background sources of sediment within the watershed would be from forested areas. There are no additional “upstream” sources of sediment to this watershed as the entire Turtle Creek Watershed including all headwaters was assessed and modeled. The remaining land uses are anthropogenic sources of sediment to the watershed, thus will not be considered background.

Recommendations

Sediment reduction in the TMDL is allocated to nonpoint sources in the watershed, including agricultural activities and stream banks. BMPs should be implemented in the affected areas. The proper implementation of these BMPs should achieve the loading reduction goals established in the TMDL.

Due to the extreme slope that was observed in the Turtle Creek Watershed, reductions in the amount of sediment reaching the streams in the watershed can be made through the right combination of

BMPs including, but not limited to: establishment of cover crops, strip cropping, residue management, no till, crop rotation, contour farming, terracing, stabilizing heavy use areas and proper management of storm water. Vegetated or forested buffers are acceptable BMPs to intercept any runoff from farm fields. For the pasturing of farm animals and animal heavy use areas, acceptable BMPs may include: manure storage, rotational grazing, livestock exclusion fencing and forested riparian buffers. Some of these BMPs were observed in the Turtle Creek Watershed; however, they were more extensively used in the unimpaired reference watershed, Crooked Creek, with forested riparian buffers being the predominant BMP in use. Since both watersheds have a moderate amount of agricultural activities, it is apparent that the greater use of BMPs, especially forested riparian buffers, in the reference watershed has contributed to its ability to maintain its attainment status as a Warm Water Fishes (WWF) stream.

Stream banks contribute to the sediment load in Turtle Creek. Stream bank stabilization projects would be acceptable BMPs for the eroded stream banks in the area. However, the establishment of forested riparian buffers is the most economical and effective BMP at providing stream bank stabilization and protection of the banks from freeze/thaw erosion and scouring flows. Forested riparian buffers also provide important natural and durable connectivity of land and water. This connectivity is necessary to provide cover, nesting and nursery sites, shade and stable temperatures, and viable substrate for aquatic organisms of all layers of the food web.

Important to TMDLs, established forested riparian buffers act as nutrient and sediment sinks. This is because the highly active and concentrated biological communities they maintain will assimilate and remove nutrients and sediment from the water column instead of allowing them to pass downstream, thus forested riparian buffers work directly toward attaining the goals of the TMDL by reducing pollutant loads. Forested riparian buffers also provide critical habitat to rare and sensitive amphibious and terrestrial organisms as well as migratory species. While forested riparian buffers are considered the most effective BMP, other possibilities for attaining the desired reductions may exist for the agricultural usages, as well as for the stream banks.

For both the agricultural land uses, further ground truthing should be performed in order to assess both the extent of existing BMPs, and to determine the most cost effective and environmentally protective combination of BMPs required for meeting the sediment reductions outlined in this report. A combined effort involving key personnel from the regional DEP office, the Union County Conservation District, Susquehanna River Basin Commission (SRBC) and other state and local agencies and/or watershed groups would be the most effective in accomplishing any ground truthing exercises. Development of a more detailed watershed implementation plan is recommended.

Public Participation

Public notice of the draft TMDL was published in the Pennsylvania Bulletin on July 21, 2012 to foster public comment on the report. The Department received one set of comments on the draft Turtle Creek TMDL report during the official comment period on September 10, 2012. The comments were submitted by: William A. Nelson, Natural Resources Director, Pennsylvania Farm Bureau (PFB). PFB's comments and DEP's responses are summarized in Attachment F, on page 42 of the document.

Literature Cited

Haith, D. A.; Mandel, R.; Wu, R. S. for Cornell University *Generalized Watershed Loading Functions Version 2.0 User's Manual*; Ithaca, NY, 1992.

Evans, B. M.; Lehning, D. W.; Corradini, K. J. for The Pennsylvania State University *AVGWLF Version 7.1 Users Guide*; University Park, PA, 2007.

