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 **future** 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 **regulated conveyance system**
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

Land Use

- Commercial Industrial
- Public/Semi-Public Parks and Recreation

Residential<br> <2 acres/lot?<br> Yes -> WLA<br> No -> LA

Golf Course<br> Surrounding area in WLA?<br> Yes -> WLA<br> No -> LA

Agriculture<br> LA

Highway<br> In the Census Urban Area?<br> Yes -> WLA<br> No -> LA

Open Water<br> NOT INCLUDED
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