

**Comment Response Document
Regarding the Water Quality Analysis of Copper and Lead
for Jones Falls, Baltimore City and Baltimore County, MD**

Introduction

The Maryland Department of the Environment (MDE) has conducted a public review of the proposed Water Quality Analysis (WQA) of copper and lead for Jones Falls. The public comment period was open from August 27, 2004 through September 25, 2004. MDE received two set(s) of comments.

Below is a list of commentors, their affiliation, the date comments were submitted, and the numbered references to the comments submitted. In the pages that follow, comments are summarized and listed with MDE’s response.

List of Commentors

Author	Affiliation	Date	Comment Number
William Stack	Baltimore City - Department of Public Works	September 9 ,2004	1
Sherry Krest	US Fish and Wildlife Service	September 23, 2004 (Postmarked)	2 and 3

1. The commentor asks why Baltimore City data was not used in the analysis.

Response: The project manager did not have the data from Baltimore City at the time of the analysis. As a result of this comment, MDE requested the available data for review. The following paragraph has been added to the report:
The Baltimore City Department of Public Works also collects dry-weather metals samples in non-tidal streams of the Jones Falls watershed. An evaluation of this data was conducted by Baltimore City and no exceedances of the water quality criteria were found, giving additional support to the WQA (Baltimore City, 2004).

2. The commentor states that although MDE suggests that Jones Falls is not an impaired waterbody for copper and lead, the commentor recommends Jones Falls remain a system of concern citing three reasons: 1) Two out of six (32 percent) of the samples at site B351 exceeded copper water quality standards for both acute and chronic standards; Lead exceeded chronic water quality standards at 32 percent of the sampling locations as well; 2) The Index of Biological Integrity (IBI) for fish and invertebrates is marginal and often falls below the acceptable score 3.0 IBI score; 3) The lack of sediment samples creates considerable uncertainty as to concentrations of metals from sources, either current or historic, that may be having an impact on the overall health of this watershed.

Response: The State of Maryland understands the need to continue to watch the health of this waterbody. Jones Falls is listed on Part 5 of the 2004 303(d) List Maryland's 2004 303(d) list identifies Jones Falls as impaired for biological communities by an unknown cause. Because this waterbody remains on Part 5 of the 303(d) List as a biological impairment, additional data will be collected as part of the TMDL process to determine the source of the impairment and identify the substance or substances causing the impairment. Water quality will continue to be monitored in conjunction with various Clean Water Act initiatives.

3. The commentor encourages the State to consider the following recommendations:
 - 1) Continue water quality and sediment monitoring for metals and other contaminants;
 - 2) Continue biological monitoring using Maryland Biological Stream Survey (MBSS) methods.

Response: As part of its overall water quality monitoring strategy, Maryland continues monitoring activities throughout Maryland. Water quality monitoring is conducted in conjunction with the State, Federal and local initiatives. Routine monitoring projects include fisheries monitoring, MBSS monitoring (which occurs on a rotating random sampling schedule), intensive monitoring, data collection for TMDL Development, CORE water quality monitoring, and the NPDES oversight.