

Elk River Watershed Association

TMDL Report for the:

- Elk River Bacteria Impairment
 - Elk River Turbidity Impairment
- Big Elk Lake Nutrient Impairment
- Mayhew Lake Nutrient Impairment

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Prepared by:

WENCK ASSOCIATES, INC.
1800 Pioneer Creek Center
P.O. Box 249
Maple Plain, Minnesota 55359-0249
(763) 479-4200



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TMDL Summary Table

TMDL Summary Table		
EPA/MPCA Required Elements	Summary	TMDL Report Section
Location	Located within the Elk River Watershed Area HUC 07010203, which is in turn within the Mississippi River (St. Cloud) Watershed. More specifically Elk River between Big Elk Lake and the St. Francis River, Mayhew Lake, and Big Elk Lake.	Section 1
303(d) Listing Information	<p>Mayhew Lake 05-0007-00 Big Elk Lake 71-0141-00 Elk River: Big Elk Lake to St. Francis River Reach 579</p> <p>This TMDL study addresses four 303d impairments on three water bodies including: bacteria and turbidity impairments on the Elk River between Big Elk Lake and the St. Francis River and nutrient impairments in Mayhew Lake and Big Elk Lake.</p>	Section 1
Applicable Water Quality Standards/ Numeric Targets	<p>Criteria set forth in Minn R. 7050.0150 (3) and (5). The numeric target for total phosphorous concentration in Mayhew Lake, a deep lake, is 40mg/l or less and in Big Elk Lake, a shallow lake, is 60mg/l or less.</p> <p>Criteria set forth in Minn. R. 7050.0220. The Elk River must meet a turbidity standard of 25 NTU.</p> <p>Criteria for <i>E. coli</i> set forth in Minn. R. 7050.0222 (4). The Elk River must not exceed 126 organisms per 100 milliliters as a geometric mean of not less than five samples in any calendar month, nor shall more than ten percent of all samples taken during any calendar month individually exceed 1,260 organisms per 100 milliliters.</p>	Section 2

TMDL Summary Table

EPA/MPCA Required Elements	Summary	TMDL Report Section																												
<p>Loading Capacity (expressed as daily load)</p>	<p>The loading capacity is the total maximum daily load for each of these conditions. The critical period for these lakes is the summer growing season. The loading capacity is set forth in Tables 6.1. & 6.1a.</p> <p>PHOSPHORUS: Total maximum daily total phosphorus load (lb/day)</p> <p>Mayhew Lake 4.67 lbs P/day (1,705 lbs P/year) Big Elk Lake 25.1 lbs P/day (9,163 lbs P/year)</p> <p>TURBIDITY: The numeric TMDL for the turbidity impairment in the Elk River reach 579 is the nutrient TMDL for Big Elk Lake (See above) plus a TSS allocation for sources downstream of Big Elk Lake. The loading capacity is set forth in Tables E.2. & 6.5</p> <table border="1" data-bbox="623 894 1130 1148"> <thead> <tr> <th>Reach</th> <th>Critical Condition</th> <th>TMDL (tons TSS/day)</th> </tr> </thead> <tbody> <tr> <td rowspan="5">Elk River 579</td> <td>High Flow</td> <td>8.23</td> </tr> <tr> <td>Wet</td> <td>2.98</td> </tr> <tr> <td>Mid-Range</td> <td>1.66</td> </tr> <tr> <td>Dry</td> <td>1.13</td> </tr> <tr> <td>Low Flow</td> <td>0.67</td> </tr> </tbody> </table> <p><i>E. COLI</i>: The TMDL of <i>E. coli</i> in the Elk River Reach # 579 is set forth in Table 6.6 expressed as a daily loading. The loading capacity is set forth in Tables E.2, 6.6 & 6.7.</p> <table border="1" data-bbox="623 1350 1130 1604"> <thead> <tr> <th>Reach</th> <th>Critical Condition</th> <th>TMDL (10⁹ org)</th> </tr> </thead> <tbody> <tr> <td rowspan="5">Elk River 579</td> <td>High Flow</td> <td>2816.55</td> </tr> <tr> <td>Wet</td> <td>1072.70</td> </tr> <tr> <td>Mid-Range</td> <td>541.67</td> </tr> <tr> <td>Dry</td> <td>329.43</td> </tr> <tr> <td>Low Flow</td> <td>167.98</td> </tr> </tbody> </table>	Reach	Critical Condition	TMDL (tons TSS/day)	Elk River 579	High Flow	8.23	Wet	2.98	Mid-Range	1.66	Dry	1.13	Low Flow	0.67	Reach	Critical Condition	TMDL (10 ⁹ org)	Elk River 579	High Flow	2816.55	Wet	1072.70	Mid-Range	541.67	Dry	329.43	Low Flow	167.98	<p>Section 6, Table 6.1, Table 6.5, Table 6.6</p>
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<p>Wasteload Allocation</p>	<p>The Wasteload Allocations for each impairment represent the WWTFs, MS-4s, industrial sources (none relevant), and the NPDES Construction Permit which includes MNG49 sites. Individual WLAs are provided for Gilman (TP), Foley (TP) and Becker (for Bacteria and TSS) WWTFs, categorical allocations are provided for MS4s.</p>	<p>Section 6</p>																												

TMDL Summary Table

EPA/MPCA Required Elements	Summary			TMDL Report Section
	Source	Permit #	Gross WLA	
	Foley WWTF	MN0023451-SD-1, -2, -3	6.2 lb TP/ day No TMDL for bacteria or Turbidity	
	Gilman WWTF	MN6580021-SD-2	0.75 lb TP/ day No TMDL for bacteria or Turbidity	
	Becker WWTF	MN0025666-SD-1	No TP TMDL, See Tables 6.5 and 6.6 for TSS & <i>E. coli</i> Allocations	
	Goenner Poultry LLC	MNG441109	No TP TMDL, 0 lb TSS/ day 0 organisms/ day	
	Eiler Bros.	MNG440909	0 lb TSS/ day 0 organisms/ day	
	MS-4s	Categorical (See table 4.2)	0.94 lb TP/ day	
	NPDES Construction Permit (includes MNG49 Sites)	MN R 100001	0.0007 lb TP/Day	
Load Allocation	The portion of the loading capacity allocated to existing non-permitted sources.			Section 6, Table 6.2
	Source	Phosphorus Load Allocation (lb/day)		
	Atmospheric and Groundwater	Mayhew Lake	0.59	
		Big Elk Lake	3.74	
	Source	Phosphorus Load Allocation (lb/day)		
	Internal Load	Mayhew Lake	1.74	
		Big Elk Lake	11.15	

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	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Direct Watershed & Tributary Loads</td> <td style="width: 50%;"> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Mayhew Lake</td> <td style="width: 50%;">2.34</td> </tr> <tr> <td>Big Elk Lake</td> <td>2.26</td> </tr> </table> </td> </tr> <tr> <td>Septic Systems</td> <td> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Mayhew Lake</td> <td style="width: 50%;">0.0</td> </tr> <tr> <td>Big Elk Lake</td> <td>0.0</td> </tr> </table> </td> </tr> </table>	Direct Watershed & Tributary Loads	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Mayhew Lake</td> <td style="width: 50%;">2.34</td> </tr> <tr> <td>Big Elk Lake</td> <td>2.26</td> </tr> </table>	Mayhew Lake	2.34	Big Elk Lake	2.26	Septic Systems	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Mayhew Lake</td> <td style="width: 50%;">0.0</td> </tr> <tr> <td>Big Elk Lake</td> <td>0.0</td> </tr> </table>	Mayhew Lake	0.0	Big Elk Lake	0.0	
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Margin of Safety	The Margin of Safety is implicit in each TMDL due to the conservative assumptions of the model and the proposed iterative nutrient reduction strategy with monitoring.	Section 6.2												
Seasonal Variation	Seasonal variation is accounted for by developing targets for the summer critical period, when the frequency and severity of nuisance algal growth is greatest. Although the critical period is the summer, lakes are not sensitive to short-term changes but rather respond to long-term changes in annual load.	Section 6.5												
Reasonable Assurance	Reasonable assurance is provided by the cooperative efforts of the Elk River Watershed Association (ERWSA), a watershed-based organization with statutory responsibility to protect and improve water quality in the water resources in the watershed in which these lakes and river are located.	Section 6.4												
Monitoring	ERWSA currently monitors lake and stream water quality annually on a schedule that reflects available funds. The recommended monitoring program to track BMP effectiveness is discussed in Section 9 of this report.	Section 9												
Implementation	This TMDL sets forth an implementation framework and load reduction strategies. The final implementation plan is part of a program to address all impaired waters within the ERWSA.	Section 8												
Public Participation	Public Comment period: Meeting location: Comments received:	Section 7												

Executive Summary

Section 303(d) of the Federal Clean Water Act (CWA) requires the Minnesota Pollution Control Agency (MPCA) to identify water bodies that do not meet water quality standards and to develop total maximum daily pollutant loads for those water bodies. A total maximum daily load (TMDL) is the amount of a pollutant that a water body can assimilate without exceeding the established water quality standard for that pollutant. Through a TMDL, pollutant loads are allocated to point and non-point sources within the watershed that discharge to the water body.

The Elk River Watershed Association (ERWSA) has reduced nutrient and sediment loads in the watershed through watershed best management practices (BMPs) to improve water quality. However, some 303(d) impairments exist. Table E.1 summarizes impairments addressed in this report. Figure E.1 shows the locations of the impaired waters in the state of Minnesota, and their location within their watershed. Figure E2 shows the impaired waters and their tributary watersheds.

Table E.1. Impairments addressed in this report.

Water Body	Impairment
Mayhew Lake (05-0007-00)	Excess nutrient concentration impairing aquatic recreation
Big Elk Lake (71-0141-00)	Excess nutrient concentration impairing aquatic recreation
Elk River: Big Elk Lake to St. Francis River (07010203-579)	Excess turbidity and bacterial concentrations impairing aquatic life and aquatic recreation

This TMDL study was undertaken to quantify the pollutant reductions needed for these impaired waters to meet State water quality standards. This TMDL study was conducted in three phases. Phase I consisted of evaluating existing data and developing a work plan for Phase II and Phase III. Phase II, included data collection, analysis, and water quality modeling. This report documents, Phase III, the TMDL Report.

Figure E.1. Location of impaired waters.

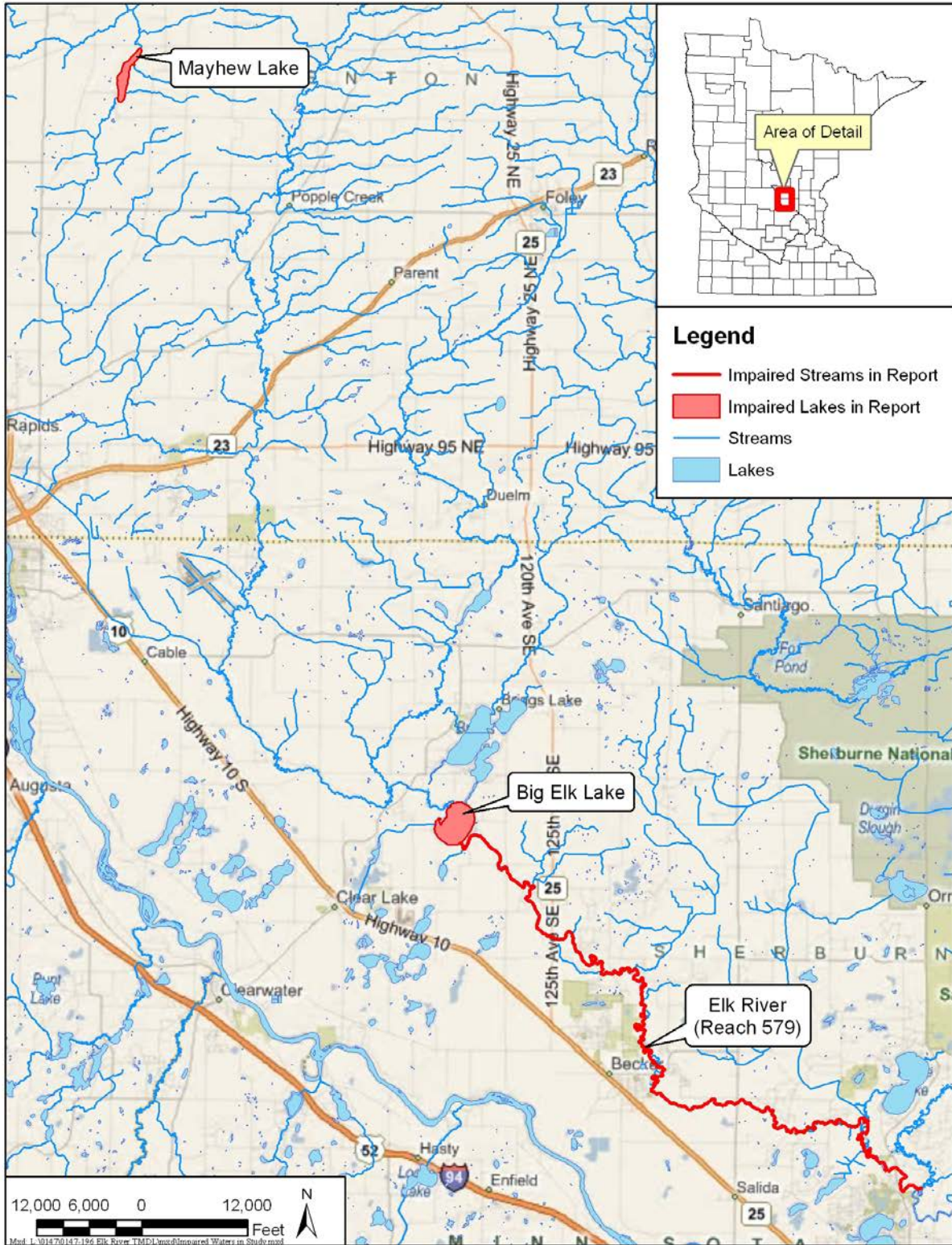
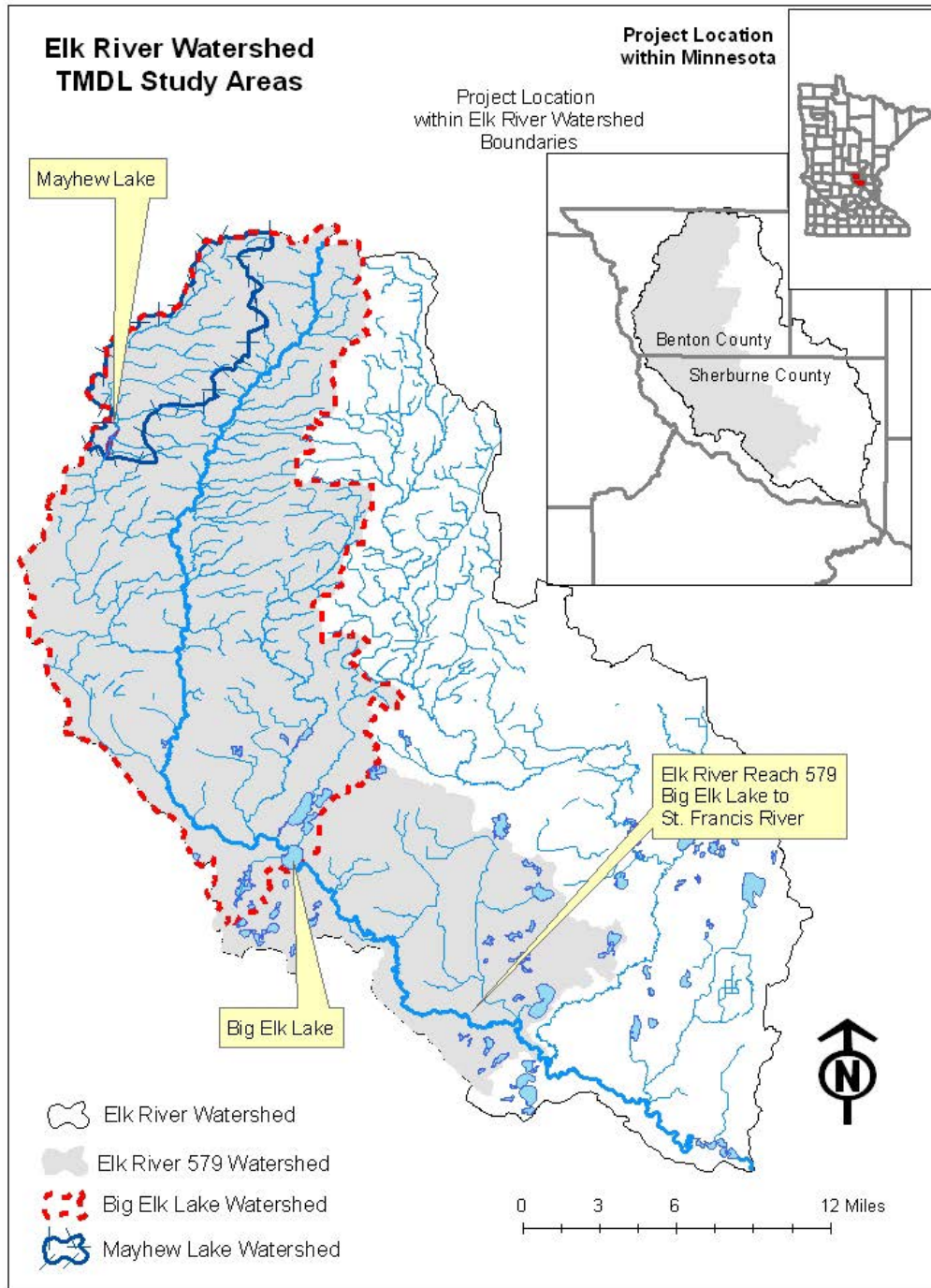


Figure E2. Impaired Waters and Tributary Watersheds



The total drainage area of the sub-watersheds draining to the impaired portion of the Elk River is 214,639 acres. Mayhew and Big Elk Lakes are located within this drainage area with individual sub-watershed areas of 18,521 and 152,484 acres respectively.

Mayhew and Big Elk Lake Nutrient Impairments

To address the lake nutrient impairments, TMDLs are set for phosphorus, since it is typically the limiting nutrient for nuisance aquatic plants in lakes. The relationships between phosphorus, Secchi depth and chlorophyll-a are well established (Heiskary and Walker, 1988, Heiskary and Wilson, 2005). As phosphorus is controlled, Secchi depth and chlorophyll-a concentrations will also meet state standards. This TMDL is written to solve the TMDL equation for numeric targets for the impaired waters. The TMDL is expressed by the following equation, and shown in Table E2: $TMDL = S(LA) + S(WLA) + MOS + RC$

Lake response models were used to set the TMDL for each lake and to calculate the load reductions needed to meet State standards. The lake response models are a numeric description of the relationship between phosphorus loading to a lake, and in lake concentration. The relationship (the model) is based on the size of the lake, drainage area, and settling rate for phosphorus which are all parameters in the model. The model tells us how many pounds of phosphorus the lake can handle and still meet its designated uses, in other words the Assimilative Capacity. The model also assists in calculating the load reductions based on current concentrations.

The lake response models are built, calibrated and validated using GIS-based watershed land use information, data collected in 2009 for this study, and the ERWSA's existing water quality database. Data are used to quantify phosphorus from land-use based sources and in-lake sources of P (load partitioning). The partitioning of the loads informs the necessary load reduction strategies. These analyses are described in Sections 4, 5 and 6 of this report and modeling results are included.

Water quality data and lake response models show that the required load reductions to meet state standards in Mayhew and Big Elk Lakes are 78% and 57% respectively. The state total phosphorus standard for Mayhew Lake (a deep lake) is 40 µg/L, while the state standard for Big Elk Lake (a shallow lake) is 60 µg/L.

The Margin of Safety (MOS) has been incorporated into this TMDL to account for uncertainty and to allow the project a reasonably high probability of success. MOS encompasses two primary factors: variability and uncertainty. "Variability" refers to the spatial and temporal fluctuations in measured values for a given parameter. "Uncertainty" refers to prediction error resulting from limits in the data and predictive models

A MOS is incorporated into these TMDLs by using conservative modeling practices to quantify the lakes response to loads. To apply the lake response model (Canfield-Bachmann model) to Big Elk and Mayhew Lakes, watershed specific data were used. Measured watershed runoff volumes, concentrations and overall measured loads were used instead of modeled watershed hydrology and phosphorus load export. Internal loading of phosphorus was also measured by quantifying release rates and anoxic factors using field data. Further, no calibration factors were used. The models fit well compared to annual average lake water quality data. Four years of data were compared for Big Elk Lake, 5 years for Mayhew. The differences between observed and

model-predicted average in-lake concentrations were generally within the reported standard deviations for annual average TP for a given year.

The Reserve Capacity for future growth was also incorporated into these nutrient TMDLs by allowing a WLA to accommodate construction. However, a no-net increase of phosphorus is used for the Reserve Capacity. This is in line with, and no more stringent than existing state statutes prohibiting the degradation of Minnesota waters.

Internal load management and reduction of phosphorus from watershed runoff will both be required to meet phosphorus load reduction goals in Mayhew Lake. Reduction of phosphorus from watershed runoff will be required to meet goals in Big Elk Lake; internal load reductions are not feasible in Big Elk Lake due to the low residence time of the lake. To meet required watershed load reductions, a mix of capital projects and land-use based BMPs will be necessary.

Elk River Turbidity Impairment

The Elk River turbidity impairment is driven by the nutrient impairment in Big Elk Lake located at the upstream end of the impaired reach. Summer algal blooms in Big Elk Lake resulting from the nutrient impairment in that lake cause turbidity readings in Elk River downstream of Big Elk Lake that do not meet the state standard resulting in a turbidity impairment in Elk River. Water quality modeling and data analysis shows that the turbidity impairment will be mitigated by achieving the in-lake nutrient standard for Big Elk Lake; therefore, the nutrient load allocation for Big Elk Lake is a surrogate for turbidity due to the direct link between the impairments. The load reductions required to meet the nutrient endpoint in Big Elk Lake will result in turbidity levels in the Elk River that meet the established State standard. The TMDL, including the MOS and RC and implementation plan established to meet the nutrient standard in Big Elk Lake will also meet the requirements for the turbidity TMDL. The applicability is discussed in Sections 4, 5, and 6 of this report.

TMDLs for sources of turbidity to the Elk River *downstream* of Big Elk Lake were allocated using total suspended solids (TSS) as a surrogate and a load duration curve as described in the MPCA's Turbidity TMDL Protocol (MPCA 2007). Even though data show these sources are small, and are not driving the impairment, all sources of turbidity to the impaired water must have a TMDL.

Elk River Bacteria Impairment

The bacteria TMDL for the Elk River was set according to the MPCA's Bacteria TMDL Protocol (March 2009). Specifically a load duration curve was used along with bacterial loads.

A load reduction of 72.5% is required in terms of *E. coli* within the listed reach to meet the State standards.

A MOS of 16% was calculated from the distribution of the available data as discussed in Section 6 of this report. The RC for future growth was also incorporated into these bacteria TMDLs by allowing a WLA to accommodate construction.

Based on *E. coli* bacteria available in the watershed, the primary implementation strategies will focus on riparian pasture management and agricultural BMPs in priority areas of the watershed.

At this time no load reductions are proposed for WWTF sources. However, should the communities determine that reductions in these sources are more cost effective than watershed-wide implementation, then the load reductions may be realized through load reductions from WWTF sources.

Table E.2. TMDLs (The calculation of the TMDLs shown in this table is described in detail in Sections 4, 5 and 6 of this report)

Total phosphorus load allocations expressed as daily loads.

Lake	Total Phosphorus TMDL (lbs/day)	Waste Load Allocation (lbs/day)	Load Allocation (lbs/day)	MOS
Mayhew	4.67	0	4.67	Implicit
Big Elk	25.1	7.96	17.15	Implicit

Partitioned non-algal turbidity TMDL.

Daily									
246876	Critical Condition	Total Wasteload Allocation (Tons)	WWTF Allocation (tons)	MS4 Allocation (Tons)	Industrial Stormwater Allocation (Tons)	Construction Stormwater Allocation (Tons)	Load Allocation (tons)	Margin of Safety (tons)	TMDL (tons)
Elk River 579	High Flow	0.56	0.27	0.13	0.08	0.08	6.84	0.82	8.23
	Wet	0.37	0.27	0.05	0.03	0.03	2.31	0.30	2.98
	Mid-Range	0.33	0.27	0.03	0.02	0.02	1.17	0.17	1.66
	Dry	0.31	0.27	0.02	0.01	0.01	0.71	0.11	1.13
	Low Flow	0.29	0.27	0.01	0.01	0.01	0.31	0.07	0.67

All calculations are based on a TSS-VSS average of 5.65 mg/L (Results of 2009 monitoring data)

T:\2378_ERWSA\Elk River\Turbidity\Turbidity Load Calcs - Annual Flow.xls\TMDL Calcs

The TMDL expressed as daily loading capacity of *E. coli* in the Elk River Reach # 579.

Daily						
Reach	Critical Condition	WWTF Wasteload Allocation (10 ⁹ org)	MS4 Wasteload Allocation (10 ⁹ org)	Load Allocation (10 ⁹ org)	Margin of Safety (10 ⁹ org)	TMDL (10 ⁹ org)
Elk River 579	High Flow	10.30	539.43	1816.17	450.65	2816.55
	Wet	10.30	203.99	686.78	171.63	1072.70
	Mid-Range	10.30	101.84	342.87	86.67	541.67
	Dry	10.30	61.01	205.41	52.71	329.43
	Low Flow	10.30	29.95	100.85	26.88	167.98

1.0 Introduction

1.1 PURPOSE

The State of Minnesota has determined that the Elk River Reach #579 does not meet the State established standards for bacteria and turbidity and that Mayhew Lake and Big Elk Lake are impaired for excess nutrients. This TMDL study addresses these four 303d impairments and is conducted in three Phases. Phase I entailed evaluating existing data, identifying data gaps and planning for future phases. Phase II entailed collection of data, data analysis, and modeling. This report documents Phase III of the TMDL study, which entails setting the TMDLs based on data collection, data evaluation and modeling completed in Phases I and II.

1.2 PROBLEM IDENTIFICATION

Water quality evaluations conducted by the State of Minnesota have determined that Mayhew Lake, Big Elk Lake, and reach 579 of the Elk River exceed State established Standards as described below (Table 1.1).

The Clean Water Act Requires the State to develop TMDLs for impaired waters. A TMDL is the amount of pollutant that a water body can assimilate without exceeding the pollutant's water quality standard.

Table 1.1. Impaired waters in the Elk River watershed.

Water Body	HUC	DNR Lake ID # or stream reach #	Listing Year	Affected Use	Pollutant or Stressor	Target Start Date	Target Completion Date
Mayhew Lake	07010203	05-0007-00	2008	Aquatic Recreation	Excessive nutrients	2008	2011
Big Elk Lake	07010203	71-0141-00	2008	Aquatic Recreation	Excessive nutrients	2010	2014
Elk River	07010203	579	2006 & 2008 respectively	Aquatic Life and Aquatic Recreation	Turbidity and pathogens (fecal coliform)	2008	2016

The impairments listed above were based on water quality monitoring conducted by Sherburne Soil and Water Conservation District (SWCD), Benton SWCD, the Minnesota Pollution Control Agency (MPCA), the Briggs Lake Chain Association and the MPCA Citizen Lake and Stream Monitoring Programs (CLMP & CSMP) over the last ten years. Water quality data collection and analysis was conducted in accordance with a QAPP submitted for this project which is on file at the MPCA.

2.0 Description of Applicable Water Quality Standards and Numeric Targets

2.1 MAYHEW LAKE AND BIG ELK LAKE

The MPCA has established numerical thresholds based on ecoregions and beneficial use class for determination of Minnesota lakes as either impaired or unimpaired. The protected beneficial use for all lakes is aquatic life and recreation as denoted by the class 2B water designation. Table 2.1 outlines the MPCA water quality goals that were used to determine that Mayhew and Big Elk Lake should be placed on the 303 (d) list of impaired waters in Minnesota. New water quality standards became effective to State rules in Minnesota Water Quality Rule Ch 7050 on March 17th, 2008 and were subsequently approved by the US Environmental Protection Agency (EPA) on May 23rd, 2008 (Table 2.2). The newly approved standards for nutrients are based on ecoregion and lake classification. The changes to the standards also include two indicators of eutrophication that measure lake response to excess phosphorus. The new goals were used to determine the endpoint goals for both Mayhew Lake and Big Elk Lake.

Table 2.1. MPCA goals used to list Big Elk Lake and Mayhew Lake impairments (North Central Hardwood Forests Ecoregion) (MPCA 2007).

Impairment Designation	TP (µg/L)	Chl-a (µg/L)	Secchi (m)
Full Use	<40	<15	≥ 1.6
Review	40-45	N/A	N/A
Impaired	>45	>18	<1.1

Table 2.2. New MPCA goals and standards for protecting Class 2B waters. Values are summer averages (June 1 through September 30) (MPCA 2008).

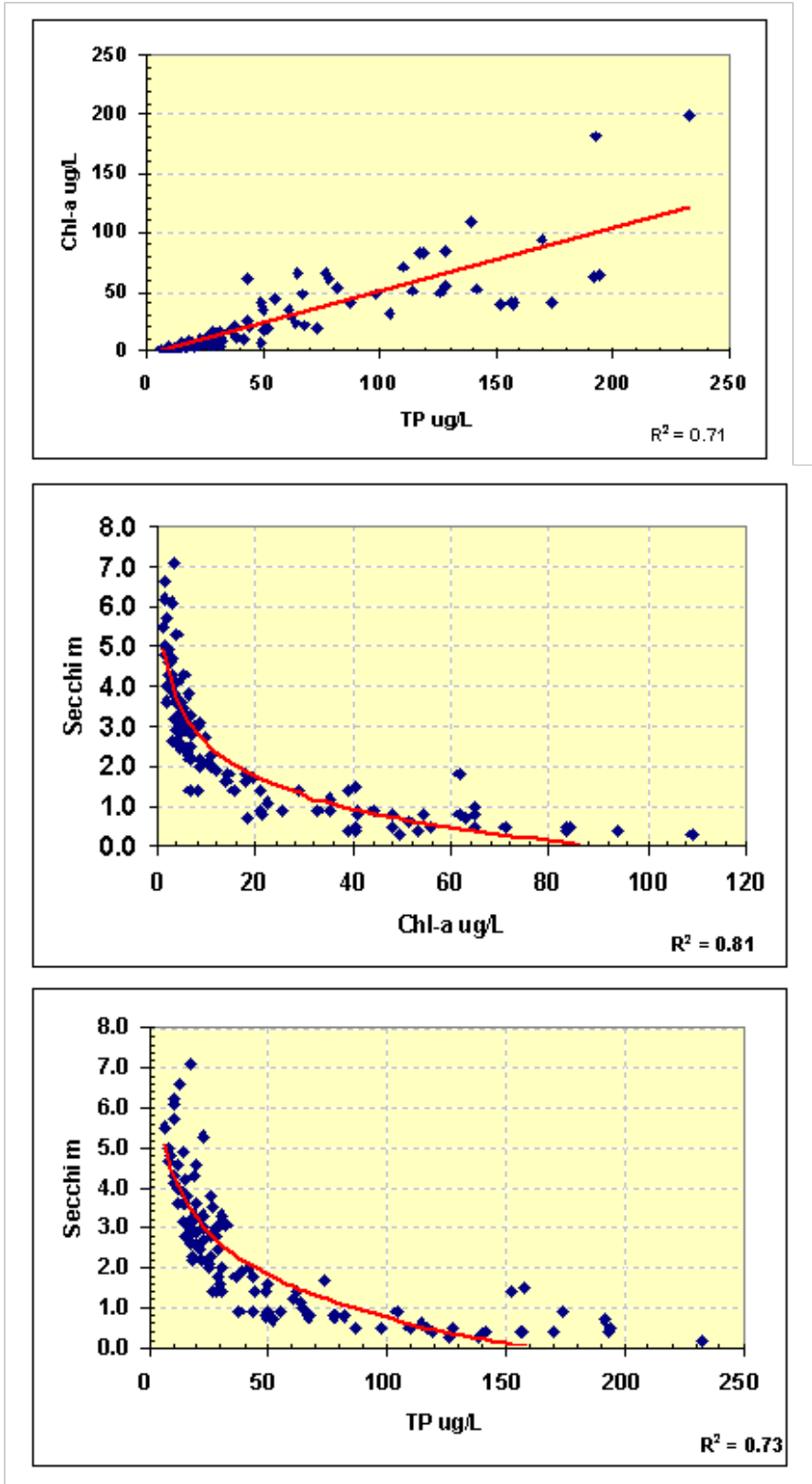
Ecoregion	TP (µg/L)	Chl-a (µg/L)	Secchi (m)	Applicable Lake Goals
CHF- Aquatic Rec. Use (class 2b) Deep Lakes	<40	<14	>1.4	Mayhew Lake
CHF- Aquatic Rec. Use (Class 2b) Shallow lakes ¹	<60	<20	>1.0	Big Elk Lake

¹Shallow lakes are defined as lakes with a maximum depth of 15 feet or less, or with 80% or more of the lake area shallow enough to support emergent and submerged rooted aquatic plants (littoral zone).

