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**Unnamed Tributaries to French Creek
Watershed TMDL**
Crawford County, Pennsylvania

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pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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DRAFT

TABLE OF CONTENTS

EXECUTIVE SUMMARY	4
TABLE 1. SUMMARY OF TMDL FOR UNNAMED TRIBUTARIES TO FRENCH CREEK WATERSHED IN LBS./YR. & LBS./DAY	4
INTRODUCTION	5
TABLE 2. INTEGRATED WATER QUALITY MONITORING AND ASSESSMENT REPORT LISTED SEGMENTS	5
CLEAN WATER ACT REQUIREMENTS.....	5
PENNSYLVANIA CLEAN STREAMS LAW REQUIREMENTS AND AGRICULTURAL OPERATIONS.....	6
INTEGRATED WATER QUALITY MONITORING AND ASSESSMENT REPORT, LIST 5, 303(D), LISTING PROCESS	7
TABLE 3. IMPAIRMENT DOCUMENTATION AND ASSESSMENT CHRONOLOGY	8
BASIC STEPS FOR DETERMINING A TMDL	8
TMDL ELEMENTS (WLA, LA, MOS)	8
FUTURE TMDL MODIFICATIONS	8
CHANGES IN TMDLS THAT MAY REQUIRE EPA APPROVAL	9
CHANGES IN TMDLS THAT MAY NOT REQUIRE EPA APPROVAL.....	9
TMDL APPROACH	9
SELECTION OF THE REFERENCE WATERSHED.....	9
TABLE 4. COMPARISON OF THE UNNAMED TRIBUTARIES TO FRENCH CREEK & MOHAWK RUN WATERSHEDS	10
<i>Figure 1. Impaired Unnamed Tributaries to French Creek Watershed</i>	12
<i>Figure 2. Reference: Unimpaired Mohawk Run Watershed</i>	13
HYDROLOGIC / WATER QUALITY MODELING.....	13
PART 1. MODEL OVERVIEW & DATA COMPILATION.....	13
PART 2. GIS BASED DERIVATION OF INPUT DATA	15
TABLE 5. GIS DATASETS	16
DATASET	16
WATERSHED ASSESSMENT AND MODELING.....	17
<i>Figure 3. Mainstem UNT French Creek streambank is destabilized</i>	19
<i>Figure 4. UNT French Creek lacks riparian buffer</i>	19
<i>Figure 5. UNT Mohawk Run with riparian buffer adjacent to cropland</i>	20
<i>Figure 6. Mainstem Mohawk Run is protected with vegetation</i>	20
TABLE 6. EXISTING LOADING VALUES FOR UNNAMED TRIBUTARIES TO FRENCH CREEK (IMPAIRED)	21
TABLE 7. EXISTING LOADING VALUES FOR MOHAWK RUN (REFERENCE)	21
DEVELOPMENT OF SEDIMENT TMDL	21
TABLE 8. TMDL VALUES FOR THE UNNAMED TRIBUTARIES TO FRENCH CREEK WATERSHED.....	22
WASTE LOAD ALLOCATION.....	22
MARGIN OF SAFETY.....	22
LOAD ALLOCATION	23
ADJUSTED LOAD ALLOCATION	23
TABLE 9. LOAD ALLOCATIONS, LOADS NOT REDUCED AND ADJUSTED LOAD ALLOCATIONS	23

DRAFT

TMDL SUMMARY	23
TABLE 10. TMDL COMPONENTS FOR THE UNNAMED TRIBUTARIES TO FRENCH CREEK WATERSHED.....	23
CALCULATION OF SEDIMENT LOAD REDUCTIONS	24
TABLE 11. SEDIMENT LOAD ALLOCATIONS/REDUCTIONS FOR LAND USES AND STREAM BANKS IN THE UNNAMED TRIBUTARIES TO FRENCH CREEK WATERSHED (ANNUAL VALUES)	24
TABLE 12. SEDIMENT LOAD ALLOCATIONS/REDUCTIONS FOR LAND USES AND STREAM BANKS IN THE UNNAMED TRIBUTARIES TO FRENCH CREEK WATERSHED (DAILY VALUES).....	25
CONSIDERATION OF SEASONAL VARIATIONS	25
CONSIDERATION OF BACKGROUND CONTRIBUTIONS	25
RECOMMENDATIONS	25
PUBLIC PARTICIPATION	26
LITERATURE CITED	26
ATTACHMENT A	28
MAP OF UNNAMED TRIBUTARIES TO FRENCH CREEK WATERSHED	28
<i>Figure A1. Unnamed Tributaries to French Creek Watershed</i>	29
ATTACHMENT B	30
EQUAL MARGINAL PERCENT REDUCTION METHOD	30
TABLE B1. EQUAL MARGINAL PERCENT REDUCTION CALCULATIONS FOR UNNAMED TRIBUTARIES TO FRENCH CREEK WATERSHED.....	32
ATTACHMENT C	33
AVGWLF GENERATED DATA TABLES	33
TABLE C1. OUTPUTS FOR UNNAMED TRIBUTARIES TO FRENCH CREEK WATERSHED	34
TABLE C2. OUTPUTS FOR MOHAWK RUN WATERSHED.....	35
ATTACHMENT D	36
PENNSYLVANIA INTEGRATED WATER QUALITY MONITORING AND ASSESSMENT REPORT: STREAMS, CATEGORY 5 WATERBODIES, POLLUTANTS REQUIRING A TMDL.....	36
ATTACHMENT E	40
EXCERPTS JUSTIFYING CHANGES BETWEEN THE 1998-2002 SECTION 303(D) LISTS AND THE 2004 TO PRESENT INTEGRATED WATER QUALITY MONITORING AND ASSESSMENT REPORTS	40
ATTACHMENT F	43
COMMENT AND RESPONSE	43