Attachment A
Map of Turtle Creek Watershed

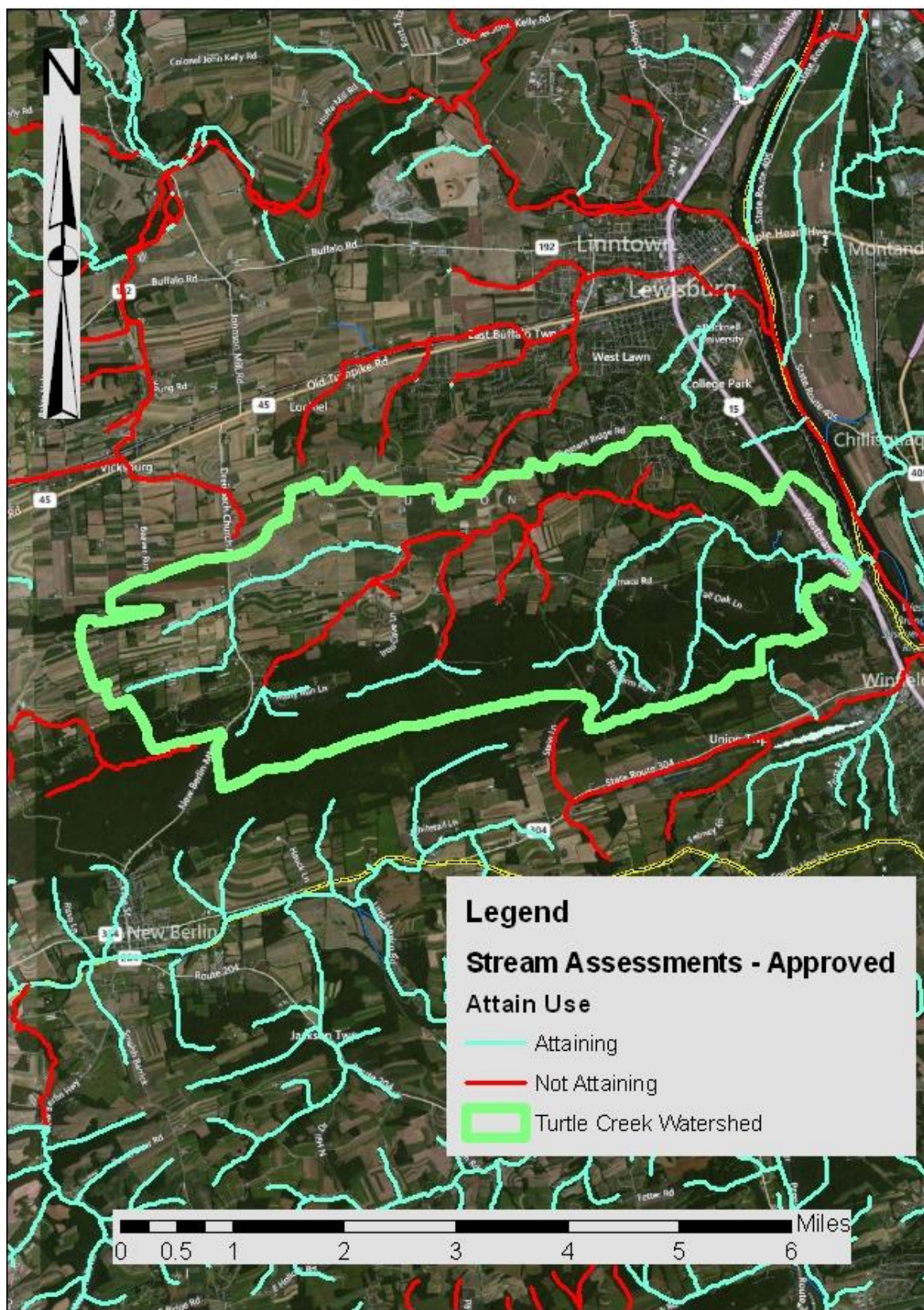


Figure A1. Turtle Creek Watershed

Attachment B
Equal Marginal Percent Reduction Method

Equal Marginal Percent Reduction (EMPR) (An Allocation Strategy)

The Equal Marginal Percent Reduction (EMPR) allocation method was used to distribute Adjusted Load Allocations (ALAs) between the appropriate contributing nonpoint sources. The load allocation and EMPR procedures were performed using a MS Excel spreadsheet. The 5 major steps identified in the spreadsheet are summarized below:

Step 1: Calculation of the TMDL based on impaired watershed size and unit area loading rate of reference watershed.