Under the new standards, Mayhew Lake is considered a deep lake with a numeric target of 40 µg/L total phosphorus concentration. Big Elk Lake is considered a shallow lake with a numeric target of 60 µg/L total phosphorus concentration. Therefore, this TMDL presents load allocations and estimated load reductions assuming endpoints of 40 µg/L and 60 µg/L for Mayhew Lake and Big Elk Lake respectively.

Numeric standards for chlorophyll-*a* and Secchi depth for Mayhew Lake and Big Elk lake are presented in Table 2.2 as well. In establishing the numeric eutrophication standards for lakes, shallow lakes and reservoirs, Minnesota documented the well-established link between high total phosphorus concentrations to both high chlorophyll-*a* concentrations and low Secchi depth (MPCA 2007, SONOR Book 2). Figure 2.1, taken from the MPCA web site, presents the relationship between Secchi depth, chlorophyll-*a* and phosphorus for Minnesota Lakes. This relationship is widely documented by others as well (Heiskary and Walker, 1988, Heiskary and Wilson, 2005). Achieving the total phosphorus goals for these lakes will result in the lake meeting the corresponding water quality standards for chlorophyll-*a* and Secchi disk transparency within the basin.

Figure 2.1. Relationships among phosphorus, chlorophyll-a and Secchi Depth in Minnesota lakes
(Source: MPCA web site <http://www.pca.state.mn.us/index.php/water-types-and-programs/surface-water/lakes/lake-water-quality/assessment-definitions-andnotes.html?menuid=&missing=0&redirect=1>)



2.2 ELK RIVER

2.2.1 Turbidity

The numeric criteria for turbidity, based on stream use classification, are provided in Table 2.3 (Minnesota Rules Chapter 7050.0220). The impaired reach covered in this TMDL is classified as a Class 2B water and has a turbidity standard of 25 NTU.

Table 2.3. Minnesota turbidity standards by stream classification.

Class	Description	Turbidity (NTUs)
1B	Drinking water	10
2A	Cold water fishery, all recreation	10
2B	Cool and warm water fishery, all recreation	25
2C	Indigenous fish, most recreation	25

Turbidity, a measure of impaired water clarity, is caused by the suspension of sediment, organic matter or algae in the water. High turbidity limits the beneficial uses of streams such as aquatic life and recreation. In source water areas, high turbidity can increase the cost of treatment for drinking water. Turbidity exceedances in reach 579 are caused by extreme algae blooms in Big Elk Lake, located at the upstream end of the impaired reach.

The standard and goal for turbidity in Class 2B waters is 25 nephelometric turbidity units (NTU). Transparency and TSS values reliably predict turbidity and can serve as surrogates at sites where there are an inadequate number of turbidity observations. For waters to be considered impaired, there must be at least 3 observations, and 10% of the observations must violate the standard. The surrogate values of transparency and TSS that correspond to the 25 NTU turbidity standard are as follows:

- transparency tube <20 centimeters
- TSS >100 mg/L

Endpoint turbidity measurements must meet the turbidity standard for Class 2B waters, 25 NTUs.

2.2.2 Bacteria

Elk River reach 579 is classified as a Class 2B water and is protected for aquatic life (warm and cool water fisheries and associated biota) and recreation (all water recreation activities including bathing). The Minnesota standard for bacteria in Class 2B waters is as follows:

Minn. R. ch. 7050.0222 subp. 4, *E. coli* water quality standard for class 2B and 2C waters states that *E. coli* shall not exceed 126 organisms per 100 milliliters as a geometric mean of not less than five samples in any calendar month, nor shall more than ten percent of all samples taken during any calendar month individually exceed 1,260 organisms per 100 milliliters. The standard applies between April 1 and October 31.

Endpoint *E. coli* concentrations were determined to be the State water quality standard of a monthly geometric mean of 126 cfu/ 100 ml and no value exceeding 1,260 cfu/ 100 ml for the

period of April 1 through October 31. However, the focus of this TMDL is on the “chronic” standard of 126 cfu/ 100 ml. It is believed that achieving the necessary reductions to meet the chronic standard will also reduce the exceedances of the acute standard (MPCA 2002).

This standard, current as of 2008, represents a change from the historic use of fecal coliform as a regulated pathogen indicator. Because the change is recent, historic in-stream water quality data available for this TMDL study was fecal coliform, not *E. coli*. Water quality data collected in 2009 as part of Phase II of the TMDL was analyzed for *E. coli*. Both the fecal coliform data and *E. coli* data was used to analyze watershed sources of bacteria and in-stream bacteria concentrations and to determine effective load reduction strategies. The *E. coli* standard was determined to be as protective as the fecal coliform standard, and load reductions that are applicable to fecal coliform will result in similar load reductions to *E. coli* bacteria (MPCA 2007).

For reference, the historical fecal coliform standards were as follows: that Fecal Coliform shall not exceed 200 organisms per 100 milliliters as a geometric mean of not less than five samples in any calendar month, nor shall more than ten percent of all samples taken during any calendar month individually exceed 2,000 organisms per 100 milliliters. The standard applies between April 1 and October 31.

3.0 Background

3.1 WATERSHED DESCRIPTION

The entire Elk River Watershed is located northwest of the Twin Cities metropolitan area in the North Central Hardwood Forests ecoregion and is a major tributary to the Upper Mississippi River. The full drainage area of the Elk River consists of approximately 392,320 acres (613 square miles) of Sherburne County, Benton County, Mille Lacs County, and Morrison County. However; the majority of the Elk River Watershed lies within Benton and Sherburne Counties. The Elk River headwaters are located in northern Benton County, and the river extends south eastward towards the City of Elk River where it outlets into the Mississippi River. The Elk River has a gradient of approximately three feet per mile.

In 1994 the Elk River Watershed Association Joint Powers Board was formed as a result of Local Water Planning efforts in Sherburne and Benton Counties. Concerned citizens identified the water quality of the Elk River and lakes in the Elk River Watershed as priorities for improvement. Thus, the two Counties determined that a watershed approach would be the most effective way to improve water quality. A Joint Powers Board was formed by Sherburne and Benton SWCDs and Counties for the purpose of coordinating efforts within the Elk River Watershed.

Land use in the northern portion of the watershed is primarily agricultural and feedlot density is high. The high percentage of agricultural land use in riparian areas increases potential to introduce phosphorus, sediment, and bacteria to surface waters. Furthermore, the numerous small to medium sized feedlots and riparian pastures offer additional opportunities for manure to enter surface water directly. The southern portion of the watershed is mainly comprised of irrigated agriculture and urban/residential developments. With the exception of Mayhew Lake, all of the lakes greater than 10 acres are located within Sherburne County. The lake shore property in the watershed tends to be densely populated. Much of this development occurred prior to the adoption of shore land ordinances. Subsequently, many lots are as small as 50 feet in width and most natural vegetation has been removed from the shorelines and replaced with turf grass. Septic systems provide waste water treatment for these areas.

Land use within the Elk River watershed has been and will continue to be influenced over the coming years by its close proximity to two major employment centers; the St. Cloud Metropolitan Area and the “Twin Cities” of Minneapolis and St. Paul. Sherburne County is served by two major transportation corridors, US TH 10 and US TH 101/169, along with the recent opening of the Northstar Commuter Rail which provide for convenient connections to careers and leisure activities in the major metropolitan area. Most of the demand for building permit requests in both the cities and the townships is taking place within the southern portions

of the watershed, within Sherburne County. Development pressure has eased in recent years due to the economic conditions.

The Elk River offers recreational opportunities for canoeists, anglers, hunters and non-game wildlife viewers close to the Minneapolis- St. Paul Metropolitan area. The Department of Natural Resources (DNR) has identified twenty five potential canoe accesses along the river and there are several lakes with public boat accesses.

In addition to the three water bodies evaluated in this TMDL, there are several other impaired water bodies located within the Elk River Watershed (Table 3.1). Impaired waters not covered with this TMDL project will be addressed in the state of Minnesota’s new approach in surface water assessment, monitoring and implementation planning. This new approach addresses surface water resource restoration and protection strategies on a major (8 digit Hydrologic Unit Code- HUC) watershed level in a 10 year cycle. This process is scheduled to begin for the Mississippi River St. Cloud Watershed (which includes the surface waters with the Elk River Watershed) in the fall of 2010. This approach will address all the impaired surface water resources within this watershed and identify protection measures for unimpaired surface water resources.

Table 3.1: Impaired waters located within the Elk River watershed. These impairments are not addressed in this TMDL.

Water Body	DNR Lake ID or Stream Reach #	Year Listed	Impairment	Target Start Date	Target Finish Date
Julia Lake	71-145	2008	Excess Nutrients (Phosphorus)	2010	2014
Rush Lake	71-147	2008	Excess Nutrients (Phosphorus)	2010	2014
Briggs Lake	71-146	2008	Excess Nutrients (Phosphorus)	2010	2014
Rice Creek	07010203-512	2006	Dissolved oxygen and turbidity	2014	2021
Elk River	07010203-579	2006	Aquatic macroinvertebrate bioassessments	2008	2016
Rice Creek	07010203-512	2006	Dissolved oxygen, turbidity	2014	1021
Battle Brook	07010203-535	2006	Aquatic macroinvertebrate bioassessments	2016	2021
Lake Orono	71-013	2008	Excess Nutrients (Phosphorus)	2010	2013
Mayhew Creek	07010203-509	2002	Fish and aquatic macroinvertebrate bioassessments	2009	2017

3.1.1 Land Use

The Elk River watershed is comprised of a variety of land uses. The National Agriculture Statistics Services (NASS) 2008 cropland data was used to determine land use within the sub-watersheds tributary to the Elk River reach 579, including Big Elk and Mayhew lakes. This data is an appropriate data set for agricultural watersheds as the use categories are specific in describing agriculture uses, such as separately classifying corn, soybeans, and alfalfa.

Land use is presented in Table 3.2. Overall, pasture/hay is the most frequent land use covering 73,567 acres or 34.3% of the 214,639 acre total area. Deciduous forest is the next highest land use with 20.1% of the total acreage. Other agricultural land uses such as corn and soybeans (row crops) comprise 15.3% and 9% of the total acreage respectively.

Table 3.2. Land use within the TMDL watersheds.

Landuse	Acres	Percent
Pasture/Hay	73,567.25	34.27%
Deciduous Forest	43,085.61	20.07%
Corn	32,761.08	15.26%
Soybeans	19,244.32	8.97%
Herbaceous Wetlands	13,524.16	6.30%
Developed/Open Space	12,607.98	5.87%
Open Water	3,623.01	1.69%
Evergreen Forest	2,490.50	1.16%
Grass Pasture	2,263.93	1.05%
Developed/Low Intensity	1,883.14	0.88%
Grassland Herbaceous	1,815.45	0.85%
Alfalfa	1,756.21	0.82%
Potatoes	1,728.90	0.81%
Spring Wheat	1,001.34	0.47%
Developed/Medium Intensity	676.98	0.32%
Rye	528.04	0.25%
Dry Beans	486.38	0.23%
Sweet Corn	380.95	0.18%
Developed/High Intensity	287.01	0.13%
Oats	208.61	0.10%
Shrubland	142.71	0.07%
Winter Wheat	140.36	0.07%
Woody Wetlands	114.06	0.05%
Peas	112.75	0.05%
Barren	59.94	0.03%
Fallow Idle Cropland	46.27	0.02%
Barley	27.12	0.01%
Woodland	25.57	0.01%
Sugarbeets	20.15	0.01%
Sorghum	7.75	0.004%
Sunflowers	4.59	0.002%
Canola	3.87	0.002%
Wetlands	3.10	0.001%
Mixed Forest	3.10	0.001%
Other Crops	2.32	0.001%
Clover Wildflowers	1.55	0.001%
Seed/Sod/Grass	0.77	0.0004%
Flaxseed	0.77	0.0004%
Total	214,639.19	100.00%

3.1.2 Population

The total population in the watershed is estimated to be 152,400 based on US Census data from 2000. Sherburne County has shown a 54 percent increase in population since 1990 and Benton County has shown a 13 percent increase. The Minnesota State Demographic Center estimated

the 2005 population of Benton County at 38,979 and Sherburne County at 82,815 people. The 2015 projected populations of Benton and Sherburne Counties are 47,980 and 119,040 people respectively.

3.2 WATER BODY DESCRIPTIONS

Mayhew Lake is a 130 acre basin located in the upper northwest corner of the Elk River watershed. Mayhew Lake is oriented as a long and narrow basin that is relatively shallow with an average depth of 13 feet and maximum depth of 20 feet. Mayhew Lake has a littoral zone covering 64 acres, or 49 percent of the basin. Mayhew Creek flows into Mayhew Lake at the northeast end of the basin and serves as the outflow point of Mayhew Lake at the southwest end of the basin. A concrete, fixed crest weir dam was installed at the outlet of the lake in 1951. The structure, which was initially built by the state of Minnesota and Benton County, is now owned by the MN DNR as is noted by the 1995 Lake Assessment Program report to be at the elevation of 1,088.5 feet. There are two other unnamed tributaries that flow into the east end of Mayhew Lake. Mayhew Lake has a contributing watershed area of 18,521 acres, resulting in a watershed to lake area ratio of 142:1. This indicates Mayhew Lake has a short residence time.

Big Elk Lake is a shallow, 360-acre basin with an average depth of five feet and a maximum depth of nine feet. Big Elk Lake meets the definition of a shallow lake because of its maximum depth, and because its littoral zone covers 100 percent of the basin. Big Elk Lake is a flow through system on the main stem of the Elk River which enters the lake in the northwest corner on river mile 39.7 and exits at the southeast corner of the lake at river mile 38.5. Lily Creek also flows into Big Elk Lake at the north end of the lake, connecting Big Elk Lake to the Briggs Chain of Lakes including Julia, Rush and Briggs Lakes. Big Elk Lake has a large contributing watershed of 152,484 acres resulting in a watershed to lake area ratio of 425:1. Due to the shallow nature of the lake, the lake volume is relatively small at only 1,540 ac-ft. The large inflow volume from the Elk River and additional tributaries results in a very short residence time for the lake, ranging from less than one to more than 60 days depending on flow in the Elk River. These types of lakes are sometimes called flowage lakes or “run of the river” lakes.

In the remainder of Section 3, Mayhew Lake and Big Elk Lake are characterized by water quality, recreational use, fish populations and health, aquatic plants, and shoreline habitat and conditions. Table 3.3 presents some lake information.

Mayhew Lake has one county owned gravel public access on the southwest corner of the lake. Improvements have been made recently to the county park on the west side of the lake which offers a fishing pier and picnic area. The park is well maintained and encourages shore fishing. Big Elk Lake has one DNR owned concrete public access on the east side of the lake off of County Road 88.

Table 3.3. Lake information

Lake Name	Mayhew Lake	Big Elk Lake
Public Boat Access	1 (gravel)	1 (concrete)
Most Recent Fish Survey	2008	2009
Primarily Managed Fish Species	Walleye, Black Crappie Northern Pike (Secondary)	Northern Pike, Walleye
Fish Stocking	Walleye, 2009	Walleye, 2009 (privately stocked)

The Elk River is an 83.4 mile long river with its origin as an intermittent stream in north central Benton County. The Elk River flows south-southeast to its confluence with the Mississippi River in the City of Elk River, Minnesota. The reach of the Elk River listed for turbidity and bacteria impairment is a 23.2 mile reach, extending from the outflow of Big Elk Lake at river mile 38.6 to its confluence with the St. Francis River at river mile 15.4 (Figure 5.8). The contributing watershed area to the listed reach of the Elk River includes the area upstream of Big Elk Lake for a total of 214,639 acres.

The United States Geological Survey (USGS) has maintained a permanent flow gauging station on the Elk River 5 miles downstream of the listed reach at river mile 9.5. Daily flows have been recorded at the USGS station since 1977. There is one major and two minor inflows between the listed reach and the USGS station (the St. Francis River, Tibbets Creek and a small inflow to Lake Orono). Average daily flows were measured at the upstream and downstream end of the impaired reach during 2009 and they correlated well with USGS flows. Evaluation of these flow data indicated that unit area flows were a good predictor of upstream flows based on the USGS data set. Therefore, the combination of the USGS data set, and the 2009 data collected in the listed reach during the TMDL study provided a long-term context. The use of these data in development of the TMDLs is discussed in Section 5.1.3 of this report.

3.2.1 Water Quality

Historical water quality data as well as data collected as part of Phase II of the TMDL study was analyzed to develop each TMDL. Specific data collection was done in accordance with the Workplan developed in Phase I of this study. Field monitoring was conducted between March and October of 2009, the flow season. Water quality samples were collected in Mayhew Lake monthly and at each tributary to Mayhew Lake every two weeks during the flow season. Water quality was measured in Big Elk Lake and its tributaries every two weeks. Flow was measured every time water quality samples were collected at stream sites. Discrete flow measurements and water quality samples were collected on the impaired Elk River reach and its tributaries every two weeks during flow season. Sample locations were selected based on subwatershed boundaries to maximize coverage. River stage was recorded continuously in the listed reach at

ER 37.3 and ER 16.6 as well as at ER 44.6 and TR ER 41.6 upstream of Big Elk Lake. Discrete flow measurements were also collected at these locations. The MPCA used these data to develop continuous flow records for these locations. Data was collected during wet and dry weather and over a range of flow conditions. Monitoring locations are shown on Figures 3.1 through 3.3.

Figure 3.1. Mayhew Lake monitoring locations.

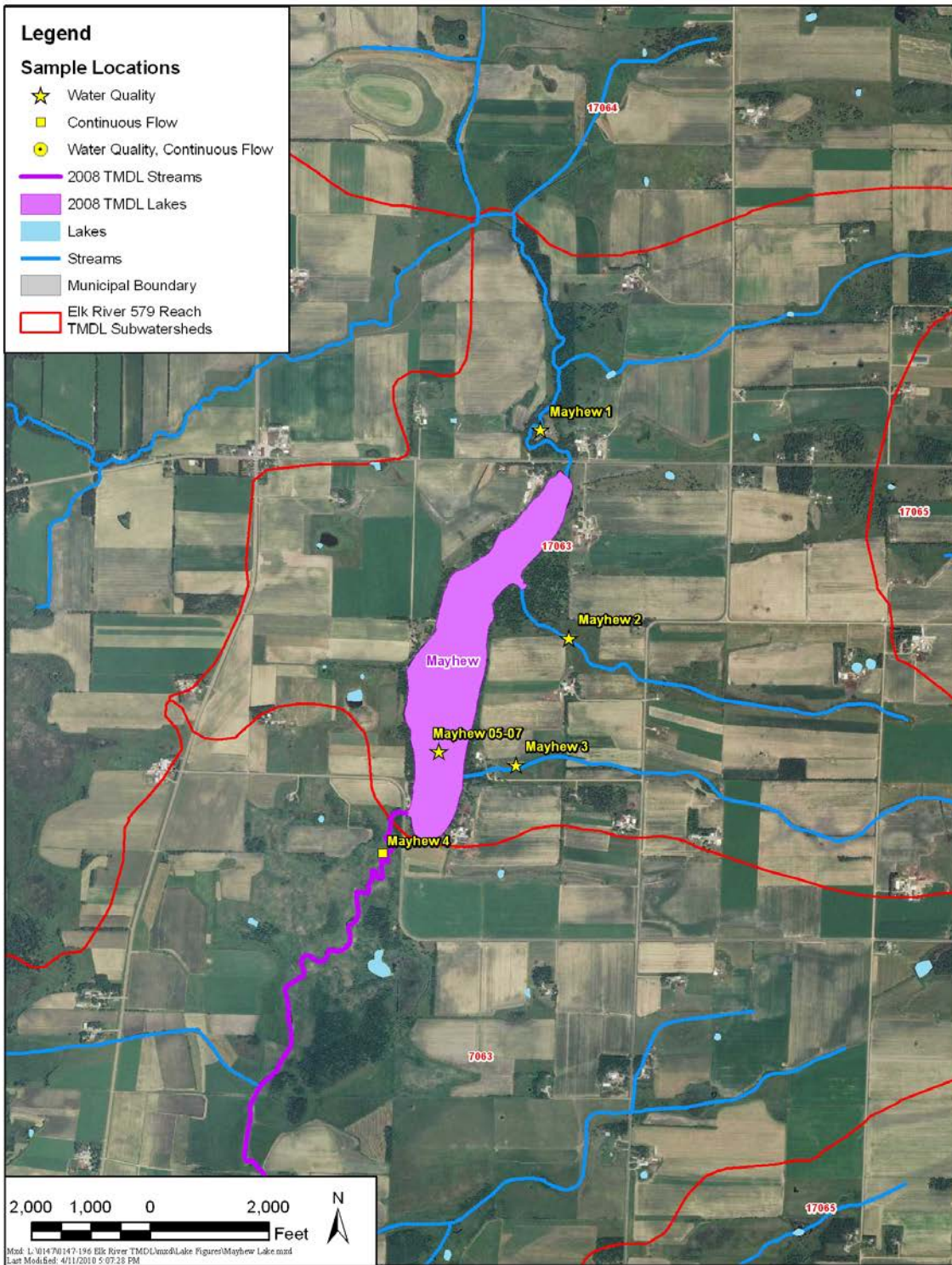


Figure 3.2. Big Elk Lake monitoring locations.

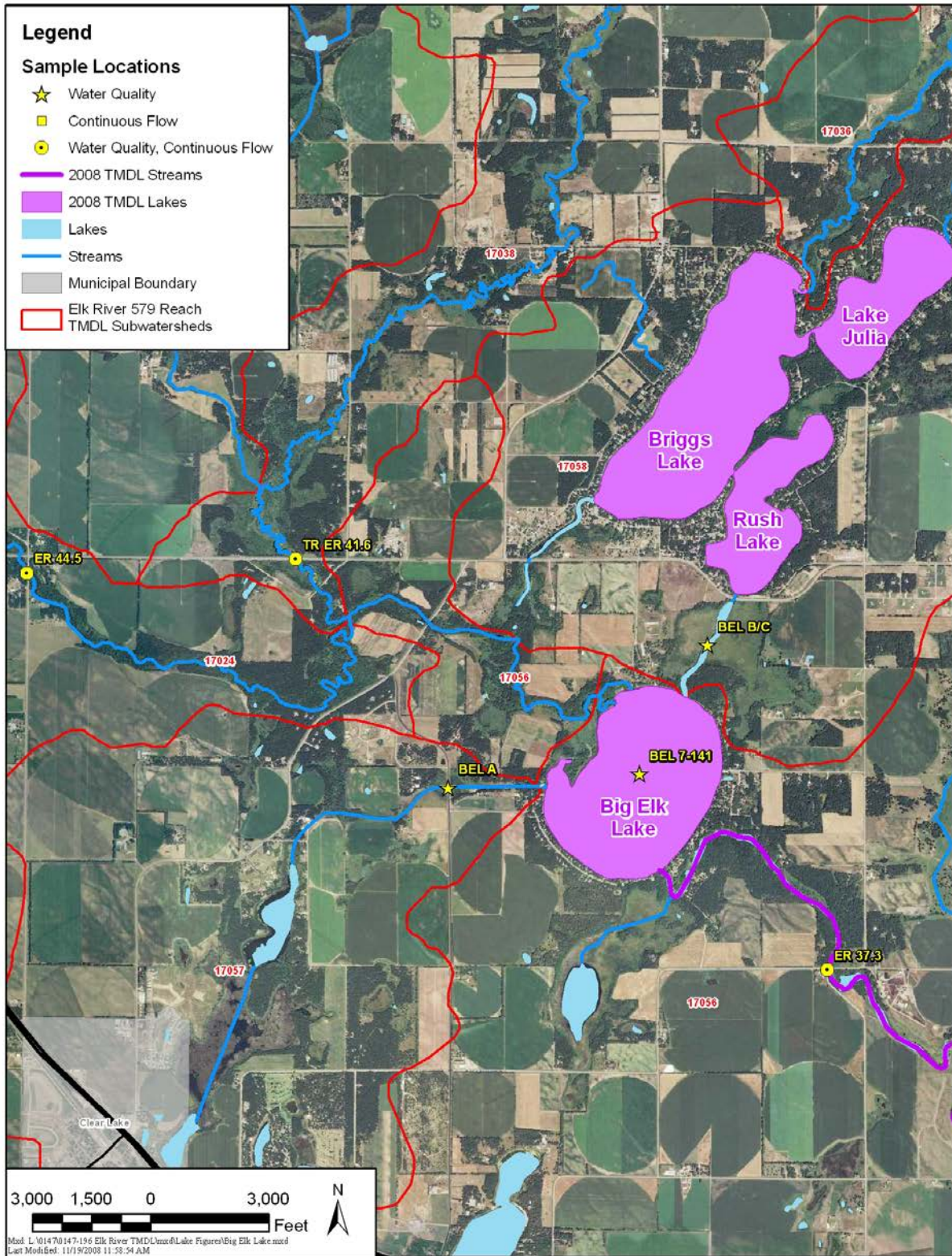
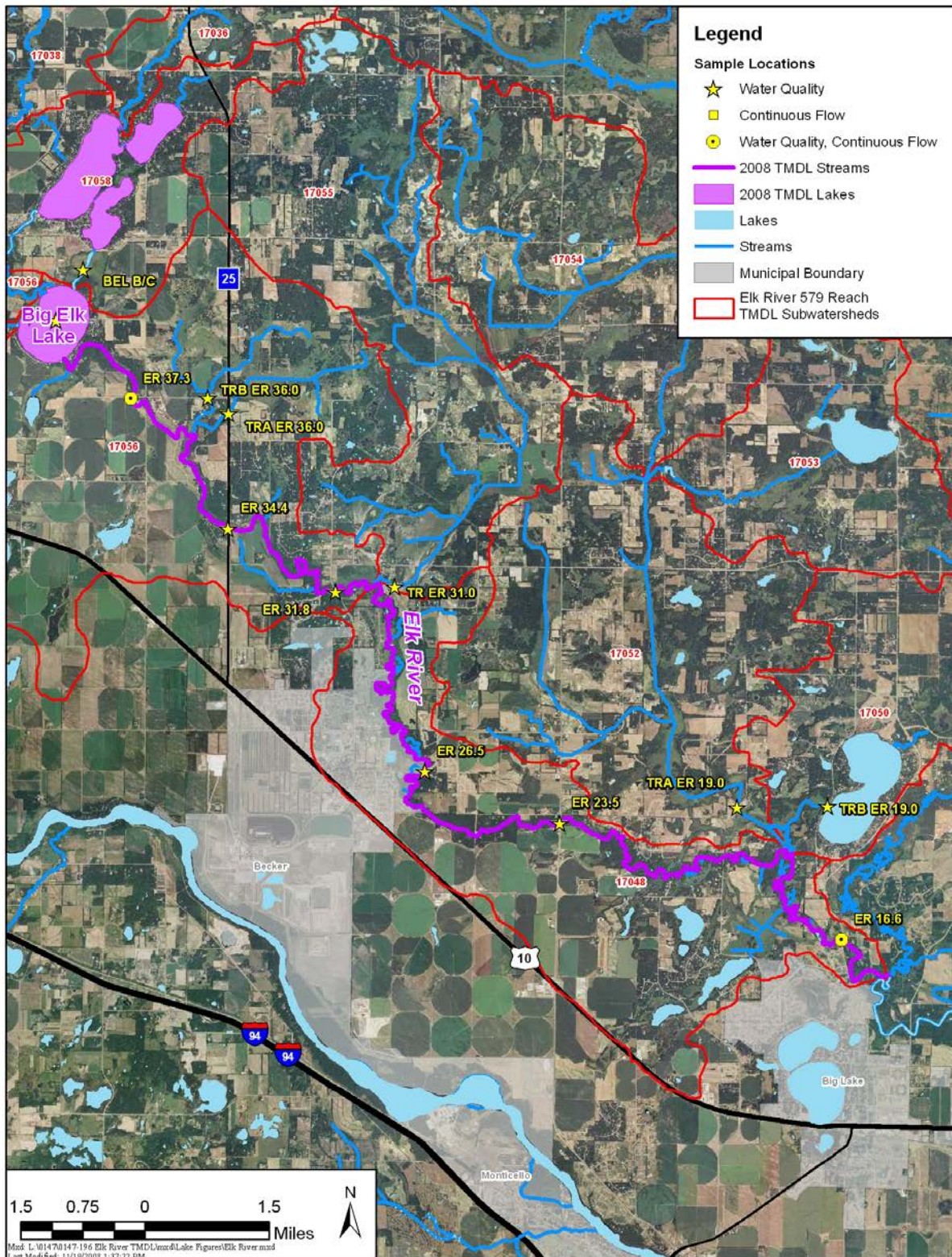


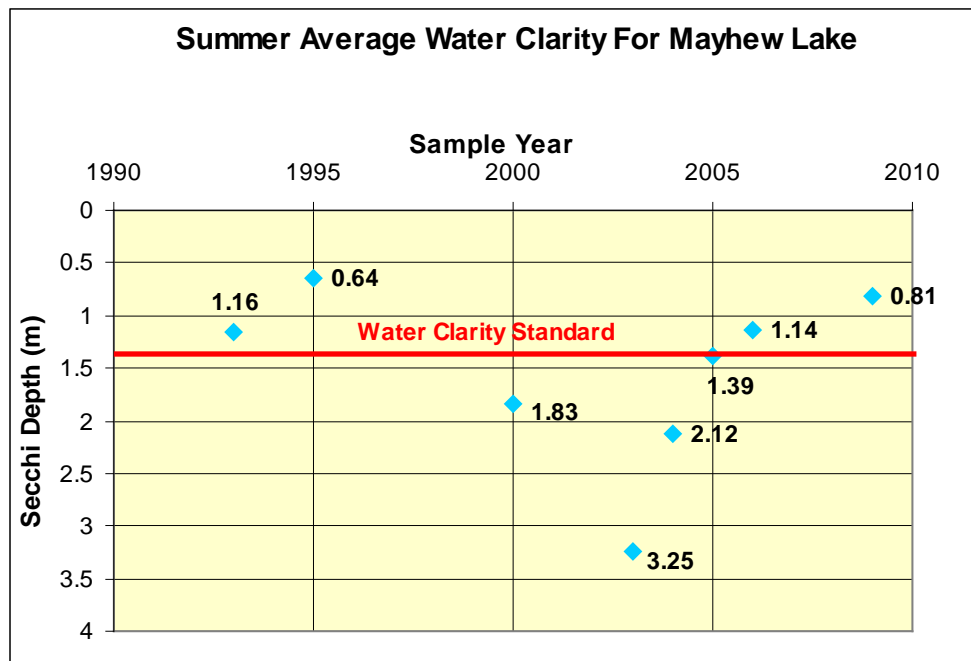
Figure 3.3. Elk River Reach 579, monitoring locations.



