Capitol Region Watershed District

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May 16, 2012

Robert Finley
Minnesota Pollution Control Agency
12 Civic Center Plaza, Suite 2165
Mankato, MN 56001

Re: Comments on Draft South Metro Mississippi River Total Suspended Solids Total Maximum Daily Load (TMDL) Report

Dear Mr. Finley:

Capitol Region Watershed District (CRWD) appreciates the opportunity to provide comments on the draft South Metro Mississippi River Total Suspended Solids Total Maximum Daily Load (TMDL) Report. CRWD has considerable, vested interest in the findings and future implications of this report as CRWD is within the South Metro Mississippi River reach. Further, CRWD is a nontraditional operator of a small MS4 and through our MS4 permit this TMDL will include numeric load reduction requirements for CRWD. CRWD's intention through its comments is to ensure that the health and sustainability of water resources in CRWD, including the Mississippi River, are protected and improved.

CRWD offers the following comments:

1. CRWD supports the goals and expected outcomes of the South Metro Mississippi River Total Suspended Solids Total Maximum Daily Load (TMDL) Report. Numeric load reduction requirements are an important step forward as an objective way to bring the Mississippi River into compliance with water quality standards. The specific load reduction requirements will help entities within the Mississippi River Watershed clearly see areas that are meeting the loading requirements and areas that are not. This will ultimately help focus resources in the areas of greatest concern.

2. CRWD supports the load reduction allocations that are completed among the major watersheds draining to the South Metro Mississippi River. The largest reductions are needed from the Minnesota River watersheds however all watersheds need to do their part to reduce loading. The proposed 25% reduction of total suspended solids loading for MS4 areas is appropriate.

3. Page 66, Sec. 7.1, #3—This section of the report indicates, "The MPCA will implement aggregate allocations at the basin scale through agency programs for MS4s…" This statement appears to be in conflict with other sections of the report (paragraph 2, Sec. 7.2.3) and statements made by agency staff at public meetings that indicate each MS4 will have a numeric wasteload allocation included in their MS4 permit. This should be clarified in the draft TMDL report.

4. Page 70, last paragraph—This section of the report states, "Applying these cost estimates to the required TSS reduction load for regulated MS4s results in an aggregate cost estimate of $850 million for the MS4s affected by this TMDL" Further detail on how the estimate was calculated and what assumptions were used is needed. Specifically:
    a. The cost estimate assumes no BMPs have been implemented since the 2002 baseline year that would have made progress towards the reduction goals. Estimates of progress towards to loading reduction goals in the last 10 years should be completed to refine the estimate of future costs of meeting the TMDL loading goals.
    b. Does the estimate include construction costs only or are design, and long-term maintenance costs included? If so, what are the life-cycle cost assumptions used?
    c. What is the period of time for implementation of the TMDL and does the $850 million cost estimate fall under that time period?
    d. Were the costs calculated on a $/lb of TSS removal? Please provide a description of the calculation. CRWD has completed extensive monitoring, and documentation of full life-cycle costs to remove TSS for BMPs constructed in CRWD and the costs range from $1.74/lb to $7.23/lb. The report—*BMP Performance and Cost-Benefit Analysis: Arlington Pascal Project 2007-2010* can be found on CRWD's website—www.capitolregionwd.org.

5. Page 76, Sec. 7.2.3, paragraph 3—This section of the report states, "...permittees may choose to demonstrate that pollutant loads from their MS4 meet the target load of 169 lbs/acre/year from the built up areas and 112.5 lbs/acre/year from the newly developed areas and open-space developed areas." This section needs increased specificity regarding how compliance with loading targets will be documented. Specifically, CRWD suggests:
    a. Provide definitions of: *built up areas, newly developed areas, open-space developed areas*.
    b. When using monitoring data to show compliance with the loading rate targets, define how many years of monitoring is required.
    c. When using monitoring data to show compliance with the loading rate targets, define how anomalously wet and dry years will be handled.
    d. When using modeling to show compliance with the loading rate targets, define the modeling methods to be used including input parameters and data.

CRWD requests that MPCA address these comments on the Draft South Metro Mississippi River Total Suspended Solids Total Maximum Daily Load (TMDL) Report to the greatest extent

possible. CRWD looks forward to final adoption and implementation of the TMDL to improve water quality in the Mississippi River. If you have any questions, please contact CRWD.