Step 2: Calculation of Adjusted Load Allocation based on TMDL, Margin of Safety, and existing loads not reduced.

Step 3: Actual EMPR Process:

- a. Each land use/source load is compared with the total ALA to determine if any contributor would exceed the ALA by itself. The evaluation is carried out as if each source is the only contributor to the pollutant load of the receiving waterbody. If the contributor exceeds the ALA, that contributor would be reduced to the ALA. If a contributor is less than the ALA, it is set at the existing load. This is the baseline portion of EMPR.
- b. After any necessary reductions have been made in the baseline, the multiple analyses are run. The multiple analyses will sum all of the baseline loads and compare them to the ALA. If the ALA is exceeded, an equal percent reduction will be made to all contributors' baseline values. After any necessary reductions in the multiple analyses, the final reduction percentage for each contributor can be computed.

Step 4: Calculation of total loading rate of all sources receiving reductions.

Step 5: Summary of existing loads, final load allocations, and % reduction for each pollutant source.

1	TMDL Total Load	Turtle Creek		2	Adjusted LA = (MDL total load - ((MOS) - loads not reduced)							
	Load = Sediment loading rate in ref. * Acres in Impaired				1391552.0	1391552.0						
	1687137.1											
	Annual Average							% reduction		Allowable		
3	Load	Load Sum	Check	Initial Adjust	Recheck	allocation	Load Reduction	Initial LA	Acres	Loading Rate	% Reduction	
	HAY/PASTURE	77400.0	2215800.0	good	77400.0	ADJUST	0.0	28791.8	48608.2	1378.8	35.3	37.2%
	CROPLAND	1270200.0		good	1270200.0	824248.0	0.6	472497.4	797702.6	2426.6	328.7	37.2%
	Transitional	35000.0		good	35000.0		0.0	13019.5	21980.5	19.8	1110.1	37.2%
	Streambank	833200.0		good	833200.0		0.4	309939.3	523260.7	0.0		37.2%
					2215800.0		1.0	1391552.0				
4	All Ag. Loading Rate	226.99										
		Allowable (Target)		Current								
	Acres	loading rate	Final LA	Loading Rates	Current Load	% Red.			Current Load	Final LA		
5	HAY/PASTURE	1378.8	35.3	48608.2	56.1	77400.0	37.2%		HAY/PASTURE	77400	48608	
	CROPLAND	2426.6	328.7	797702.6	523.4	1270200.0	37.2%		CROPLAND	1270200	797703	
	transitional	19.8	1110.1	21980.5	1767.7	35000.0	37.2%		TRANSITIONAL	35000	21980	
	Streambank	0		523260.7		833200.0	37.2%		STREAMBANK	833200	523261	
				1391552.0		2215800.0	37.2%					