3.2.1.1 Mayhew Lake

Historical water quality data for Mayhew Lake was retrieved from the MPCA Environmental Data Access (EDA) website. Water clarity data (i.e., Secchi depth measurements) are available from 1993 through 2006. Total phosphorus and chlorophyll-a data are available from 1995 through 2006. Water clarity, phosphorus, and chlorophyll-a data were also collected in 2009 as part of Phase II of the TMDL. Mean Secchi depth measurements for Mayhew Lake have varied from a low of 0.64 meters in 1995 to a high of 3.25 meters in 2003 (Figure 3.4). The 2009 summer average was 0.81 meters. The most recent years of water clarity measurements, 2003 through 2009, show a decline in lake water clarity; however, some of the data seemed to have been entered with incorrect units (three of the measurements exceeded the maximum lake depth, and many more exceeded the lake depth at the measurement location indicating that meters were mistaken for feet). For the purpose of Figure 3.4, values that appeared to have been mis-entered were corrected by using the correct units (feet). In any case, given the issue with these data, the Secchi depth data is not given equal weight with TP or Chlorophyll-a in terms of evaluation of lake water quality or trends. 2003 is the only year in which the average summer Secchi depth met the new State standard of readings greater than 1.4 meters for deep lakes in the North Central Hardwood Forest ecoregion.

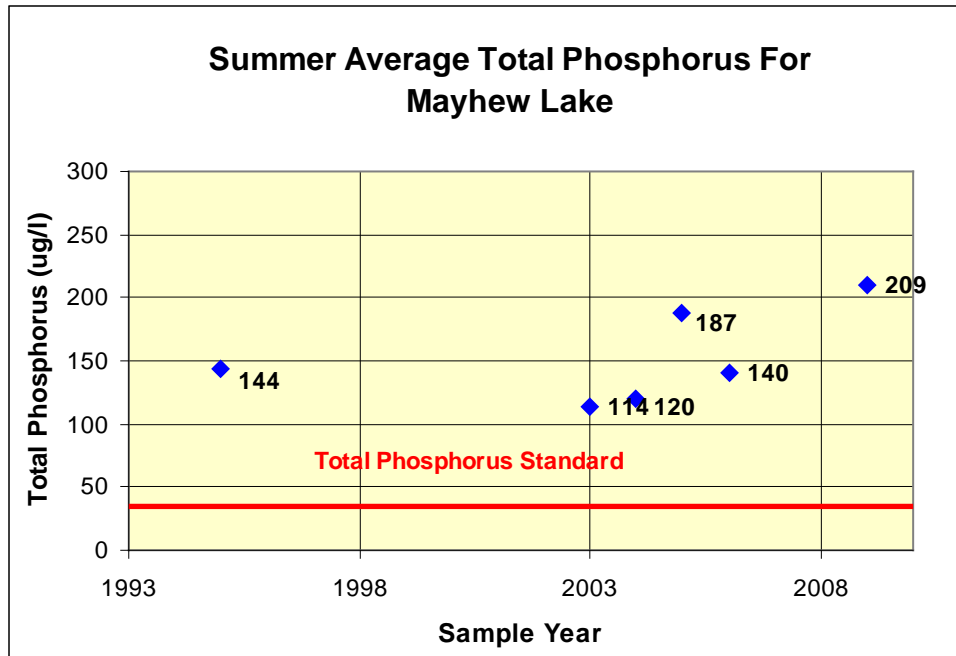
Figure 3.4. Summer average Secchi depth readings in Mayhew Lake.



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Average summer growing season total phosphorus has ranged from 110 $\mu\text{g/L}$ to 223 $\mu\text{g/L}$ (Figure 3.5). The reported decline in lake water clarity values observed from 2003 through 2009 appears to correlate with observed total phosphorus concentrations in Mayhew Lake. Total phosphorus concentrations in Mayhew Lake have exceeded the State standard of 40 $\mu\text{g/L}$ for lakes of the North Central Hardwood Forests ecoregion in all monitoring years with 2009 presenting the highest average on record.

Figure 3.5. Summer average total phosphorus concentrations in Mayhew Lake.



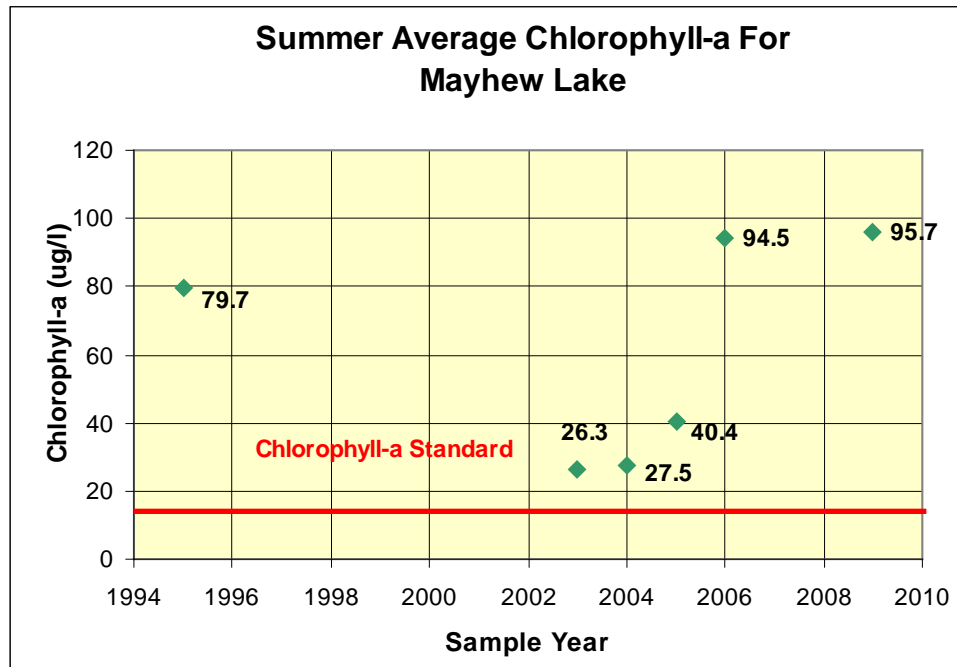
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The highest observed average chlorophyll-a concentration was 95.7 $\mu\text{g/L}$ in 2009 (Figure 3.6). Concentrations have exceeded the State standard of 14 $\mu\text{g/L}$ for lakes of the North Central Hardwood Forests ecoregion in all monitoring years and recent years, 2006 and 2009, present the highest concentrations on record for Mayhew Lake.

Each of the Trophic Status Indicators (TSI's, Secchi, phosphorus and chlorophyll-a) show a trend of declining water quality between 2003 and 2009. The 2003 to 2009 trend correlates with increased precipitation between 2003 and 2009. Increased precipitation in a lake with long residence times can correspond to higher watershed loads of phosphorus, which would explain the observed decline in water quality. The trend is not necessarily reflective of changing watershed conditions, but continued evaluation is recommended. Annual precipitation in Benton County for measured years shown in the graphs is as follows:

- 2003: 26.56 inches
- 2004: 27.28 inches
- 2005: 30.59 inches
- 2006: 30.39 inches
- 2009: 33.80 inches

Figure 3.6. Summer average chlorophyll-a concentrations in Mayhew Lake.

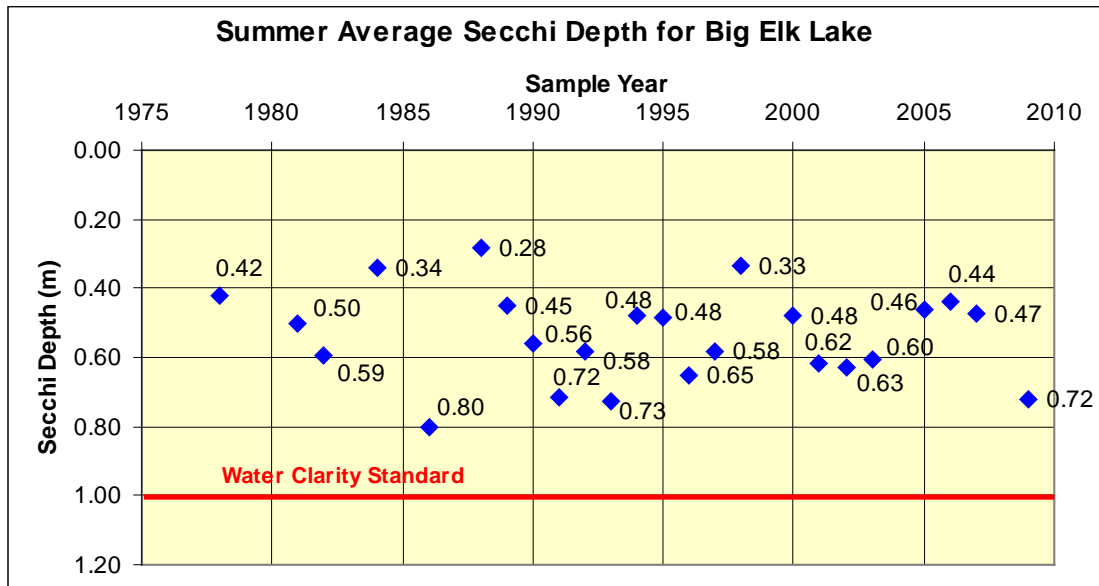


T:\2378_ERWSA\Mayhew\ All WQ Data.xls\Summer TP_CH1a

3.2.1.2 Big Elk Lake

Water quality data for Big Elk Lake was retrieved from the MPCA EDA website. Water clarity data (i.e. Secchi depth measurements) are available from 1978 through 2007. Total phosphorus and chlorophyll-a data are available from 1981 through 2007. Water clarity, total phosphorus, and chlorophyll-a data as well as other water quality data were collected in 2009 as part of Phase II of the TMDL. Secchi depth measurements for Big Elk Lake have varied from a low of 0.28 meters in 1988 to a high of 0.80 meters in 1986 (Figure 3.7). From 2000 to 2007, summer average Secchi depth was relatively stable ranging from 0.44 to 0.63 meters. The 2009 summer average Secchi depth was 0.72 meters. All measured years for water clarity fall below the State standard of 1.0 meters for shallow lakes in the North Central Hardwood Forest ecoregion. The Secchi data reveals no significant improving or declining trend.

Figure 3.7. Summer average Secchi depth readings for Big Elk Lake.

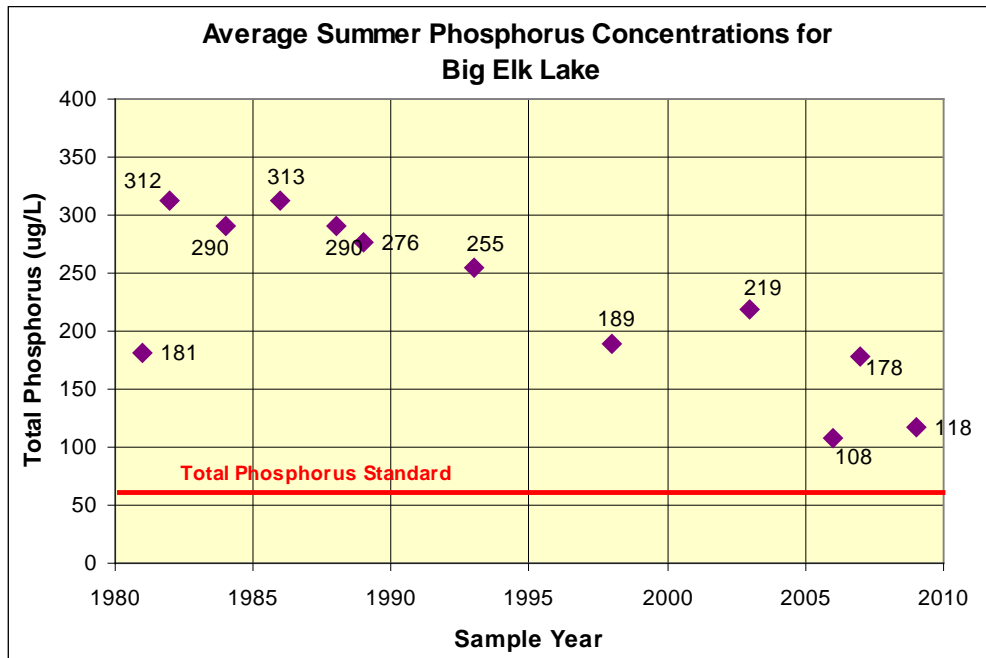


T:\2378_ERWSA\Big Elk Lake\Coppy of EDA_71_0141_Elk Lake.xls\Graphs

Average summer growing season total phosphorus concentrations have ranged from 108 $\mu\text{g/L}$ in 2006 to 313 $\mu\text{g/L}$ in 1986 (Figure 3.8). Total phosphorus concentrations in Big Elk Lake ranged from 181 to 313 $\mu\text{g/L}$ from 1980 to 2000. Phosphorus data shows a strong declining trend in recent years, the four sample years since 2000 showed average total phosphorus concentrations ranging from 108 to 219 $\mu\text{g/L}$ with the 2006, 2007, and 2009 sample years presenting the lowest averages on record. However, despite the lower total phosphorus concentrations observed in recent years, concentrations have exceeded the State standard of 60 $\mu\text{g/L}$ for shallow lakes of the North Central Hardwood Forests ecoregion in all monitoring years.

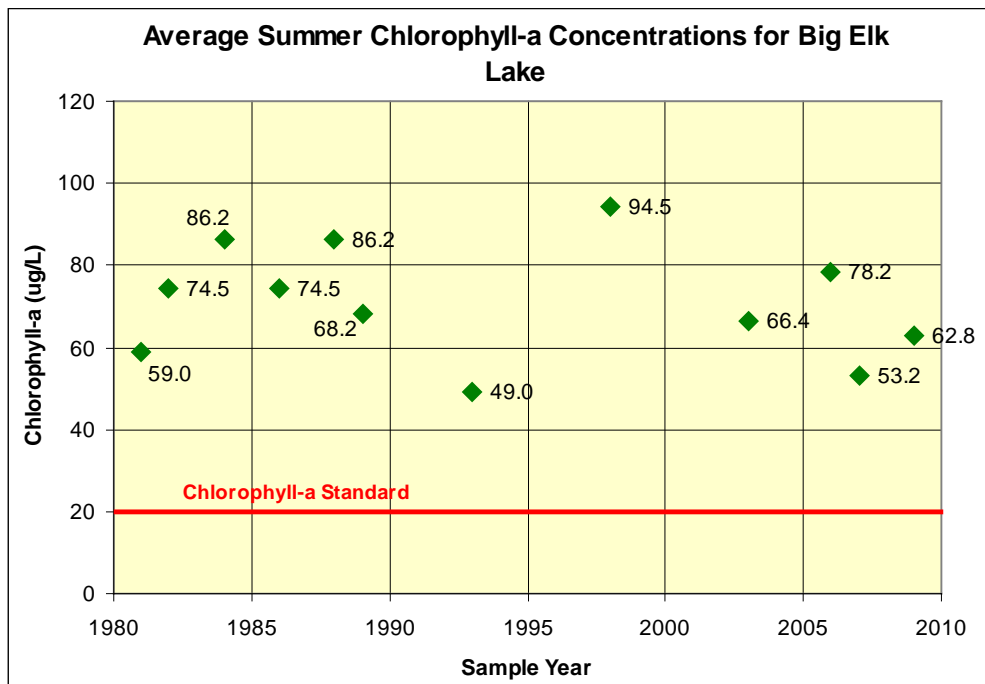
Average summer growing season chlorophyll-a concentrations have ranged from a low of 49 $\mu\text{g/L}$ in 1993 to 94.5 $\mu\text{g/L}$ in 1998 (Figure 3.9). The 2009 average concentration was 62.8 $\mu\text{g/L}$. There has been a moderate amount of observed variation in summer growing season average chlorophyll-a concentrations in Big Elk Lake. Chlorophyll-a concentrations have increased or decreased by more than 50 percent between monitoring years, with no clear trends across monitoring years. Average summer growing season chlorophyll-a concentrations in Big Elk Lake have exceeded the State standard of 20 $\mu\text{g/L}$ for shallow lakes of the North Central Hardwood Forests ecoregion during all monitoring years.

Figure 3.8. Summer average total phosphorus concentrations for Big Elk Lake.



T:\2378_ERWSA\Big Elk Lake\All WQ Data.xls\All Years TP

Figure 3.9. Summer average chlorophyll-a concentrations for Big Elk Lake.



T:\2378_ERWSA\Big Elk Lake\COPY of EDA_71_0141_Elk Lake.xls\Graphs

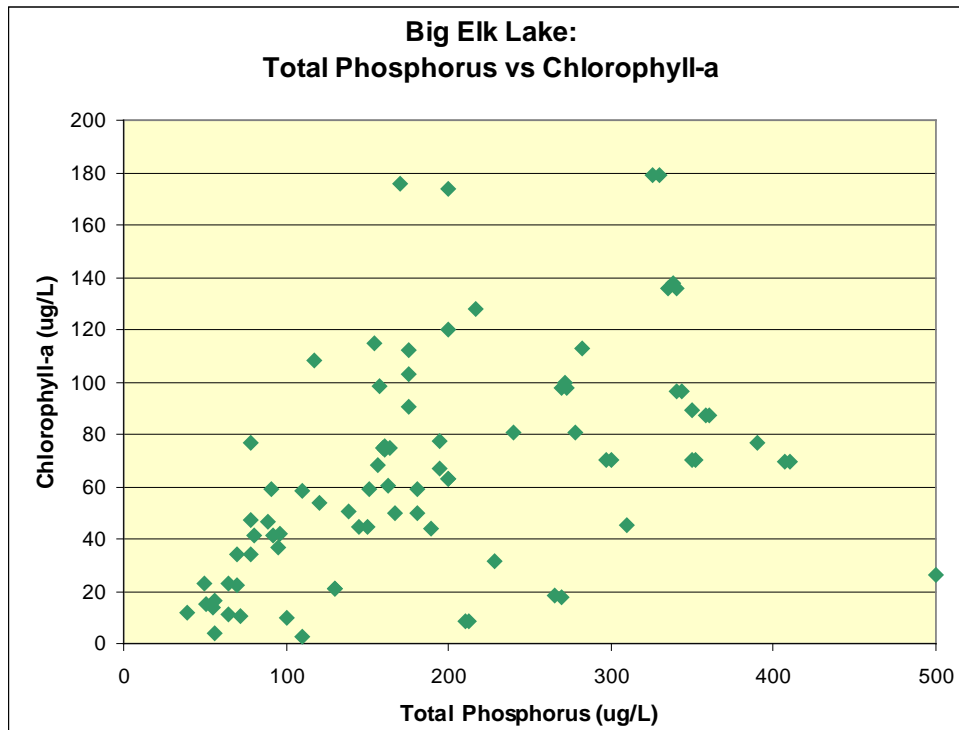
Discrete chlorophyll-a concentrations were compared to discrete total phosphorus concentrations in Big Elk Lake (Figure 3.10). In general, high chlorophyll-a concentrations are associated with

high total phosphorus concentrations. Variability in the relationship between TP and chlorophyll-*a* in Big Elk Lake is likely due to a combination of factors:

1. First, the residence time of Big Elk Lake is short relative to generation times for algae. Figure 5.2 in the Phase I Report shows the relationship between Elk River inflows to Big Elk Lake and residence time in Big Elk Lake as it relates to the flow duration curve for that location. About 40% of the time, the lake has a residence time less than 7 days. About 80 % of the time, the residence time for Big Elk Lake is less than 14 days. The high flow-through rate of this lake indicates that the lake hydrodynamics are influencing growing conditions for chlorophyll-*a*. That is to say that TP is not the limiting factor for chlorophyll-*a* in this lake and that chlorophyll-*a* concentrations are the result of a multiplicity of factors.
2. It is common to have high variability in chlorophyll-*a* at the high TP concentrations observed in Big Elk Lake, as TP is far in excess of algal needs. Such variability can be observed in the relationships shown in figure 3.10.

Despite the variability of the TP- chlorophyll-*a* relationship at high levels of TP and low residence times, it is generally understood that the best way to control chlorophyll-*a* concentrations (algal blooms and the accompanying algal turbidity observed in Elk River) in lakes is to reduce TP loads to lakes (Heiskary and Walker, 1988, Heiskary and Wilson, 2005 and 2008).

Figure 3.10. Discrete chlorophyll-*a* concentrations versus discrete total phosphorus concentrations for Big Elk Lake.

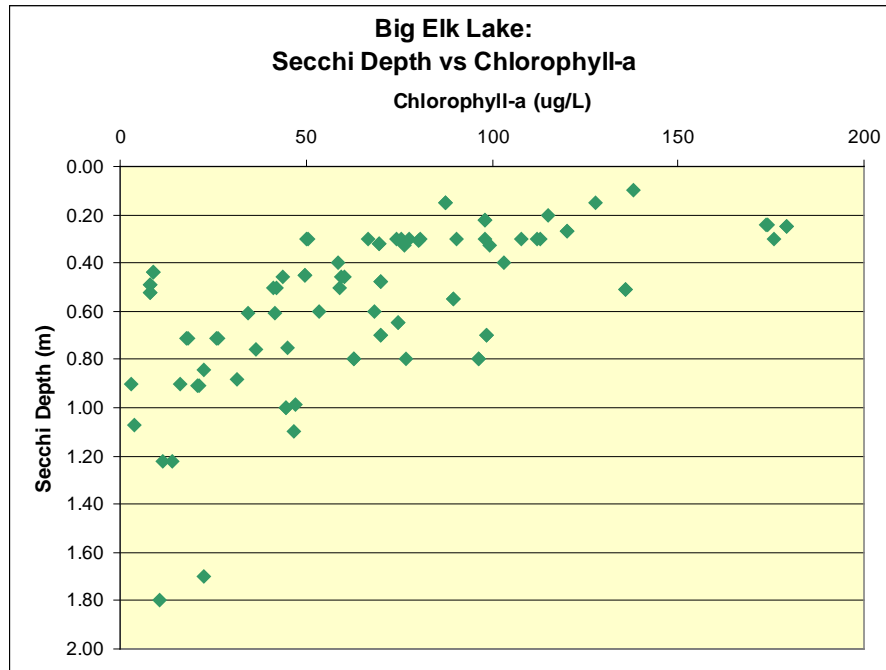


T:\2378_ERWSA\Big Elk Lake\COPY of EDA_71_0141_Elk Lake.xls\Chla vs Flow

Discrete chlorophyll-*a* concentrations were also compared to discrete Secchi depth readings in Big Elk Lake (Figure 3.11). This comparison reveals that algal turbidity is likely the main

driving factor affecting water clarity in Big Elk Lake, though turbidity from other sources like wind re-suspension and rough fish is also common in shallow lake systems like this one.

Figure 3.11. Discrete chlorophyll-a concentrations versus discrete Secchi depth readings for Big Elk Lake.



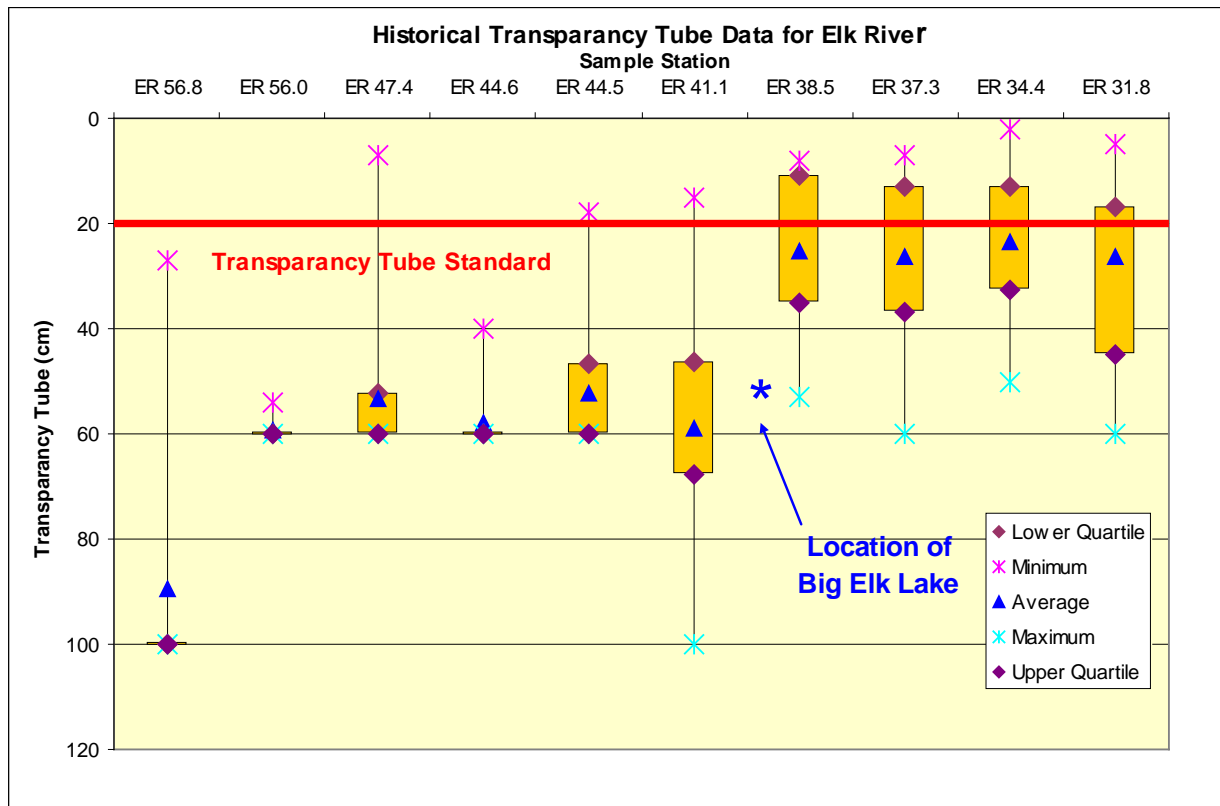
T:\2378_ERWSA\Big Elk Lake\Cop of EDA_71_0141_Elk Lake.xls\Chla vs Flow

3.2.1.3 Elk River Reach 579

3.2.1.3.1 Turbidity

Historical transparency data is available for ten stations along the Elk River, six stations upstream of Big Elk Lake and four stations within the listed reach downstream of Big Elk Lake. Longitudinal transparency data for the Elk River is presented by river mile from upstream to downstream (Figure 3.12). Stations ER 56.8 through Station ER 41.1 are upstream of Elk Lake and outside of the reach listed for turbidity impairment. The median transparency value for these samples is 60 or greater. Station ER 47.4, ER 44.5 and ER 41.1 do have three or more values below 20 cm. However, the number of samples below 20 cm is not greater than 10% of the total sample measurements and therefore the reach is not considered impaired for turbidity. Sampling stations within the listed reach are Stations ER 38.5, ER 37.3, ER 34.3 and ER 31.8.

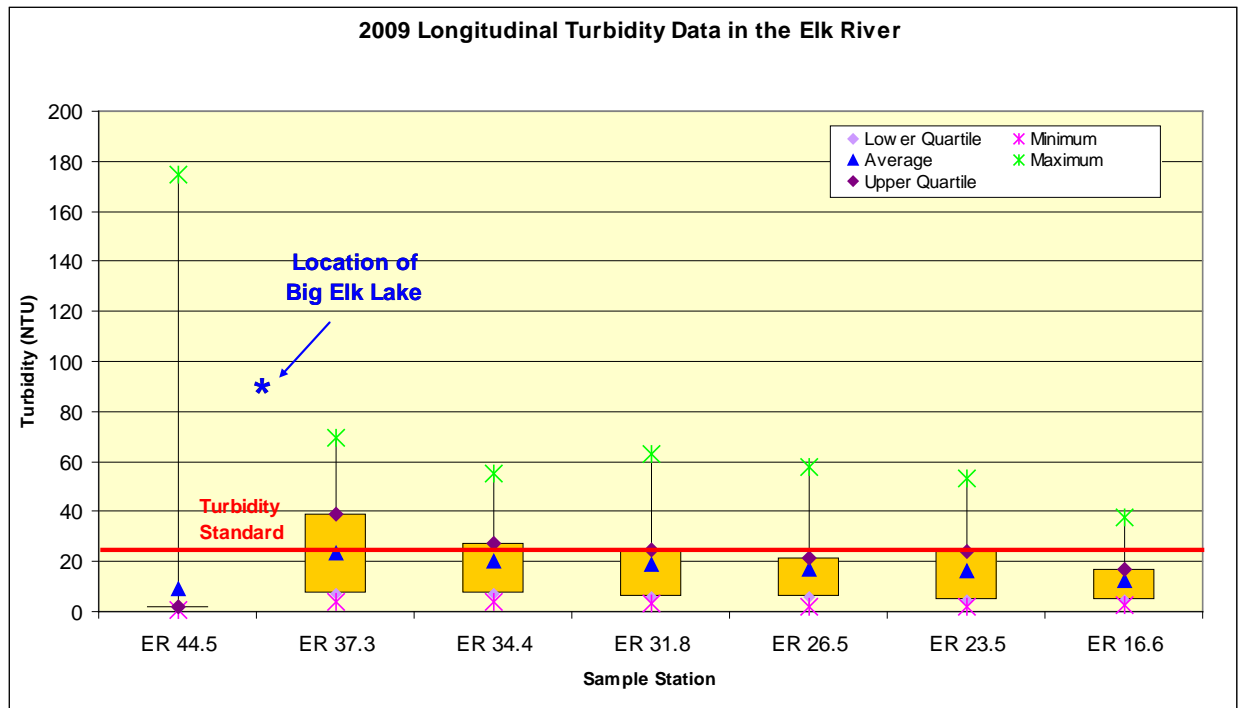
Figure 3.12. Historical longitudinal transparency tube readings in the Elk River.