DRAFT

TMDL Unnamed Tributaries to French Creek Watershed Crawford County, Pennsylvania

Executive Summary

Unnamed Tributaries to French Creek are tributaries of French Creek in Crawford County, Northwestern Pennsylvania (PA).

A Total Maximum Daily Load (TMDL) for sediment was developed to address sediment from agricultural activities noted in Pennsylvania's Section 303(d) and Integrated Lists. A surface water assessment conducted by the Department in 2000 documented and designated the impairments. A sediment TMDL has been developed to address the existing siltation impairment. 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 in the Unnamed Tributaries to French Creek Watershed is 867,160 pounds per year (2,376 pounds per day). Based on a comparison to a similar, unimpaired watershed, Mohawk Run, the maximum sediment loading that should still allow water quality objectives to be met in the Unnamed Tributaries to French Creek Watershed is 517,729 pounds per year (1,418 pounds per day). Allocation of the sediment TMDL is summarized below:

Summary of TMDL for the Unnamed Tributaries to French Creek Watershed (lbs./yr.)						
Pollutant	TMDL	WLA	MOS	LA	LNR	ALA
Sediment	517,729	5,177	51,773	460,779	7,440	453,339
Summary of TMDL for the Unnamed Tributaries to French Creek Watershed (lbs./day)						
Pollutant	TMDL	WLA	MOS	LA	LNR	ALA
Sediment	1,418	14	142	1,262	20	1,242

The Unnamed Tributaries to French Creek Watershed TMDL is allocated to nonpoint sources, with 10% of the TMDL reserved explicitly as a margin of safety (MOS) as well as 1% reserved as a bulk wasteload allocation. The wasteload 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 Unnamed Tributaries to French Creek Watershed. The load allocation (LA) is that portion of the total load assigned to nonpoint sources; 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) and stream bank and is equal to the sum of forested, unpaved roads and low intensity development loadings. The adjusted load allocation (ALA) represents the remaining portion of the LA to be distributed among agricultural and stream bank uses receiving load reductions. The TMDL developed for the Unnamed Tributaries to French Creek Watershed established a 40% reduction in the current sediment loading of 867,160 pounds per year (2,376 pounds per day).

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Introduction

The Unnamed Tributaries to French Creek Watershed are currently designated as Warm Water Fishes (WWF). This Total Maximum Daily Load (TMDL) calculation has been prepared for all segments in the Unnamed Tributaries to French Creek Watershed (Attachment A). The stream and all of its tributaries are located in Cussewago and Venango Townships, and Venango Borough (Crawford County). Unnamed Tributaries to French Creek, including all headwater tributaries, makes up approximately 32.9 stream miles downstream to the mouth where it enters French Creek. The entire watershed basin is approximately 6.6 square miles (2962 acres, 4224 hectares). Land use in the UNTs French Creek watershed is dominated by agriculture (58 %) and forest (40.5 %). The agricultural component of the landscape consists of hay/pasture (57.8%) and cropland (42%). Other land uses include unpaved roads (0.1%) and low intensity development (0.2 %).

The UNTs French Creek watershed is located in the Glaciated Pittsburgh Plateau Physiographic Section of the Appalachian Plateaus Physiographic Province and is part of the Upper French Creek basin (SWP16A). The Glaciated Pittsburgh Plateau Section consists of much broad, rounded upland cut by many long, linear, flat-floored valleys. The narrow to wide valleys are separated from adjacent uplands by steep slopes on one or both sides. The valley floors are often wetlands and there is frequently a considerable depth of unconsolidated material beneath the valley floor. The bedrock is largely covered by glacial deposits, and consists of a variety of sandstones, siltstones, and shale, as well as some conglomerates and coal. The rock type of the UNTs French Creek watershed consists approximately of 50% interbedded sedimentary rock and 50% sandstone. The dominant hydrologic soil group (Dom HSG), or runoff potential, in the UNTs French Creek watershed is C. Hydrologic soils in Group C have a moderately high runoff potential and are sandy clay loam with low infiltration rates when thoroughly wetted.

Table 2. Integrated Water Quality Monitoring and Assessment Report Listed Segments				
State Water Plan (SWP) Subbasin: 16A				
HUC: 05010004– French				
Unnamed Tributaries to French Creek -				
Source	EPA 305(b) Cause Code	Miles	Designated Use	Use Designation
Agriculture	Siltation	19.16	WWF	Aquatic Life

HUC= Hydrologic Unit Code

WWF= Warm Water 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

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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.

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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.

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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.