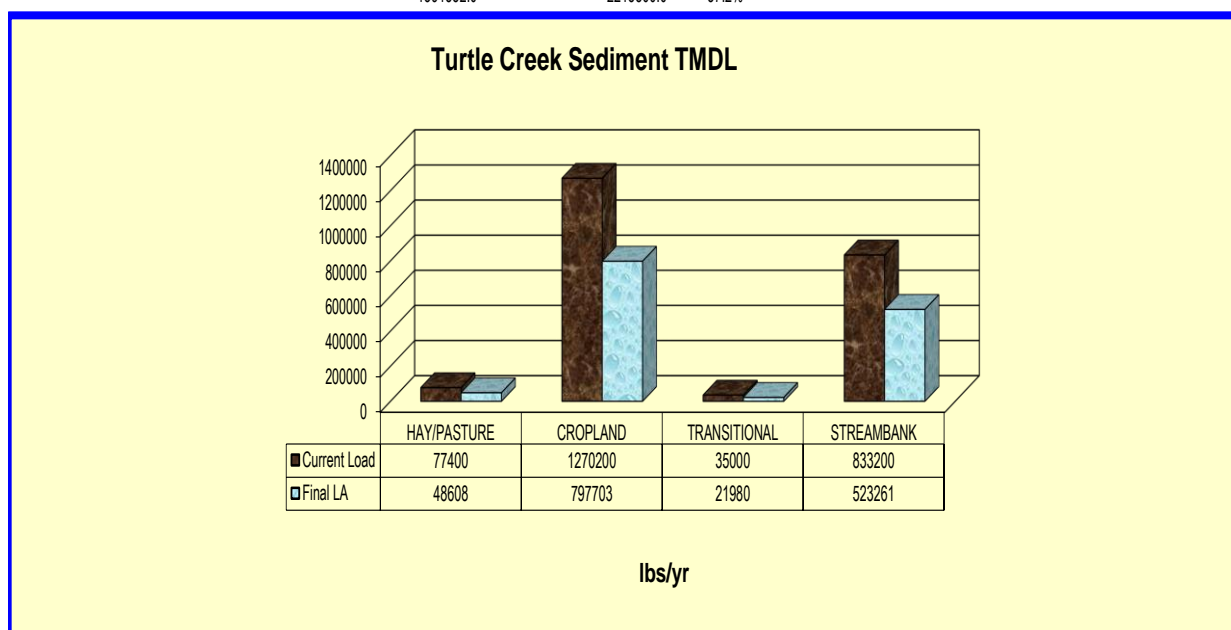


Table B1. Equal Marginal Percent Reduction calculations for Turtle Creek Watershed

Attachment C
AVGWLF Generated Data Tables

Rural LU	Area (ha)	CN	K	LS	C	P
Hay/Past	558	75	0.275	0.357	0.03	0.52
Cropland	982	82	0.292	0.224	0.42	0.52
Forest	1501	73	0.249	2.65	0.002	0.45
Wetland	11	87	0.272	0.125	0.01	0.1
Turf_Grass	2	71	0.28	0.076	0.08	0.2
	0	0	0	0	0	0
	0	0	0	0	0	0
	0	0	0	0	0	0
Bare Land	Area (ha)	CN	K	LS	C	P
	0	0	0	0	0	0
Transition	8	87	0.277	0.273	0.8	0.8
Urban LU	Area (ha)	CN	K	LS	C	P
Lo_Int_Dev	227	83	0.275	0.323	0.08	0.2
	0	0	0	0	0	0

Month	Ket	Day Hours	Season	Eros Coef	Stream Extract	Ground Extract
Jan	0.59	9.3	0	0.12	0	0
Feb	0.64	10.3	0	0.12	0	0
Mar	0.67	11.8	0	0.12	0	0
Apr	0.68	13.2	0	0.3	0	0
May	0.87	14.4	1	0.3	0	0
Jun	0.98	14.9	1	0.3	0	0
Jul	1.04	14.7	1	0.3	0	0
Aug	1.07	13.7	1	0.3	0	0
Sep	1.09	12.2	1	0.12	0	0
Oct	0.93	10.8	0	0.12	0	0
Nov	0.84	9.6	0	0.12	0	0
Dec	0.78	9.1	0	0.12	0	0

Init Unsat Stor (cm)	10	Initial Snow (cm)	0	Recess Coefficient	0.1
Init Sat Stor (cm)	0	Sed Delivery Ratio	0.157	Seepage Coefficient	0
Unsat Avail Wat (cm)	14.8974	Tile Drain Ratio	0.5	Sediment A Factor	6.8040E-04
		Tile Drain Density	0	Sed A Adjustment Factor	1

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Table C1. Data contained in TRANSPRT.DAT for Turtle Creek Watershed

GWLF Total Loads for file: TurtleCreek-0

Period of analysis: 23 years from 1976 to 1998

Source	Area (Acres)	Runoff (in)	Tons		Total Loads (Pounds)			
			Erosion	Sediment	Dis N	Total N	Dis P	Total P
Hay/Past	1378.8	2.8	246.5	38.7	2266.2	2498.3	255.9	325.1
Cropland	2426.6	4.9	4045.5	635.1	6930.0	10740.8	783.6	1919.2
Forest	3709.0	2.4	257.1	40.4	381.8	623.9	12.1	84.2
Wetland	27.2	7.4	0.1	0.0	8.7	8.8	0.3	0.3
Turf_Grass	4.9	2.0	0.2	0.0	5.7	5.9	0.7	0.7
Transition	19.8	7.4	111.7	17.5	96.3	201.5	6.6	38.0
Lo_Int_Dev	560.9	5.3	93.0	14.6	0.0	275.4	0.0	36.7
Farm Animals						0.0		0.0
Tile Drainage				0.0		0.0		0.0
Stream Bank				416.6		41.7		18.3
Groundwater					52326.1	52326.1	687.2	687.2
Point Sources					0.0	0.0	0.0	0.0
Septic Systems					136.0	136.0	5.6	5.6
Totals	8127.3	3.40	4754.0	1163.0	62150.8	66858.4	1752.0	3115.4

