Dry Comal Creek and Comal River WPP

Comment Matrix – review from TCEQ

October 2017

#	Page	Section / Paragraph	Comment	Response
1	Title		EPA has asked that we start adding the project AUs to the title/front of WPPs so they aren't as difficult to find. I'll let y'all decide the best way to incorporate the AUs here.	Assessment units (i.e., segment IDs) for the Comal River (1811) and Dry Comal Creek (1811A) were added to the Fly Sheet. The Comal River assessment unit was also added to the Executive Summary.
2	Title		Please replace the current EPA logo with the one I have sent you.	The EPA logo was updated.
3	Page i	Acknowledgements	Acronyms should be listed for all agencies or none.	Added acronyms for all agencies.
4	Page iv - ix	Table of Contents, List of Tables, List of Figures	Reminder to refresh these lists after responding to comments.	All tables were updated following edits to the WPP.

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5	ES-5	Executive Summary	Please verify the statements below, they differ from what is shown is Figure 3. "The 2013 BST results indicated approximately 50 percent of the *E. coli* bacteria in the water were from wildlife, and 30 percent of the bacteria were from livestock sources (see Section 4.3 for BST results). BST analyses were repeated in 2016 and showed that up to 70 percent of the *E. coli* in the Dry Comal Creek and Comal River were from wildlife, and up to only 20 percent were from livestock."	The pie charts in Figure 3 are the average of the 2013 and 2016 BST results for the Dry Comal (left pie chart) and the Comal River (right pie chart). The sentence presented discusses percentages of sources for each year. Modifications included: "~~The 2013 BST results indicated approximately 50 percent of the *E. coli* bacteria in the water were from wildlife, and 30 percent of the bacteria were from livestock sources (see Section 4.3 for BST results). BST analyses were repeated in 2016 and showed that up to 70 percent of the *E. coli* in the Dry Comal Creek and Comal River were from wildlife, and up to only 20 percent were from livestock~~." "The average BST results for the Dry Comal Creek indicated approximately 59 percent of the *E. coli* bacteria were from wildlife, and 26 percent of the bacteria were from livestock sources. Average BST results for the Comal River showed that approximately 64 percent of the *E. coli* bacteria were from wildlife and 23 percent were from livestock. Comparing data from 2013 and 2016 (data shown in Section 4.3), the percentage of *E. coli* in both the Dry Comal Creek and Comal River from wildlife increased."
6	ES-5	Executive Summary	The Executive Summary states that "Locations of potential *E. coli* pollution sources in the Watershed, and their respective *E. coli* loading rates were estimated using SELECT." Although, SELECT loading rates are never discussed in the document.	Added a reference in Executive Summary to the SELECT results in Sections 4.4 and 4.5. "…loading rates were estimating using SELECT (see Sections 4.4 and 4.5)."
7	ES-8	Table 2	When printed maintenance phase is hard to see, suggest changing color.	The color for maintenance phase was changed to improve readability when printed.

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8	ES-8	Table 2	For livestock education, why is it only in the maintenance phase? Why is it not included in initial implementation?	The Partnership agreed to initiate as many BMPs as possible in Year 1; however, those that required funding to initiate are planned for Year 2 when we expect funding may be available. Additionally, all outreach and education activities with programs already developed (e.g., livestock programs through AgriLife, OSSF programs through the County, feral hog programs through TWS and TPWD) were considered maintenance phase as new programs did not require development. No changes required.
9	ES-9	Executive Summary	I like Figure 5, it is a good visual representation of the plan meeting the targeted load reductions.	Thank you. No changes required.
10	ES-9	Executive Summary	Figure 5 shows that the potential E. coli reduction for the Comal River is 3.50×10^{11} but Table 9 in section 4 shows 3.51×10^{11}, this is probably just due to rounding but please reconcile for consistency.	Table 9 was corrected to show 3.50×10^{11}. Other locations of the WPP with this value were confirmed as well.
11	ES-11	Executive Summary	The Executive Summary as a whole is really good. It will be an effective education and outreach tool. If the Executive Summary is going to be disseminated as a separate document and it was developed with 319(h) funds there will need to be a funding acknowledgement similar to the one on the inside cover of the WPP.	The Executive Summary was updated to include the 319(h) funding source acknowledgement in case it is separated from the larger document.