Sincerely,

Mark Doneux

Mark Doneux
Administrator

cc: Anna Kerr, MPCA
Ray Bohn, Minnesota Association of Watershed Districts
Kevin Bigalke, Nine Mile Watershed District, President of Assoc. of WD Administrators
Pat Byrne, CRWD Citizen's Advisory Committee

Minnesota Department of Transportation
395 John Ireland Blvd.
Saint Paul, MN 55101

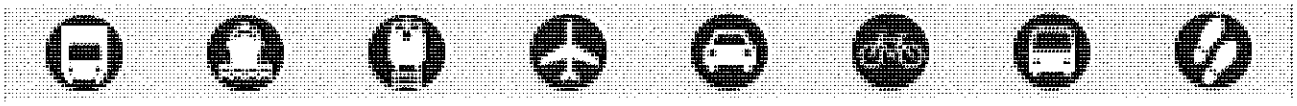
May 29, 2012

Mr. Robert Finley
Regional Manager, Watersheds
Minnesota Pollution Control Agency
12 Civic Center Plaza, Suite 2165
Mankato, MN 56001

RE: South Metro Mississippi River Total Suspended Solids Total Maximum Daily Load Report
Comments by the Minnesota Department of Transportation

Dear Mr. Finley:

The Minnesota Department of Transportation (MnDOT) appreciates the opportunity to provide comments on this Total Maximum Daily Load (TMDL) Report. In general, MnDOT supports efforts to protect Minnesota's water resources. MnDOT activities and facilities are subject to the Construction Storm Water (CSW) and Municipal Separate Storm Sewer Systems (MS4) National Pollutant Discharge Elimination System (NPDES) permits. As such, we work diligently to preserve and protect water quality in a responsible and cost effective manner. We are therefore encouraged to see that the Minnesota Pollution Control Agency (MPCA), in describing the implementation approach (7.1), emphasizes targeting of funding for the most cost effective Total Suspended Solids (TSS) reduction sites. We would encourage MPCA to adopt this approach more fully as part of the overall TMDL strategy. As drafted, this does not appear to be the case. Rather we see a document which proposes to burden regulated entities with a substantial task (25% reduction of their TSS loading), at tremendous cost (estimated at $850 million), to achieve little reduction (nearly all loading comes from nonpoint sources-p 65) in the overall loading to the river. We recommend that MPCA reconsider its approach and evaluate whether such large expenditures for such little improvement is warranted. We offer the following comments.



Best Management Practices (BMP) Baseline

In development of this TMDL, previous drafts and communications (response to comments letter dated April 26, 2010, MPCA to MnDOT) suggested that MPCA's approach was to apply the 25% reduction in MS4 loading with a baseline of no BMPs. This approach would be consistent with other TMDLs, such as the Lower Minnesota River Dissolved Oxygen (DO) TMDL. At some point, and for reasons not clear, MPCA changed the baseline to 2002, thus penalizing MS4s who implemented stormwater BMPs prior to that time. We do not believe that this change in baseline is warranted and suggest that any baseline be based on no BMPs.

Unimpaired Reach Watersheds

Large areas of the watershed within the TMDL study area discharge to waters, or reaches of waters, which have not been determined to be impaired based on TSS or turbidity (e.g. Mississippi River above Lock and Dam 1). The TMDL even reports that TSS levels decrease as the Minnesota and Mississippi Rivers traverse the Metroshed (e.g. Mississippi River 24 mg/l at Anoka, 20 mg/l Lock and Dam 1). It is unclear why these areas would be included in the TMDL and be subject to a WLA. Other TMDL projects are excluding discharges to unimpaired reaches from the WLA requirements (e.g. Upper Mississippi River Bacteria TMDL). Why has that approach not been used in this TMDL?

Accounting for Upstream TMDLs

The Minnesota River appears to account for a large portion of loading to the South Metro Mississippi River. The proposed loading reductions of upstream watershed TMDLs, such as the Minnesota River and others, do not appear to be accounted for in this TMDL. It is unclear why they are not. We suggest that any upstream TMDL reduction be accounted for in this TMDL.

Yearly Average WLAs, Flow Regime WLAs

The WLAs appear to be expressed, in part, as average annual loadings. We generally agree with this rather than a daily or instantaneous standard. It seems somewhat inconsistent that compliance with the seasonal standard (32 mg/l long term summer mean) would be evaluated based on a yearly average, or on flow regimes outside of the summer period. It would be expected that a large proportion of the loading occurs during high flows in the spring which is outside of the

summer season. How were these summer long term averages translated into yearly average WLAs or flow based WLAs outside of the summer season, and is it appropriate to do so?