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Table C2. Outputs for Turtle Creek Watershed

Rural LU	Area (ha)	CN	K	LS	C	P
Hay/Past	733	75	0.266	1.693	0.03	0.45
Cropland	44	82	0.267	0.669	0.42	0.45
Forest	1771	73	0.234	7.996	0.002	0.66
Wetland	9	87	0.259	0.212	0.01	0.1
Coal_Mines	5	87	0.224	0.081	0.8	0.1
	0	0	0	0	0	0
	0	0	0	0	0	0
	0	0	0	0	0	0
	0	0	0	0	0	0
Bare Land	Area (ha)	CN	K	LS	C	P
	0	0	0	0	0	0
	0	0	0	0	0	0
Urban LU	Area (ha)	CN	K	LS	C	P
Lo_Int_Dev	129	83	0.264	0.759	0.08	0.2
	0	0	0	0	0	0

Month	Ket	Day Hours	Season	Eros Coef	Stream Extract	Ground Extract
Jan	0.69	9.4	0	0.12	0	0
Feb	0.75	10.4	0	0.12	0	0
Mar	0.78	11.8	0	0.12	0	0
Apr	0.8	13.2	0	0.3	0	0
May	0.95	14.4	1	0.3	0	0
Jun	1.03	14.9	1	0.3	0	0
Jul	1.08	14.6	1	0.3	0	0
Aug	1.11	13.6	1	0.3	0	0
Sep	1.13	12.2	1	0.12	0	0
Oct	1.0	10.8	0	0.12	0	0
Nov	0.93	9.6	0	0.12	0	0
Dec	0.88	9.1	0	0.12	0	0

Init Unsat Stor (cm)	10	Initial Snow (cm)	0	Recess Coefficient	0.1
Init Sat Stor (cm)	0	Sed Delivery Ratio	0.164	Seepage Coefficient	0
Unsat Avail Wat (cm)	13.1083	Tile Drain Ratio	0.5	Sediment A Factor	3.9797E-04
		Tile Drain Density	0	Sed A Adjustment Factor	1

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Table C3. Data contained in TRANSPRT.DAT for Crooked Watershed

GWLF Total Loads for file: CrookedCreek-0

Period of analysis: 23 years from 1975 to 1997

Source	Area (Acres)	Runoff (in)	Tons		Total Loads (Pounds)			
			Erosion	Sediment	Dis N	Total N	Dis P	Total P
Hay/Past	1811.3	2.5	1259.1	206.5	2669.8	3908.7	325.6	578.8
Cropland	108.7	4.5	419.7	68.8	282.9	695.8	33.7	118.1
Forest	4376.2	2.2	1235.8	202.7	408.4	1624.4	12.9	261.4
Wetland	22.2	6.9	0.1	0.0	6.6	6.7	0.2	0.2
Coal_Mines	12.4	6.9	2.1	0.3	0.2	2.2	0.0	0.4
Lo_Int_Dev	318.8	4.9	116.8	19.2	0.0	146.4	0.0	19.5
Farm Animals						0.0		0.0
Tile Drainage				0.0		0.0		0.0
Stream Bank				192.7		19.3		8.5
Groundwater					31693.6	31693.6	486.4	486.4
Point Sources					0.0	0.0	0.0	0.0
Septic Systems					120.2	120.2	15.0	15.0
Totals	6649.6	2.50	3033.6	690.2	35181.7	38217.4	873.8	1488.3

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Table C4. Outputs for Crooked Creek Watershed

Attachment D
Pennsylvania Integrated Water Quality Monitoring and Assessment
Report: Streams, Category 5 Waterbodies, Pollutants Requiring a
TMDL

**Pennsylvania Integrated Water Quality Monitoring and Assessment Report
Streams, Category 5 Waterbodies, Pollutants Requiring a TMDL**