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

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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 Unnamed Tributaries to French 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 Unnamed Tributaries to French Creek Watershed. This approach is based on selecting a non-impaired, or reference, watershed and

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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 Mohawk Run Watershed was selected as the reference watershed for developing the Unnamed Tributaries to French Creek Watershed TMDL (see Figure 1 and Figure 2). The reference Mohawk Run watershed is located in State Water Plan 16A (French Creek), in Crawford County (Rockdale, Cambridge, Woodcock and Richmond Townships) approximately 6 miles east of the impaired UNTs French Creek (Figure 2). Protected uses include water supply (livestock and wildlife), recreation, and aquatic life (Warm Water Fishes - WWF) under 25 PA Code Chapter 93, Section 93.9q (Commonwealth of Pennsylvania, 2008). Based on the Department’s 305(b) report database, the reference segments are currently attaining their designated uses. The identification of designated use attainment in the reference watershed was based on sampling completed by the Department during June 8, 1999 surveys using the SSWAP protocol (formerly called the Unassessed Waters program).

Table 4 compares the two watersheds in terms of size, location, and other physical characteristics.

Table 4. Comparison of the Unnamed Tributaries to French Creek & Mohawk Run Watersheds		
	Unnamed Tributaries to French Creek Watershed	Mohawk Run Watershed
Physiographic Province	Appalachian Plateau	Appalachian Plateau
Drainage Area (sq mi)	6.6	5.49
Dominant Land Use %		
% hay/pasture	33.4	24
% cropland	24.4	12
Dominant Soils Group	C	C
Surface Geology %		
Sandstone	50	40
Interbed Sed.	50	60

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Average K-Factor	0.35	0.34
Average Rainfall (in.)	42.05	46.03
Average Runoff (in.)	2.91	3.10

Drainage area, location, and other physical characteristics of the UNTs French Creek watershed were compared to the Mohawk Run watershed. An analysis of value counts for each pixel of the MRLC grid revealed that while land cover/use distributions are not an exact match, both watersheds are similar. Forested land and agriculture, including cropland and pasture, are the dominant land use categories in both watersheds. Surficial geology in the UNTs French Creek and Mohawk Run watersheds were also compared. Rock types in the UNTs French Creek watershed consist of approximately 50% sandstone and 50% interbedded sedimentary rock. The reference Mohawk Run watershed also contains sandstone and (40 %) interbedded sedimentary rock (60 %). Geologic features primarily affect surface runoff and background nutrient loads through influences on soils, landscape, fracture density, and directional permeability. The UNTs French Creek and Mohawk Run watersheds are very similar in terms of land use, rock types, soil K factor, precipitation, and average runoff.

(<http://www.dcnr.state.pa.us/topogeo/map13/13plps.aspx> Accessed 14 April 2009.)

U.S. Department of Agriculture, Natural Resources Conservation Service. 2007. National Engineering Handbook, Title 210-VI, Part 630, Chapter 7, Hydrologic Soil Groups. Washington, DC.).

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UNT French Creek - Crawford County

