

Approach For Assigning Allocations-Elm Creek Watershed WRAPP

September 11, 2013

Objectives for Meeting

- Re-visit approach for assigning pollutant loading allocations for TMDL's
- Base approach on most recent guidance from MPCA¹ (November 2011)

¹ Guidance on What Discharges Should Be Included in the TMDL Wasteload Allocation for MS4 Stormwater

Overview of MPCA Guidance

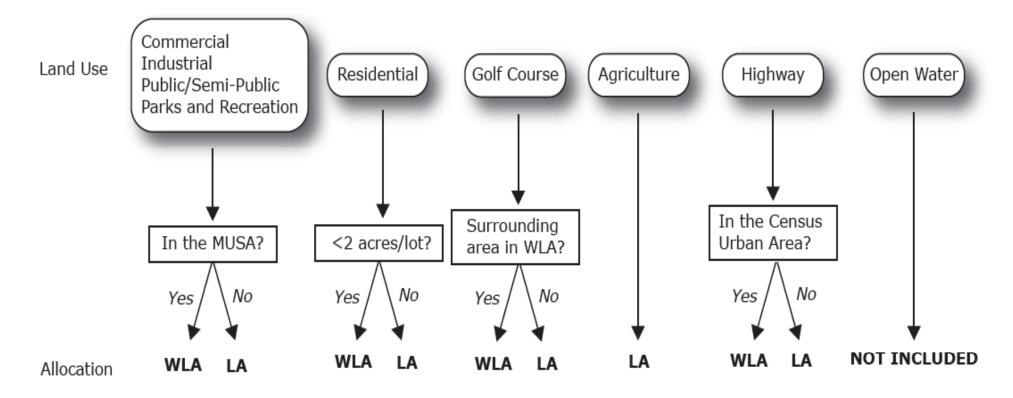
- Wasteload allocation (WLA) should include loads from <u>future</u> urban land use footprint
- Future urban footprint defined using land use and/or orderly annexation plans
- MS4 permittee only responsible for discharges when future urban areas are incorporated into MS4's <u>regulated</u> <u>conveyance system</u>

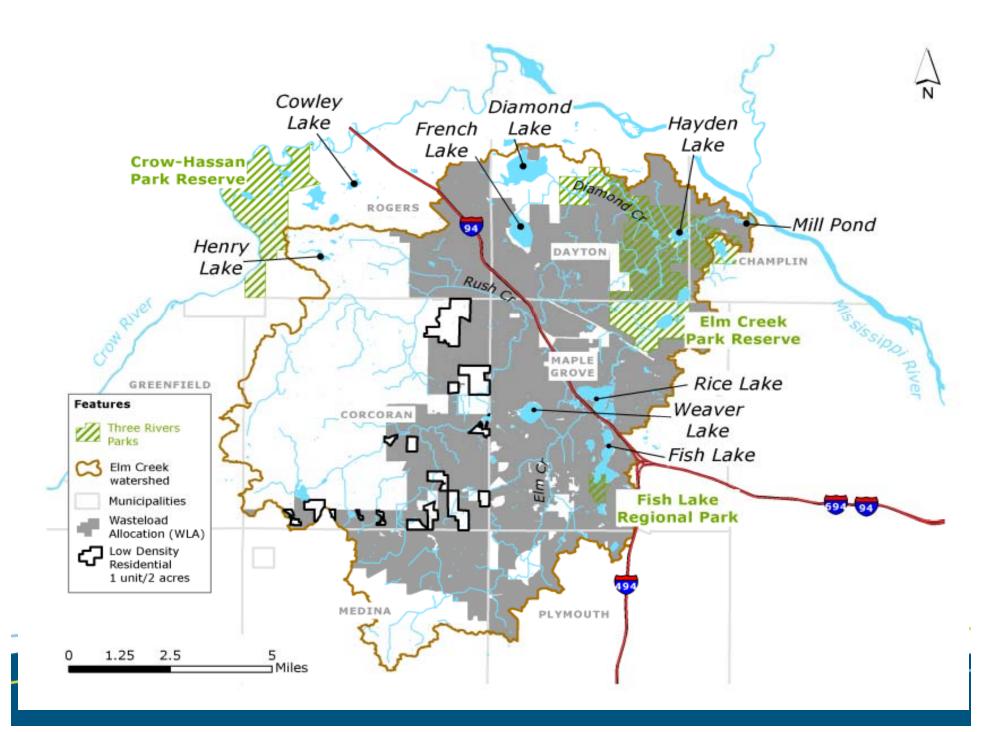
Overview of MPCA Guidance (con't)

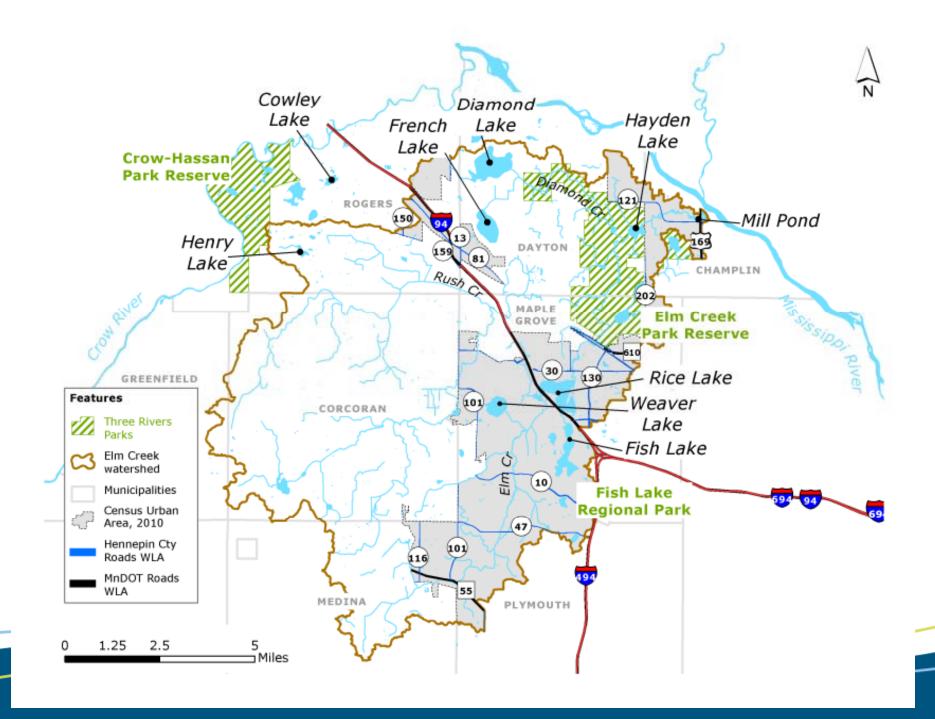
Benefits:

- Reduces the likelihood that TMDL will need to be re-opened
- Provides MS4 permittees with flexibility to manage stormwater discharges as land use changes
- Could include generating "off-sets" to reduce need to retro-fit in already developed areas

Partitioning of Loads By Land Use







Other Important Considerations

- Will assign draft load allocations based on proportionate area
- Propose to use monitoring data and/or modeling to help decide:
 - Which MS4's need to reduce loads for a specific pollutant
 - How much they need to reduce
- Will need to include a procedure to transfer pollutant loads from the LA to the WLA when it's warranted

QUESTIONS/DISCUSSION