#	Page	Section / Paragraph	Comment	Response
12	ES-11	Executive Summary	How will the reduction in car accidents due to deer be measured? I suggest a different measure of success, number of landowners reached by "Do-not-Feed Wildlife" program for example.	Data on deer-related vehicle accidents will be collected from third parties, such as insurance companies, and/or from the City's Environmental Services Division on collection of road-side carcasses. Additional measures for tracking success of the "Do-not-Feed Wildlife" program are summarized in Table 26 and Section 5.4.1 and include the number of people reached by education and outreach programs. Added the following language to Section 5.4.1, Deer Population Assessment: "Data on deer-related vehicle accidents will be collected from third parties, such as insurance companies, and/or from the City's Environmental Services Division on collection of road-side carcasses."
13	Various	Various	Recommend using City for all references to New Braunfels throughout the document for consistency.	The document was updated to consistently refer to the City of New Braunfels as "City."
14	6	Watershed Boundaries	Confirm that the southeastern HUC is the Dry Comal River – Guadalupe River	Using the USGS Watershed Boundary Dataset, the HUC name was confirmed. No changes required. https://www.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=4c08f2e2b13741da96ad4a8f6aa5e36a 
15	7	Figure 7	When printed off it is hard to see the Comal River in the light blue.	The color used for the Comal River was changed.

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16	33	Section 2.10.1	Thank you for footnote 6! You are proactively answering EPA comments.	Thank you. No changes required.
17	52	Table 9	I suggest an edit to the Table caption since the table includes both annual and daily reduction targets.	The Table 9 caption was updated to "Median Annual and Daily Load Reduction Targets". Additionally, the column titles were updated to read "Daily Load" and "Annual Load".
18	52	Section 4.3	BST results should not be used to quantify source loadings. The BST sampling and analyses was not covered under a QAPP and the results only show the bacteria contributions for a snapshot in time. SELECT is a widely accepted method to estimate source loadings in WPPs and should be used in this document. BST results can be used to choose and prioritize BMPs. The Navasota River WPP, which was recently accepted by EPA, used LDCs, BST and SELECT results to estimate loadings and needed load reductions. I suggest using this as a reference on how to handle these different sets of data.	The total loading rates estimated from SELECT and the total load reductions estimated from LDCs were used to determine if the BMPs will meet the water quality target. The "Estimated *E. coli* Loading at Medium Flows" columns were removed from Table 10. Additionally, the table caption was updated to "Average Percent of *E. coli* Measured in BST Analysis", and this column heading was accordingly removed from the table. The misleading text prior to Table 10 was also removed, and Table 10 was introduced earlier before Figure 36: "Table 10 summarizes the average percent of *E. coli* measured in BST analysis, which was used to assess the load reduction required per source (see Section 5.3.1 for details)."
19	53	4.3	Cattle is broken out separately from livestock in the 7-way split. Suggest providing an example of non-avian livestock for clarity.	Text with bullet 5 updated to read "Non-avian livestock, excluding cattle (e.g., goats, sheep)"
20	54-55	Table 10	Please check the headers on Table 10, the headers on page 54 are different than the headers on page 55. Another solution would be to put Table 10 all on one page.	Headers were corrected.

#	Page	Section / Paragraph	Comment	Response
21	54-55	Table 10	Were the flows in this table taken at the same time as the BST samples were collected? How did stakeholders determine the % sources in Table 10, footnote "1"? 90% human contribution from OSSF is a very high number and would indicate that the county was not doing its job. Wastewater overflows and sewer line breaks, etc. seem very under represented.	USGS gage stream flow data for periods of up to 20 years (period of data depends on the site and how long USGS gage at that location has been installed) were used to determine the medium flow rates. Flow rates were measured at the time BST samples were collected and are included in the flow data set. Regarding footnote 1, the text was modified to clarify how the percentages were determined: "The portion of bacteria contributed by humans is likely due to OSSFs, wastewater, and other sources (e.g., dumping, transient populations, etc.). Because there is not an active County OSSF inspection program, there are numerous older OSSFs in the watershed that were constructed in the 1970's, and NBU has a proactive wastewater inspection program, it was assumed the human contribution of bacteria is 90% from OSSFs, 5% from wastewater, and 5% from other sources. Non-avian wildlife was assumed to be 70 percent deer and 30 percent feral hogs, based upon stakeholder knowledge and SELECT."
22	57	Figure 39	This figure is to show the subwatersheds but the subwatershed outlines are not clearly shown. Update this map to more clearly show the subwatersheds.	The figure was updated to more clearly show the subwatersheds.
23	58	Section 4.4 Table 11	The livestock source category in Table 11 includes cattle, goats & sheep, hogs, horses, and chickens. But only cattle (Figure 40) and goats and sheep (Figure 41) are listed or referenced after Table 11. Are values for horses, chickens, and hogs considered negligible? Suggest adding language to the text for clarity.	Horses, hogs and chickens were removed from Table 11. Added language in the text above Figure 40 to clarify: "These calculations resulted in an estimated 2,748 cattle and 2,501 goats and sheep, in the Watershed. Although NASS data shows chickens, horses and swine also in the Watershed, the population sizes and/or relative bacteria contributions per animal are small compared to the contributions from cattle, goats and sheep. Thus, for the purposes of estimating loading and performing SELECT analysis, calculations focused on cattle, goats and sheep. BMPs selected targeting cattle, goats and sheep will also include chickens, horses and swine."