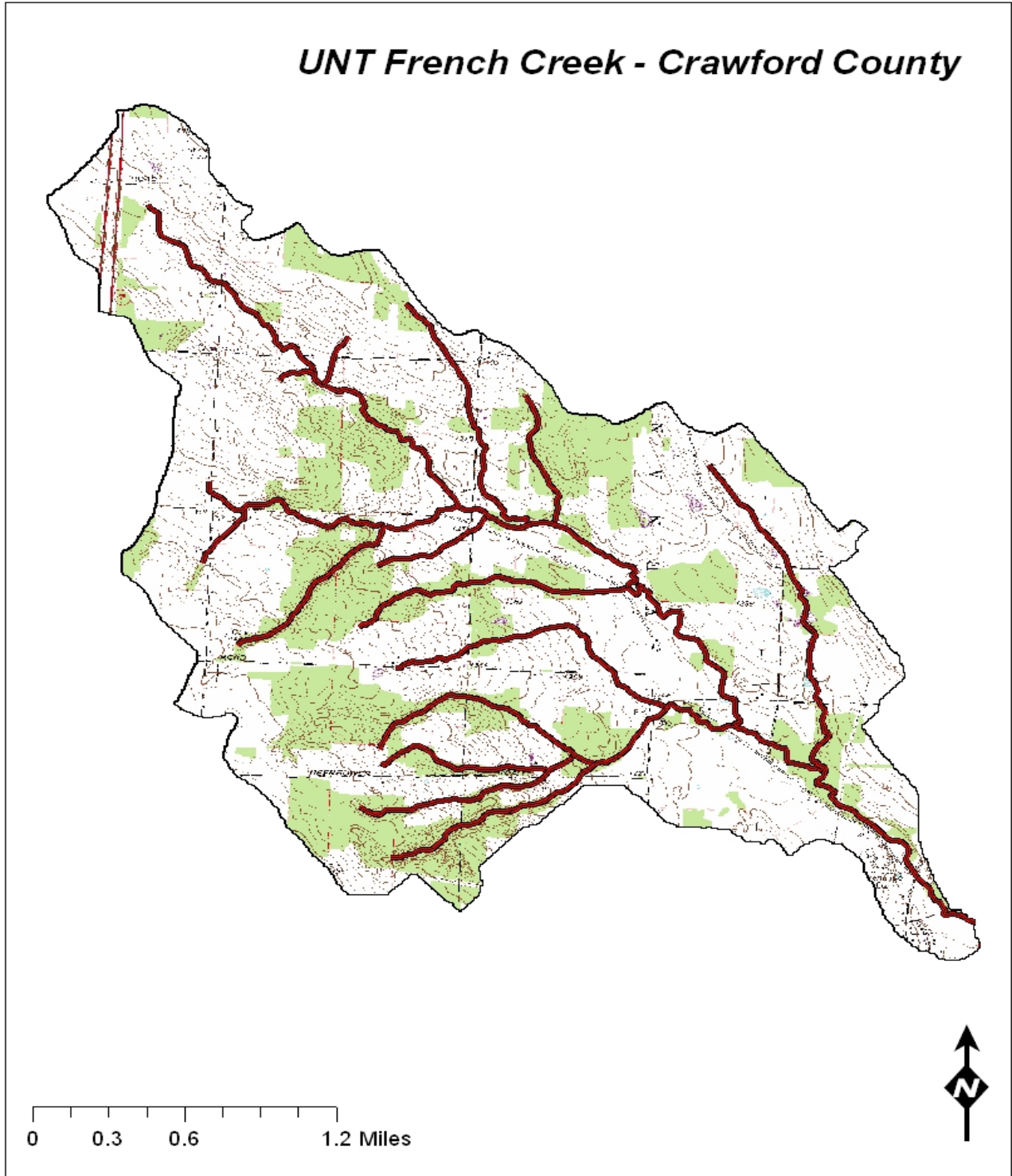


Figure 1. Impaired Unnamed Tributaries to French Creek Watershed

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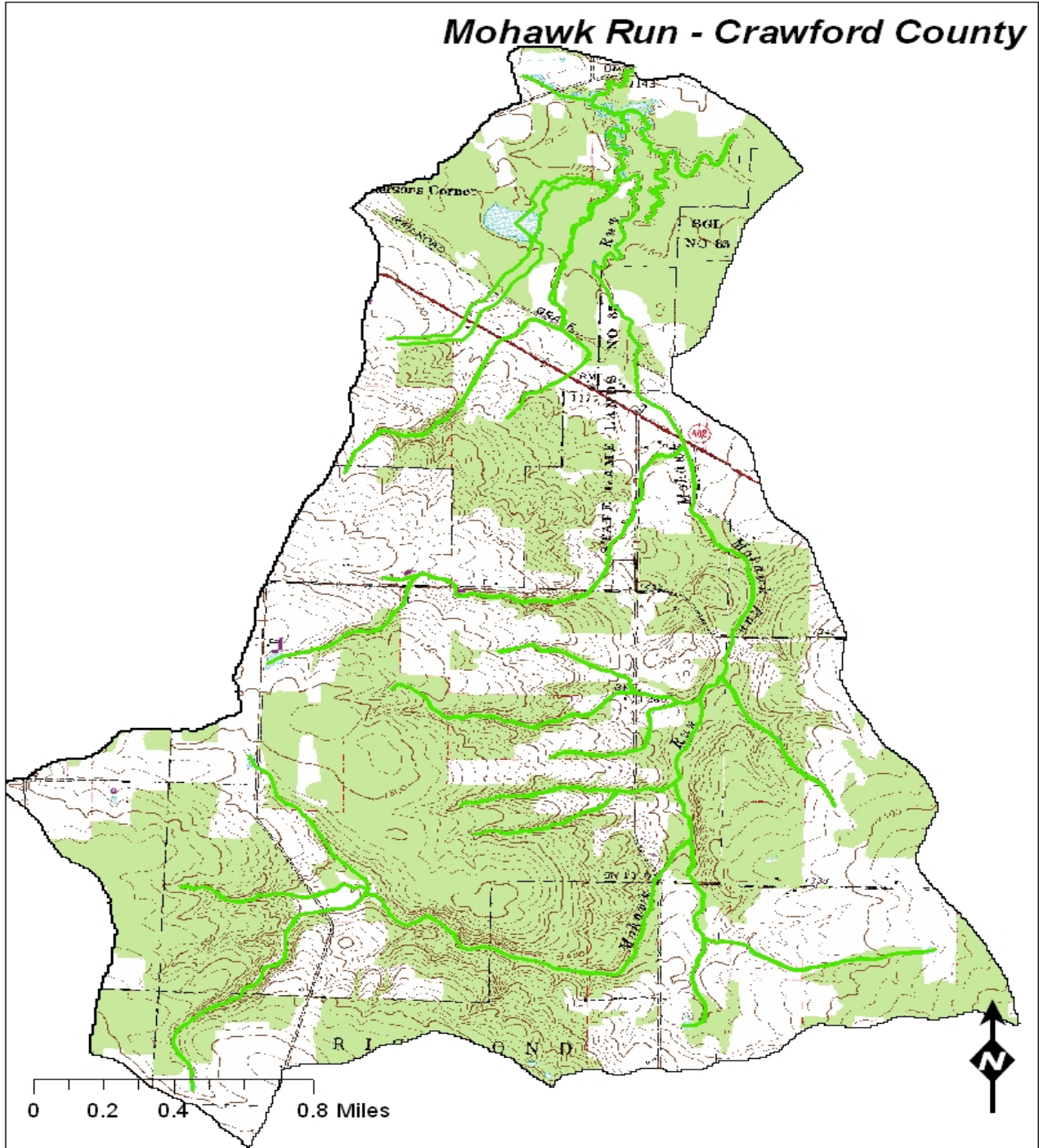


Figure 2. Reference: Unimpaired Mohawk Run Watershed

Hydrologic / Water Quality Modeling

Part 1. Model Overview & Data Compilation

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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.