Stream Name Use Designation (Assessment ID) Source	Cause	Date Listed	TMDL Date
Hydrologic Unit Code: 02050206 - Lower West Branch Susquehanna			
<u>Turtle Creek</u> HUC: 02050206			
Aquatic Life (2961) - 3.47 miles; 4 Segment(s)* Crop Related Agric	Siltation	2004	2017
<u>Turtle Creek (Unt 18701)</u> HUC: 02050206			
Aquatic Life (2961) - 0.34 miles; 2 Segment(s)* Crop Related Agric	Siltation	2004	2017
<u>Turtle Creek (Unt 18702)</u> HUC: 02050206			
Aquatic Life (2961) - 0.78 miles; 3 Segment(s)* Crop Related Agric	Siltation	2004	2017
<u>Turtle Creek (Unt 18703)</u> HUC: 02050206			
Aquatic Life (2961) - 0.64 miles; 1 Segment(s)* Crop Related Agric	Siltation	2004	2017
<u>Turtle Creek (Unt 18704)</u> HUC: 02050206			
Aquatic Life (2961) - 1.31 miles; 1 Segment(s)* Crop Related Agric	Siltation	2004	2017
<u>Turtle Creek (Unt 18706)</u> HUC: 02050206			
Aquatic Life (2961) - 2.00 miles; 3 Segment(s)* Crop Related Agric	Siltation	2004	2017
<u>Turtle Creek (Unt 18707)</u> HUC: 02050206			
Aquatic Life (2961) - 0.25 miles; 2 Segment(s)* Crop Related Agric	Siltation	2004	2017

Report Summary

Watershed Summary

	Stream Miles	Assessment Units	Segments (COMIDs)
Watershed Characteristics	23.98	1	42

*Segments are defined as individual COM IDs

Page 1 of 2

**Pennsylvania Integrated Water Quality Monitoring and Assessment Report
Streams, Category 5 Waterbodies, Pollutants Requiring a TMDL**

Stream Name	Use Designation (Assessment ID)			
Source	Cause	Date Listed	TMDL Date	
Impairment Summary				
Source	Cause	Miles	Assessment Units	Segments (COMIDs)
Crop Related Agric	Siltation	8.79	1	16
		8.79**	1**	16**

**Totals reflect actual miles of impaired stream. Each stream segment may have multiple impairments (different sources or causes contributing to the impairment), so the sum of individual impairment numbers may not add up to the totals shown.

Use Designation Summary				
		Miles	Assessment Units	Segments (COMIDs)
Aquatic Life		8.79	1	16

*Segments are defined as individual COM IDs

Attachment E
Excerpts Justifying Changes between the 1998-2002 Section 303(d)
Lists and the 2004 to present Integrated Water Quality Monitoring
and Assessment Reports

The following are excerpts from the Pennsylvania DEP Section 303(d) narratives that justify changes in listings between the 1996-2002 303(d) Lists and the 2004 to present Integrated Water Quality Monitoring and Assessment Reports. The Section 303(d) listing process has undergone an evolution in Pennsylvania since the development of the 1996 list.

In the 1996 Section 303(d) narrative, strategies were outlined for changes to the listing process. Suggestions included, but were not limited to, a migration to a Global Information System (GIS), improved monitoring and assessment, and greater public input.

The migration to a GIS was implemented prior to the development of the 1998 Section 303(d) list. As a result of additional sampling and the migration to the GIS some of the information appearing on the 1996 list differed from the 1998 list. Most common changes included:

1. mileage differences due to recalculation of segment length by the GIS;
2. slight changes in source(s)/cause(s) due to new EPA codes;
3. changes to source(s)/cause(s), and/or miles due to revised assessments;
4. corrections of misnamed streams or streams placed in inappropriate SWP subbasins; and
5. unnamed tributaries no longer identified as such and placed under the named watershed listing.

Prior to 1998, segment lengths were computed using a map wheel and calculator. The segment lengths listed on the 1998 Section 303(d) list were calculated automatically by the GIS (ArcInfo) using a constant projection and map units (meters) for each watershed. Segment lengths originally calculated by using a map wheel and those calculated by the GIS did not always match closely. This was the case even when physical identifiers (e.g., tributary confluence and road crossings) matching the original segment descriptions were used to define segments on digital quad maps. This occurred to some extent with all segments, but was most noticeable in segments with the greatest potential for human errors using a map wheel for calculating the original segment lengths (e.g., long stream segments or entire basins).

