



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
GREAT LAKES NATIONAL PROGRAM OFFICE
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 20 2010

Mr. Chris Korleski
Commissioner
Ohio Environmental Protection Agency
Lazarus Government Center
50 West Town Street, Suite 700
Columbus, Ohio 43215

Dear Mr. Korleski:

Thank you for your July 15, 2010 submittal, "*Maumee Area of Concern Boundary Realignment and Expansion*" in which the Ohio Environmental Protection Agency (OEPA), in conjunction with the Partners for Clean Streams (the Maumee RAP Advisory Committee), requests a realignment and minor expansion of the Area of Concern (AOC) boundaries because of recent administrative changes in water quality planning made by OEPA. OEPA has changed the manner of conducting watershed and other water quality programs by moving from the use of Hydrologic Unit Codes (HUC) 11/14 designations to HUC 10/12 designations. This alters the areas that are delineated for water quality sampling, for identifying the Total Mass Daily Load (TMDL) areas and for implementing watershed management programs, including the Remedial Action Plan (RAP) Program for AOCs.

In order for the Maumee AOC to be consistent with OEPA's watershed and other water quality programs, you are requesting to realign the Maumee AOC boundaries with the State's watershed boundaries as well as to expand the western border of the AOC to align with the headwaters of the Swan Creek and Ottawa River watersheds. The AOC has been using the new HUC 10/12 boundaries in recent months since it is a logical approach to restoration and improvement of the waterways. Finally, the proposed western border change will make it official and much easier for mapping and data management purposes.

It is our understanding that realigning the Maumee AOC to the HUC 10/12 boundaries and including the headwaters of the two waterways do not change the number or status of the current Beneficial Use Impairments nor does it add any known sites for the Great Lakes Legacy Act.

Based upon your narrative and the accompanying maps, EPA agrees with the boundary modification request. We will send a letter explaining the modification to the International Joint Commission via EPA's Office of International Affairs and the U. S. Department of State. A copy of the letter will also be sent to the proper Canadian Federal and Provincial Agencies. Finally, the modifications will be incorporated into EPA's Great Lakes National Program Office Areas of Concern website.

I am looking forward to working with you and your staff at OEPA in moving this AOC towards delisting.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary V. Gulezian". The signature is fluid and cursive, with a long horizontal stroke at the end.

Gary V. Gulezian
Director

cc:

Mr. Patrick Lawrence, Maumee RAP

Ms. Cherie Blair, OEPA

Ms. Julie Letterhos, OEPA

Mr. Gary Gulezian, USEPA

Mr. David Barna, USEPA

Mr. John Perrecone, USEPA

Mr. Gary Prichard, USEPA

Director, Great Lakes Regional Office, IJC

Mr. Pete Christich, USEPA-Office of International Affairs

Mr. Michael Goffin



State of Ohio Environmental Protection Agency

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Mr. Gary Gulezian, Director
USEPA - Great Lakes National Program Office
77 West Jackson Blvd. (G-17J)
Chicago, IL 60604-3511

Dear Mr. Gulezian:

The Ohio Environmental Protection Agency and the Partners for Clean Streams are hereby submitting this request for a realignment and minor expansion to the Maumee Area of Concern (AOC). As discussed in the enclosed "Maumee Area of Concern Boundary Expansion Request" document, this request for realignment is being made primarily due to Ohio EPA's change from using HUC 11/14 to HUC 10/12 to delineate areas for its sampling, TMDLs, and watershed management programs. With this change, the current Maumee AOC boundary no longer lines up with the watershed boundaries.

Along with the realignment, it is also being requested that the western border of the Maumee AOC be expanded to align with the headwaters of the Swan Creek and Ottawa River watersheds, rather than by the political county boundaries as originally defined. The proposed western border change will make mapping and data management of the system easier and more comprehensive.

If you have any questions concerning this request, please direct them to the Ohio EPA Maumee RAP Coordinator, Cherie Blair. She can be reached at (419) 373-3010 or Cherie.Blair@epa.state.oh.us.