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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/m³).

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 Unnamed Tributaries to French Creek TMDL calculations via AVGWLF and provides explanations of how they were used for development of the input files for the GWLF model.

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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.

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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 Unnamed Tributaries to French Creek and the Mohawk Run Watersheds. All AVGWLF data and outputs have been attached to this TMDL as Attachment C. Department staff visited the Unnamed Tributaries to French Creek Watershed and the Mohawk Run Watershed to get a better understanding of existing conditions that might influence the AVGWLF model. General observations of the individual watershed characteristics included (photos included on pages 19-20):

Unnamed Tributaries to French Creek Watershed (impaired)

- Pastureland and cropland situated to the stream edge with inadequate riparian buffer
- Streambank destabilization
- Channel alteration resulting in accelerated erosion

Mohawk Run Watershed (reference)

- Riparian buffer zones between watercourses and land use activities

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

Unnamed Tributaries to French Creek Watershed

- No changes to the model were necessary for the Unnamed Tributaries to French Creek Watershed.

Mohawk Run Watershed

- No changes to the model were necessary for the Mohawk Run Watershed.

The AVGWLF model produced information on watershed size, land use, sediment loading, and total phosphorus loading. The sediment loads used for this TMDL represent an annual average over

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the 15 years simulated by the model (1983 to 1998). This information was used to calculate existing unit area loading rates for the Unnamed Tributaries to French Creek and Mohawk Run watersheds.

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Figure 3. Mainstem UNT French Creek streambank is destabilized.



Figure 4. UNT French Creek lacks riparian buffer.

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Figure 5. UNT Mohawk Run with riparian buffer adjacent to cropland.



Figure 6. Mainstem Mohawk Run is protected with vegetation.

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

Source	Area (ac)	Sediment (lbs)	Unit Area Load (lbs/ac/yr)
HAY/PAST	1,413	65,780	47
CROPLAND	1,033	315,640	306
FOREST	1,717	6,920	4
Unpaved_Rd	35	0	0
LO_INT_DEV	37	520	14
Stream Bank		478,300	
total	4,235	867,160	205

Source	Area (ac)	Sediment (lbs.)	Unit Area Load (lb/ac/yr)
HAY/PAST	761	39,320	52
CROPLAND	381	96,980	255
FOREST	2,044	8,660	4
Unpaved_Rd	22	17,580	792
LO_INT_DEV	7	60	8
Stream Bank		230,360	
total	3,215	392,960	122

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 Unnamed Tributaries to French Creek Watershed was established based on current loading rates for sediment in the reference watershed. Mohawk Run is currently designated as a Warm Water Fishes (WWF) and previous biological assessments have determined that the watershed is attaining its designated uses. Reducing the loading rates of sediment in the Unnamed Tributaries to French Creek Watershed, a Warm Water Fishes (WWF) 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 Mohawk Run Watershed using the AVGWLF model. The target TMDL value for sediment was determined by multiplying the unit area loading rates for the Mohawk Run Watershed by the total watershed area of the Unnamed Tributaries to French Creek Watershed (Table 8).

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Pollutant	Loading Rate in Reference (lb/ac-yr)	Total Area in Unnamed Tributaries to French Creek Watershed (ac)	Target TMDL Value (lb/yr)	Target TMDL Value (lb/day)
Sediment	122	4,235	517,729*	1,418

* takes into account rounding in previous calculations

The target TMDL value was then used as the basis for load allocations and reductions in the Unnamed Tributaries to French 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 discharges in the Unnamed Tributaries to French Creek Watershed. A bulk reserve allocation of 1.0% of the TMDL is set to account for the dynamic nature of future permit activity.

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

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 Unnamed Tributaries to French Creek. The MOS used for the sediment TMDL was set at 51,773 lbs./yr.

$$MOS = 517,729 \text{ lbs./yr. (TMDL)} * 0.1 = 51,773 \text{ lbs./yr.}$$

or

$$MOS = 1,418 \text{ lbs./day (TMDL)} * 0.1 = 142 \text{ lbs./day}$$

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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 460,779 lbs./yr.

$$LA = 517,729 \text{ lbs./yr. (TMDL)} - 51,773 \text{ lbs./yr. (MOS)} - 5,177 \text{ lbs./yr. (WLA)} = 460,779 \text{ lbs./yr.}$$

or

$$LA = 1,418 \text{ lbs./day (TMDL)} - 142 \text{ lbs./day (MOS)} - 14 \text{ lbs./day (WLA)} = 1,262 \text{ lbs./day}$$

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 Unnamed Tributaries to French Creek Watershed TMDL was developed to address impairments caused by agricultural activities including, hay/pastureland (Hay/Past) and Cropland, they were not the only land uses considered for reductions. Stream banks noted in the Unnamed Tributaries to French 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 9).