New MS4 areas and allocation transfers

As additional MS4 areas become regulated, there needs to be a mechanism to provide them with WLAs. The document (p 50) indicates when this occurs "MPCA will transfer waste load allocation to them..." This approach appears to transfer WLA from one MS4 to a newly regulated MS4, which may be the case in some instances. However, there are other situations where load allocation (LA) will need to be transferred to waste load allocation as when a non-regulated MS4 area becomes regulated. The LA/WLA transfers should be more detailed and fully explained as it is outlined in MPCA's guidance document" Guidance on What Discharges should be included in the TMDL Waste Load Allocation for Stormwater (MPCA, 2011).

Use of Flow Duration Curves for Large River Systems

For large rivers such as the Mississippi, individual storm events may have little relation to stream flow. The flow duration curve approach, however, seems to tie storm events to stream flow, and hence the WLAs. This TMDL suggests that different kinds of BMPs are needed to address the different flow regimes. This is quite impractical as most water quality BMPs are designed based on 2 year storm events rather than stream flow regime. MPCA needs to recognize this. Typical BMPs are not intended or designed to treat flood flows. It would be impractical and cost prohibitive to do so. Use of the flow duration approach should be reconsidered for large river systems.

Site Specific Standard

MnDOT provided comments on the proposed site specific standard (Comment letter dated April 26, 2010, MnDOT to MPCA). The site specific standard (SSS) document stated that it is likely the SSS would be retained during the triennial rule review. It is unclear to us at this time whether that has occurred and if the standard is now part of the water quality rules. Please clarify this.

Costs

The TMDL estimates an 850 million dollar cost to MS4s based on information from the Weiss study. The Weiss study however, did not include land costs, or costs for BMPS used in ultra-urban areas or other proprietary type devices. In the highly developed areas, land costs can be extremely high. Additionally, because of limited space costly ultra-urban BMPs may need to be

utilized. These typically have much higher operation and maintenance costs, and often are located in areas with challenging access. Therefore the cost of compliance could be substantially higher than is currently estimated. We would encourage MPCA to explore more cost effective load reduction options, including the concept of banking.

Timeframe for Implementation

Previous TMDLs developed by MPCA have stated a timeframe for meeting the TMDL goals (e.g. Lower Minnesota River DO TMDL – 30 years). Principal 4 of the Work Plan Outline (p 81) appears to set a goal for the 25 % reduction by 2020. This appears to be an extremely aggressive schedule, especially for MS4's to meet. In addition, when MS4s are forced to retrofit, rather than incorporate BMPs into capital improvement projects, the costs likely rise substantially.

TMDL Consistency

While we understand that each TMDL is tailored to each specific situation, we are finding great discrepancies between and among the many TMDLs and implementation plans. We have noted some of those in our comments (e.g. baselines, unimpaired reaches, etc.). This TMDL apparently did not even follow MPCA's own TMDL guidance on allocation transfers. We would encourage MPCA to further evaluate how to provide more consistency within the TMDL process.

Conclusion

The report shows that NPDES regulated entities contribute a very small proportion of the sediment loading to the river. Yet they will be tasked with implementing expensive strategies to achieve high levels of treatment in their systems, which will yield little if any improvement in the overall sediment loading to the Mississippi River. This does not seem to be a rational approach to meeting the goal. Rather, it raises the question of whether the goal is realistically achievable. If it is, then MPCA should rethink its approach and find truly cost effective strategies which have a chance to work. If not, the question becomes – is it really worth the cost?

Please feel free to contact our office should you have any questions regarding our comments.

Sincerely,

John Sampson, P.E.
Acting Chief Environmental Officer
Office of Environmental Stewardship

Enclosures

cc: Lisa Thorvig, Director, MPCA Municipal Division
Jon Chiglo, MnDOT Engineering Services
Scott Peterson, MnDOT Government Affairs
Mike Barnes, MnDOT Operations
Beth Neuendorf, MnDOT Metro Water Resources
Bob Nibbe, MnDOT District 3

9 Mile Creek
WATERSHED DISTRICT
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May 29, 2012

Mr. Robert Finley
Minnesota Pollution Control Agency
12 Civic Center Plaza, Suite 2165
Mankato, MN 56001

Re: Comments on Draft South Metro Mississippi River Total Suspended Solids Total Maximum Daily Load (TMDL) Report