T:\2378_ERWSA\Elk River\[Copy of Mainstem Elk River WQ Data.xls]Turbidity Charts

Turbidity data was collected in 2009 as part of Phase II. Data was collected at one station upstream of Big Elk Lake and at 6 stations within the listed reach of the Elk River. Box plots displaying the geometric mean turbidity values, as well as the range of observed values for each sample station are presented in Figure 3.13. State standards are displayed on the chart.

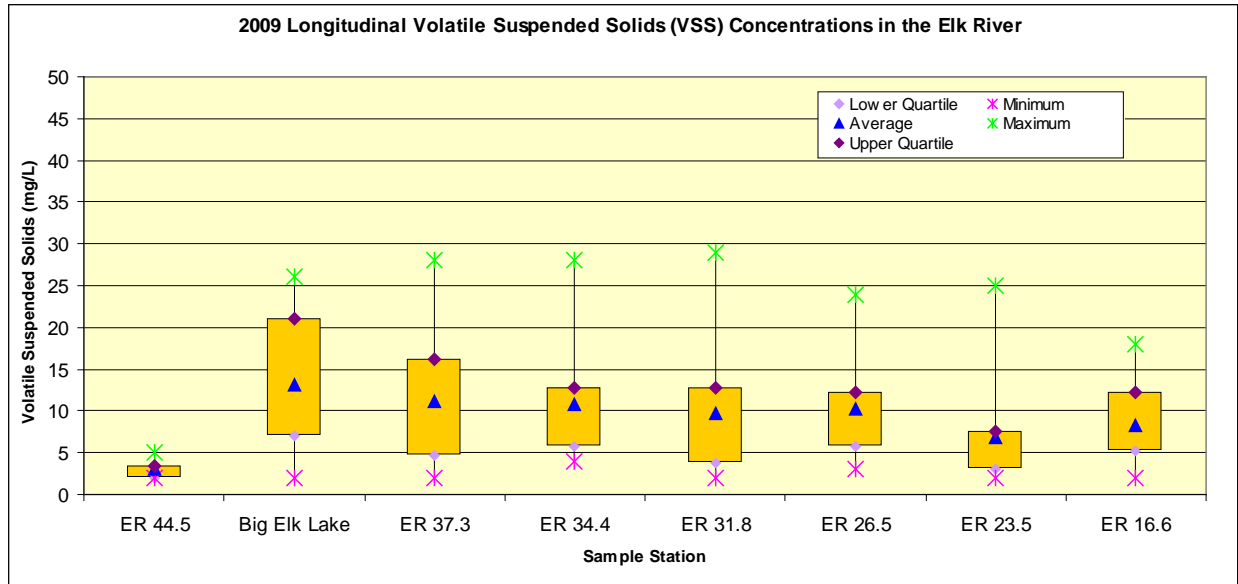
Figure 3.13. 2009 longitudinal turbidity readings in the Elk River.



T:\2378_ERWSA\Elk River\2009 WQ data.xls\Turbidity Chart

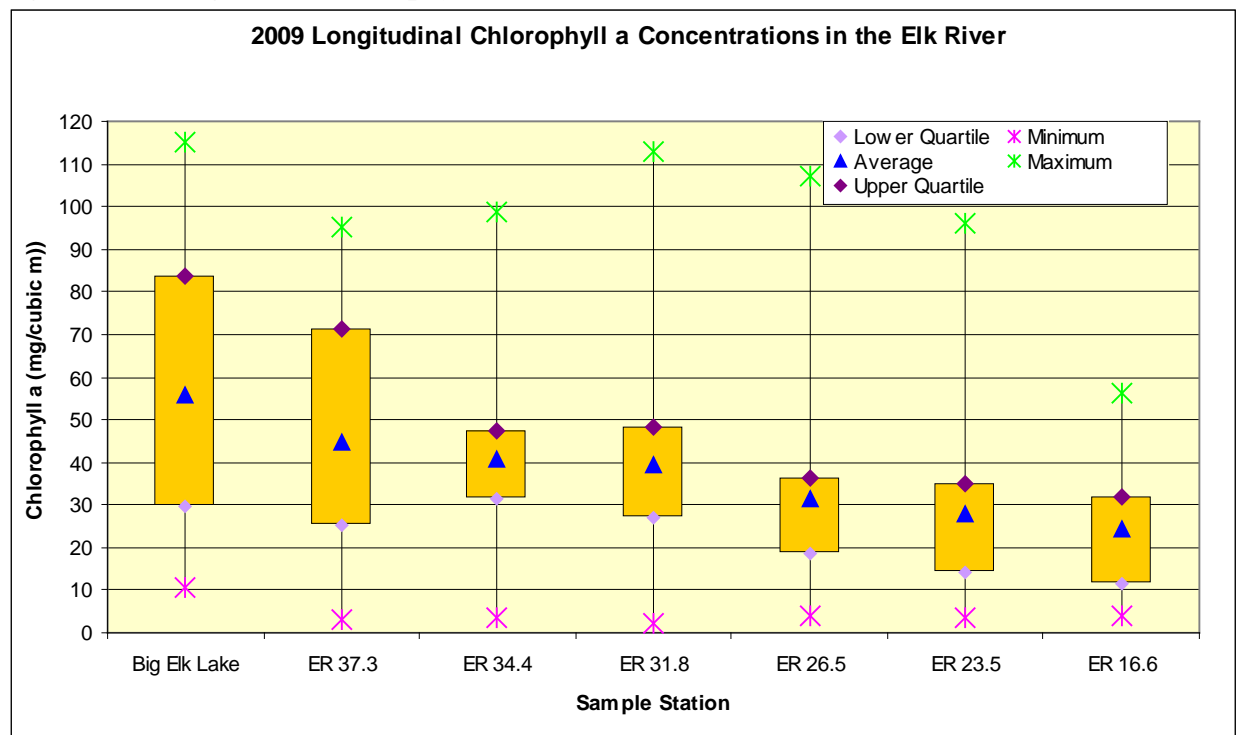
Displaying the turbidity data longitudinally helps to illustrate the influence Big Elk Lake has on the water clarity within the Elk River. Big Elk Lake is a hyper-eutrophic system with total phosphorus and chlorophyll-*a* concentrations well above the state water quality standards. Water clarity, measured by Secchi depth, is typically 0.5 meters or less within Big Elk Lake. Flows from the Elk River entering Big Elk Lake are typically clear and low in turbidity (see Figure 3.13). Watershed sediment and in-stream sources of turbidity upstream of the lake are not likely contributing significantly to the turbidity downstream of the lake. Instead, watershed nutrient sources to the lake from the upper watershed coupled with the lake dynamics are the driving factor in the turbidity impairment in the Elk River downstream of Big Elk Lake. The high nutrient and chlorophyll-*a* concentrations in the lake lead to high algal turbidity within the lake, which is discharged to Elk River. Data and observations also indicate that algae populations are sustained in the upper portion of the listed reach of the Elk River. Figures 3.14 and 3.15 present longitudinal box plots of volatile suspended solids (VSS) and chlorophyll-*a* concentrations in the Elk River, indicating these are the primary contributors to the turbidity impairment.

Figure 3.14. Longitudinal VSS concentrations in the Elk River.



T:\2378_ERWSA\Elk River\[2009 WQ data.xls]VSS Chart

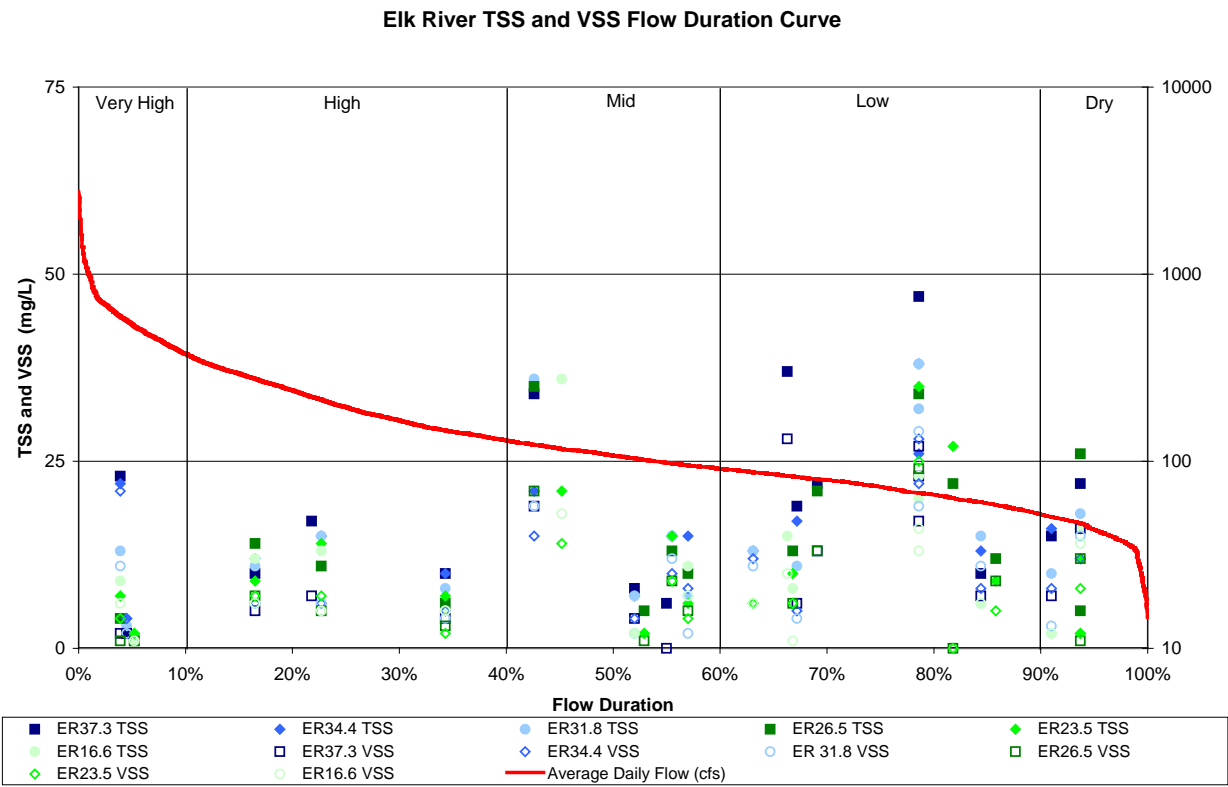
Figure 3.15. Longitudinal chlorophyll-a concentrations in the Elk River.



T:\2378_ERWSA\Elk River\[2009 WQ data.xls]Chlorophyll Chart

Figure 3.16 shows TSS and VSS along the flow duration curve for the listed reach. The highest turbidity readings generally occur in lower flows.

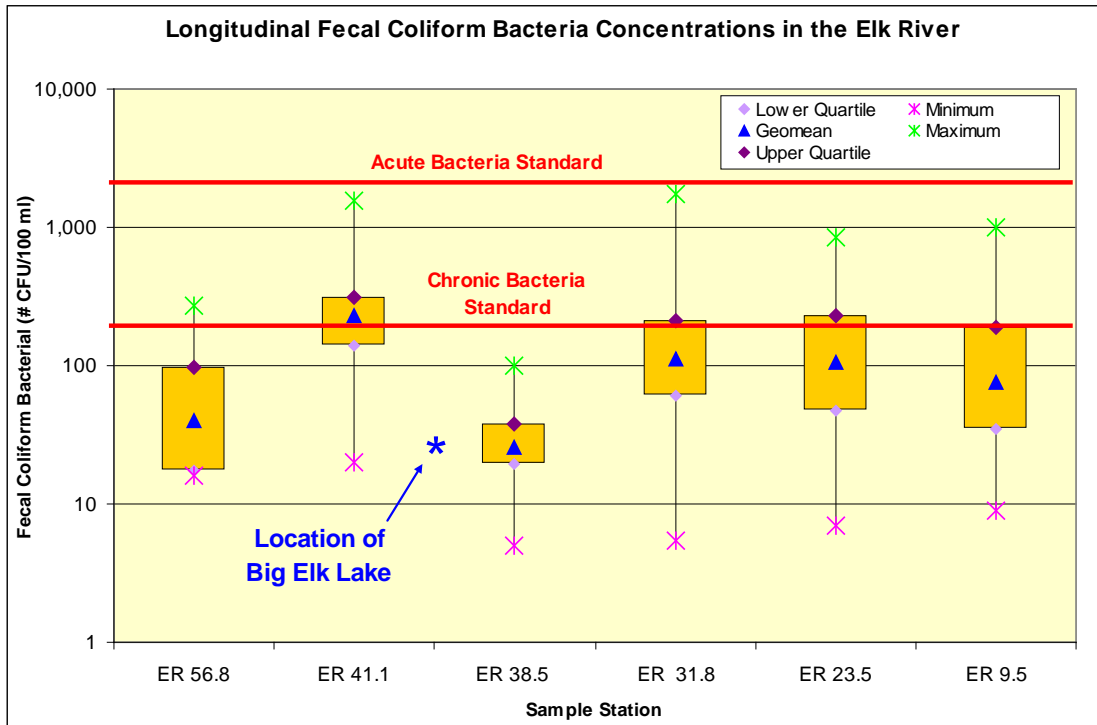
Figure 3.16. Flow Duration Curve with TSS and VSS Concentrations.



3.2.1.3.2 Bacteria

Historical water quality data for the Elk River was analyzed for fecal coliform bacteria concentrations for sampling years 1974-1976 and 2002-2007. Bacteria concentrations as fecal coliform were measured at six stations along the main stem of the Elk River, two stations upstream of Big Elk Lake, three stations downstream of Big Elk Lake within the listed reach and one station downstream of the St. Francis River outside of the listed reach. Box plots displaying the geometric mean fecal coliform bacteria concentrations, as well as the range of observed values from each station are presented in Figure 3.17. The chronic (200 CFU/100ml) and acute (2,000 CFU/100ml) standards for fecal coliform are displayed on this graph.

Figure 3.17. Box plots of historical longitudinal fecal coliform bacteria concentrations in the Elk River.



T:\0147\196 Elk River TMDL\Elk River Water Quality Data\Mainstem Elk WQ Data.xls\Fecal Coliform Charts

A summary of the discrete fecal coliform samples by month for the three sample stations within the listed reach of the Elk River are presented in Table 3.4. Although there were no exceedances of the acute standard, there were 15 samples exceeding the chronic standard. Eleven of the fifteen exceedances of the State chronic standard occur in August and September. Approximately 20 percent of all collected samples exceed the State chronic standard.

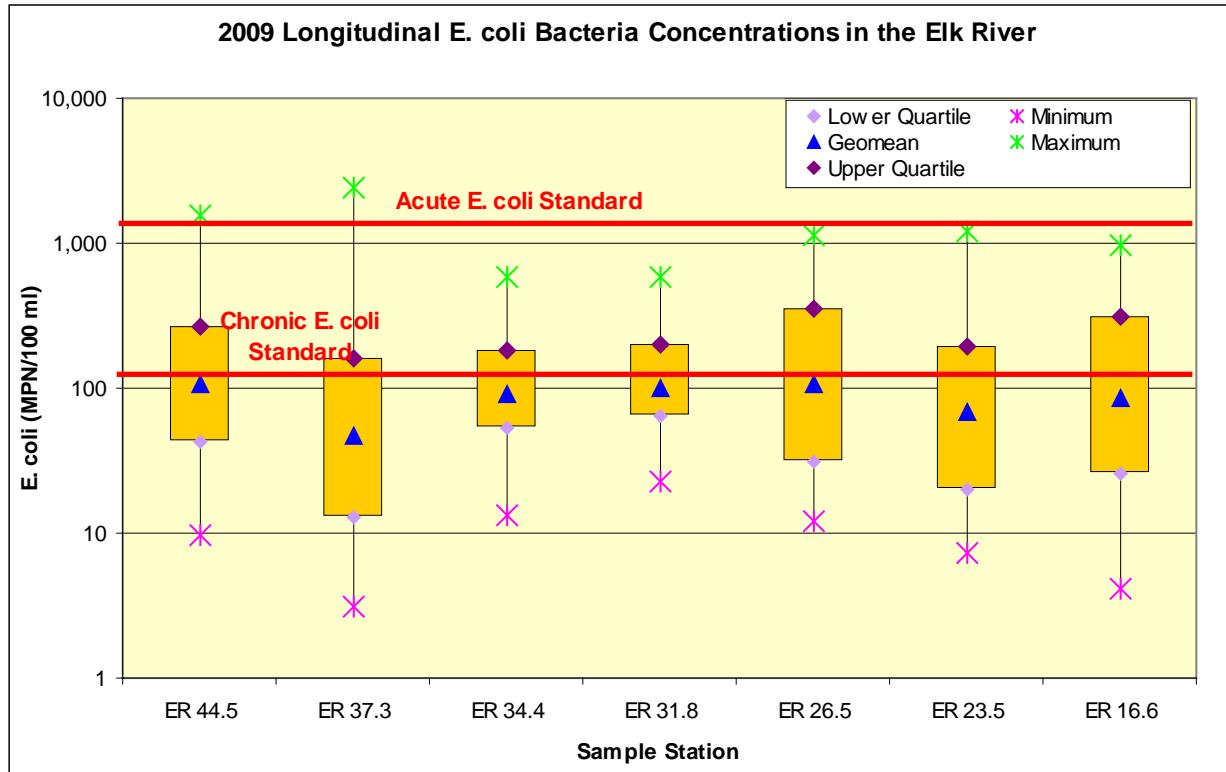
Table 3.4. Summary of fecal coliform bacteria samples for monitoring stations within the listed reach of the Elk River

Month	Total Samples	# > 200 CFU/100 ml	# >2,000 CFU/100ml	Monthly Geomean
May	8	0	0	23
June	15	3	0	59
July	12	1	0	83
August	18	7	0	165
September	11	4	0	148

Water quality data was collected in 2009 as part of Phase II of the TMDL and bacterial data was analyzed for *E. coli*, consistent with the new State standard. Bacteria concentrations as *E. coli* were measured at seven stations along the main stem of the Elk River; one station upstream of Big Elk Lake and six stations downstream of Big Elk Lake within the listed reach. Box plots displaying the geometric mean *E. coli* bacteria concentrations, as well as the range of observed

values from each station are presented in Figure 3.18. The chronic (126 CFU/100ml) and acute (1,260 CFU/100ml) standards for *E. coli* are displayed on this graph.

Figure 3.18. Box plots of 2009 longitudinal *E. coli* bacteria concentrations in the Elk River (mainstem).



T:\2378_ERWSA\Elk River\2009 WQ data.xls\E Coli Chart

A summary of the discrete *E. coli* samples by month for the six sample stations within the listed reach of the Elk River are presented in Table 3.5. There were thirty-nine exceedances of the State chronic standard which is approximately 40 percent of all samples collected. One sample at river mile 37.3 in the month of August exceeded the State acute standard.

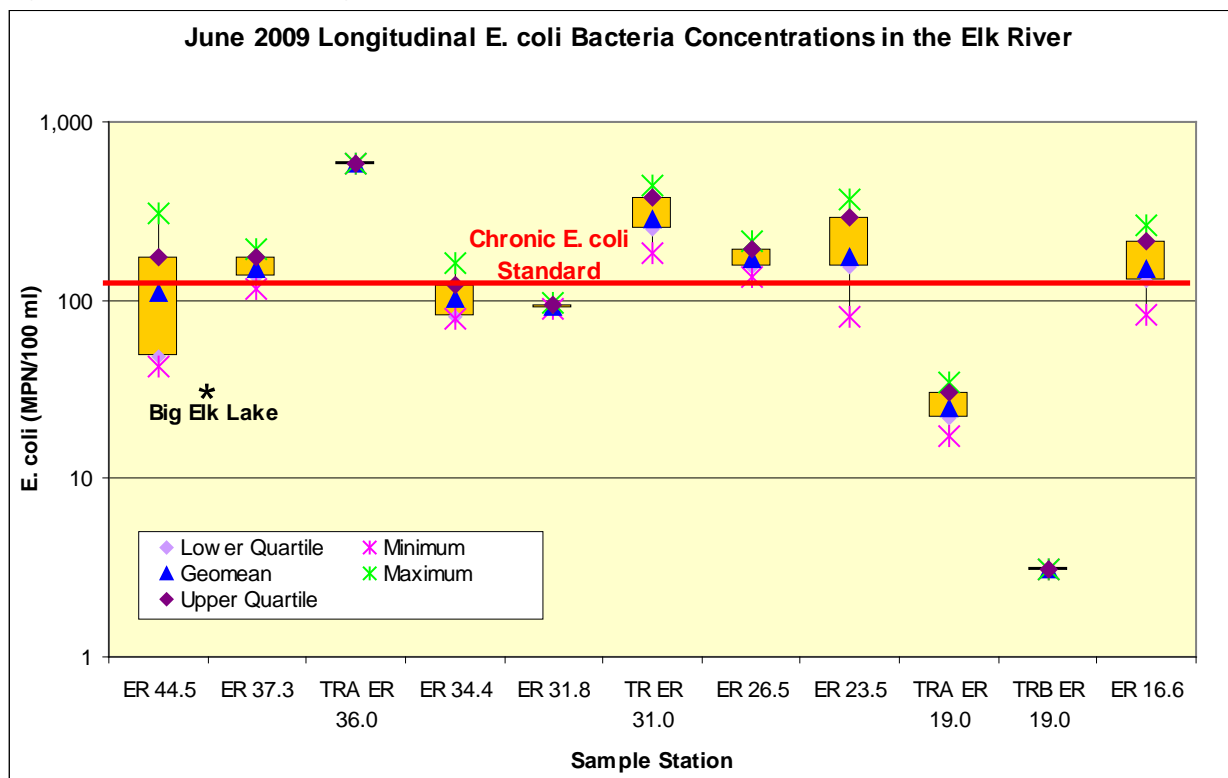
Table 3.5. Summary of *E. coli* bacteria samples for six monitoring stations within the listed reach of the Elk River.

Sample Month	Total Samples (n)	#>126 CFU/100 ml	#>1260 CFU/100ml	Monthly Geomean
April	19	2	0	19
May	12	0	0	36
June	13	6	0	132
July	12	6	0	127
August	12	10	1	458
September	18	15	0	198
October	13	0	0	29

The monthly geometric mean *E. coli* concentrations exceed the State standard of 126 cfu/100 ml in the months of June – September. The higher concentrations of *E. coli* in August and September correlate with the high concentrations of Fecal Coliform present in the historical data for the same months.

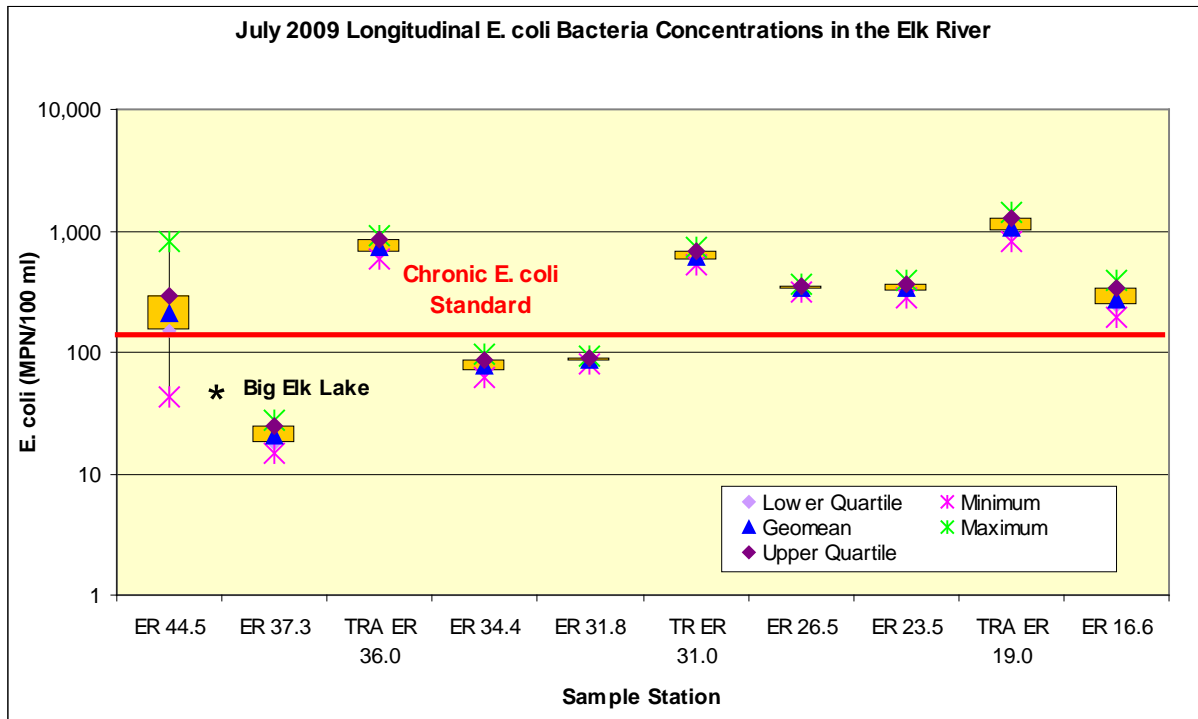
Figures 3.19 – 3.22 present longitudinal bacteria concentrations for the Elk River, including data upstream of Big Elk lake as well as tributaries, for the months where exceedances occurred (June-August). This data indicates that the bacteria impairment cannot be attributed to a specific use or subwatershed and the impairment is most likely a land use issue throughout the entire watershed, most specifically land use in the riparian areas.

Figure 3.19. June 2009 Longitudinal *E. coli* Concentrations in the Elk River.



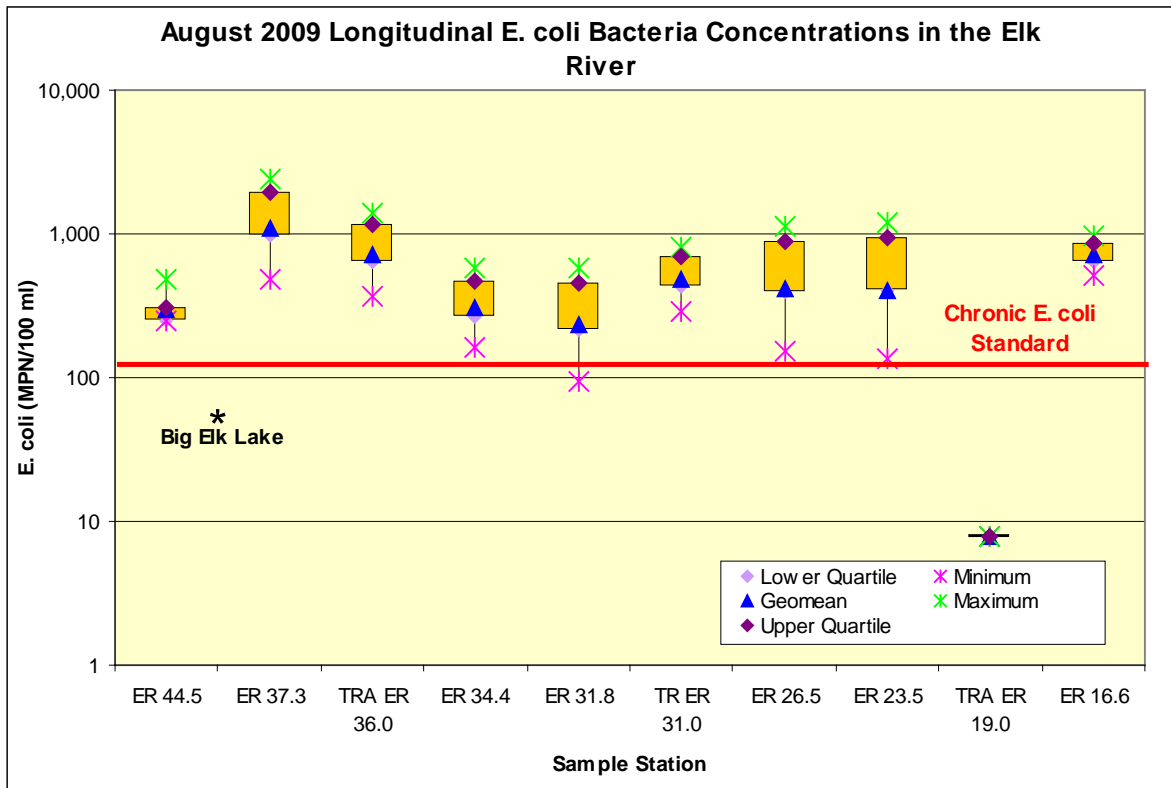
T:\2378_ERWSA\Elk River\2009 WQ data.xls\Long. E.coli by exceed. months

Figure 3.20: July 2009 longitudinal *E. coli* concentrations in the Elk River.



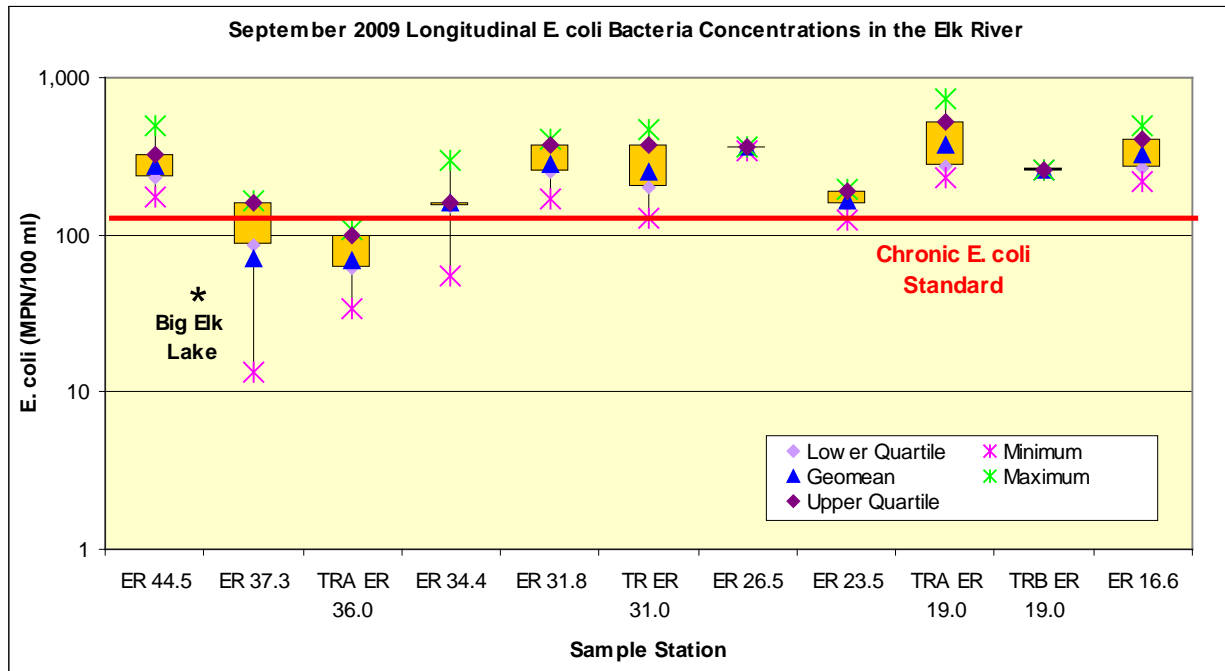
T:\2378_ERWSA\Elk River\2009 WQ data.xls\Long. *E. coli* by exceed. months

Figure 3.21. August 2009 longitudinal *E. coli* concentrations in the Elk River.



