



**GILMORE & ASSOCIATES, INC.**  
ENGINEERING & CONSULTING SERVICES

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***MEMORANDUM***

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**Date:** August 28, 2017  
**To:** Jennifer Sincock  
**From:** Janene M. Marchand, P.E., Gilmore & Associates, Inc.  
**cc:** Jon A. Hammer, Township Manager, Franconia Township  
George E. Witmayer, Executive Director, Franconia Sewer Authority  
Douglas C. Rossino, P.E., Gilmore & Associates, Inc.  
**Reference:** Draft Indian Creek TMDL Comments

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We have reviewed the Preliminary Draft TMDL for Sediment in the Indian Creek Watershed, Montgomery County, PA Existing Loads (Draft TMDL) as discussed at a Stakeholders meeting on August 3, 2017. Though it is our understanding that this is not a formal comment period, we respectfully request that the following be considered by the EPA in the finalization of the TMDL for the watershed:

1. There does not appear to be sufficient information provided for the possible load allocation scenarios proposed. If higher loading reductions are required for stream bank and agriculture erosion sources as suggested by Possible Allocation Strategy 2, how does this affect the type of BMPs the municipalities will be required to install as part of their MS4 Programs? Will municipalities be expected to seek easements and agreements with private owners of agricultural uses?
2. It is unclear as to which locations each stream segment was sampled in determining the impairment and adding the creek to the PA 303(d) List of Impaired Waters in 1996, 2004, and 2014. Could this information be provided in a summary table and narrative including the method of sampling, locations of samplings and the IBI score for each? It is our understanding that the information is on file at the Harrisburg office and may be provided on the website in response to question 1 in your meeting notes from the August 3, 2017 Stakeholder Meeting.
3. It was stated that once the aquatic life use is met and the IBI is met, the stream is no longer considered impaired. How often is the IBI determined for each watershed and is the IBI an average determined for the entire length of stream including unnamed tributaries?
4. It is unclear if any other watersheds were considered as the "Reference Watershed". We recommend that the narrative include specific information on why the Birch Run was chosen over other watersheds.
5. Regarding MapShed, it is my understanding that the program uses 2001 land use data that is a hybrid of the National Land Cover Database (NLCD) and a manual urban area delineation effort. It is noted in the Draft TMDL that Franconia Township provided land

use data. We request that the report indicate the year in which the information was last updated.

6. As described in the stakeholder meeting minutes, EPA will set up a website to house modeling files, presentations, reports, pictures, etc. We have not received this information to date and may have additional comments once the information is provided for review.
7. The EPA requested information from the municipalities regarding installed BMP's. The Draft TMDL does not clearly indicate which BMPs were considered in the modeling. We are aware of the following BMPs that were not required to be installed under an NPDES Permit, which have been installed by Franconia Township within the Indian Creek Watershed: Rain Garden (40.313263, -75.365643) in 2014, and Riparian Buffer Plantings (40.298833, -75.379574) in 2009. We assume that all BMPs installed on private property as part of an NPDES Permit were incorporated, however, please confirm.