Dear Mr. Finley:

The Nine Mile Creek Watershed District (NMCWD) appreciates the opportunity to review and provide comments on the draft South Metro Mississippi River Total Suspended Solids (TSS) TMDL Report. The NMCWD encompasses 50 square miles and portions of six (6) Municipal Separate Storm Sewer System (MS4) communities that drain to the Minnesota River within the South Metro Mississippi River watershed. The South Metro Mississippi TSS TMDL has the potential for significant impacts on the Nine Mile Creek Watershed and its six MS4 Communities. The NMCWD commends the Minnesota Pollution Control Agency's efforts to reduce sediment loads in the Minnesota River and Mississippi River, but we have concerns about the methodology that was used to determine the required sediment load reductions.

The NMCWD offers the following comments for your consideration:

ISSUES WITH THE POLLUTANT LOADING ANALYSIS

1. Throughout the TMDL Report, the MPCA has made the assumption that all urban watersheds are the same regarding their total suspended solids (TSS) load contribution. This is not a reasonable assumption. Whenever possible, TSS loading estimates should be based on, or calibrated to actual monitoring data for individual tributary watersheds.
2. On Page 35, the report states, "Settling out of larger particles in the receiving stream likely accounts for the slightly higher estimate of urban runoff generated by models, compared to mouth-of-stream monitoring data." Based on what geomorphology tells us about urban streams, it does not seem "likely" that these systems are net sinks for sediment. This statement is an unsubstantiated hypothesis and should be stricken from the report. .

Board of Managers

LuAnn Tolliver - Minnetonka *Corrine Lynch - Eden Prairie*
Jodi Peterson - Bloomington *Steve Kloiber - Edina* *Geoffrey Nash - Edina*

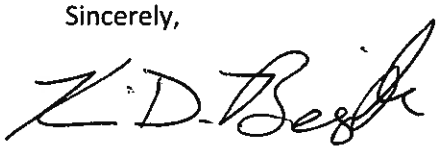
3. The TMDL Report estimates sediment loads for urban lands using land cover data and TSS loading export coefficients. This approach assumes that loading is primarily driven by land use differences and that loading occurs as a spatially distributed rate. Both of these assumptions are suspect. These assumptions conflict with local research on TSS loading conducted by the St. Croix Watershed Research Station (SWRS), and cited in the TMDL Report, that suggests that much of the TSS loading is heavily influenced by near-channel processes and not evenly distributed across the watershed. Furthermore, if event mean concentration data used in the model are not representative of the channel and gully stability of the modeled catchment, it would seem to invite in significant error in the loading estimate. The TMDL should use a model that is more spatially explicit for estimating TSS loads from tributary watersheds.
4. No error analysis is provided for the estimated urban watershed TSS loads. The approach used to estimate pollutant loads relies on an aggregate of event mean concentrations (EMC) for various land use types. The literature for EMCs show a wide range of values for any given land use. Therefore, we can conclude that there may be considerable uncertainty regarding the loading result provided here. An error estimate for the TSS loading should be included in the report regardless of the calculation method used.
5. There is wide discrepancy between TSS export coefficients used in the modeling report and the TMDL document. The Limno-Tech modeling report (page 62 of the report) cites research by the Metropolitan Council which used detailed water quality monitoring and modeling to estimate TSS exporting from a 372 square mile Twin Cities Metropolitan Area of 66 pounds per acre. These estimates, drawn from a local study published in a professional journal, *Water, Air and Soil Pollution* in 2006, is about one-fifth the average annual MS4 runoff export of the 225 pounds per acre used as the existing load in the TMDL report (page 56). The later value was based on nationwide estimates published by the U.S. Army Corps of Engineers (Corps, 2004). If the local measurements cited in the Metropolitan Council study had been used in the TMDL Report, the total contribution of TSS from MS4s would have been less than one percent of the total load, vs. the 5.8 percent estimate cited in the TMDL Report. An explanation should be given as to why the loading rates are different for the modeling report and the TMDL report. Wherever possible, local monitoring data should take precedence over data aggregated from non-local sources.
6. It is unclear why the Corps (2004) reference was chosen to estimate the existing MS4 loadings when local monitoring data exists to assess the actual TSS contributions to the Metro Mississippi. Further, the Corps reference data does not include TSS loading rates, but only has TSS event mean concentrations. It is unclear how the MPCA arrived at an average existing loading rate of 225 lbs/ac/yr. The details of this calculation should be provided, along with a rationale for choosing to use the data from the Corps (2004) reference instead of using local monitoring data.