Migration to National Hydrography Data (NHD)

New to the 2006 report is use of the 1/24,000 National Hydrography Data (NHD) streams GIS layer. Up until 2006 the Department relied upon its own internally developed stream layer. Subsequently, the United States Geologic Survey (USGS) developed 1/24,000 NHD streams layer for the Commonwealth based upon national geodatabase standards. In 2005, DEP contracted with USGS to add missing streams and correct any errors in the NHD. A GIS contractor transferred the old DEP stream assessment information to the improved NHD and the old DEP streams layer was archived. Overall, this marked an improvement in the quality of the streams layer and made the stream assessment data compatible with national standards but it necessitated a change in the Integrated Listing format. The NHD is not attributed with the old DEP five digit stream codes so segments can no longer be listed by stream code but rather only by stream name or a fixed combination of NHD fields known as reachcode and ComID. The NHD is aggregated by Hydrologic Unit Code (HUC) watersheds so HUCs rather than the old State Water Plan (SWP) watersheds are now used to group streams together. A more basic

change was the shift in data management philosophy from one of “dynamic segmentation” to “fixed segments”. The dynamic segmentation records were proving too difficult to manage from an historical tracking perspective. The fixed segment methods will remedy that problem. The stream assessment data management has gone through many changes over the years as system requirements and software changed. It is hoped that with the shift to the NHD and OIT’s (Office of Information Technology) fulltime staff to manage and maintain SLIMS the systems and formats will now remain stable over many Integrated Listing cycles.

Attachment F
Comment and Response

The Department received one set of comments on the draft Turtle Creek TMDL report during the official comment period on September 10, 2012. The comments were submitted by:

William A. Nelson, Natural Resources Director
Pennsylvania Farm Bureau

Pennsylvania Farm Bureau's comments and DEP's responses are summarized below:

Comment

Future TMDL Modifications

The EPA is insistent that the PA DEP provide "reasonable assurance" that a TMDL will be attained within a certain timeframe. The EPA also subscribes to "adaptive management" which exposes agricultural operators to ever changing strategies and requirements designed to meet the TMDL for sediment. This increases the uncertainty, time and expense needed to implement new BMPs on the part of agricultural operators. New criteria are sure to be imposed to meet the sediment TMDL due to "new information or circumstances" leaving producers with little reasonable assurance of their own that the ongoing requirements will ever be satisfied. Allowing public participation in any adjustments to "load allocations" from agriculture may lead to unreasonable requirements by environmental groups which are not friendly to the advanced agricultural methods used to produce food.

No attempt should be made by any agency to encourage the retirement of land from agricultural production to enhance the value of "land use information" for TMDL purposes.

Response

There are no timelines, explicit or implied, in the Turtle Creek TMDL. The concept of adaptive management is not specific to any sector and merely suggests that alternatives to the reductions called for in the TMDL may also produce the same desired results. Denying public participation or open comment on future changes to any TMDL is not something the Department would consider. Encouragement or promotion of any specific BMPs or load reduction strategies is beyond the scope of this TMDL.

Comment

Selection of the Reference Watershed

There are no current standards within the EPA or PA DEP that establishes thresholds for sediment within a watershed that adversely impact water quality. However, the Generalized Watershed Loading Functions model (GWLFE) uses a non-impaired reference watershed as an indicator where loading values need to be in an impaired watershed to achieve water quality standards. The proposed TMDL does not take into consideration actual recorded loads from monitoring stations which could be used as a scientific check to quantify the amount of sediment discharged from the Turtle Creek Watershed. It is critical that the origins of the sediment be

scientifically confirmed since discharges may result from stream bank erosion or legacy sediment and not from agricultural sources.

Response

The GWLF-E model was calibrated in 36 watersheds statewide of varying size, physiography and landuse to data collected at water quality monitoring stations. The Department does not believe that not taking grab samples in Turtle Creek to attempt to quantify the annual sediment load negates the scientific defensibility of the analysis performed.