<table>
<tr><th>#</th><th>Page</th><th>Section / Paragraph</th><th>Comment</th><th>Response</th></tr>
<tr><td>24</td><td>72-73</td><td>Section 5.3.1</td><td>Were all of the assumptions discussed with the stakeholders and approved by them?</td><td>Yes. All assumptions were provided to Stakeholders for review and comment. Text in 5.3.1 updated to clarify:

“TAG and Stakeholder Group members reviewed goals to ensure they were practical and achievable in the Watershed and assumptions to ensure they matched Stakeholder knowledge and experiences.”</td></tr>
<tr><td>25</td><td>72-73</td><td>Section 5.3.1</td><td>It would be helpful to have a reference in each of the numbered steps in this section to a place in the WPP where the actual numbers and/or more information can be found.

For example, the E. coli loading per source per waterbody can be found in Table 11. Adding a reference to Table 11 in step #3 would be helpful.</td><td>Section references were added to each step in Section 5.3.1.
<table>
<tr><th>Step No.</th><th>Refer to…</th></tr>
<tr><td>#1</td><td>Section 4.1.2 (Watershed Characterization: Methodology for Estimating Pollutant Loads – Load Duration Curves)</td></tr>
<tr><td>#2</td><td>Section 4.3 (Watershed Characterization: Sources of Bacteria Pollution in the Dry Comal Creek and Comal River)</td></tr>
<tr><td>#3</td><td>Appendix G: Estimated E. coli Load Reduction Calculations</td></tr>
<tr><td>#4</td><td>Table 11 and Section 4.5 (Watershed Characterization: SELECT Results for the Dry Comal Creek and Comal River Watershed)</td></tr>
<tr><td>#5</td><td>Appendix G: Estimated E. coli Load Reduction Calculations</td></tr>
<tr><td>#6</td><td>Section 5 (Best Management Practices) & Appendix G: Estimated E. coli Load Reduction Calculations</td></tr>
<tr><td>#7</td><td>Appendix G: Estimated E. coli Load Reduction Calculations</td></tr>
<tr><td>#8</td><td>Appendix G: Estimated E. coli Load Reduction Calculations</td></tr>
<tr><td>#9</td><td>Appendix G: Estimated E. coli Load Reduction Calculations</td></tr>
<tr><td>#10</td><td>Appendix G: Estimated E. coli Load Reduction Calculations</td></tr>
<tr><td>#11</td><td>Appendix G: Estimated E. coli Load Reduction Calculations</td></tr>
<tr><td>#12</td><td>Appendix G: Estimated E. coli Load Reduction Calculations</td></tr>
</table></td></tr>
<tr><td>26</td><td>72-73</td><td>Section 5.3.1</td><td>Does Table 10 show the load produced by the total population of each source? If so, reference Table 10 in step #4.</td><td>The “Estimated E. coli Loading at Medium Flows” columns were removed from Table 10. Additionally, the table caption was updated to “Average Percent of E. coli Measured in BST Analysis”, and this column heading was accordingly removed from the table.

The misleading text prior to Table 10 was also removed, and Table 10 was introduced earlier before Figure 36:

“Table 10 summarizes the average percent of E. coli measured in BST analysis, which was used to assess the load reduction required per source (see Section 5.3.1 for details).”