ISSUES WITH THE METHOD USED FOR THE WASTE LOAD ALLOCATION

7. The TMDL Report states that all MS4s are expected to achieve the same level of pollutant load reduction regardless of location. This unfairly penalizes MS4s that have been pro-active in managing their stormwater. We suggest you use an alternative approach to the waste load allocation that does not penalize proactive MS4s.
8. MS4s in the Nine Mile Creek Watershed can demonstrate compliance with the Waste Load Allocation by simply referencing Figure 19 of the TMDL Report, which show that the respective TSS loading rate of 165 lbs/ac/yr for the watershed are below the TMDL target loading rate of 169 lbs/ac/yr for built up areas. Watersheds that are currently meeting the target loading rates should not be required to further reduce their loading under the TMDL Waste Load Allocation.
9. The estimated cost for MS4 compliace with the TMDL of $850 million is totally unreasonable. The TMDL Report should demonstrate how these costs were developed.

The Nine Mile Creek Watershed District appreciates that opportunity to provide comments on the South Metro Mississippi Total Suspended Solids TMDL. We hope that our comments will result in a more concise TMDL Report that will achieve significant reductions in TSS loads to the Minnesota and Mississippi Rivers. If you have any questions, please contact the NMCWD at (952) 835-2078.

Sincerely,



Kevin D. Bigalke
Administrator

South Washington WATERSHED District

May 24, 2012

Robert Finley
Minnesota Pollution Control Agency
12 Civic Center Plaza, Suite 2165
Mankato, MN 56001

RE: South Metro Mississippi River TSS TMDL

Dear Mr. Finley:

Thank you for the opportunity to comment on the Draft South Metro Mississippi River TSS TMDL. Although SWWD—a nontraditional MS4—does not currently have any outfalls to the Mississippi River, we actively work with municipalities in the District to protect and restore water resources, including the Mississippi River. During review of the Draft TMDL, we noted the following comments:

1. (Page 47) The Draft TMDL states that allocations from a number of other TMDLs in the watershed are more restrictive than the proposed South Metro TMDL. We would suggest that the proposed South Metro TMDL reflect allocations that will already be required through other TMDLs. Anything different ignores the valuable work and planning that has already taken place and shifts responsibility for reductions already required through those other TMDLs.
2. (Page 69) How does the Draft TMDL account for communities that are not currently contributing flow or TSS to the Mississippi River? For example, most of the City of Woodbury is non-contributing as runoff now terminates at SWWD's regional infiltration facility.
3. (Page 70) The Draft TMDL estimates a cost for reducing point sources at $850 million for the affected MS4s. Further, the report speculates that much of the work has already been accomplished and a portion of the $850 million expended. We agree that significant progress has been made over the past 10 years and recommend that MPCA take steps toward quantifying that progress and resources expended to achieve it.
4. (Page 76) The draft TMDL allows MS4 permittees to demonstrate compliance with the target load allocation through water quality monitoring or modeling. However, the document does not specify expectations or requirements for doing so. SWWD requests that the Draft TMDL provide guidance for demonstrating compliance including:
    a. Length of data record that is sufficient for demonstrating compliance,
    b. How to account for climatic variability (i.e. wet and dry years),and
    c. Standards/expectations for input parameters and data used in modeling.
5. (Page 80) The Draft TMDL states that one of the principles of the implementation plan will be a linkage to water resource management plans at the

federal, state, and local levels. Based on the work plan outline, that link appears limited to mechanisms that require local agencies to incorporate elements of the MPCA implementation plan. What efforts will be made to incorporate or account for long established local efforts in the MPCA implementation plan?

If you have any questions or need additional information, please contact me at 651/714-3714 or jloomis@ci.woodbury.mn.us.

Sincerely,
South Washington Watershed District

John Loomis
Water Resource Specialist

United States Department of the Interior

FISH AND WILDLIFE SERVICE
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Bloomington, Minnesota 55425-1665

May 29, 2012

Mr. Robert Finley
Southeast Regional Manager
Minnesota Pollution Control Agency
12 Civic Center Plaza, Suite 2165
Mankato, MN 56001

Re: Draft TMDL – South Metro Mississippi River

Dear Mr. Finley:

This letter constitutes U.S. Fish and Wildlife Service's (Service) comments on the Draft South Metro Mississippi River Total Suspended Solids (TSS) Total Maximum Daily Load (TMDL Study).