	Sediment (lbs./yr.)	Sediment (lbs./day)
Load Allocation	460,779	1,262
Loads Not Reduced:		
Forest	6,920	19
Low Intensity Development	520	1
Unpaved Roads	0	
Adjusted Load Allocation	453,339	1,242

TMDL Summary

The sediment TMDL established for the Unnamed Tributaries to French Creek Watershed consists of a Load Allocation (LA) and a Margin of Safety (MOS). The individual components of the Unnamed Tributaries to French Creek Watershed TMDL are summarized in Table 10.

Component	Sediment (lbs./yr.)	Sediment (lbs./day)
TMDL (Total Maximum Daily Load)	517,729	1,418
WLA (Waste Load Allocation)	5,177	14
MOS (Margin of Safety)	51,773	142
LA (Load Allocation)	460,779	1,262

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LNR Loads Not Reduced)	7,440	20
ALA (Adjusted Load Allocation)	453,339	1,242

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 and stream banks in the Unnamed Tributaries to French 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.
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.

Tables 11 and 12 contain the results of the EMPR for Hay/Pasture, Cropland and stream banks in the Unnamed Tributaries to French 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 11. Sediment Load Allocations/Reductions for Land Uses and Stream Banks in the Unnamed Tributaries to French 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
Cropland	1033	305.59	165.96	315,640	171,417	46
Hay/Pasture	1413	46.54	25.27	65,780	35,724	46
Stream Banks				478,300	246,198	49

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		Current Loading	Allowable Loading	Current Load	Load Allocation	
Land Use	Acres	(lbs./acre/day)	(lbs./acre/day)	(lbs./day)	(lbs./day)	% Reduction
Cropland	1033	0.84	0.45	865	470	46
Hay/Pasture	1413	0.13	0.07	180	98	46
Stream banks				1,310	675	49

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 waterbody and the resulting impact on beneficial uses, establishing this TMDL using average annual conditions is protective of the waterbody.

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 landuses 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 Unnamed Tributaries to French Creek Watershed including all headwaters was assessed and modeled. The remaining landuses 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, transitional lands and stream banks. Implementation of BMPs in these affected areas is called for according to this TMDL document. The proper implementation of these BMPs should achieve the loading reduction goals established in the TMDL.

From an agricultural perspective, 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:

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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 Unnamed Tributaries to French Creek Watershed; however, they were more extensively used in the unimpaired reference watershed, Mohawk Run, with forested riparian buffers as being the predominant BMPs in use. Since both watersheds have a considerable 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 Unnamed Tributaries to French 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 landuses, 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 Erie and Crawford County Conservation Districts 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 April 16, 2011 to foster public comment on the allowable loads calculated.

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.

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

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Attachment A
Map of Unnamed Tributaries to French Creek Watershed

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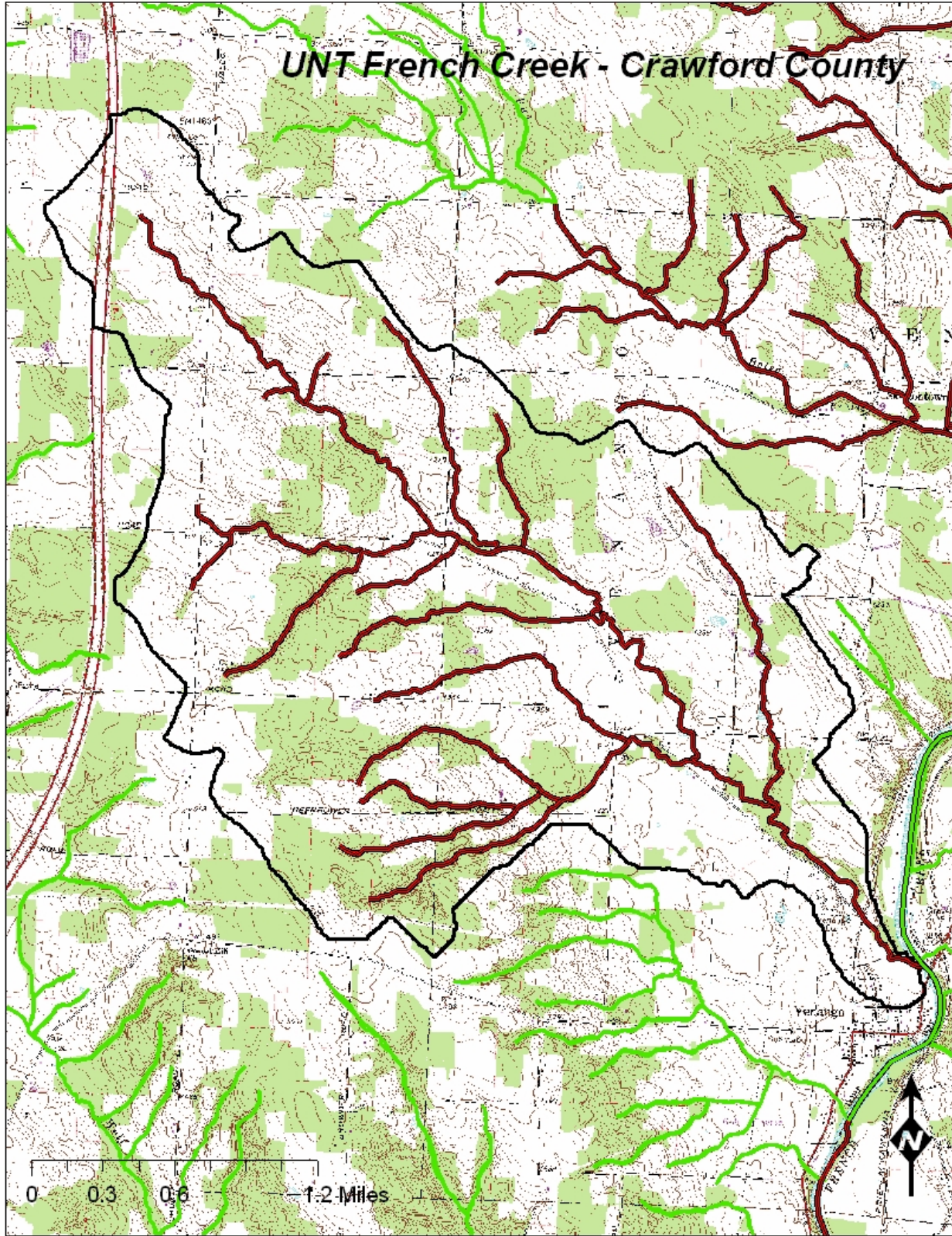