See comment 25 for added references within Section 5.3.1.</td></tr>
</table>

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27	72-73	Section 5.3.1	Is there an Appendix that you can reference for step #5?	Text was added to the end of Step #5: "Refer to Appendix G for detailed calculations."
28	77	Table 13	319(h) cannot be used as a funding source to reduce deer/hog populations by relocating or euthanasia. Please remove from table or specify restriction in table.	A footnote will be added to Table 13: "319(h) funding will not be used to fund any active wildlife management BMPs." The Watershed Partnership will assess alternative funding sources for active wildlife management BMPs.
29	77-95	Tables 13-20	Each of the BMP tables only incudes 319(h) as a funding source. All potential sources of funding that are appropriate for each BMP should be included in these tables. 319(h) is considered seed money and should not be looked at as a sustaining funding source.	Moderate and high priority funding sources listed in Section 9.2 were added to the BMP tables.
30	77-95	Tables 13-20	I suggest adding the priority watersheds from the SELECT results into the BMP tables if possible. SELECT was performed so BMPs could be focused and prioritized but the priority subwatersheds are not discussed.	Priority subwatersheds were added for each source. Text was added to Table 12 to define "Priority Subwatershed" as "Subwatershed numbers (see Figure 39) corresponding with the highest potential loading (based upon SELECT analysis in Section 4.5) and/or the areas prioritized by the Stakeholder Group based on their knowledge and experiences (see Appendix C for summary maps)." Most BMPs target a wider range of subwatersheds (e.g., outreach and education BMPs generally target the entire Watershed).
31	77-95	Tables 13-20	Suggest using a different color for the priority text to increase contracts, especially in the gray shaded rows	The color of the priority text was changed to increase contrast.
32	85	5.5	Livestock BMPs – Average operations were assumed to have 20 cattle and 20 sheep and goats. Again, no mention of any other livestock (horses, hogs, chickens in Table 11). Were these sources considered negligible?	Horses, hogs and chickens were removed from Table 11. See comment 23 for additional information. No additional changes required.

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33	86	Table 16	If the Comal River watershed is mostly developed, why is there a load reduction associated with Livestock Outreach and Education?	Text added to the end of the Livestock Outreach and Education section in Section 5.5 to clarify: "Outreach and education activities will focus on the more rural Dry Comal Creek Watershed. However, outreach and education will also include landowners in the Comal River Watershed. Although the Comal River Watershed is mostly developed, BST analysis (see Section 4.3) highlighted that livestock account for approximately 16 percent of bacteria in the Comal River Watershed."
34	86	Table 16	NRCS funding can also be included in this table	NRCS funding will be added to the table. See comment 29 for more information.
35	90	Section 5.6.2	Why limit the identification and implementation of structural stormwater BMPs to $500,000?	A footnote was added to the following bullet: Identification and implementation of approximately $500,000[1] in additional low impact development (LID) and reduced impervious cover infrastructure. 1 – A small budget is included for LID and impervious cover projects planned for implementation years 6 through 10. However, the budget was limited as the Stakeholder Group requested focusing resources on reduction of animal populations and related outreach efforts, which contribute the largest percentage to the *E. coli* concentrations in the Watershed based upon BST results. Additionally, NBU has an active MS4 program, described in Section 2.10.1.
36	95	Section 5	I suggest adding a summary table with some accompanying text to the end of this section that includes the expected load reductions from each source and the total expected load reductions. This will further show that the expected load reductions from BMPs are greater than the potential loadings. Table G-1 would be a good addition to this section.	Moved Section 7.2 to the end of Section 5. Section 7.2 covers this summary. Also added Table G-1 into this section ahead of the graphs already provided.