Sincerely,

Chris Korleski
Director
Ohio Environmental Protection Agency

Patrick Lawrence
President
Partners for Clean Streams, Inc. (Maumee RAP)

cc: Cherie Blair, Ohio EPA, NWDO, Division of Surface Water
Julie Letterhos, Ohio EPA, Central Office, Division of Surface Water
Dave Barna, USEPA, Westlake

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



Environmental
Protection Agency



Maumee Area of Concern Boundary Realignment and Expansion

Prepared by Cherie Blair, Maumee RAP Coordinator, Ohio EPA
June 8, 2010

The Ohio Environmental Protection Agency, in conjunction with the Partners for Clean Streams (Maumee RAP Advisory Committee), respectfully request a realignment and minor expansion to the Maumee Area of Concern. This request for realignment of the Maumee Area of Concern is being made primarily due to Ohio EPA's change from using HUC 11/14 to HUC 10/12 to delineate areas for its sampling, TMDLs, and watershed management programs. With this change, the current Maumee AOC boundary no longer lines up with the watershed boundaries. This is most evident in the headwaters of the Toussaint River (southern portion of the AOC near Bowling Green).

Along with the realignment, it is also being requested that the western border of the Maumee AOC be expanded to align with the headwaters of the Swan Creek and Ottawa River watersheds; rather than by the political county boundaries as originally defined. The *DRAFT - Maumee AOC Stage 2 Watershed Restoration Plan (2006)* already includes these areas since it was the logical approach to restoration and improvement of these waterways. The proposed western border change will simply make it official, and much easier for mapping and data management purposes.

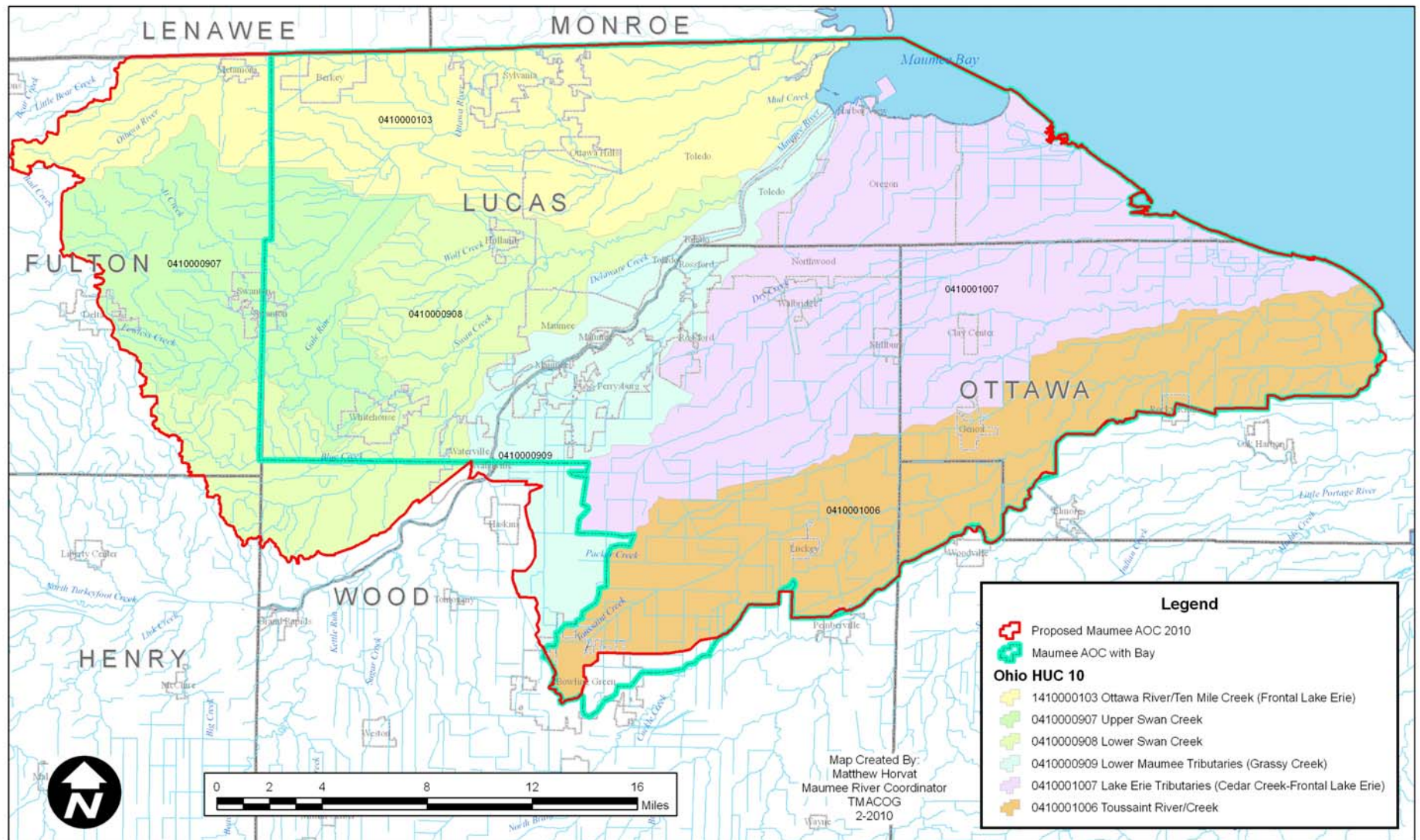
Realigning the Maumee AOC to the HUC 10/12 boundaries and including the headwaters does NOT change the number of Beneficial Use Impairments, nor does it add any known Great Lakes Legacy Act eligible sites. The majority of the area being added is rural, agricultural lands.