Figure A1. Unnamed Tributaries to French Creek Watershed

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Attachment B
Equal Marginal Percent Reduction Method

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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.

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Microsoft Excel - UNTFRENCHMPR.xls													
File Edit View Insert Format Tools Data Window Help													
Type a question for help													
G10													
A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Step 1:	TMDL Total Load				Step 2:	Adjusted LA = (TMDL total load - ((MOS) - loads not reduced-WLA)						
2		Load = Sediment loading rate in ref. * Acres in Impaired					453339	453339					
3		517729											
4													
5													
6		Annual Average					% reduction				Allowable		
7	Step 3:	Load	Load Sum	Check	Initial Adjust	Recheck	allocation	Load Reduction	Initial LA	Acres	Loading Rate	% Reduction	
8		CROPLAND	315640.0	859720.0	good	315640	ADJUST	0.38	144223	171417	1033	165.96	46%
9						381420							
10		HAY/PASTURE	65780.0		good	65780		0.08	30056	35724	1413	25.27	46%
11													
12		Streambank	478300.0		bad	453339		0.54	207141	246198			49%
13													
14						834759		1.00		453339			
15													
16	Step 4:	All Ag. Loading	84.68										
17													
18			Allowable (Target)		Current								
19		Acres	loading rate	Final LA	Loading Rates	Current Load	% Red.						
20	Step 5:	CROPLAND	1033	165.96	171417	305.59	315640	46%					
21													
22		HAY/PASTURE	1413	25.27	35724	46.54	65780	46%					
23													
24		streambank			246198		478300	49%					
25													
26					453339		859720	47%					
27													
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Table B1. Equal Marginal Percent Reduction calculations for Unnamed Tributaries to French Creek Watershed

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Attachment C
AVGWLF Generated Data Tables

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GWLF Total Loads for **UNTFrenchCreek**

Period of analysis: 15 years, from Apr 1983 to Mar 1998

Source	(Acres)	(in)	[Tons]		Total Loads (Pounds)			
	Area	Runoff	Erosion	Sediment	Dis. Nitr.	Tot. Nitr.	Dis. Phos.	Tot. Phos.
HAY/PAST	1413.4	2.53	187.92	32.89	2114.82	2312.14	253.68	299.40
CROPLAND	1032.9	4.47	901.82	157.82	2735.18	3682.10	324.83	544.20
CONIF_FOR	79.1	2.16	0.31	0.05	7.35	7.67	0.23	0.31
MIXED_FOR	182.9	2.16	1.25	0.22	16.99	18.30	0.54	0.84
DECID_FOR	1455.4	2.16	18.23	3.19	135.21	154.35	4.27	8.70
UNPAVED_RD	34.6	6.96	0.00	0.00	158.17	158.17	10.91	10.91
LO_INT_DEV	37.1	4.86	1.48	0.26	0.00	0.03	0.00	0.00
Stream Bank				239.15		717.46		166.21
Groundwater					19631.65	19631.65	504.79	504.79
Point Sources					0.00	0.00	0.00	0.00
Septic Syst.					1076.58	1076.58	5.63	5.63
Totals	4235.4	2.90	1111.0	433.6	25875.95	27758.45	1104.88	1540.99

Table C1. Outputs for Unnamed Tributaries to French Creek Watershed

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GWLF Total Loads for **mowhawk**