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37	96	Table 20	Is there no is wastewater line maintenance planned by the city? No investigation of lift station problems? I think you could site the MS4 activities here and remove 319(h) as a funding source for Point Sources.	The City's ongoing SSO program is documented in 2.10.3. MS4 activities are documented in 2.10.1. The authors were careful to not mix MS4 funding in with WPP activities as MS4 funding must be handled separately. All activities in Table 20 are outside the scope of the City's MS4 and SSO program as it addresses discharges and systems outside the City's jurisdiction. A footnote was added to the table for financial resources stating: 1 – These BMPs cover activities outside the scope of the City's MS4 (Section 2.10.1) program and NBU's SSO (Section 2.10.3) program. The City and NBU will continue these programs in parallel with these additional activities.
38	99-100	Figures 52 and 53	This infographic will make a great education and outreach tool. If the WPP Infographic is going to be disseminated as a separate document and it was developed with 319(h) funds there will need to be a funding acknowledgement similar to the one on the inside cover of the WPP.	Added the funding acknowledgement into the infographic.
39	111-116	Section 6.4	For consistency with the BMP tables, can potential sources of funding and priority subwatersheds (if applicable) be added to the education and outreach sidebars?	Potential sources of funding and priority subwatersheds were added to the education and outreach sidebars.
40	121	Table 26	When printed it is hard to see maintenance phase and no activity.	The color for maintenance phase was changed to improve readability when printed.
41	130	Section 7.4	I suggest moving section 7.4 into section 8, it seems like a better fit.	Section 7.4 was moved to the end of Section 8.

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42	130	Section 7.4	How will you implement adaptive management? I suggest including some information on the annual stakeholder reviews and the 3-year checkpoint in this section.	Text added to the end of Section 7.4 (new Section 8.4): "Stakeholders, with support from the WPP Coordinator and WPP Consultant, will review data, including progress toward achieving implementation milestones (Table 26 and Section 8.1), water quality data in comparison to projected targets (Section 8.2), population dynamics (Section 8.3), and funding/resource availability. Although an official checkpoint is scheduled for the end of the third year to review progress and adjust the implementation schedule and goals, as necessary, to meet the WPP goals, should any of the following triggers be identified during annual reviews, the WPP will be redirected, as needed: • The need for additional funding or funding sources to implement planned BMPs, • Significant weather changes (e.g., severe droughts or flooding), • Unanticipated changes to water quality in the Watershed, • Schedule delays or inability to implement planned BMPs (see Figure 67), • Strong community or City Council opposition to implementation or continuance of BMPs, • Changes to population dynamics (as described in Section 8.3), and/or • Any other factors determined to influence the efficacy of the WPP."
43	130	Section 7.4	Are there any specific criteria that will trigger the need for revisions to the implementation plan or mid-course corrections?	See response to comment 42.

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44	134	Table 29	Since there is a delay normally observed between Nonpoint Source BMPs and instream water quality do you believe 10 years to be a practical timeline to meet the target goal of 113CFU/100mL?	Although it will be challenging to meet the target *E. coli* goal in 10 years, the Watershed Partnership believes near-term improvement in water quality is critical to the Watershed and community. Thus, a goal of no more than 10 years was identified for reaching the targeted water quality. Text was added to Section 8.2.2 after the fourth sentence: "Although there are many variables outside the Watershed Partnership's control that impact the feasibility of meeting these targets (e.g., land use changes, effectiveness of BMPs, source population changes, weather, etc.), the Watershed Partnership identified a critical target of no more than 10 years for achieving improvement in the water quality in the Comal River and Dry Comal Creek. Thus, critical BMPs anticipated to have the greatest impact on water quality are planned for implementation as soon as funding is available. If the identified *E. coli* targets are not met by the proposed schedule, the Watershed Partnership will adapt the WPP to either implement BMPs more aggressively, implement new BMPs, or, in the case that unforeseen circumstances arise, extend the proposed schedule." Current sentence six will begin a new paragraph.
45	134	Table 29	The column headers in Table 29 say CFU/mL instead of CFU/100mL.	The column headers were corrected to CFU/100mL.
46	139	Table 31	The TCEQ 319(h) application is usually posted on June 1st. The table says that the application is in September.	The date for TCEQ 319(h) applications was updated to June 1st.
47	141	Table 31	The Clean Water State Revolving Fund can also be used for stormwater and wastewater projects, not only OSSFs.	The potential eligible activities were updated to: "Repair, rehabilitation and replacement of OSSFs, stormwater improvements, and wastewater projects."