T:\2378_ERWSA\Elk River\2009 WQ data.xls\Long. *E. coli* by exceed. months

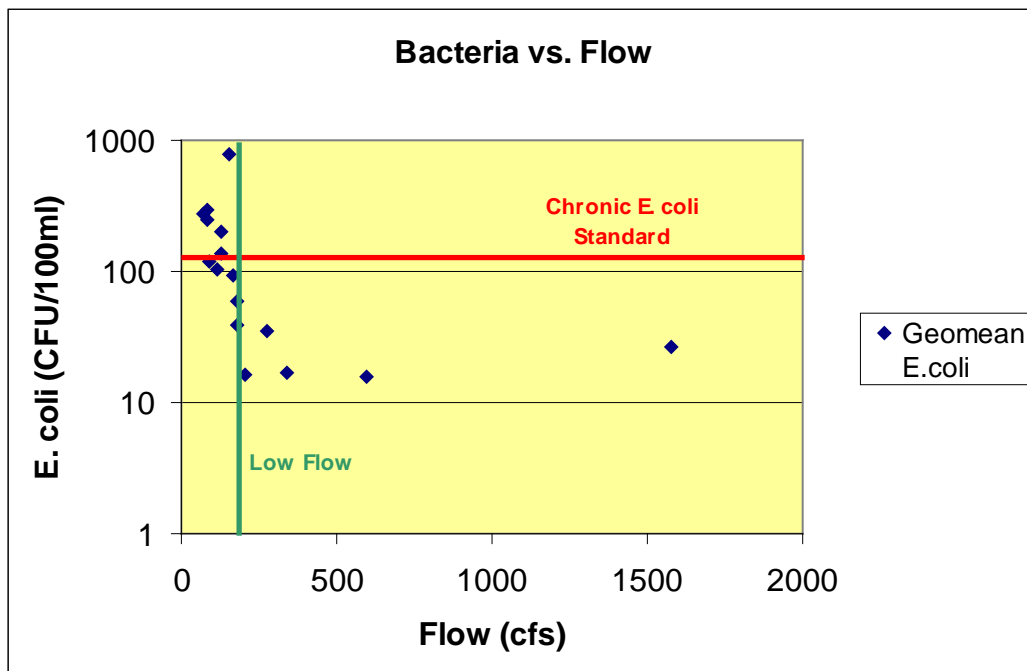
Figure 3.22. September 2009 longitudinal *E. coli* concentrations in the Elk River.



T:\2378_ERWSA\Elk River\2009 WQ data.xls\Long. *E. coli* by exceed. months

Figure 3.23 presents a correlation between bacteria concentrations and flow conditions. This data indicates that the bacteria impairment is prevalent in lower flow conditions.

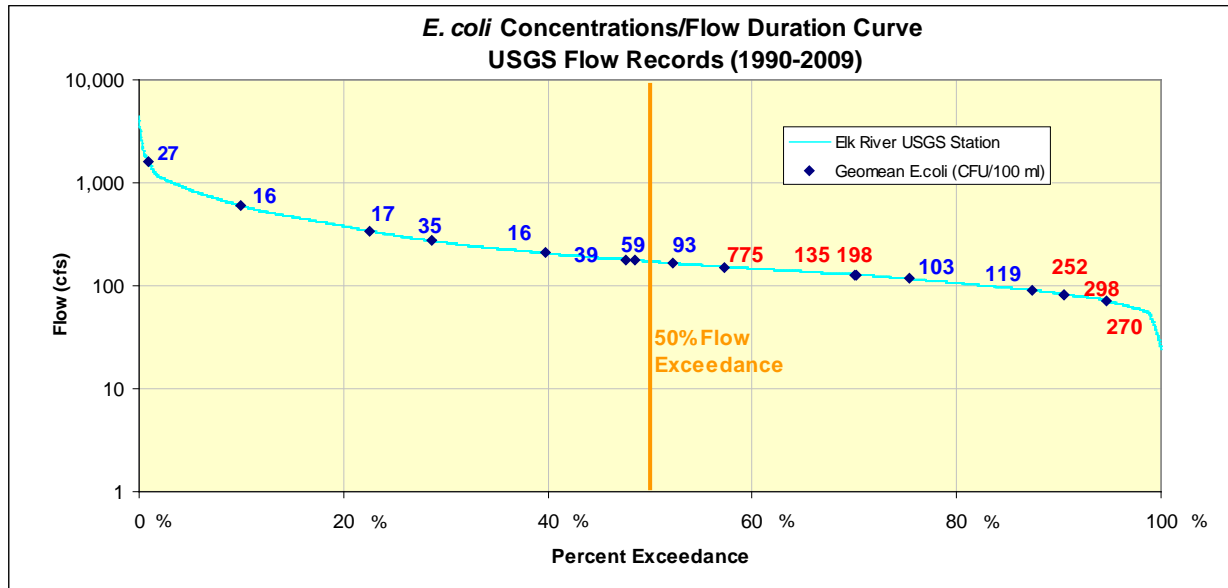
Figure 3.23: Bacteria concentrations vs. flow for Elk River impaired reach.



T:\2378_ERWSA\Elk River\2009 WQ data.xls\Bacteria vs. Flow

Figure 3.24 presents geomean bacteria concentrations along the flow duration curve for the listed reach. *E. coli* concentrations exceeding the State standard occur in the upper mid-range, dry or low flow conditions. No impairment is indicated for higher flow regimes.

Figure 3.24. Flow duration curve with bacteria concentrations.



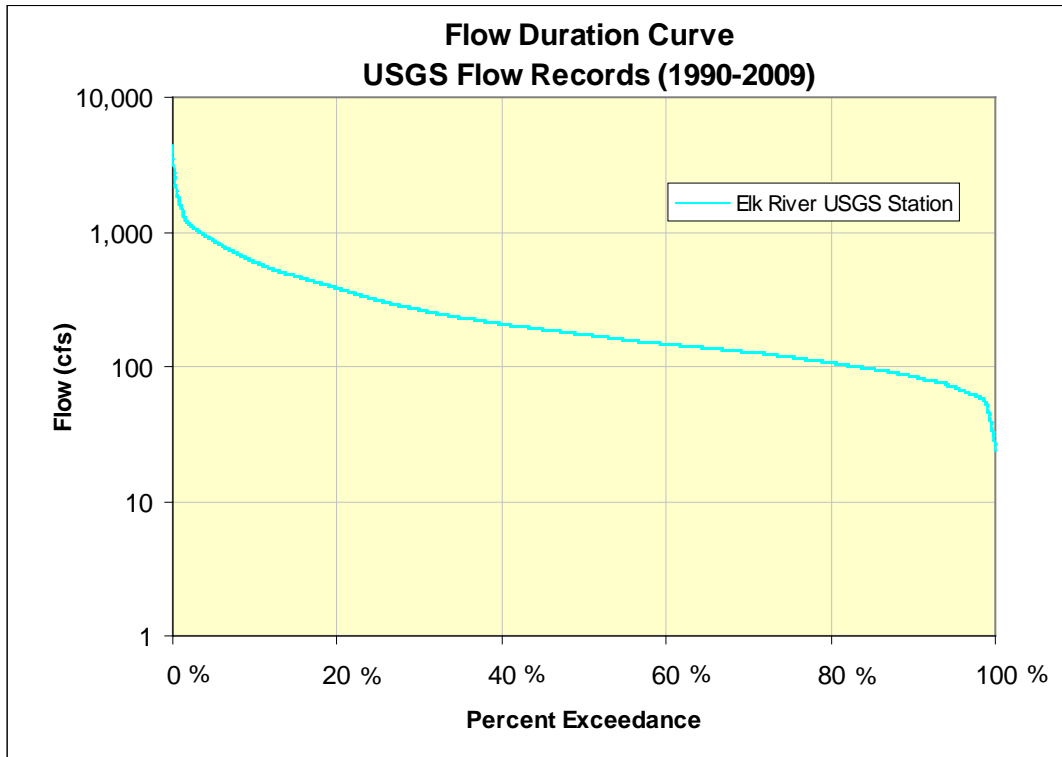
T:\2378_ERWSA\Elk River\Bacteria\[Bacteria Load Calcs - Annual Flow.xls]20 year flow duration (daily)

* Note: Red values exceed chronic state standard for *E. coli*.

3.2.2 Hydrology

Average daily discharge has been monitored and reported at the USGS station 05275000 located in Big Lake at CSAH 15 (approximately 5 miles below Elk River Reach 579) periodically since 1911 and yearly since 1990. Monthly average flows since 1911 at the USGS station range from 112 cubic feet per second (cfs) in January to 659 cfs in April. The maximum average daily flow at the USGS stations was 7,170 cfs on April 16, 1965. The lowest average daily flow was recorded on August 1st, 1934 was 4.0 cfs. The average annual runoff estimated from 1911-2009 is 6.70 inches. The average annual runoff over the last two years (2008 and 2009) was 5.68 and 5.45 respectively (USGS Water Data Report 2009). Figure 3.25 presents a flow duration curve which was generated from the USGS station flow records for 1990 to 2009. Additional flow sites are identified in this report and were used in developing the TMDLs.

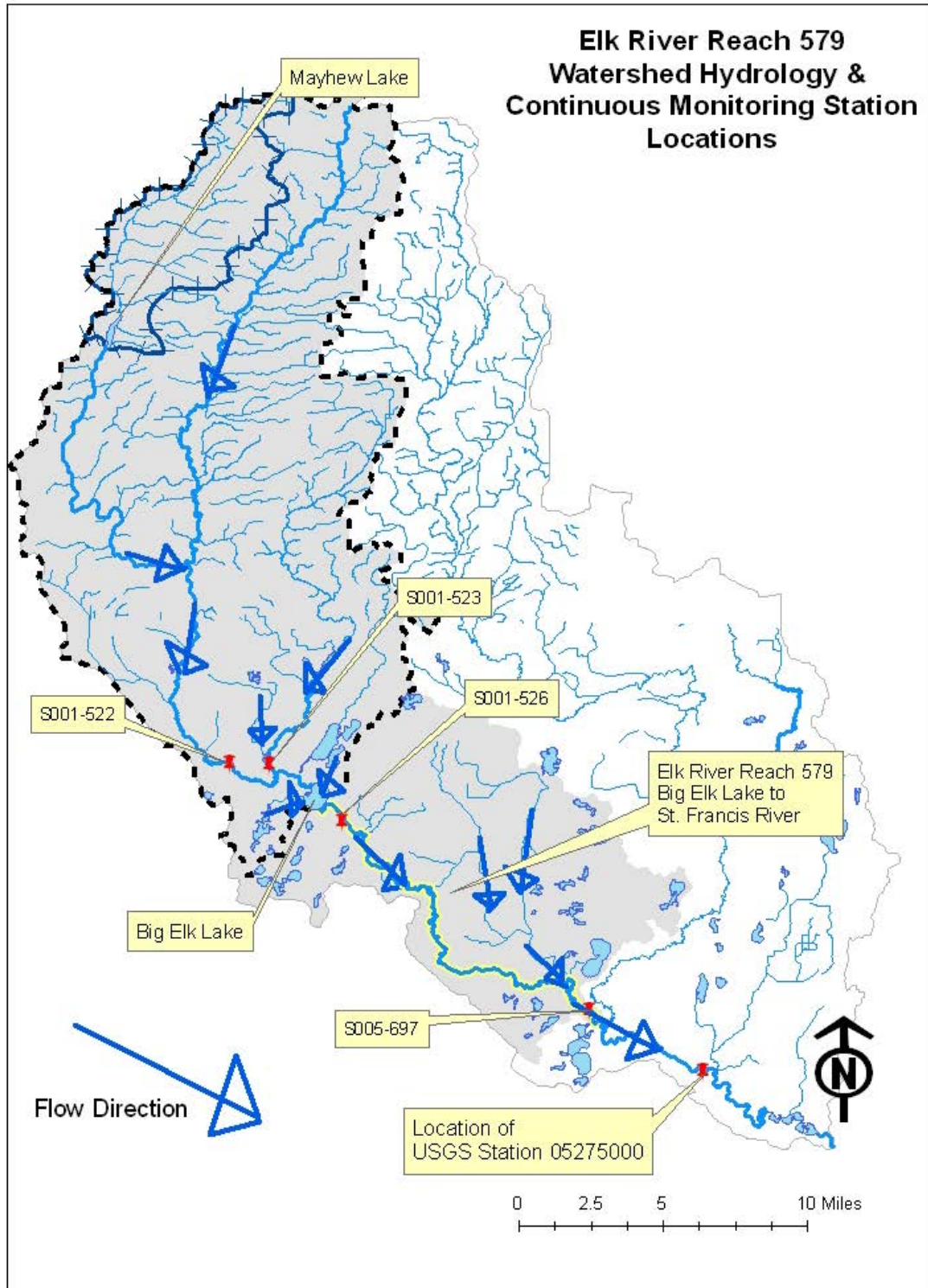
Figure 3.25. Flow duration curve.



T:\2378_ERWSA\USGS runoff_mmb.xls]20 year annual

Figure 3.26 displays the basic hydrology for surface water in the watershed and the location of the USGS station. Water also enters the system through groundwater and precipitation runoff from the surrounding watershed.

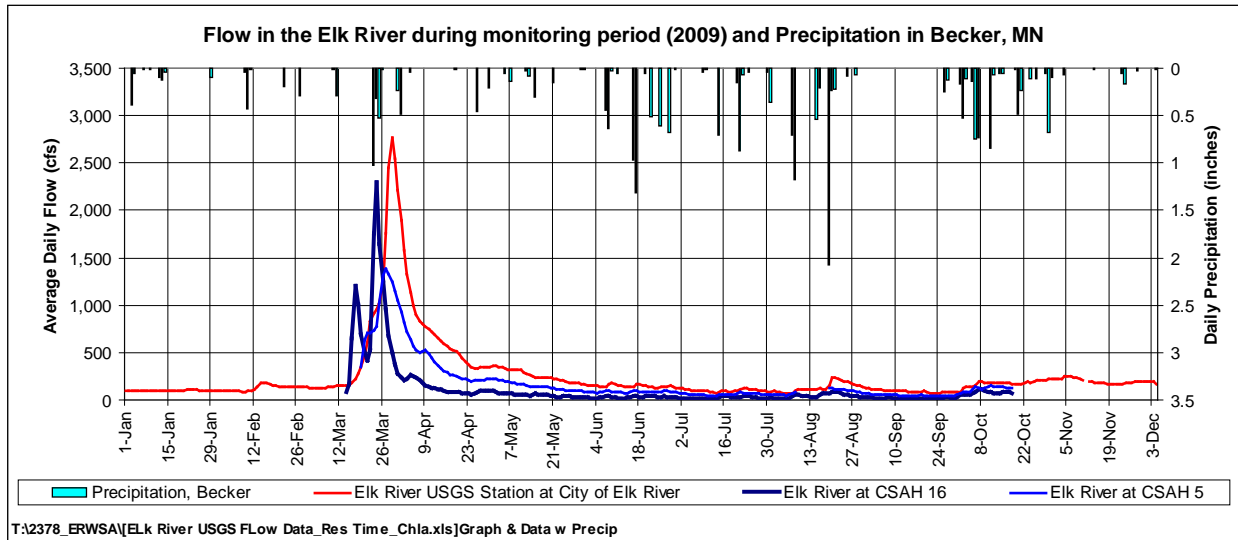
Figure 3.26. Surface water flow in Elk River reach 579 watershed.



The monitoring year 2009 was a slightly below average year with respect to watershed runoff. The hydrograph for 2009 is shown in Figure 3.27, along with precipitation and flow for the

USGS station at the City of Elk River, and the two other monitoring stations where continuous flow was measured. The peak flows in March and April are driven by spring snow melt runoff from the upper watershed.

Figure 3.27. Flow and precipitation in the watershed in 2009.



3.2.3 Recreational Uses

Mayhew Lake and Big Elk Lake provide a variety of recreational uses, including fishing and boating. Mayhew Lake has one county owned gravel public access on the southwest corner of the lake. Improvements have been made recently to the county park on the west side of the lake which offers a fishing pier and picnic area. The park is well maintained and encourages shore fishing. Big Elk Lake has one DNR owned concrete public access on the east side of the lake off of County Road 88.

3.2.4 Fish Community

Mayhew Lake

A review of the most recent fish population assessment developed by the DNR reveals that the fish community of Mayhew Lake has fluctuated over time. Mayhew Lake has produced a stable black crappie fishery but populations of species such as walleye, bluegill or northern pike have been less stable. Walleyes do not naturally reproduce within Mayhew Lake and populations have been sustained with various levels of stocking efforts overtime. The 2008 walleye catch was significantly lower than 2002 and below the management goals of the lake. Walleye fingerlings were most recently stocked in 2009. Northern pike numbers have largely decreased since the 2002 survey in which the northern pike population was larger than desirable. The 2008 northern pike population fell within the normal range for the lake class. High perch numbers were also documented in the lake and as an important prey species for both walleye and northern pike may help increase walleye and northern pike numbers. Although some perch fishing has been reported in recent years, the lake is best known for black crappie fishing. A large number

of black crappies were caught as part of the 2008 panfish assessment and the lake management goal for black crappie was met. Bluegill and sunfish were less abundant. The assessment also found a high number of black bullhead as well as some yellow bullhead. Black bullhead is more prevalent in turbid water which may be an indicator of the lake water quality.

Carp are not easily sampled by gears traditionally used for DNR population estimates, and it is common for carp to be more prevalent in a lake than is indicated by the DNR surveys. The majority of the carp in the 2002 survey were caught in trapnets which were not used in the 2008 survey. The DNR indicates that common carp have a significant presence within the lake from direct observations and electrofishing. Common carp can present significant management problems, especially in shallow, eutrophic basins such as Mayhew Lake. Carp are a long lived species, with adults reaching ages of more than 50 years in some systems. Common carp are bottom-feeders that uproot aquatic macrophytes during feeding and spawning, re-suspending bottom sediments and nutrients. These activities can lead to increased nutrients in the water column, ultimately resulting in increased nuisance algal blooms. Addressing the presence of common carp in Mayhew Lake may be an important factor when attempting to improve water quality within the lake.

Big Elk Lake

The primary management species in Big Elk Lake are northern pike and walleye. Both species were stocked frequently during the 1960s and 1970s. Walleye have not been stocked in Big Elk Lake since 1980, however the Briggs Lake Chain Association was granted a permit to privately stock in 2009. Private stocking includes fish purchased by the DNR for stocking and fish purchased and stocked by private citizens and sporting groups. The most recent DNR survey indicates that both walleyes and northern pike are successfully reproducing in the system either within the lake itself or within the Elk River. The populations of walleye and northern pike are now self-sustaining and have an adequate forage base provided by the minnow and white sucker community. The catch rate for northern pike has increased significantly since the 1999 survey and anglers can expect success for northern pike. The panfish population (bluegill, black & white crappie, pumpkinseed and yellow perch) is low, likely due to the lack of stable submerged aquatic vegetation which provides spawning habitat, feeding areas and a refuge from predators. Big Elk Lake has a significant rough fish community that includes black bullhead and common carp. Riverine fish species are also common and white sucker catch rates have been high in each of the past five fish survey years.

3.2.5 Aquatic Plants

Mayhew Lake

A 2009 plant survey conducted by MPCA and ERWSA staff showed that Mayhew Lake lacks the typical aquatic plant community expected in the vegetated portion of the lake system. The DNR lake management plan states that the greatest depth of submerged plant growth was three feet. Based on a review of the lake depth contours, this indicates the area of the lake with submerged plant growth is very limited. Additionally, livestock with access to the lake in

pastured areas have altered shoreline conditions causing a loss of emergent vegetation and some bank erosion.

Improved water clarity within the lake would likely increase the percentage of the lake with submerged plant growth. An increase in the submerged aquatic plant base in Mayhew Lake may help to consume and remove nutrients in the water column as well as provide additional habitat for fish and wildlife as long as the plant community is native and not dominated by plants shown to degrade water quality such as curly leaf pond weed.

Big Elk Lake

A review of the lake management plan developed by the DNR reveals that Big Elk Lake lacks the typical aquatic plant community expected in a shallow lake system. Vegetation surveys conducted by the DNR in 1986, 1999, and 2009 indicated that most of the basin is devoid of submerged vegetation. A low number of native submerged species are present in the lake including coontail, sago pondweed and bushy pondweed. These species were mainly limited to depths of 2 to 5 feet in the shallow bays along the north and west shores of the lake near the stream inlets. The exotic species curly leaf pondweed was also observed in both the 1986, 1999 and 2009 surveys, but its distribution across the lake is limited. It does not appear to be expanding in abundance. Emergent vegetation is sparse around the lake shore, again limited to the shallow bays and marsh areas near the stream inlets. The emergent species observed by the DNR include sedges, bulrush, arrowhead and needlerush. The lack of healthy aquatic vegetation in the basin is likely due to the high algal turbidity in the lake that limits light transparency. The basin has a long fetch, and with its overall shallow depth, the absence of a stable root system from submerged aquatic vegetation may lead to some internal loading due to wind suspension of silty, organic sediments.

3.2.6 Shoreline Habitat Conditions

The shoreline areas are defined as the areas adjacent to the lakes edge with hydrophytic vegetation and water up to 1.5 feet deep or a water table within 1.5 feet from the surface. Shoreline areas should not be confused with shoreland areas which are defined as 1,000 feet upland from the ordinary high water level (OHWL). Natural shorelines provide water quality treatment, wildlife habitat, and increased biodiversity of plants and aquatic organisms. Natural shoreline areas also provide aesthetic values and important habitat to fisheries including spawning areas and refugia.

Buffering shorelines with native vegetation provide numerous benefits to both lakeshore owners and lake users including improved water quality, increased biodiversity, important habitat for both aquatic and terrestrial animals, and stabilizing erosion resulting in reduced maintenance of the shoreline. Identifying projects where natural shoreline habitats can be restored or protected will enhance the overall lake ecosystem.

The littoral zone is defined as that portion of the lake that is less than 15 feet in depth and is where the majority of the aquatic plants are found. The littoral zone of the lake also provides the

essential spawning habitat for most warm water fishes (e.g. bass, walleye, and panfish). Mayhew Lake is 52% littoral and Big Elk Lake is 100% littoral. The definition of a shallow lake is any lake that has a maximum depth of 15 feet or less or that is 80 percent or more littoral. Based on this criterion, Big Elk Lake is considered a shallow lake while Mayhew Lake is considered a deep lake.

Tables 3.6 a and b provide a summary of shoreline conditions for each of the lakes based on the most recent surveys. Two tables are presented to account for the different classification categories used by different surveyors and different methods. No specific details about the methodologies were available. In the 2002 lake survey data for Mayhew Lake, it was noted that, with some exception, cattle have access to the water.

Table 3.6a. Shoreline characteristics, DNR surveys.

Lake Name	Mayhew Lake (2002 DNR Survey)	Big Elk Lake (2009 DNR Survey)
Forested	5%	37%
Marsh	-	28%
Residential	-	23%
Grassland	13%	8%
Pasture/Agricultural	80%	4%
County Park	2%	-

Table 3.6b. Shoreline characteristics, Minnesota Conservation Corps (MCC) survey.

Classification	Mayhew Lake (2009 MCC Survey)
Mowed/ Lawn	8%
Natural Shoreland	43%
Natural Shoreland w/Adjacent Agricultural Use Adjacent	40%
Pasture	8%

3.2.7 Stream Bank Conditions

The primary sources of sediment in streams are sediment conveyed from the landscape and soil particles detached from the streambank. The amount of sediment conveyed from the landscape will vary based on general soil erodibility, land cover, slope, and conveyances to the stream. Streambank erosion is a natural process that can be accelerated significantly as a result of change in the watershed or to the stream itself. In Elk River reach 579, stream bank erosion is a minimal contributor to the total TSS load (~1.0% - 2.4%).

The annual soil loss by mile was estimated using field collected data and a method developed by the Natural Resources Conservation Service referred to as the “NRCS Direct Volume Method,” or the “Wisconsin method,” (Wisconsin NRCS 2003). Soil loss is calculated by:

1. measuring the amount of exposed streambank in a known length of stream;
2. multiplying that by a rate of loss per year;
3. multiplying that volume by soil density to obtain the annual mass for that stream length; and then
4. converting that mass into a mass per stream mile.

The Direct Volume Method is summarized in the following equation:

$$\frac{(\text{eroding area}) (\text{lateral recession rate}) (\text{density})}{2,000 \text{ lbs/ton}} = \text{erosion in tons/year}$$

The eroding area is in square feet, the lateral recession rate is in feet/year, and density is in pounds/cubic feet (pcf). The eroding area is defined as that part of the streambank that is bare, rilled, or gullied, and showing signs of active erosion such as sloughed soil at the base. The length and width of the eroding face of the streambank is multiplied to calculate an eroded area.

The lateral recession rate is the thickness of soil eroded from a streambank face in a given year. Soil loss may occur at an even rate every year, but more often occurs unevenly as a result of large storm events, or significant land cover change in the upstream watershed. Historic aerial or other photographs, maps, construction records, or other information sources may be available to estimate the total recession over a known period of time, which can be converted into an average rate per year. However, these records are often not available, so the recession rate is estimated based on streambank characteristics that evaluate risk potential. Table 3.7 presents the categories of bank condition that are evaluated and the varying levels of condition and associated risk severity score.

Table 3.7. Bank condition severity rating.

Category	Observed Condition	Score
Bank Stability	Do not appear to be eroding	0
	Erosion evident	1
	Erosion and cracking present	2
	Slumps and clumps sloughing off	3
Bank Condition	Some bare bank, few rills, no vegetative overhang	0
	Predominantly bare, some rills, moderate vegetative overhang	1
	Bare, rills, severe vegetative overhang, exposed roots	2
	Bare, rills and gullies, severe vegetative overhang, falling trees	3
Vegetation / Cover on Banks	Predominantly perennials or rock	0
	Annuals / perennials mixed or about 40% bare	1
	Annuals or about 70% bare	2
	Predominantly bare	3
Bank / Channel Slope	V-shaped channel, sloped banks	0
	Steep V- shaped channel, near vertical banks	1
	Vertical Banks, U-shaped channel	2
	U-shaped channel, undercut banks, meandering channel	3
Channel Bottom	Channel in bedrock / non-eroding	0
	Soil bottom, gravels or cobbles, minor erosion	1
	Silt bottom, evidence of active down cutting	2
Deposition	No evidence of recent deposition	1
	Evidence of recent deposits, silt bars	0

A Cumulative Rating score of 0-4 indicates a streambank at slight risk of erosion. A score of 5-8 indicates a moderate risk, and 9 or greater a severe risk. A field survey of the Elk River reach 579 was performed in fall 2009 to catalog the condition of the stream bank. Data collected during the field survey was used to calculate the annual soil loss within the reach. The majority of stream bank in the impaired Elk River reach was identified at a moderate risk of erosion with minimal areas indicating a severe risk. There were very few areas identified with active erosion during the field survey.

The Wisconsin NRCS used its field data from streams in Wisconsin to assign a lateral recession rate for each category (Table 3.8). Professional judgment is necessary to select a reasonable rate within the category. For Elk River reach 579 it was determined that assigning a range of values was appropriate to represent the stream bank. The applicable range of lateral recession rate was determined to be 0.1 – 0.3 feet per year.

Table 3.8. Estimated annual lateral recession rates per severity risk category.

Lateral Recession Rate (ft/yr)	Category	Description
0.01 - 0.05 feet per year	Slight	Some bare bank but active erosion not readily apparent. Some rills but no vegetative overhang. No exposed tree roots.
0.06 - 0.15 feet per year	Moderate	Bank is predominantly bare with some rills and vegetative overhang. Some exposed tree roots but no slumps or slips.
0.16 - 0.3 feet per year	Severe	Bank is bare with rills and severe vegetative overhang. Many exposed tree roots and some fallen trees and slumps or slips. Some changes in cultural features such as fence corners missing and realignment of roads or trails. Channel cross section becomes U-shaped as opposed to V-shaped.
0.5+ feet per year	Very Severe	Bank is bare with gullies and severe vegetative overhang. Many fallen trees, drains and culverts eroding out and changes in cultural features as above. Massive slips or washouts common. Channel cross section is U-shaped and stream course may be meandering.

The assumed recession rate was multiplied by the total eroding area to obtain the estimated total annual volume of soil loss. To convert this soil loss to mass, soil texture or actual measured bulk dry density was used to establish a volume weight for the soil.

Using the WI NRCS method, the range of values for annual soil loss within the impaired reach was calculated to be 0.35-0.85 tons/mile or 8.06-19.66 tons/year for the 23.2 mile long reach. The annual TSS load, calculated at river mile 16.6 from the 2009 sampling data, was 827.5 tons.

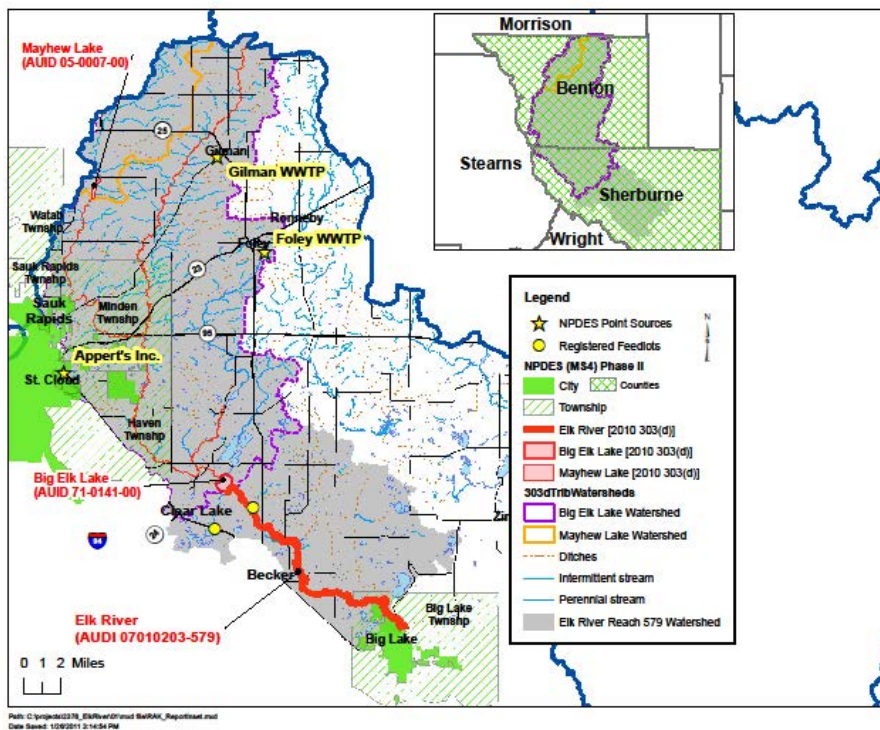
4.0 Pollutant Source Assessment

A key component to developing a TMDL is to understand the sources contributing to the impairment. This section provides a brief description of the potential sources in the watershed contributing to turbidity, *E. coli* bacteria, and excess nutrients. Both permitted and non-permitted sources are present within the watershed.

4.1 PERMITTED SOURCES

Permitted sources can include industrial effluent, municipal wastewater treatment plants, construction runoff, concentrated animal feeding operations (CAFOs) and municipal stormwater. These can each be sources of turbidity, bacteria (*E. coli* & fecal coliform), and excess nutrients. The following is an inventory of the MPCA permitted sources in the TMDL watershed. Permitted sources are shown in Figure 4.1.