Period of analysis: 15 years, from Apr 1983 to Mar 1998

Source	(Acres)	(in)	(Tons)		Total Loads (Pounds)			
	Area	Runoff	Erosion	Sediment	Dis. Nitr.	Tot. Nitr.	Dis. Phos.	Tot. Phos.
HAY/PAST	761.1	3.09	109.82	19.66	1397.93	1515.88	164.65	187.37
CROPLAND	380.5	5.52	270.87	48.49	1251.45	1542.37	145.44	201.49
CONIF_FOR	133.4	2.62	0.78	0.14	15.05	15.89	0.48	0.64
MIXED_FOR	286.6	2.62	2.09	0.37	32.32	34.57	1.02	1.45
DECID_FOR	1623.5	2.62	21.32	3.82	183.06	205.95	5.78	10.19
UNPAVED_RD	22.2	8.53	49.08	8.79	124.71	177.42	8.60	18.76
LO_INT_DEV	7.4	6.01	0.19	0.03	0.00	0.00	0.00	0.00
Stream Bank				115.18		345.54		66.57
Groundwater					14104.31	14104.31	419.46	419.46
Point Sources					0.00	0.00	0.00	0.00
Septic Syst.					894.11	894.11	5.63	5.63
Totals	3214.8	3.10	454.2	196.5	18002.94	18836.04	751.06	911.57

Table C2. Outputs for Mohawk Run Watershed

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

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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: 05010004 - French			
<u>French Creek (Unt 52885)</u> HUC: 05010004			
Aquatic Life (1502) - 1.53 miles; 4 Segment(s)* Agriculture	Siltation	2002	2015
<u>French Creek (Unt 52886)</u> HUC: 05010004			
Aquatic Life (1502) - 1.62 miles; 10 Segment(s)* Agriculture	Siltation	2002	2015
<u>French Creek (Unt 52887)</u> HUC: 05010004			
Aquatic Life (1502) - 4.20 miles; 12 Segment(s)* Agriculture	Siltation	2002	2015
<u>French Creek (Unt 52888)</u> HUC: 05010004			
Aquatic Life (1502) - 1.19 miles; 1 Segment(s)* Agriculture	Siltation	2002	2015
<u>French Creek (Unt 52889)</u> HUC: 05010004			
Aquatic Life (1502) - 0.63 miles; 1 Segment(s)* Agriculture	Siltation	2002	2015
<u>French Creek (Unt 52890)</u> HUC: 05010004			
Aquatic Life (1502) - 1.21 miles; 1 Segment(s)* Agriculture	Siltation	2002	2015
<u>French Creek (Unt 52891)</u> HUC: 05010004			
Aquatic Life (1502) - 0.52 miles; 1 Segment(s)* Agriculture	Siltation	2002	2015
<u>French Creek (Unt 52892)</u> HUC: 05010004			
Aquatic Life (1502) - 1.28 miles; 6 Segment(s)* Agriculture	Siltation	2002	2015
<u>French Creek (Unt 52893)</u> HUC: 05010004			
Aquatic Life (1502) - 0.84 miles; 1 Segment(s)*			

*Segments are defined as individual COM IDs.

Page 1 of 3

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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
<u>French Creek (Unt 52893)</u>			
HUC: 05010004			
Aquatic Life (1502) - 0.84 miles; 1 Segment(s)* Agriculture	Siltation	2002	2015
<u>French Creek (Unt 52894)</u>			
HUC: 05010004			
Aquatic Life (1502) - 0.21 miles; 2 Segment(s)* Agriculture	Siltation	2002	2015
<u>French Creek (Unt 52896)</u>			
HUC: 05010004			
Aquatic Life (1502) - 0.16 miles; 4 Segment(s)* Agriculture	Siltation	2002	2015
<u>French Creek (Unt 52897)</u>			
HUC: 05010004			
Aquatic Life (1502) - 1.80 miles; 5 Segment(s)* Agriculture	Siltation	2002	2015
<u>French Creek (Unt 52898)</u>			
HUC: 05010004			
Aquatic Life (1502) - 1.31 miles; 1 Segment(s)* Agriculture	Siltation	2002	2015
<u>French Creek (Unt 52899)</u>			
HUC: 05010004			
Aquatic Life (1502) - 0.97 miles; 1 Segment(s)* Agriculture	Siltation	2002	2015
<u>French Creek (Unt 52900)</u>			
HUC: 05010004			
Aquatic Life (1502) - 0.12 miles; 1 Segment(s)* Agriculture	Siltation	2002	2015
<u>French Creek (Unt 52901)</u>			
HUC: 05010004			
Aquatic Life (1502) - 0.74 miles; 2 Segment(s)* Agriculture	Siltation	2002	2015
<u>French Creek (Unt 52902)</u>			
HUC: 05010004			
Aquatic Life (1502) - 0.83 miles; 1 Segment(s)* Agriculture	Siltation	2002	2015

*Segments are defined as individual COM IDs.

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

Stream Name	Cause	Date Listed	TMDL Date
Use Designation (Assessment ID)			
Source			

Report Summary

Watershed Summary

	Stream Miles	Assessment Units	Segments (COMIDs)
Watershed Characteristics	19.14	1	54

Impairment Summary

Source	Cause	Miles	Assessment Units	Segments (COMIDs)
Agriculture	Siltation	19.16	1	54
		19.16 **	1 **	54 **

**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	19.16	1	54

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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**

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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

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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.

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**Attachment F
Comment and Response**

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