Sediment loads from streambank erosion are part of the modeled load, though legacy sediment loads are not. During the implementation of the TMDL, it may be discovered that addressing the legacy sediment load is necessary for Turtle Creek to meet water quality standards. Such a re-focusing would be consistent with an “adaptive management” approach and may be considered in time.

Comment

The calibration of the Generalized Watershed Loading Functions model (GWLF – E) which simulates runoff and sediment loads from a watershed originating from agriculture, forested and developed land may contain questionable input data similar to that discovered in the Chesapeake Bay Model. Farm Bureau contends the data used to calibrate the Bay Model was flawed and caused serious concerns about the accuracy of this data base being used to establish a TMDL for the Chesapeake Bay Watershed. For example, the USDA information on agricultural practices within the Chesapeake Bay Watershed was far different than the information used by the EPA which brought into question the entire accuracy of the Bay Model. On the Turtle Creek Watershed, the Generalized Watershed Loading Functions model (GWLF-E) calculates a TMDL from simulated runoff and sediment data based on variable-size agricultural, forested and developed land areas. If agricultural land use areas are not represented accurately, a disproportionate amount of sediment discharges may be erroneously assigned to agriculture increasing the difficulty of compliance. Land use areas devoted to agricultural production within a watershed should be confirmed as being correct. For instance, cropping practices such as no-till, which is considered a significant best management practice to restrict sediment loss, must include an accurate measurement of the land area devoted to this practice within the watershed. No mention was made in the proposal as to whether the GWLF-E model is programmed to recognize more than one agricultural BMP assigned to the same acre which could grossly misrepresent the conservation efforts implemented by agricultural producers. And finally, the accuracy of the GWLF-E model cannot be complete without a method to confirm the number of unreported BMPs that contribute significantly to the reduction of sediment discharges. Significant weight must also be given to sediment losses from sources other than agriculture such as stream banks, particularly when legacy sediment is present (legacy sediment is not specifically mentioned in the proposed TMDL for the Turtle Creek Watershed). Research conducted by the Penn State CEAP Team in Centre County on the Spring Creek Watershed documented legacy sediment to be a major source of sediment in waterways and could be a significant factor in the Turtle Creek Watershed.

Response

No data used in the Bay Model was used in the GWLF-E model for this analysis. If the commenter has information to show that data such as landuse distribution or land area with specific cropping practices, the Department could incorporate those data. However, the information contained in the TMDL was the best information available at the time the TMDL was developed and is still the best information we have.

Please see the previous response regarding potential loading from legacy sediment and streambanks.

Comment

Watershed Assessment and Modeling

The proposal mentions that the PA DEP has conducted visits to the Turtle Creek Watershed and recorded observations on limited or absent riparian buffers and other conservation practices. There needs to be ample time afforded to the producers to allow procurement of the necessary financial and technical assistance needed to implement conservation stewardship practices.

The proposed TMDL for the Turtle Creek Watershed will reduce loading rates for sediment to levels equal to or less than the referenced Crooked Creek Watershed. A close examination of the Crooked Creek Watershed reveals a substantial difference between acreage established for cropland compared to that of the impaired Turtle Creek Watershed. The Crooked Creek Watershed identifies substantially less cropland acreage which greatly reduces the loading rate for sediment compared to the Turtle Creek Watershed. Thus, the model assigns a much greater acreage to cropland and substantially more sediment loading to the Turtle Creek Watershed which will result in greater TMDL restrictions. In this respect, the referenced Crooked Creek Watershed contains a shortfall of cropland acres and does not closely resemble cropland acres of the Turtle Creek Watershed.

Response

The Department agrees with the commenter that time and resources are needed to establish limited or absent riparian buffers. As mentioned above, there are no explicit timelines established for the implementation of the Turtle Creek TMDL.

The commenter's observation that there is significantly less cropland in the reference watershed than in Turtle Creek is correct and the Department was aware of the differences in landuse distribution. It is difficult to find a watershed attaining water quality standards that matches the necessary basin characteristics and is close to 50% agricultural land. While it is important not to set an unachievable load by choosing a reference watershed that is almost exclusively forested land, the roughly 37% sediment reductions called for seem achievable and indicates that the chosen reference watershed is appropriate.