Figure 4.1 Permitted sources



4.1.1 Facilities with NPDES Permits

Evaluation of point sources in the MPCA’s Environmental Data Access (EDA) website showed four National Pollutant Discharge Elimination System (NPDES) permitted wastewater treatment facilities (WWTFs) are located within the impaired reach of the Elk River. NPDES permit holders discharging to the impaired reach of the Elk River are listed below.

Table 4.1. List of NPDES permitted WWTFs in the study area.

NPDES Permit Holder Name	NPDES Permit Number	Population ¹ Served	MPCA Limits	Watershed Location
Foley WWTF	MN0023451-SD-1, -2, -3	2624	FC, TSS	Elk River Reach 579, Big Elk Lake
Gilman WWTF	MN6580021-SD-2	228	FC, TSS	Elk River Reach 579, Big Elk Lake
Becker WWTF	MN0025666-SD-1	4105	P,TSS	Elk River Reach 579
Eagle View Commons WWTF	MN0063983	102 ²	NA	Elk River Reach 579, Big Elk Lake
Appert’s Inc.	MN0052728	NA	NA	Elk River Reach 579, Big Elk Lake

FC= fecal coliform; TSS= total suspended solids; P= phosphorus

ER 579= Elk River reach 579 watershed

¹ League of MN Cities 2008

² 40 homes are served by the system, calculated from 2000 census average persons per household for Benton County

Foley WWTF is a class D facility consisting of two main lift stations and two stabilization ponds (Birch Pond and Golf Pond). Birch pond has a controlled discharge (SD001) which discharges to a marsh into Stoney Brook. Stoney Brook becomes Rice Creek prior to its confluence with the Elk River. The pond has a detention time of 180 days at designed flow and treats up to 161,000 gallons per day (gpd). According to the MPCA permit, SD001 cannot discharge flow in the months of January through March, July and August. This discharge point must meet a fecal coliform limit of 200 colony forming units (cfu) per 100 ml limit as a calendar month geometric average and a total suspended solids (TSS) limit of 45 mg/L as a calendar month average. No phosphorus limit is required although phosphorus concentrations are recorded on the facilities discharge monitoring reports (DMR).

The second stabilization pond, Golf Pond, also has a controlled discharge (SD002) into a ditch to Stoney Brook. Golf Pond is designed to treat influent up to 210,300 gpd and has a detention time of 180 days at designed flow. The primary cells of Golf pond also have a manually controlled outlet control structure (SD003) which discharges to Stoney Brook. According to the MPCA permit SD002 cannot discharge flow in the months of January through March, July and August. SD002 must meet a 200 cfu/ 100ml fecal coliform limit and a TSS limit of 45 mg/L. No phosphorus limit is required although concentrations are recorded on the facilities DMRs. SD003 is not regulated by any limits.

Gilman WWTF consists of a two cell stabilization pond. Both ponds have a detention time of 290 days at an average flow of .045 mgd. This facility treats domestic sewage and discharges to

an unnamed ditch which flows to Bailey Creek which flows to the Elk River. According to the MPCA permit, the facility must meet a 200 cfu/ 100ml fecal coliform limit, a 45 mg/L TSS limit No P limit is required although P concentrations are recorded on the facilities DMRs. Discharge is prohibited from January through March, July and August.

Becker WWTF is a Class A facility. Becker WWTF consists of two separate trains with a combined final discharge to the Elk River. One train treats water from the industrial park and the second treats domestic flow. Both trains currently use chemical application and a polymer addition for phosphorus and solids removal. Biosolids are mechanically thickened, go through a lime pasteurization process and are land applied. The Becker WWTF was designed to treat a combined average wet weather flow (AWW) of 850,000 gallons per day (GPD). The system was recently upgraded for an expanded flow which will allow it to treat an AWW flow of 2,150,000 gpd. Although the treatment capacity has increased, discharge limits remain the same and will be in effect until 2011. Effluent from the discharge has a 1 mg/L Phosphorus limit and 30 mg/L total suspended solids limit as calendar month averages based on a daily flow of 850,000 gallons. These limits are effective from January through December.

Eagle View Commons WWTF is a Class C facility consisting of a gravity sewer system that discharges to one lift station, a cast in place tank constructed with three compartments in series with a total tank capacity of 38,779 gallons. One compartment is sized at 19,389 gallons and the other two compartments are sized at 9,695 gallons each. A splitter manhole splits flow between two lined subsurface flow-forced aeration wetland treatment cells measuring 10,000 square feet each, and a dosing manhole with a dosing siphon periodically discharges wastewater to one 15,600 square foot unlined wetland that acts as an infiltration bed. This WWTF is designed to serve 40 homes; four bedroom homes with a contribution of 250 gallons per day (gpd) per home. The wetland treatment system has an average annual design flow of 10,000 gpd and a peak daily flow of 16,667 gpd. No commercial or industrial facilities are proposed to be served by the wastewater treatment system. Given the nature of land application systems, no numeric individual waste load allocation (WLA) is necessary.

Appert's Inc. is a food service processor and distributor located in the NW 1/4 of NW 1/4 of Section 6, Township 35 North, Range 30 West, in the city of St. Cloud, Haven Township, Sherburne County, Minnesota. NPDES permit number MN0052728 authorizes the discharge of cooling water with a number of chemical additives is discharged from two outfalls (SD001 and SD002) to an abandoned gravel pit located on the property. The average discharge flow rate for this cooling water is 5,000 gallons per day, (0.005 mgd) with a maximum rate of 9,800 gallons per day, (0.0098 mgd). One of the chemical additives approved for use at the facility contains phosphorus.

The wetland/abandoned gravel pit that receives Appert's discharge is hydrologically isolated from the impaired waters and therefore the facility does not cause or contribute to the impairments. In the event that the discharge should later be connected to the larger watershed, the permit should be modified to limit or prohibit the use of phosphate bearing additives. No numeric individual wasteload allocation is necessary.

Impairment Contribution: *E. coli*, excess nutrients, turbidity

4.1.2 MS4s

An evaluation of permit holders also revealed NPDES Phase II permits for small municipal separate storm sewer systems (MS4s). These MS4s are covered under General Permit MNR040000. The preferred ID numbers assigned to these permit holders are as follows:

Table 4.2. List of NPDES Phase II stormwater permit holders in the TMDL study area.

NPDES Phase II Permit Holder Name	MS4 Preferred ID	Watershed Location (ER 579= Elk River Reach 579, BEL= Big Elk Lake)
Sherburne County	MS4400155	ER 579, BEL
Big lake Township	MS4400234	ER 579
City of Big Lake	MS4400249	ER 579
Benton County	MS4400067	ER 579, BEL
Sauk Rapids City	MS4400118	ER 579, BEL
Sauk Rapids Township	MS4400153	ER 579, BEL
St. Cloud City	MS4400052	ER 579, BEL
MNDOT Outstate District	MS4400180	ER 579, BEL
Haven Township	MS4400136	ER 579, BEL
Minden Township	MS400147	ER 579, BEL
Minnesota Correctional-St Cloud MS4	MS400179	ER 579, BEL
Watab Township MS4	MS400161	ER 579, BEL

Impairment Contribution: *E. coli*, excess nutrients, turbidity

4.1.3 Construction, Industrial and MNG49 Sand and Gravel Permits

The MPCA issues construction permits for any construction activities disturbing: 1) One acre or more of soil, 2) Less than one acre of soil if that activity is part of a “larger common plan of development or sale” that is greater than one acre or 3) Less than one acre of soil, but the MPCA determines that the activity poses a risk to water resources. The Environmental Protection Agency (EPA) estimates a soil loss of 20 to 150 tons per acre per year from stormwater runoff at construction sites. Such sites vary in the number of acres they disturb.

The Industrial Stormwater General Permit applies to facilities with Standard Industrial Classification Codes in ten categories of industrial activity with significant materials and activities exposed to stormwater. Significant materials include any material handled, used, processed, or generated that when exposed to stormwater may leak, leach, or decompose and be carried offsite. The NPDES Stormwater Program requires that the industrial facility obtain a permit and create a Stormwater Prevention Pollution Plan (SWPPP) for the site outlining the structural and/or non-structural best management practices used to manage stormwater and the site’s Spill Prevention Control and Countermeasure Plan. An annual report is generated documenting the implementation of the SWPPP.

The categorical WLA also includes several sand and gravel mines (MNG49) located within the watershed which are covered under the general permit.

Impairment contribution: excess nutrients, turbidity

4.1.4 Livestock Facilities with NPDES Permits

A Confined Animal Feeding Operation (CAFO) is a feedlot having 1,000 or more animal units, or a smaller feedlot with a direct man-made conveyance to surface water. A feedlot designated as a CAFO is required to operate in accordance with a NPDES permit. According to the MPCA Feedlot database there are two CAFOs located in the Sherburne County portion of Elk River reach 579 watershed. The CAFOs represent a total of 1,456 animal units (AU) comprised of 1060 beef and 396 poultry AUs.

Table 4.3: List of CAFO NPDES permit holders in the TMDL study area

CAFO NPDES Permit Holder	Permit Number	AU's	Watershed Location
Goenner Poultry LLC	MNG441109	396	ER 579
Eiler Bros.	MNG440909	1060	ER 579

Impairment contribution: excess nutrients, *E. coli*, turbidity

4.2 NON-PERMITTED SOURCES

Below is an inventory of the non-point sources in the Elk River watershed that have been identified as potential sources of nutrients, *E. coli*, or turbidity.

The turbidity impairment in Elk River reach 579 has been identified to be the result of algal blooms caused by excess nutrients from Big Elk Lake. Big Elk Lake is addressed in this TMDL for Excess Nutrients (phosphorus) and reductions in nutrient loading to the lake will result in turbidity reductions in Elk River reach 579. As such, many of the sources of excess nutrients identified below are also listed as sources of turbidity.

4.2.1 Atmospheric Deposition

The atmosphere delivers phosphorus to water and land surfaces both in precipitation and dryfall (dust particles that are suspended by winds and later deposited). Such atmospheric inputs must be accounted for in development of a nutrient budget, though they are generally very small direct inputs to the lake and are impossible to control.

Impairment contribution: Excess nutrients, turbidity

4.2.2 Internal Phosphorus Release

Phosphorus accumulated in the lake sediments released under specific conditions is called internal loading. Internal loading can result from sediment anoxia where poorly bound phosphorus is released into the water column in a form readily available for phytoplankton production. The build up of phosphorus in lake-bottom sediments increases due to increased phosphorus loading from the watershed. Internal loading can also result from sediment re-suspension that may result from rough fish activity or prop wash from boat activity. Additionally, curly leaf pondweed can increase internal loading because it senesces and releases phosphorus during the summer growing season (late June to early July).

In-lake nutrient cycling is an important component of the whole-lake nutrient budget. Internal phosphorus release was first modeled, and then measured to validate the models. The 2009 data collection quantified watershed loads, these measured watershed loads, in-lake water quality, and periods of anoxia were used in combination with the Canfield-Bachmann lake response model to back-calculate sediment release rates. To validate the models, the sediment release rates were directly measured at Eau Galle Laboratories from lake cores collected in early 2010. The measured values validated the modeled results, indicating a high level of confidence in measured watershed loads, and lake water quality.

Impairment contribution: Excess nutrients, turbidity

4.2.3 Groundwater

Groundwater can be a source or sink for water in a lake and contains varying levels of phosphorus. Therefore groundwater can contribute phosphorus and effect the hydraulic residence time of lakes. In the case of Mayhew and Big Elk Lakes, groundwater was determined to be recharging both lakes, and therefore constitute a source of water and phosphorus.

Groundwater contributions to the water and phosphorus budget of each lake were determined through direct measurement of the surficial water budget: Inflow and outflow volumes were measured in 2009. The surface expression of groundwater for each lake was determined to be the difference between the outflow and the sum of the inflows. To validate these measured values, the long term baseflow data for the Elk River at the City of Elk River were evaluated along with the regional hydrologic atlas, and published values for groundwater characteristics in the area.

Impairment contribution: Excess nutrients, turbidity

4.2.4 Subsurface Sewage Treatment Systems (SSTS)

The homes riparian to Big Elk Lake, Mayhew Lake and the Elk River are almost exclusively served by SSTS, as are several areas of the watershed. Failing SSTS can be a significant source of phosphorus to surface waters. Based on records obtained by Sherburne County we can estimate that on average, 25 percent of the SSTS in the County may be failing (pers. communication between T. Determan and Nancy Riddle 2010). A 1991 Septic Leachate survey conducted on Big Elk Lake and the Briggs Chain of Lakes concluded that of the 504 residential units around the lakeshores, 10 percent exhibited indications of insufficiently treated septic leachate (Water Research & Management, Inc.). There are five homes with SSTS located on the lakeshore of Mayhew Lake. Benton County staff indicates that, on average, 30 percent of the SSTS in the County are failing (T. Determan pers. communication with Charles Nelson 2010).

In addition to phosphorus, *E. coli* from humans can reach surface water through the pathways of SSTS. Failing or nonconforming SSTS can be a source of *E. coli* bacteria, especially during dry periods when these sources continue to discharge and runoff driven sources are not active. Poorly treated effluent can contain elevated concentrations of *E. coli* and is considered a threat to

public health. Estimates from the Counties, past research conducted by Water Research and Management, Inc. (October 1991) and conservative estimates were used to approximate the external load that can be attributed to failing SSTS.

Impairment contribution: Excess nutrients, turbidity, *E. coli*

4.2.5 Straight-pipe Septic Systems

Straight pipe septic systems are septic systems that deposit untreated raw sewage directly to rivers, lakes, drain tiles or ditches. For comparison, a properly functioning SSTS treats sewage with chemical, physical and biological processes using a septic tank and a soil treatment system. Straight-pipe septic systems are illegal and unpermitted, but are likely to exist in the watershed.

Impairment contribution: Excess nutrients, turbidity, *E. coli*

4.2.6 Rural and Urban Residential runoff

Runoff from the residential and urban riparian areas, lake shore property, and other areas of the watershed not covered under an MS4 Permit can be a major source of phosphorus, turbidity and *E. coli* loading to surface water. Lakeshore homes and other residential areas have the potential to transport materials such as grass clippings, leaves, car wash wastewater and animal waste to surface water. All of these materials contain phosphorus and bacteria which can impair local water quality. Lake shore property around Big Elk Lake and several lakes located upstream from the lake have dense residential populations.

Untreated urban stormwater has demonstrated indicator bacteria (fecal coliform, *E. coli*) concentrations as high as, or higher than grazed pasture runoff, cropland runoff, and feedlot runoff (USEPA 2001, Bannerman et al. 1993, 1996). There is relatively little urban area in the portion of the Elk River watershed listed for bacteria impairment, with urban and developed lands comprising approximately 7 percent of the total area. Consequently, urban stormwater is a relatively small proportion of the bacterial load in this watershed.

Impairment contribution: Excess nutrients, turbidity, *E. coli*

4.2.7 Non-permitted CAFO Livestock Facilities and Riparian Pastures

Runoff from traditional and non-traditional livestock feedlots, pastures and land application of manure have the potential to be significant sources of nutrients and *E. coli*.

There are numerous small to medium sized feedlots and riparian pastures scattered throughout the watershed which offer opportunities for manure to enter surface water directly; however, there is considerable variation in the type and density of livestock facilities across the watershed. The feedlot density is the highest in the upper portion of the watershed where Benton County is listed as having the highest density of broiler chickens and the 5th highest density of dairy cows in the state. To that point, runoff from feedlots may be a significant source of phosphorus and *E. coli* contamination during periods of heavy precipitation. However, many small sized livestock

operations have riparian pastures which lead to opportunities for manure to enter surface water directly during dry periods.

The MPCA registered feedlot data base lists 188 feedlots and approximately 29,330 AUs in the Elk River 579 watershed. The registered feedlots are mainly composed of dairy, beef and chicken. Other animals include horse, sheep, and swine. It is important to note that based on field observations and reports by SWCD staff, that registered feedlots comprise only a small percentage of total feedlots in Benton and Sherburne Counties.

Impairment contribution: Excess nutrients, turbidity, *E. coli*

4.2.8 Agricultural Land Use

A high percentage of the land use in the watershed is agricultural consisting of row crops (corn, soybeans and small grains) and hay. Manure application on row crops and the type of manure application (surface vs. incorporated) of manure can contribute to *E. coli* in waterways. In areas where surface manure is applied to crop fields, open tile inlets can serve as a transport mechanism to deliver bacteria to the Elk River and its tributaries.

Manure from animal feedlots including poultry, hog and dairy producers is applied to the landscape through one of two methods, surface application or liquid incorporation. Large hog or dairy feedlot operations typically have a liquid manure pit and these operations use liquid incorporation to apply manure. Small to medium sized beef, dairy and hog operations apply manure, typically starting in mid to late fall after harvesting is complete with surface manure applications continuing through the winter. Surface applied manure is worked into the soil with agriculture tillage equipment, which may take place immediately after application but may be delayed until the spring immediately prior to planting.

A recent survey of 187 soil test results in Benton County revealed that 93% of soil phosphorus tests conducted were greater than 21 ppm, the threshold where the MPCA begins to regulate land application of manure. A survey of 50 poultry manure tests and 30 manure spreader calibrations shows that on average, phosphorus is being applied at 604 pounds per acre with rates as high as 1,479 pounds per acre.

For Benton County, the combination of long, moderately steep slopes, easily erodible sandy loam soil that is inherently high in phosphorus, a high density of feedlots, and predominately agricultural land use in riparian areas leads to an extremely high potential to introduce large amounts of phosphorus, sediment, and bacteria to surface waters. Comparatively, soil types and flatter slopes mean overall slightly less risk of erosion in Sherburne County.

Impairment contribution: Excess nutrients, turbidity, *E. coli*

4.2.9 Wildlife

Natural background loads for *E. coli* bacteria can be attributed to wildlife. The focus of this assessment was on deer and geese because they are known contributors of *E. coli* bacteria and are considered a good estimate of wildlife densities in general.

Wildlife populations were estimated utilizing past research and knowledge of the Department of Natural Resources. Deer populations in the Elk River Watershed are estimated to be 15-20 deer per square mile. Goose densities were estimated based on Metro area estimates and were reduced to half of those estimates based on MN DNR input (Fred Bengston pers. comm.).

Table 4.4: Deer and goose population estimates.

Wildlife	Density (per sq mile)	Population (est.)
Deer	15-20	5025-6700
Geese	1.4	469

Impairment contribution: *E. coli*

4.2.10 In-Stream sources

In-stream erosion sources (stream banks and bed) result from the instability of the stream channel. Channel instability can result from overgrazing and/or high or flashy flow events. The slope of the bank, amount of moisture in the soil, and the cohesiveness of the material all play a role in bank failure. A substantial portion of the sediment derived from banks and beds may have originally come from upland soil eroded years earlier and deposited in riparian areas.

Impairment contribution: Turbidity

5.0 Loading Capacity

5.1 MODELING APPROACH

5.1.1 Lake Nutrients

Lake response to nutrient loading was modeled using the BATHTUB suite of models and a significant data set available for the impaired waters and their tributary watershed. BATHTUB is a series of empirical eutrophication models that predict the response to phosphorus inputs for morphological complex lakes and reservoirs (Army Corps of Engineers, 2009). Several models (subroutines) are available for use within the BATHTUB model. The Canfield Bachman model within BATHTUB was used to predict the response of the lakes described herein to total phosphorus loads and load reductions. The Canfield-Bachmann model was developed using data collected from 704 natural lakes to best describe the lake phosphorus sedimentation rate which is needed to predict the relationship between in-lake phosphorus concentrations and phosphorus load inputs. The phosphorus sedimentation rate is an estimate of net phosphorus loss from the water column through sedimentation to the lake bottom. The phosphorus sedimentation rate is used in concert with lake-specific characteristics such as annual phosphorus loading, mean depth, and hydraulic flushing rate to predict in-lake concentrations of phosphorus as they relate to phosphorus loading. These model predictions are compared to measured data to evaluate how well the model describes the lake system.

In establishing the numeric eutrophication standards for lakes, shallow lakes and reservoirs, Minnesota documented the well-established link between high total phosphorus concentrations to both high chlorophyll-a concentrations and low secchi depth (MPCA 2007, SONOR Book 2). Figure 2.1, taken from the MPCA web site presents the relationship between Secchi depth, Chlorophyll-a and phosphorus for Minnesota Lakes. This relationship is widely documented by others as well (Heiskary and Walker, 1988, Heiskary and Wilson, 2005). Achieving the total phosphorus goals for Big Elk Lake will result in the lake meeting the corresponding water quality standards for chlorophyll-a and Secchi disk transparency. Because the nutrient impairment in Big Elk Lake is driving the turbidity impairment in the Elk River downstream of Big Elk Lake, the nutrient TMDL is also used as the surrogate for achieving the turbidity TMDL as well. This is discussed in Section 5 of this report.

As stated above, a significant set of data was available historically for these impaired lakes and their tributary watersheds. Further, data gaps were identified during Phase I of the project and additional data was collected during 2009 as documented in Section 3 of this report.

The modeling conducted for these TMDLs relied on

- Measured in-lake water quality,
- Measured hydrology,

- Measured watershed phosphorus runoff and loadings
- watershed specific land use,
- lake morphometry, and
- measured internal lake nutrient cycling

Due to the fact that each of the phosphorus loads were quantified using measured data, the models fit well compared to annual average lake water quality data, and so no calibration factors were used. In addition to the large dataset of measured input values, three years of measured in-lake water quality were used for calibration and validation for Big Elk Lake and five years of data was used for calibration/validation of the Mayhew Lake model. Additional presentations of data collected and evaluated for this project was presented in the Phase I and Phase II reports. Results are also contained in the lake model appendices.

The differences between observed and model-predicted average in-lake concentrations were generally within the reported standard deviations for annual average TP for a given year providing a robust calibration.

5.1.2 Turbidity

The upstream end of the listed reach of the Elk River is Big Elk Lake. Water quality in Big Elk Lake directly impacts water quality in the Elk River. The sources of turbidity to the Elk River include

- Algal and non-algal turbidity in Big Elk Lake which encompasses the nutrient and turbidity sources in the upper watershed
- In-stream sources of turbidity from the listed reach of the Elk River itself
- Watershed based sources of turbidity downstream of the Big Elk Lake which include agricultural and urban land uses.

The different types of sources are driven by different things, and represent themselves differently in terms of their water quality constituents. In the case of this impairment, algal turbidity and non-algal turbidity have been partitioned to best represent the appropriate surrogates for the TMDL, and the resulting implementation required. Two surrogates were used:

1. Nutrients in Big Elk Lake are the surrogate for algal turbidity in the Elk River. The VSS load duration curve analysis, water quality and flow data analysis and modeling conducted for the Big Elk Lake nutrient TMDL and the turbidity TMDL for the Elk River showed that the nutrients in Big Elk Lake were the driver of the turbidity impairment. Meeting the nutrient TMDL in Big Elk Lake will result in Elk River meeting the state standard for turbidity. In fact, meeting the nutrient TMDL was more conservative than setting separate nutrient criteria for the upper watershed to achieve the nutrient criteria (and resulting VSS/ chlorophyll-a concentrations) in Big Elk Lake.
2. The non- algal turbidity was set using the non-algal component of TSS as the surrogate (TSS minus VSS).

To correlate water quality in Big Elk Lake to the impaired reach, an in-stream VSS surrogate concentration equivalent to the 25 NTU State standard was calculated in accordance with the TMDL Protocol (March 2007). The in-stream VSS surrogate for the state standard is 13.4 µg/L. However, rather than setting a numerical TMDL utilizing this equivalent concentration, the direct relationship between in-lake and in-stream water quality was used to demonstrate that achieving the 60 µg/l total phosphorus concentration needed to meet the nutrient TMDL for Big Elk Lake (and subsequent reductions in chlorophyll-a and VSS concentrations in the outflow of the lake which is the upstream end of the impaired reach) will result in turbidity readings below the 25 NTU standard within the impaired river reach.

A separate TMDL is also needed to allocate loads to non-algal sources of turbidity primarily downstream of Big Elk Lake. Though data show these sources are small, and not driving the impairment, they are none the less sources of turbidity and must receive an allocation under this TMDL. This is discussed in more detail in Section 5.3.2.1 of this report.

5.1.3 Bacteria

The TMDL was set using the load duration approach in accordance with the TMDL Protocols (MPCA 2009). The flow duration curves were developed using flow data from the USGS permanent flow gauging station located just downstream of the impaired reach at river mile 9.5 and flow measured upstream in 2009 for the project. These data were used in conjunction with the *E. coli* standard to develop the TMDL. Monthly mean flows were used to develop a load duration curve.

Flow duration curves were developed from data collected in 2009 at the continuous flow monitoring stations at ER 37.3 and ER 16.6 and compared to a 2009 flow duration curve developed from the USGS station. The USGS station provided statistically significant range of flow conditions. Data collected at all three stations in 2009 were correlated. This correlation was used to develop the flow duration curves for the stations within the listed reach.

The load duration curve approach begins by ranking all of the recorded flows over time to determine a percentage of the time specific flow levels are exceeded. These flow values are then multiplied by the State standard for *E. coli*, of 126 org/100 ml, to determine the allowable bacteria load across all flow regimes. The allowable loads are calculated as the total number of organisms/month of *E. coli* bacteria that can be delivered to the river that will result in a concentration meeting the State standard. The calculated monthly loads are plotted as a continuous curve on a logarithmic scale which displays the bacteria load at the state standard across all flow regimes.

5.1.3.1 *E. coli* Available for Runoff

The *E. coli* produced in the watershed was divided into several source areas. It is important to note that this process assumes that all *E. coli* produced in the watershed, remains in the watershed. The estimated amount of *E. coli* potentially available each month for runoff is shown in Table 5.1. The daily production estimates for each animal unit or individual were based on

literature values for fecal coliform (MPCA 2002) which were converted to be expressed in terms of *E. coli*.

Table 5.1. Estimated monthly *E. coli* bacteria available during runoff events.

Category	Source	Animal Units or Individuals in Subwatershed	<i>E. coli</i> Organisms Produced Per Unit Per Month (10 ⁹)*	Total <i>E. coli</i> Available (10 ⁹)	Total <i>E. coli</i> Available by Source (10 ⁹)	Percent by Source
Livestock	Riparian Livestock	8,732.3 Dairy AUs	1379.85	12,049,275	29,367,055	58.2%
		5,461.3 Beef AUs	2491.40	13,606,272		
		1,539 Swine AUs	1533.17	2,359,546		
		222 Horse AUs	8.05	1,787		
		2,072.1 Chicken AUs	651.60	1,350,176		
	Surface Applied Manure	4,924.9 Dairy AUs	1379.85	6,795,629	19,335,729	38.3%
		3,957.1 Beef AUs	2491.40	9,858,711		
		1,279 Swine AUs	1533.17	1,960,922		
		32 Horse AUs	8.05	258		
		1,105.3 Chicken AUs	651.60	720,210		
Human	Failing Septic Systems and Unsewered Communities	16,889 people	38.35	647,342	647,342	1.3%
Wildlife	Deer	5,869 deer	9.59	56,239	112,571	0.2%
	Geese	470 geese	0.20	94		
	Other Wildlife	Equivalent of Deer	9.59	56,239		
Urban Stormwater	Improperly Managed Pet Waste	10,250 dogs and cats	95.89	984,211	984,211	2.0%
Total					50,446,909	100%

* Derived from literature values in Mulla et. Al (2001), USEPA (2001), and Alderisio and DeLuca (1999)

Developing the delivery potential for each quantified source to reach surface waters is based on assigning risk values on a scale of 1-5 (1= very low risk and 5 = very high risk). These assumptions are divided into wet weather conditions and dry weather conditions to differentiate between those sources that are precipitation driven versus those which are not dependent on precipitation. The dry weather sources are septic systems, riparian livestock in pastures with direct access to the streams, and wildlife. Surface applied manure has been excluded as a dry weather source of bacteria in other TMDL studies. However, based on the agricultural conditions in the Elk River watershed it was determined that surface applied manure is assigned a very low delivery potential in dry weather conditions, and a low estimated delivery potential in wet weather relative to other sources.

Seasonality was accounted for in the amount available for wash off due to seasonal differences in application practices. Septic system delivery potential was not doubled here to reflect some of the variability in assessing failing septic systems. Some septic systems are considered failing due to interaction with the water table, but may not have a direct connection to surface waters,

depending on their proximity. The delivery potential remains high though where drain tiling is present.

Table 5.2. *E. coli* delivery potential.