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48	144	Table 31	I suggest changing the Environmental Quality Incentives Program and the Grazing Lands Conservation Initiative to high priorities. These funds can be used to implement WQMPs.	The Environmental Quality Incentives Programs and the Grazing Lands Conservation Initiative were changed to high priority. The potential eligible activities will also be updated: "~~No high or moderate priority BMPs selected for this WPP are eligible; however, this funding source may be useful in the future as new BMPs are considered.~~ WQMP implementation"
49	145	Table 31	Remove the Water Supply Enhancement Program from this table.	The Water Supply Enhancement Program was removed.
50	Appendix B	3	What does MDNR mean? (in the second paragraph)	MDNR is the Missouri Department of Natural Resources. This is a reference to the citations listed as the "Water Quality Parameters (n.d.)….." The in-text citation was updated to show: "Missouri Department of Natural Resources, n.d." The full citation was updated to: Missouri Department of Natural Resources (n.d.). Water Quality Parameters. Retrieved from https://dnr.mo.gov/env/esp/waterquality-parameters.htm#Conductivity
51	Appendix C	Figure C-1	There are 9 numbers on the map but only 4 listed in the text. There are also two number 1s on the map.	Numbers were removed from the blue circles. Both note 1s were combined into one note.
52	Appendix C	Figure C-4	Location 3 is listed as a horse ranch, but horses are only identified in Table 11 (page 58) and never referenced again. Are horses a source or not?	Non-avian livestock (other than cattle) account for 4% of the bacteria, according to BST, so horses could potentially be a source. We will continue to assess potential pollution from horses as we move through implementation. A note was added to the Horse Ranch* * Although horses were not considered one of the larger contributing sources to *E. coli* bacteria in the Watershed, locations of horses in the Watershed were noted and will be reassessed during WPP implementation.

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53	Appendix C	Figure C-4	There is a reference to smaller operations being more likely to be overstocked, and thus should be prioritized. On page 84 in 5.5 it references smaller operations as being overgrazed, and a more likely source because of lack of grass cover. These are similar but not the same thing. Are smaller operations overstocked or overgrazed? If smaller operations are overstocked, was this taken into consideration when establishing estimates for livestock?	Overstocking was considered in establishing the livestock estimates. The number of AUs was increased by 25% to allow for overstocking. The following text was removed from Figure C-4: "~~Small Ranches:~~ ~~Smaller operations (not identified on the map) are more likely to be overstocked, and thus, should be prioritized.~~" The wording for Section 5.5 was updated to clarify that overstocking and overgrazing are not the same thing. Higher bacteria levels can result from both more livestock on the property, and from less grass cover to remove bacteria before it reaches the waterbody. Additionally, the text in Section 5.5 regarding smaller operations was removed as marked-up by the TCEQ.
54	Appendix C	Figure C-5	Locations are listed from 1 to 10 on the map, but the only number listed in the sidebar is #10. Recommend removing all the numbers, and only labeling the Trinity Aquifer Wells.	The numbers were removed from the blue dots. #10 was renumbered as #1 in the dot and sidebar.
55	Appendix C	Figure C-7 Pet Waste	Areas listed as high density do not need to be numbered. They are identified by color, and aren't differentiated from each other. There are already 4 numbered locations.	The numbers were removed from the blue dots.
56	Appendix C	Figure C-8	The comments in the sidebar list 4 locations, but only 2 are identified on the map.	Added additional locations and numbered all locations to match the formatting used in the other maps.

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57	Appendix G	Watershed Data Analysis	Table 10 shows the total E. coli load in the Comal River as $7.00*10^{11}$ although Appendix G says that it is $6.96*10^{11}$. Table 11 shows that the loading rate per dog is $1.12*10^{9}$ but appendix G says that is 3.15×10^{9}. This is probably just due to rounding but please reconcile for consistency.	The loading numbers presented in Table 10 were removed per comment 18. $6.96*10^{11}$ is the correct value. Table 11 was updated to show a 3.15×10^{9} *E. coli* loading rate.
58	Appendix G	Watershed Data Analysis	Section 5.6.3 says that the goal was to install 200 pet waste stations in the watershed although Appendix G says that the goal is 180.	The goal of 180 pet waste stations in Appendix G is just for the Comal River Watershed. The Dry Comal Creek has an additional 20 stations planned. Thus, the total number of pet waste stations for the entire Watershed matches. No changes required.
59	Appendix G	Table G-3 Page 50	Which sources were used to calculate values for livestock? Cattle, sheep, goats, hogs, horses, chickens?	Added a note to the table to clarify that livestock included cattle sheep and goats for these calculations. See comment 23 for more information.