Lake Pepin, Mississippi River and Minnesota River are of high importance to the Service's goals of conserving its trust resources – endangered species, migratory birds, nationally significant and interjurisdictional fisheries, and Service-owned lands. Within this study area, there are four federally listed Endangered mussels and implementation of this report has significant potential to support recovery. The South Metro River will not reach its full potential for the reestablishment of populations of endangered mussels until sediment delivery is substantially reduced and when both suspended and embedded sediments decline.

This TMDL Study identifies that the Minnesota River accounts for 75 percent of the TSS load to the South Metro Mississippi, on an average annual basis. The Service's Minnesota Valley National Wildlife Refuge (Refuge) is located along a 70-mile stretch of the Minnesota River from Henderson to Bloomington, Minnesota. On Page 28, the TMDL Study states that long-term average TSS concentration declines from 141 mg/L at Jordan to 112 mg/L at Fort Snelling. It should be noted that this 21 percent TSS reduction occurs largely on Refuge and State lands that conserve fish, wildlife and plants, and provide recreational opportunities to the public. Recent floodplain deposition has occurred on the Refuge, amounting to several feet of sediment in some areas and is adversely affecting submerged aquatic and emergent vegetation that provides essential food and cover for fish and migratory birds. The frequency and amount of deposition has been increasing and is well documented by Refuge staff between Jordan and Ft Snellings, as well as the Blakely Unit near Henderson, MN. This increase in sediment deposition stresses the importance of swift implantation of the TMDL Study and a focused effort along major TSS contributing watersheds on the Minnesota River. We also recommend that monitoring continue at Jordan on the Minnesota River under Principle Four, Action 3 to address concerns over increased floodplain deposition on Refuge lands.

The Service urges Minnesota Pollution Control Agency to initiate implementation of these conservation measures at the watershed and landscape scales as soon as is practicable. The Service is committed to reducing erosion on Refuge lands and we will strive to put as much of our resources towards reaching the goals outlined in this TMDL Study.

If you have any questions about the Service's position on this TMDL Study, please feel free to contact me or Andrew Horton of this office at (612)725-3548.

Sincerely,

Tony Sullins

Tony Sullins
Field Supervisor

Cc (email only): Charles Blair, Minnesota Valley Wildlife Refuge

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May 22, 2012

Robert Finley
Minnesota Pollution Control Agency
12 Civic Center Plaza
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Mankato, MN 56001

Re: South Metro Mississippi River Total Suspended Solids TMDL

Dear Mr. Finley:

Our Department has reviewed the South Metro Mississippi River Total Suspended Solids (TSS) Total Maximum Daily Load (TMDL) that was public noticed February 27, 2012 and generally supports the sediment load reductions that have been identified in this TMDL. This TMDL was prepared to address the sediment/turbidity impairment problem that has been identified by both our states in the Mississippi River extending from the mouth of the Minnesota River to upper Lake Pepin. Excessive sediment contributions are contributing to water quality standard exceedances and rapid infilling of Lake Pepin. Our Department is interested in this TMDL because it has a direct influence on our Mississippi River border waters and sediment load reductions have been identified for some of Wisconsin's watersheds in the impaired river reach. Staff from our Department have been actively working with the Minnesota Pollution Control Agency (MPCA) on water quality problems on the Mississippi River for the past two decades.

We would like to provide the following comments and questions:

- Although the TMDL addresses sediment load contributions from watersheds in Minnesota and Wisconsin, given legal requirements our Department anticipates a need to prepare a consistent TMDL and public notice that TMDL.

-The sediment TMDL identifies no needed load reductions for the St. Croix River basin and an overall 20% load reduction for the Big River, Trimbelle Creek, Isabelle Creek and Rush River watersheds in Wisconsin. We generally support these load reduction targets. However, we believe the TMDL should provide more specific information on how the actual TSS loads were calculated for these watersheds, where applicable.

-The wasteload allocations for permitted facilities without TSS limitations are based on a TSS concentration of 32 mg/L, equivalent to the site-specific river standard, rather than 30 mg/L which would be consistent with a 6% margin of safety identified in the TMDL. We would like to know why the TMDL doesn't use a 30 mg/L TSS concentration to derive waste load allocations for these facilities.

-Table 7 provides annual TSS load allocations at varying flow conditions for various sources and categories. We believe the TMDL should describe how the five flow categories (very high, high, moderate, low and very low) are defined and derived.