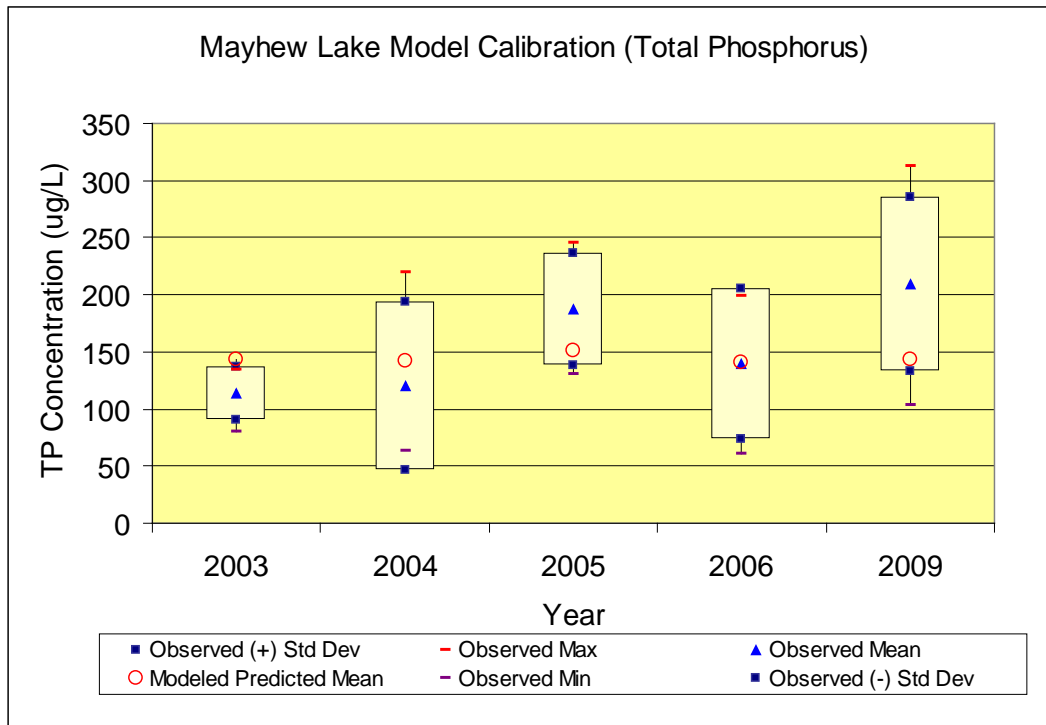
Source	Estimated Delivery Potential	
	Wet Conditions	Dry Conditions
Riparian Livestock	Very High	High
Surface Applied Manure	Low	Very Low
Failing Septic Systems	Moderate	Moderate
Unsewered Communities	Very Low	Very Low
Deer	Very Low	Very Low
Geese	Moderate	Moderate
Other Wildlife	Very Low	Very Low
Urban Stormwater Runoff	Moderate	N/A

5.2 MODEL CALIBRATION/VALIDATION RESULTS

5.2.1 Mayhew Lake Model

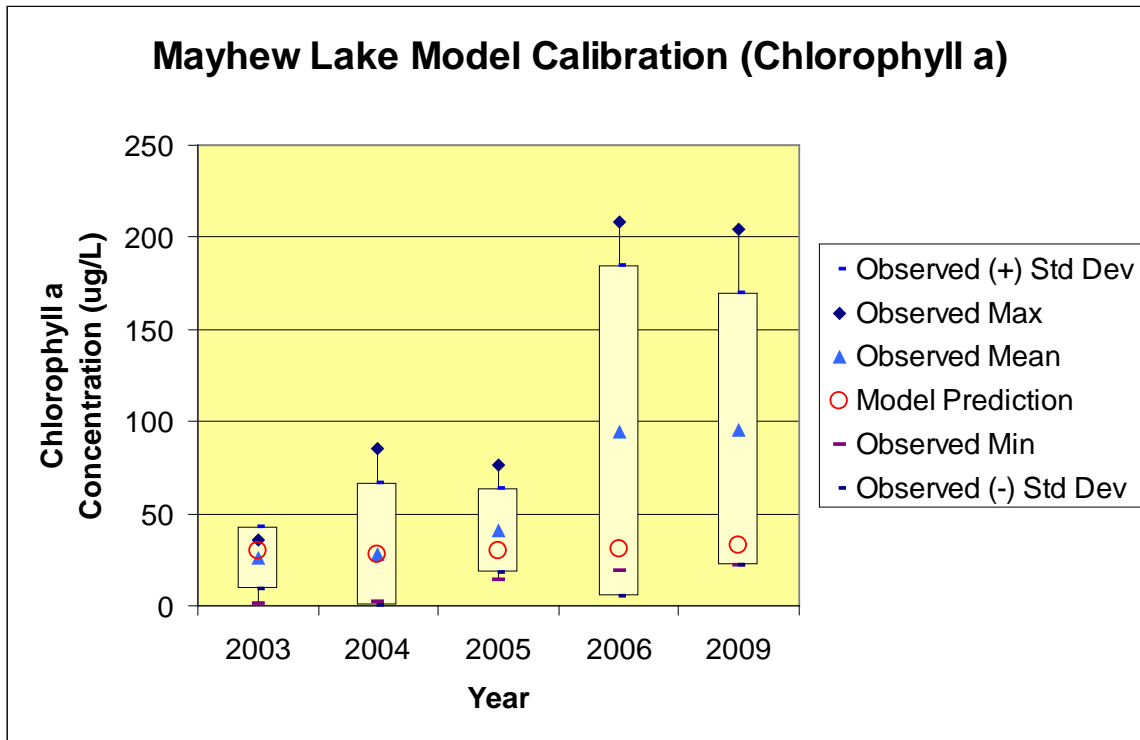
Water quality data was available for 2003-2006 and 2009. Each year was modeled utilizing the methods described in the previous section. The calibration of the modeling to recorded total phosphorous concentrations is presented in Figure 5.1. The calibration of the models to recorded chlorophyll-a concentrations is portrayed in Figure 5.2.

Figure 5.1. Mayhew Lake model calibration (total phosphorus).



T:\2378_ERWSA\Lake Response Model\LRM Mayhew_mmb Calib 1.xls]TP Calibration Chart

Figure 5.2. Mayhew Lake model calibration (chlorophyll-a).

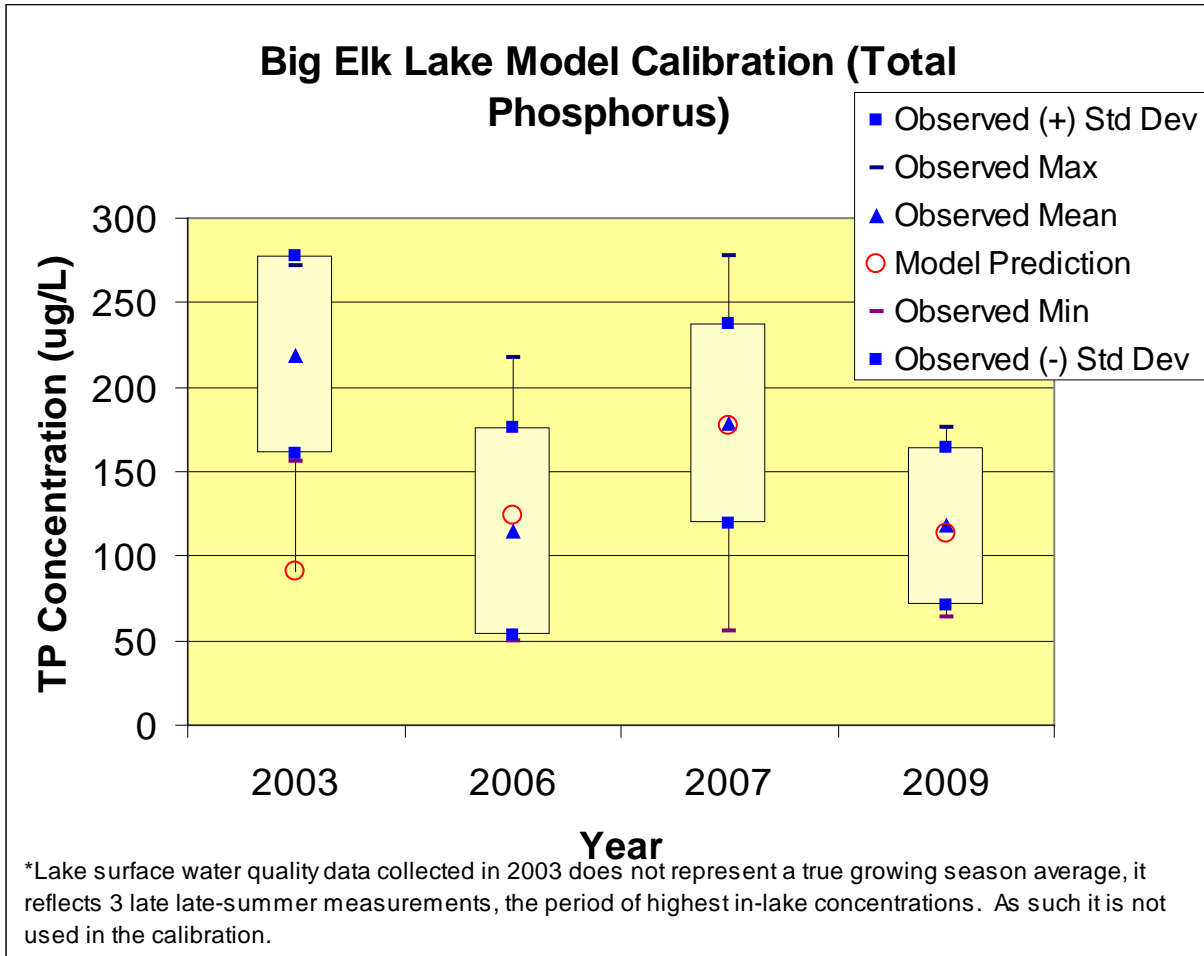


T:\2378_ERWSA\Lake Response Model\LRM Mayhew_mmb Calib 1.xls]Chl-a Calibration Chart

5.2.2 Big Elk Lake Nutrient TMDL

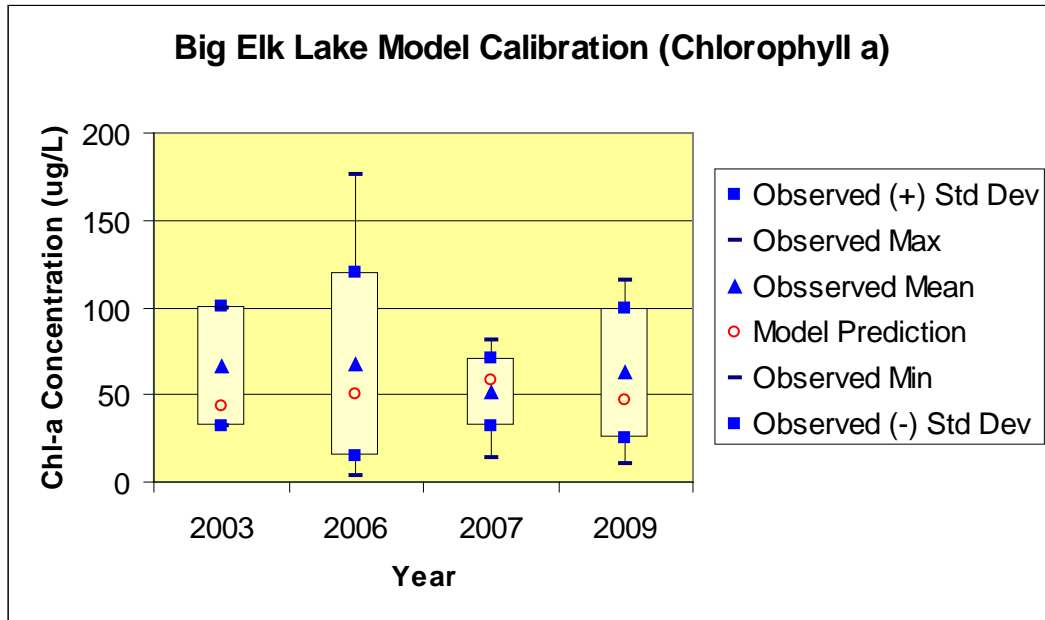
Water quality data was available for 2003, 2006, 2007 and 2009. However, 2003 data was not used for the model calibration because only three samples were collected during late summer. Each year was modeled utilizing the methods described in the previous section. The calibration of the modeling to recorded total phosphorous concentrations is presented in Figure 5.3. The calibration of the models to recorded chlorophyll-a concentrations is portrayed in Figure 5.4.

Figure 5.3. Big Elk Lake model calibration (total phosphorus).



T:\2378_ERWSA\Lake Response Model\[Seasonal LRM Big elk Lake_mmb Calib 3.xls]TP Calibration Chart

Figure 5.4. Mayhew Lake model calibration (chlorophyll-a).



T:\2378_ERWSA\Lake Response Model\[Seasonal LRM Big elk Lake_mmb Calib 3.xls]Chl-a modeling

5.2.3 Elk River Reach 579 Turbidity TMDL

As previously discussed, achieving the endpoint of the Big Elk Lake nutrient TMDL will improve water clarity in the impaired reach. The following series of figures (Figures 5.5 – 5.7) provides additional supporting data that achieving the Big Elk Lake nutrient TMDL will meet the requirements for restoring the turbidity impairment.

5.2.3.1 Selection of the Turbidity Surrogates

Data analysis to select turbidity surrogates was conducted in accordance with the Turbidity TMDL Protocols and Submittal Requirements (MPCA 2007). This section documents selection of the turbidity surrogate.

Water quality data and field observations indicate that the nutrient impairment in Big Elk Lake was the driver of the turbidity impairment in the Elk River downstream of Big Elk Lake (Table 5.3). Upstream of Big Elk Lake, only 4 % of turbidity tube measurements indicate a violation of the standard, compared with 40% downstream measurements. Field staff observed that flows from the Elk River entering Big Elk Lake are clear and low in turbidity, yet the outflow from Big Elk Lake shows a significant increase in algal turbidity.

Table 5.3. Summary of historical transparency tube readings for the Elk River upstream of Big Elk Lake and within the listed reach (transparency tube measurements of less than 20 cm indicate a violation of standard)

Sample Location	Number of samples (n)	Meets Standard		Violates standard	
		n > 20 cm	% > 20 cm	n < 20 cm	% < 20 cm
Upstream of Big Elk Lake	391	376	96%	15	4%
Listed Reach of Elk River	396	239	60%	157	40%

Further, TP concentrations upstream of Big Elk Lake are not significantly different from TP concentrations downstream of Big Elk Lake. In 2009, average TP concentration was 100 ug/L upstream of Big Elk Lake and 115 ug/L downstream of Big Elk Lake.

The lack of observed turbidity (algal or watershed source) upstream of Big Elk Lake, combined with a field investigation of in-stream sources of turbidity (discussed in section 3.2.7 of this report) indicate that the source of the turbidity is the nutrient impairment in Big Elk Lake. Further, if the driver of the turbidity was solely the TP concentrations, one would expect that the upstream reach would also be impaired for algal turbidity.

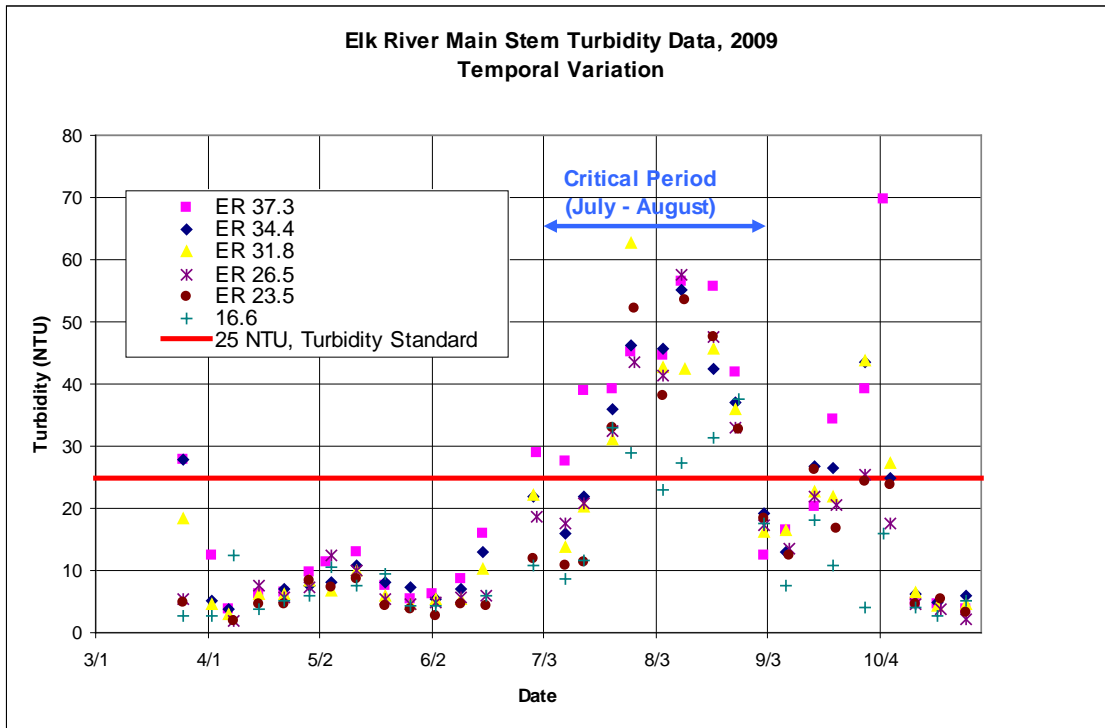
Big Elk Lake is a hyper-eutrophic shallow lake with total phosphorus and chlorophyll-a concentrations well above the state water quality standards. Big Elk Lake water clarity measured by Secchi depth also violates state standards and is typically 0.5 meters or less. Variation of turbidity, transparency, and VSS along the length of the Elk River illustrates the influence Big Elk Lake has on the water clarity within the Elk River (Figures 3.13 through 3.15). Further, seasonal variations of the 2009 turbidity, VSS and chlorophyll-a correlate with growing season algal blooms in Big Elk Lake (Figures 5.5- 5.7).

These data indicate that nutrient sources in tributary to Big Elk Lake, coupled with the lake dynamics are the driving factor in the turbidity impairment in the Elk River downstream of Big Elk Lake. Data and observations also indicate that algae thrive in the listed reach of the Elk River.

Given that the lake nutrient impairment is also driving a turbidity impairment, one must determine if meeting the lake nutrient standard will result in a sufficient improvement in downstream water quality to meet the turbidity standard. To that end, the analysis of in-stream data was conducted to determine the surrogate.

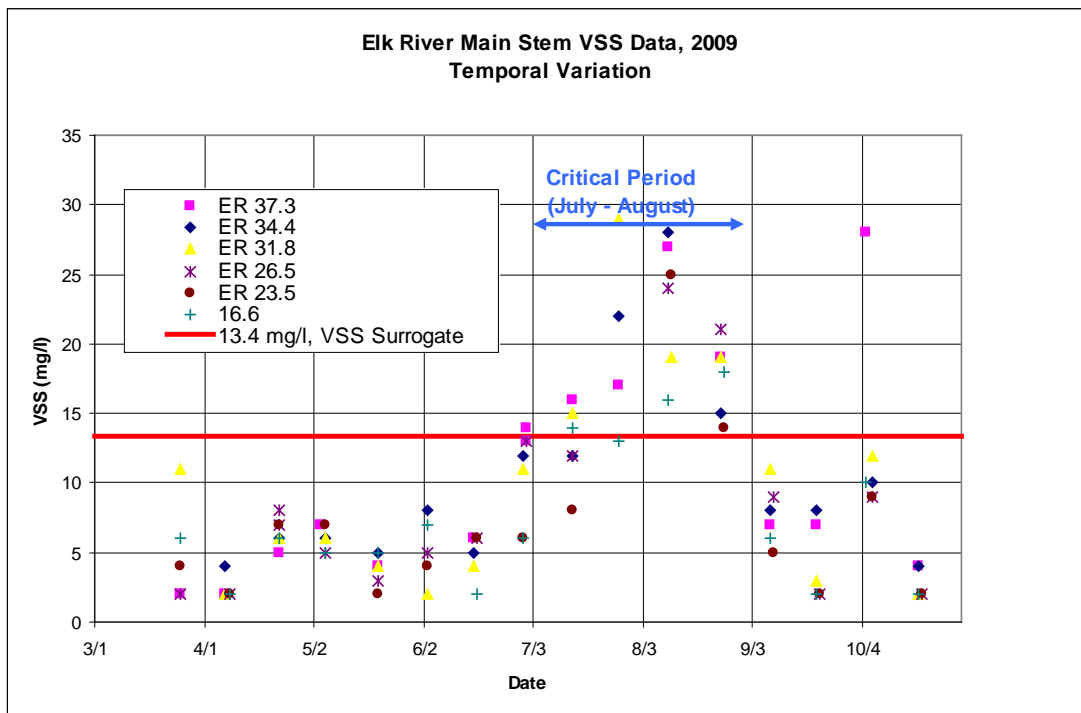
The in-stream surrogate with the highest correlation to measured turbidity was VSS, because VSS is an indicator of algal turbidity this further verifies that the impairment is driven by algal turbidity. The surrogate analysis for turbidity shown in Figure 5.5 was conducted in accordance with the Turbidity TMDL Protocols and Submittal Requirements (MPCA 2007).

Figure 5.5. Temporal variation in 2009 turbidity data.



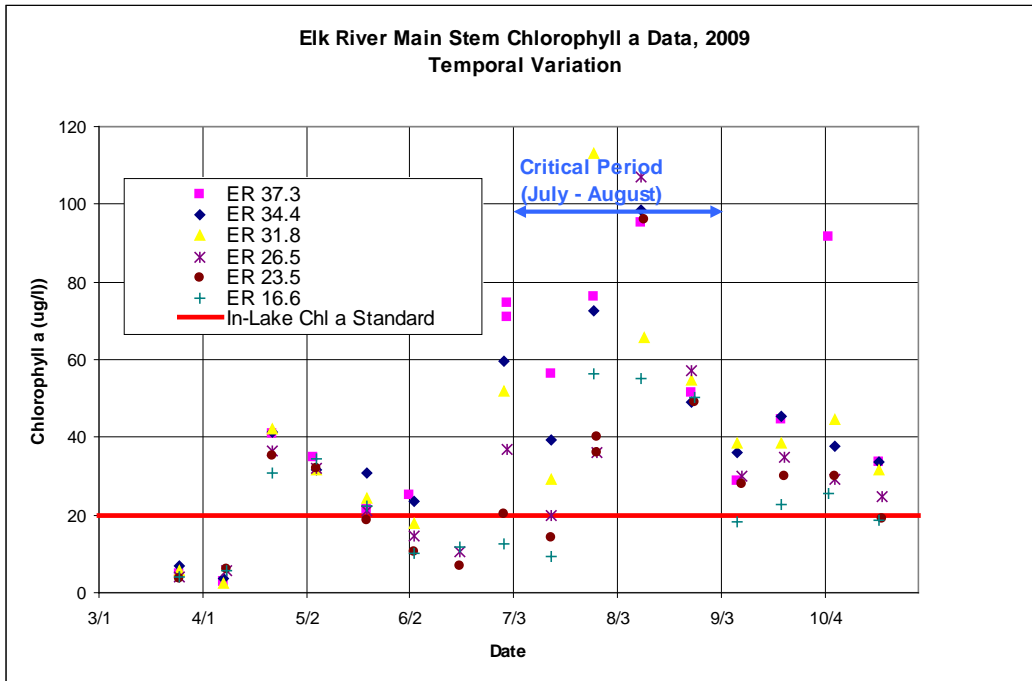
T:\2378_ERWSA\Elk River\Turbidity\[Critical Period for Reduction.xls]Temporal Variation (Turb)

Figure 5.6. Temporal variation in 2009 VSS data.



T:\2378_ERWSA\Elk River\Turbidity\[Critical Period for Reduction.xls]Temporal Variation (VSS)

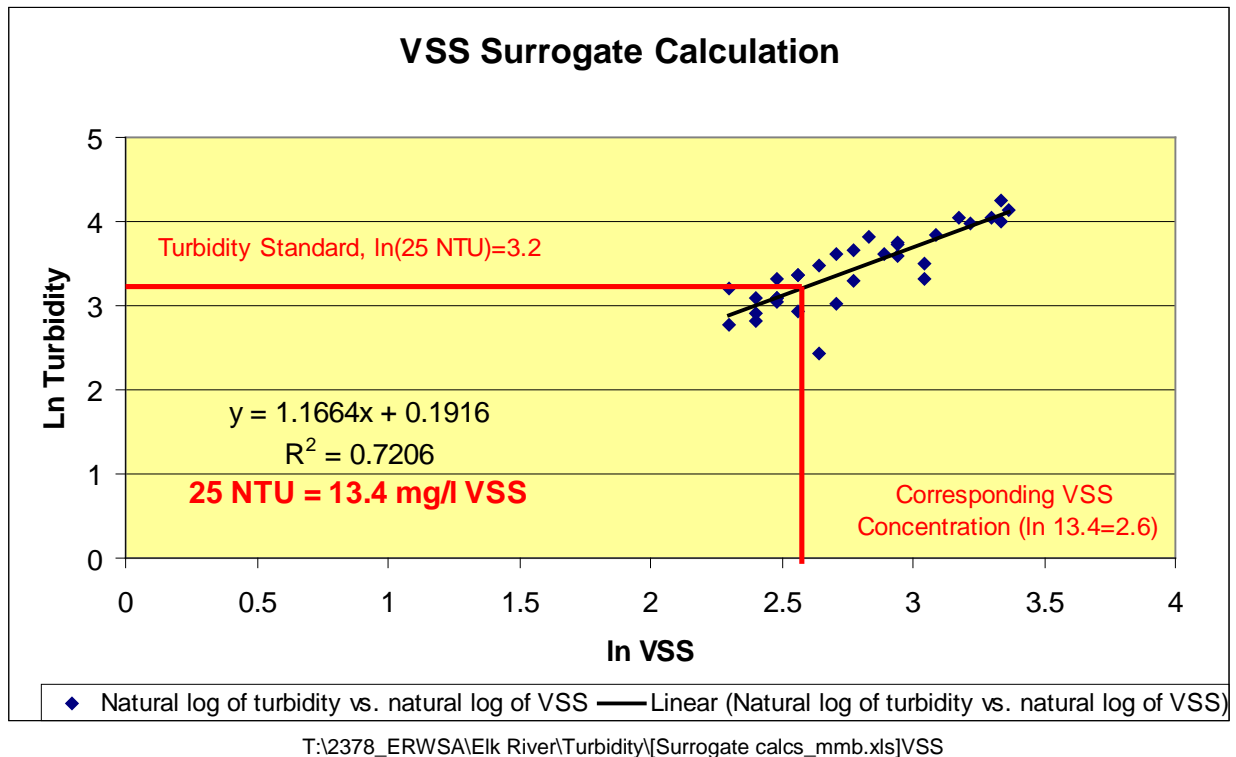
Figure 5.7. Temporal variation in 2009 chlorophyll-a data.



T:\2378_ERWSA\Elk River\Turbidity\[Critical Period for Reduction.xls]Temporal Variation (Chl a)

Figure 5.8 shows that the VSS surrogate for the 25 NTU state standard is 13.4 mg/L VSS. That is to say, if we reduce in-stream VSS to 13.4 mg/L or lower, we will have achieved the state’s 25 NTU standard. Per the state Bacteria TMDL protocol, the data are evaluated assuming an underlying natural log-normal distribution. As such, the natural log of the data points are compared on the x and y axes of figure 5.8. The natural log of the turbidity standard of 25 NTU is 3.22; based on a regression of the relationship of these data, the corresponding VSS value is 13.4 mg/L (or a natural log of 2.6).

Figure 5.8. VSS surrogate calculation.



Based on the model of lake response to nutrient input, the hydrologically average year will result in an average summer TP concentration in Big Elk Lake of about 137 µg/L. Data and modeling for Big Elk Lake indicate that a 57% phosphorus load reduction to Big Elk Lake is needed to meet the nutrient TMDL.

Figures 5.9 through 5.11 show the correlations between in-stream VSS, TP and chlorophyll-a. These relationships demonstrate that using the 60 µg/l endpoint of the Big Elk Lake nutrient TMDL is more conservative than using the calculated VSS surrogate endpoint of 13.4 mg/L. In other words, the load reduction required to meet the nutrient TMDL is greater than the load reduction to meet the turbidity impairment alone using the VSS surrogate.

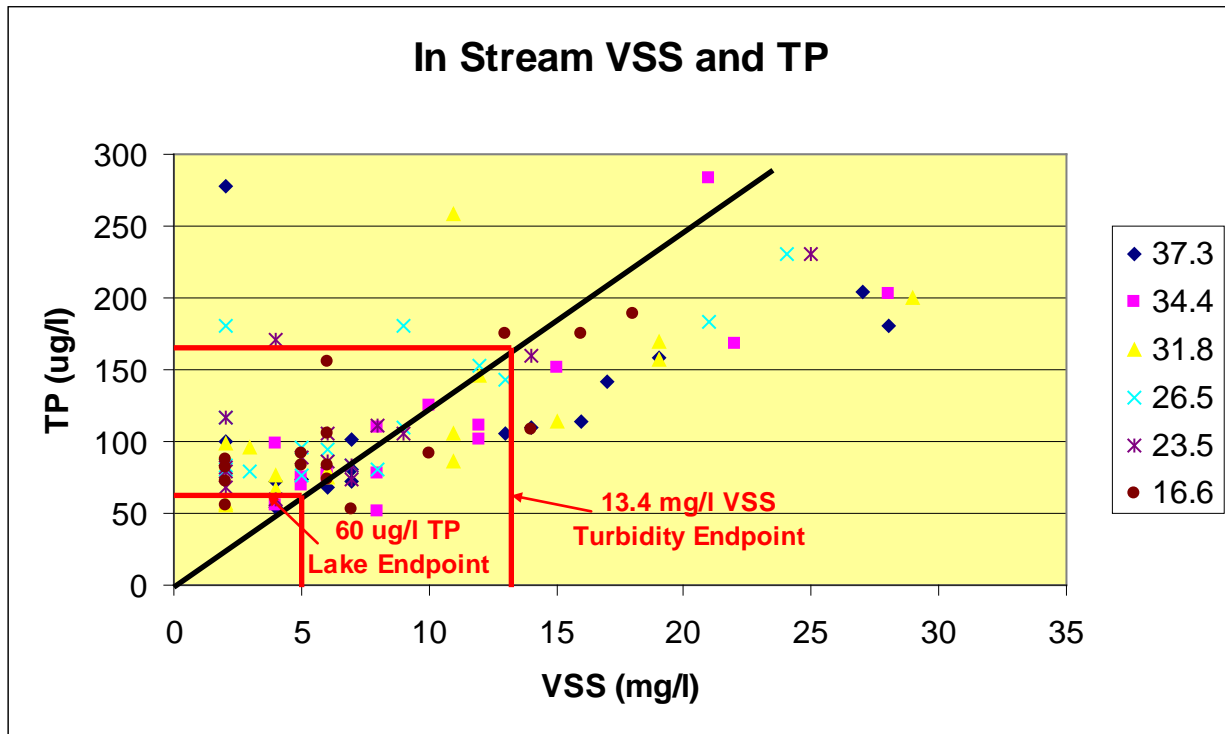
Specifically, the in-stream VSS- TP relationship shows that the VSS surrogate of 13.4 mg/L corresponds to an in-stream TP concentration in excess of 100 µg/L. The state standard Big Elk Lake would require outflows from Big Elk Lake to equal 60 µg/L TP, which corresponds to a VSS concentration of around 5 mg/L or less (Figure 5.9).

Further, comparing VSS and chlorophyll-a in the Elk River shows that we begin to see exceedances of the VSS standard when chlorophyll-a concentrations exceed 40 µg/L. The state standard of 20 µg/L required for Big Elk Lake correlates with a much lower VSS concentration of about 6 µg/L (Figure 5.10). And the bulk of the exceedances of the turbidity standard of 25 NTU occur when chlorophyll-a is greater than 40 µg/L. The Big Elk Lake standard for chlorophyll-a of 20 µg/L provides a significant margin of safety (Figure 5.11).

In other words, the load reductions required to achieve the nutrient standard in Big Elk Lake will result in a more conservative turbidity TMDL for the Elk River than would be provided by using the VSS surrogate alone.

TMDLs are also needed for the sources of turbidity downstream of Big Elk Lake. The measured sources of non-algal turbidity were partitioned by subtracting VSS (algal turbidity) from TSS. Existing sources of non-algal turbidity were quantified by source and the TMDL was set.