The Maumee AOC was originally identified in the *Maumee Area of Concern Stage 1 Report (1990)* as the area extending from the Bowling Green water intake near Waterville along the Maumee River at river mile 22.8 downstream to Maumee Bay. The area included direct drainage into the waters that are within Lucas, Ottawa, and Wood counties. This includes Swan Creek, Ottawa River (Ten Mile Creek), Duck Creek, Otter Creek, Cedar Creek, Grassy Creek, and Crane Creek. In 1992, this area was extended to the east to include Turtle Creek, Packer Creek, and the Toussaint River. In 2009, in accordance with the US EPA Great Lakes National Program Office efforts to map each AOC, the Maumee AOC map was modified to include Maumee Bay. Although this area had always been a part of the AOC, the focus of efforts had been on the river systems; noting that improvements to the rivers and streams would benefit the Bay.

Attachment 1 is a map that illustrates the current AOC boundary in green and the proposed realignment boundary in red. It should be noted that the 2009 modification to show the Maumee Bay as a part of the Maumee AOC has been retained.

Attachment 2 is a letter supporting this modification from Partners for Clean Streams. Partners for Clean Streams, Inc. (PCS) was formed in early 2007 as a 501(c)3 non-profit community organization with an interest in supporting local and regional water quality improvements in the metro-Toledo area. The mission of PCS is to strive for abundant open space and a high quality natural environment; adequate floodwater storage capacities and flourishing wildlife; stakeholders who take local ownership in their resources; and rivers, streams, and lakes that are clean, clear and safe. In January 2008 PCS announced that the Maumee RAP Advisory Committee (RAC) was now nestled within the committee structure of PCS to assist the PCS Board of Directors to deliver a wide range of programs, projects, and community outreach efforts associated with water quality improvements that have been of long standing interest to the Maumee RAP community.

Attachment 1 – Proposed Maumee AOC Boundary Realignment & Expansion



Attachment 2 – Support Letter from Partners for Clean Streams/Maumee RAP

Patrick Lawrence, Ph.D.
*President of Board & Maumee RAC Chair,
Associate Professor, University of Toledo*

Anthony Sloma
*Vice President of Board of Directors
Environment Health & Safety Manager,
Perstorp Polyoils*

Colleen Dooley
*Treasurer of Board of Directors
Attorney, Private Practice*

Jennifer Huber
*Secretary of Board of Directors & DAC Chair
Citizen*

John Hull, P.E.
*Board Member
President, Hull & Associates, Inc.*

Scott Ousky
*Board Member
Citizen*

Terry Shankland
*Board Member
CEO, Shankland's Catering*

Tim Schetter
*Board Member
Land Planning & Acquisition Manager
Metroparks of the Toledo Area*

Timothy Walters, Ph.D.
*Board Member
Senior Ecologist, Mannik & Smith Group, Inc.*



June 7, 2010

Mr. Gary Gulezian, Director
USEPA - Great Lakes National Program Office
77 West Jackson Blvd. (G-17J)
Chicago, IL 60604-3511

Dear Mr. Gulezian:

On the behalf of the Board of Directors for Partners for Clean Streams Inc. (PCS), we are writing to endorse the proposal by Ohio EPA to realign and expand the boundary of the Maumee Area of Concern (AOC). These changes will allow for PCS, and the Maumee RAP community, to better focus their efforts at addressing the water quality and related environmental issues that face the Maumee AOC in reference to the identified beneficial use impairments.

Many recent, current and future projects and activities within the Maumee AOC address watershed scale issues and concerns to address the BUIs so realignment of the AOC boundaries to encompass those HUCs will provide for the enhanced efforts at making our waters again swimmable, fishable and drinkable.

Sincerely,

Patrick Lawrence, Ph.D.
President, Board of Directors

Water is Life!
Help Sustain PCS...
One Drop at a Time!

**Partners for
Clean Streams, Inc.**

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PARTNERING FOR CLEAN STREAMS