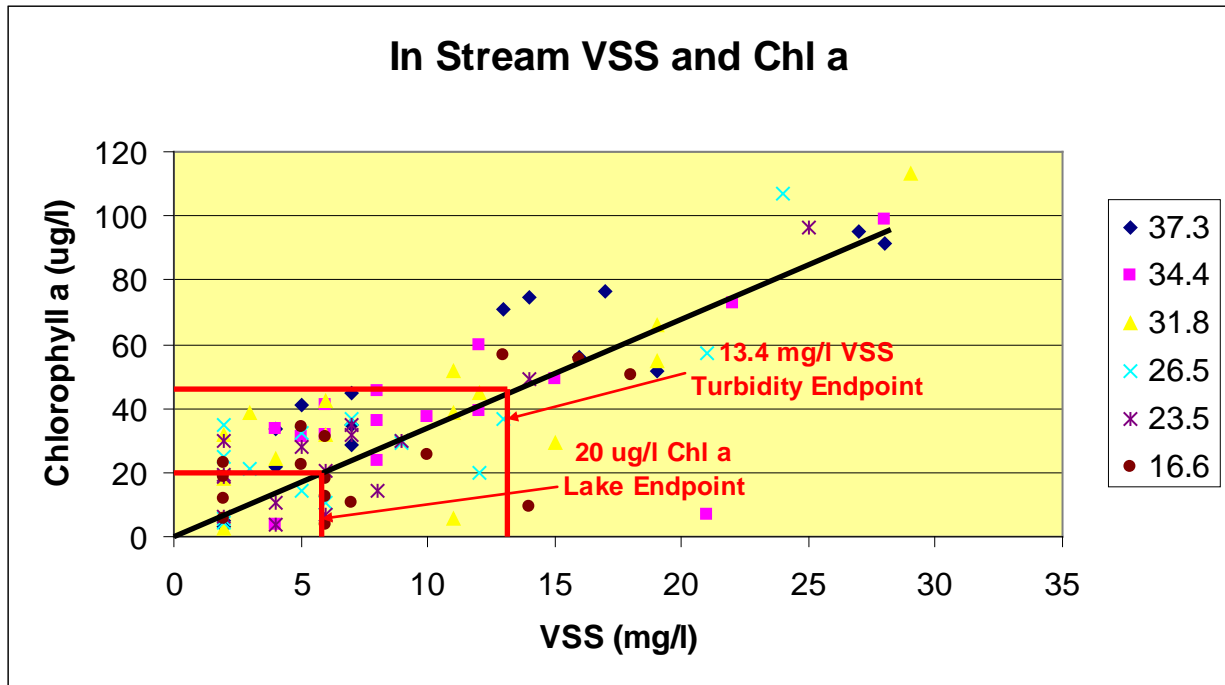
Figure 5.9. In-stream VSS and total phosphorus.



T:\2378_ERWSA\Elk River\Turbidity\[turbidity_mmb.xls]In Stream TSS, VSS, CHla

Note: The black solid line is a linear regression of the relationship between VSS and TP.

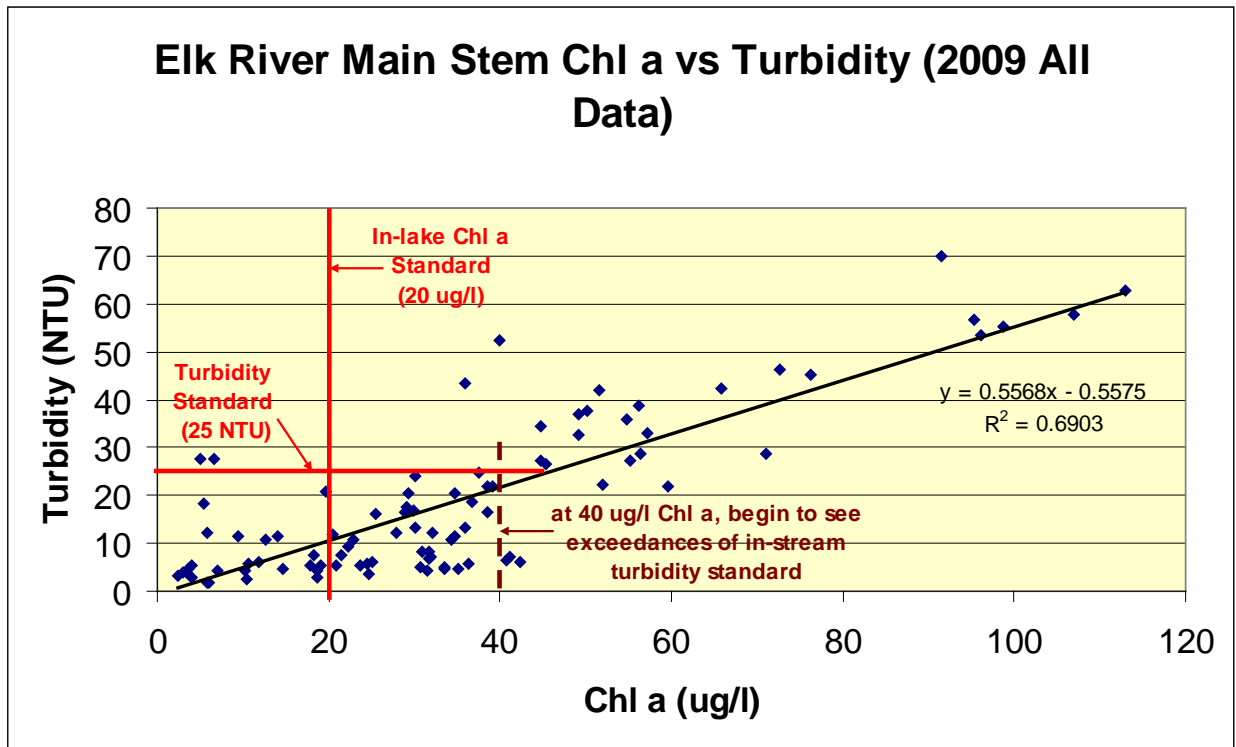
Figure 5.10. In-stream VSS and chlorophyll-a.



T:\2378_ERWSA\Elk River\Turbidity\turbidity_mmb.xls]In Stream TSS, VSS, CH1a

Note: The black solid line is a linear regression of the relationship between VSS and chlorophyll-a.

Figure 5.11. In-stream chlorophyll-a and turbidity.



T:\2378_ERWSA\Elk River\Turbidity\[Surrogate calcs_mmb.xls]Chl a

Note: The black solid line is a linear regression of the relationship between chlorophyll-a and turbidity.

6.0 TMDL

6.1 ALLOCATION APPROACH

The TMDL is represented by the following equation:

$$\text{TMDL} = \text{SLA} + \text{SWLA} + \text{MOS} + \text{RC}$$

Where:

SLA= Load Allocation, or the sum of the unpermitted sources including background sources such as precipitation and groundwater contribution as well as unpermitted watershed source like some agricultural, residential and urban land uses. Specifically, LA= Atmospheric Contribution +Groundwater+ Watershed Load + Tributary Loads +Internal Loads.

SWLA= Waste Load Allocation, or the sum of the permitted sources including WWTFs, MS4s, and permitted CAFOs.

MOS= Margin of Safety

RC= Reserve Capacity

6.1.1 Nutrients

Nutrient loads for the lake TMDLs are set for phosphorus, since this is typically the limiting nutrient for nuisance aquatic plants. This TMDL is written to solve the TMDL equation for the numeric target of 40 µg/l of total phosphorus for Mayhew Lake and 60 µg/l of total phosphorus for Big Elk Lake.

There are no known WWTFs which discharge in the Mayhew Lake watershed. There are three WWTFs which discharge in the Big Elk Lake watershed, none of which has a total phosphorus effluent discharge limit. These discharges will require Waste Load Allocations, which are included in this TMDL report.

There are several permitted MS4s within the Big Elk Lake watershed (see table 4.2). Because the existing water quality data quantified total nutrient loads well, but did not partition loads specifically to sources, it is recommended these MS4s be assigned a categorical wasteload allocation calculated from the permitted MS4 area and the total watershed area and expressed as a percentage (0% for Mayhew Lake and 28.9% for Big Elk Lake). The resulting WLA was increased by 2% to account for future growth. An additional 0.2% of the overall TMDL was added to the WLA to account for construction and industrial stormwater.

The WLA must be divided among existing permitted sources under state law. Discharge from septic systems is not allowed by law and therefore the load allocation for septic systems will be zero. Relative proportions allocated to each source are based on reductions that can be achieved through Best Management Practices.

Lake response modeling was conducted and analyzed on an annual basis to establish the TMDL at a level necessary to attain and maintain applicable water quality standards. Daily Waste Load Allocations were derived from this analysis. The daily load and waste load allocations are calculated for the average annual hydrologic conditions in each lake and are shown in Table 6.1. The overall load reduction required and the WLAs for the Foley and Gilman WWTFs are based on average annual in lake concentrations as measured during the last 10 year period prior to publication of this report (data were available 2003 to 2006 and 2009) and the loads quantified for that average annual condition in the lake response model. Required load reductions are shown and discussed in Section 8 of this report.

Table 6.1. Total phosphorus TMDL expressed as daily loads (from lake response models and source watershed data).

Lake	Total Phosphorus TMDL (lbs/day)	Waste Load Allocation (lbs/day)	Load Allocation (lbs/day)	MOS
Mayhew	4.67	0	4.67	Implicit
Big Elk	25.1	7.96	17.15	Implicit

Table 6.1a. Big Elk Lake Waste Load Equation (all values in lbs/day)

WLA	=	WWTF WLA (Foley + Gilman)	+	MS4 WLA	+	Reserve Capacity	+	Construction Stormwater WLA
7.96	=	6.95	+	0.94	+	0.07	+	0.0007

Load allocations by source for each lake are provided in Table 6.2. No reduction in atmospheric or groundwater loading is targeted because this source is impossible to control on a local basis. The remaining load reductions were applied based on understanding of the lakes, efficacy of proposed implementation strategies, as well as the model results.

Table 6.2. Partitioned total phosphorus Load Allocations expressed as daily loads.

Lake	Load Allocation	Direct & Tributary Watershed Inflows	Septic Systems	Atmospheric + Groundwater	Internal
Mayhew	4.67	2.34	0.00	0.59	1.74
Big Elk	17.15	2.26	0.00	3.74	11.15

Annual total maximum loads are provided in Tables 6.3 and 6.4. The values above are calculated from these annual loads. The loading capacity is based on average model predicted results for years in which lake water quality data was available (within the last 10 years).

Table 6.3. Total phosphorus load allocations expressed as annual loads.

Lake	Total Phosphorus TMDL (lbs/year)	Waste Load Allocation (lbs/year)	Load Allocation (lbs/year)	MOS
Mayhew	1,705	0	1705	Implicit
Big Elk	9,163	2,905	6,258	Implicit

Table 6.4. Partitioned total phosphorus load allocations expressed as annual loads (lbs/ yr).

Lake	Load Allocation (lbs/year)	Direct & Tributary Watershed Inflows (lbs/year)	Septic Systems (lbs/year)	Atmospheric + Groundwater (lbs/year)	Internal (lbs/year)
Mayhew	1,705	854	0	216	635
Big Elk	6,258	824	0	1365	4069

6.1.2 Turbidity

The numeric TMDL for the turbidity impairment in the Elk River reach 579 is the nutrient TMDL for Big Elk Lake, plus a TSS allocation for sources of turbidity downstream of Big Elk Lake.

As discussed previously in this report, setting the nutrient TMDL in Big Elk Lake is an appropriate surrogate for a numeric turbidity TMDL. By achieving the nutrient goal in Big Elk Lake as allocated in the above section, water quality within the listed reach will improve and meet the State standard of 25 NTUs for turbidity. In addition to the load reduction for Big Elk Lake, sources of turbidity to the Elk River downstream of Big Elk Lake were assigned TMDLs using a TSS surrogate. However, no load reductions in TSS from downstream sources were necessary in this TMDL.

Table 6.5 shows the non-algal turbidity TMDL.

Table 6.5. Partitioned non-algal turbidity TMDL (Daily loads).

Daily (Tons per day)									
246876	Critical Condition	Total Wasteload Allocation (Tons)	WWTF Allocation (tons)	MS4 Allocation (Tons)	Industrial Stormwater Allocation (Tons)	Construction Stormwater Allocation (Tons)	Load Allocation (tons)	Margin of Safety (tons)	TMDL (tons)
Elk River 579	High Flow	0.56	0.27	0.13	0.08	0.08	6.84	0.82	8.23
	Wet	0.37	0.27	0.05	0.03	0.03	2.31	0.30	2.98
	Mid-Range	0.33	0.27	0.03	0.02	0.02	1.17	0.17	1.66
	Dry	0.31	0.27	0.02	0.01	0.01	0.71	0.11	1.13
	Low Flow	0.29	0.27	0.01	0.01	0.01	0.31	0.07	0.67

All calculations are based on a TSS-VSS average of 5.65 mg/L (Results of 2009 monitoring data)

T:\2378_ERWSA\Elk River\Turbidity\Turbidity Load Calcs - Annual Flow.xls\TMDL Calcs

- WWTF allocation is for Becker alone.

6.1.3 Bacteria

Because stream *E. coli* concentrations are dependent upon the daily flow which is dynamic, it is appropriate to express the TMDL and load reduction by an allowable load across all flow conditions as is demonstrated in Figure 6.1 for monthly loads and 6.2 for daily loads. To determine acceptable loads under the critical flow regimes, chronic standard concentrations were multiplied by the flow at each interval. Monthly mean flow data was used to calculate the load duration curve. The daily loads were derived from the calculated monthly loads.

Figure 6.1. Total Maximum Daily Load for the listed segment of the Elk River. Concentrations represent total monthly load based on 126 *E. coli*/100 mL standard.

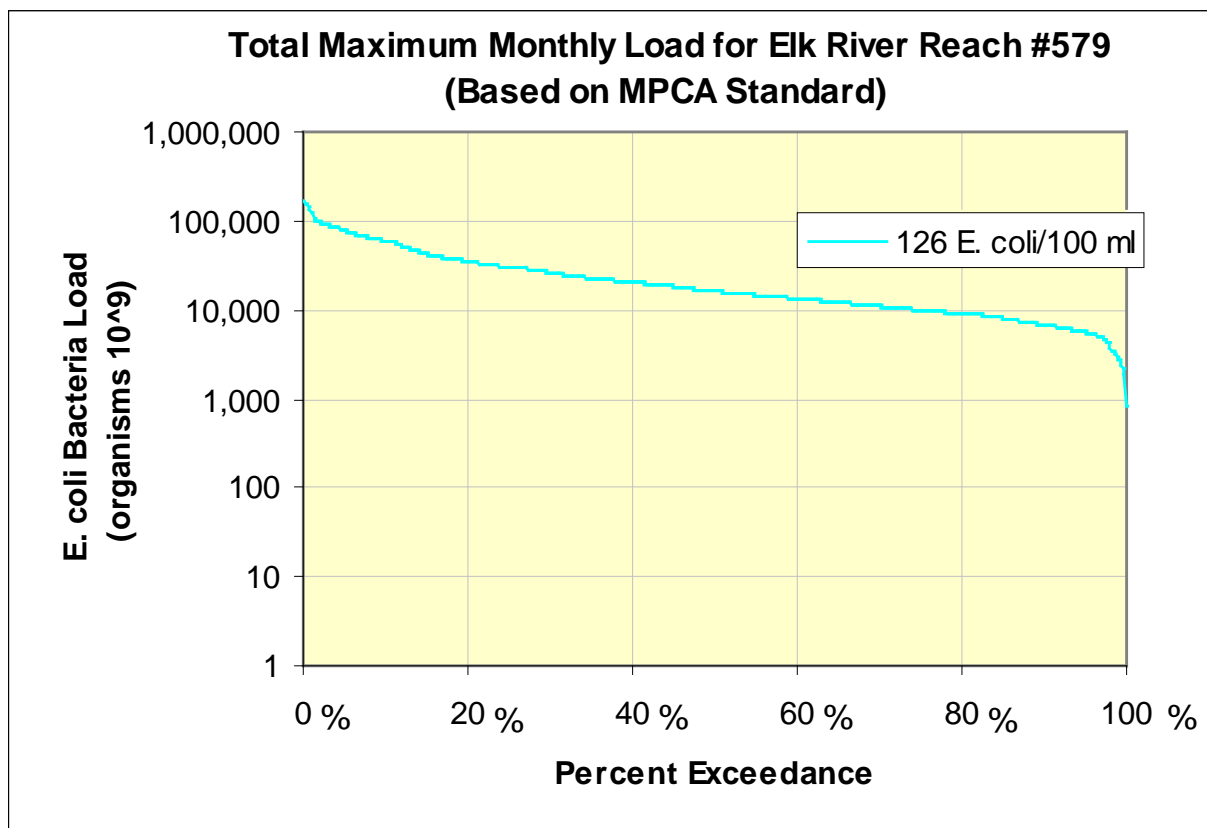
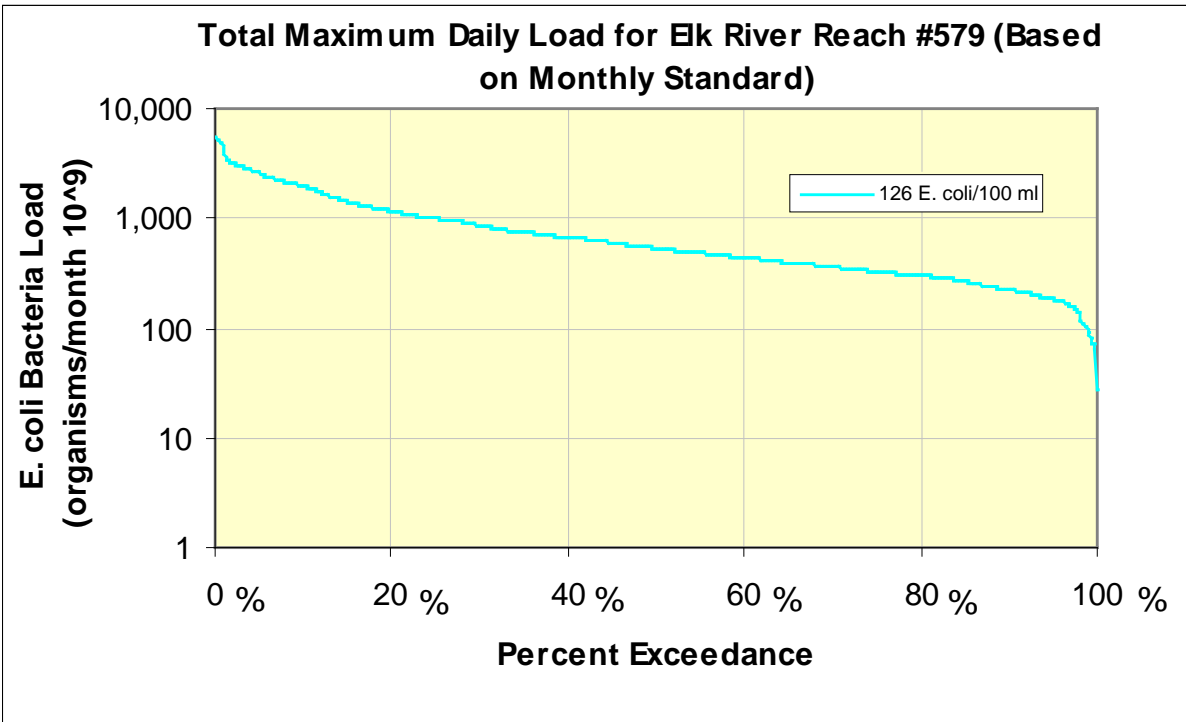


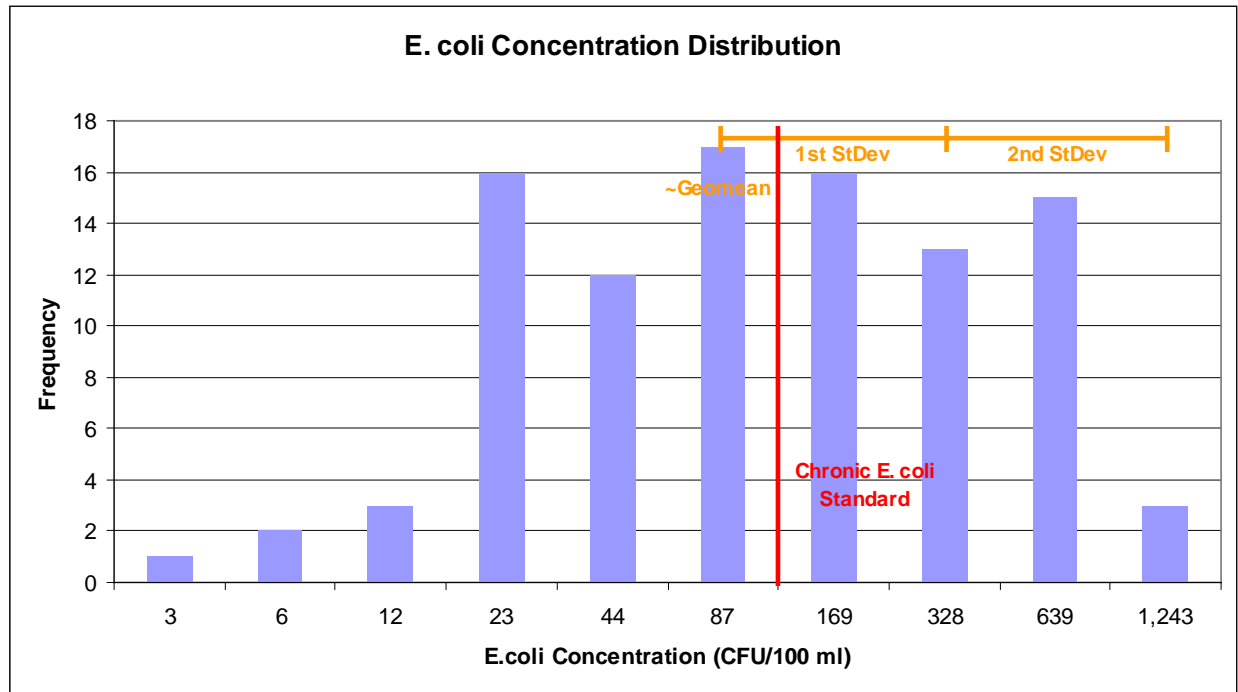
Figure 6.2. The Total Maximum Daily Load for the listed segment of the Elk River. Concentrations represent Total Daily Load derived from monthly load (Standard of 126 *E. coli*/100 ml.)



T:\2378_ERWSA\Elk River\Bacteria\[Bacteria Load Calcs - Annual Flow.xls]Load Duration (Method 2)

To develop the TMDL equation, the seasonal mean discharge was calculated for each of five flow conditions. These data were then multiplied by the standard of 126 *E. coli*/100 ml to establish the TMDL (Table 6.5). The Margin of Safety (MOS) was established using all existing watershed data to quantify uncertainty in the data. Figure 6.3 displays the distribution of the available data. The MOS was calculated from the difference between the geometric mean and the value two standard deviations above the geometric mean. The use of two standard deviations was applicable due to the data distribution and range of concentrations. The calculated MOS, expressed as a percentage of the state chronic standard (16%) and applied to the TMDL equation, is extremely conservative in this case.

Figure 6.3. Distribution of 2009 *E. coli* concentrations.



T:\2378_ERWSA\Elk River\2009 WQ data.xls\Hist1

The wasteload allocation (WLA) was calculated using known discharges from the point sources within the watershed. To calculate the TMDL for Becker for example, the design flow rate of 2.15 MGD is used in conjunction with the standard for *E. coli* of 126 CFU/ 100 mL to calculate a daily TMDL, and from there a monthly TMDL.

TMDL for MS4s are based on the contributing area of MS4 relative to non MS-4 area. The load allocation (LA) assigned for the wet flow is the load remaining after the MOS and WLA are subtracted from the TMDL using the following calculation:

$$\text{TMDL} - \text{MOS} - \text{WLA} = \text{LA}$$

or

$$1072.70 \times 10^9 \text{ E. coli} - 171.63 \times 10^9 \text{ E. coli} - 211.59 \times 10^9 \text{ E. coli} = 689.48 \times 10^9 \text{ E. coli}$$

Under this scenario the load allocation is 64 percent of the TMDL at 126 *E. coli*/100 ml and the MOS and WLA make up the remaining load. The TMDL loads for both daily loads and monthly loads based on the 126 *E. coli* /100 ml daily standard are provided in Tables 6.6 and 6.7, respectively. Note that the WLA for bacteria, though expressed as *E. coli* for the TMDL will be expressed in MPCA permits as fecal coliform where 126 cfu/ mL *E. coli* = 200 cfu/mL fecal coliform. This is the current practice of the MPCA.

Table 6.6. The TMDL expressed as daily loading capacity of *E. coli* in the Elk River Reach # 579.

Daily						
Reach	Critical Condition	WWTF Wasteload Allocation (10 ⁹ org) (Becker WWTF)	MS4 Wasteload Allocation (10 ⁹ org)	Load Allocation (10 ⁹ org)	Margin of Safety (10 ⁹ org)	TMDL (10 ⁹ org)
Elk River 579	High Flow	10.30	539.43	1816.17	450.65	2816.55
	Wet	10.30	203.99	686.78	171.63	1072.70
	Mid-Range	10.30	101.84	342.87	86.67	541.67
	Dry	10.30	61.01	205.41	52.71	329.43
	Low Flow	10.30	29.95	100.85	26.88	167.98

Table 6.7. The TMDL expressed as monthly loading capacity of *E. coli* in the Elk River Reach # 579.

Monthly						
Reach	Critical Condition	WWTF Wasteload Allocation (10 ⁹ org)	MS4 Wasteload Allocation (10 ⁹ org)	Load Allocation (10 ⁹ org)	Margin of Safety (10 ⁹ org)	TMDL (10 ⁹ org)
Elk River 579	High Flow	313.33	16409.56	55247.89	13708.72	85679.49
	Wet	313.33	6205.28	20892.00	5221.07	32631.67
	Mid-Range	313.33	3097.89	10430.03	2636.43	16477.67
	Dry	313.33	1855.93	6248.57	1603.39	10021.22
	Low Flow	313.33	911.20	3067.84	817.59	5109.96

While estimates of *E. coli* contributions are derived from literature values and knowledge of the land practices, actual fecal coliform or *E. coli* data is based on field monitoring. Load and wasteload allocations were based on thorough watershed wide monitoring of *E. coli* from April 1 through October 31. This robust data set provided for a thorough seasonal evaluation of loads and consequently the magnitude of the exceedances and reductions needed to meet the standard.

6.2 MARGIN OF SAFETY

A Margin of Safety has been incorporated into this TMDL by use of conservative modeling approaches to account for an inherently imperfect understanding of lake systems and to ultimately ensure that the nutrient reduction strategy is protective of the water quality standard.

The Canfield Bachman model was used to predict the response of the lakes described herein to phosphorus loads and load reductions. Canfield-Bachmann is an empirical model developed using data collected from 704 natural lakes to best describe the lake phosphorus sedimentation rate which is needed to predict the relationship between in-lake phosphorus concentrations and phosphorus load inputs. The phosphorus sedimentation rate is an estimate of net phosphorus loss from the water column through sedimentation to the lake bottom. The phosphorus sedimentation rate is used in concert with lake-specific characteristics such as annual phosphorus loading, mean depth, and hydraulic flushing rate to predict in-lake concentrations of phosphorus as they relate to phosphorus loading. These model predictions are compared to measured data to evaluate how well the model describes the lake system.

To apply the Canfield-Bachmann model to these lakes measured watershed specific data were used: measured watershed runoff volumes, concentrations, overall loads, internal loads, and groundwater concentrations were used instead of modeled watershed hydrology and phosphorus load export. Further, no calibration factors were used.

The models fit well compared to annual average lake water quality data. Three to five years of data were compared for Mayhew and Big Elk Lakes respectively, and differences between observed and model-predicted average in-lake concentrations were generally within the reported standard deviations for annual average TP for a given year. The fit of the model ensures that the loads, and necessary load reductions predicted by the model are sufficient to achieve the in lake standards.

As discussed in sections 3, 4, and 5 of this report, the nutrient TMDL for Big Elk Lake is used as a surrogate for the turbidity TMDL in the Elk River. As such, the MOS for the Big Elk Lake nutrient TMDL also applies for the Turbidity TMDL. However, the data shows that based on the relationship between in-stream turbidity in lake water quality, using the lake nutrient TMDL for Big Elk Lake provides an additional MOS for the turbidity TMDL. Correlations between TP, chlorophyll-a, and in stream VSS and turbidity indicate that a reduction in chlorophyll-a concentrations of 25 to 49% is needed to meet the standard. The target water quality goal provides a reduction on the order of 57%. Therefore, the turbidity TMDL will be achieved in advance of the lake nutrient TMDL for Big Elk Lake.

For the bacteria TMDL an explicit (quantified variability across the flow regime) margin of safety has been used. The explicit MOS of 16% was calculated from the distribution of available data as discussed in the previous section. This MOS accounts for the variation in flow for each flow regime as well as the distribution of recorded *E. coli* concentrations.

6.3 RESERVE CAPACITY

The subwatersheds to the listed reach are located within Benton and Sherburne Counties. Both counties have experienced rapid growth due to the proximity to two of the fastest growing population centers in the state, St. Cloud and the Twin Cities.

In 2007, the Minnesota State Demographic Center reported that the population in which the County is expected to double by the year 2030. The city of Becker, which is located in a subwatershed which directly drains to the listed reach, experienced a 54% growth over 6 years, the 2006 population reported by the Minnesota Office of the State Demographer was 4,105 compared to the 2000 census population of 2,673. Although Sherburne County was experiencing rapid residential growth, due to recent economic conditions development has slowed and the above population estimates may have been over-projected. The Sherburne County auditor has estimated the 2030 population to be a 55.8% increase from the current estimated population, however, these estimates were based on economic growth realized in the early 2000s. Projected growth in the county is limited to urban areas and the Land Use Plan protects productive farmlands and agri-business operations. Housing in agricultural areas is limited to 1 housing unit per 40 acres.

Benton County is also one of the fastest growing counties in the state. The Minnesota Department of Employment and Economic Development reported a population increase of 29% from 1990-2005 with a projected growth of another 32% by 2020 with a population of 51,490 people. The majority of the area within the subwatersheds to the listed reach is designated as agricultural land use. The 2005 Benton County Land Use Plan increased the number of allowable housing units in agricultural land use areas from 1 per 40 acres (set in 1999) to 4 per 40 acres to allow for growth. The Land Use Plan designates urban growth areas around the cities of Foley and Gilman within the subwatershed to the listed reach. These areas are targeted for annexation and municipal utilities. Development has slowed due to recent economic conditions and literature available regarding growth in Benton County has yet to be updated. The growth rates discussed above may have been over projected, and while future growth is inevitable in Benton County, it may not occur as rapidly as predicted in the future as it did in the early 2000s.

The WLA includes a 2% reserve capacity to allow for future growth of urban areas. Further, there are no planned WWTF expansions in the Mayhew or Big Elk Lake watersheds at this time, any proposed expansion would have to comply with permit limits that are equivalent to current WLA or realize load reductions elsewhere in the watershed.

Growth within the urban areas of Benton and Sherburne Counties will result in bacteria from humans being treated at waste water treatment plants which already contribute to the listed reach of the Elk River. These WWTFs currently limit the concentration of bacteria discharged from the system and the quantity of discharge may increase with population growth. The Becker WWTF was recently expanded to increase treatment capacity however discharge concentration limits are still at the current permitted level (based on 845,000 GPD). The wasteload allocation for the TMDL was adjusted to account for the expansion as future permits may increase the allowable discharge limits.

Growth in the rural areas of the watershed will result in the installation of new SSTS systems to treat bacteria, since straight pipe septic systems are illegal. New SSTS systems will effectively treat bacteria and will not contribute to the bacteria load in the watershed. Changes in the human population should not change the load allocations provided in this TMDL. Additionally, loads from septic systems are not allowed under current law and it is unlikely that future sources will be permitted to discharge into the listed reach. Consequently no provisions for changes in human population have been identified in the load allocation of the TMDL.

Another source of *E. coli* in the watershed is livestock. Some new large feedlot operations may occur in the future within the watershed. However, livestock facilities and practices are heavily scrutinized and often are permitted, especially in the case of new or expanding operations. Consequently, changes in animal numbers, practices, or facility size and type, will be associated with permits and mitigation practices to minimize export of *E. coli*. Potential increases in *E. coli* from livestock practices in the watershed should be mitigated. However, it is likely that the existing agricultural practices in the watershed will continue in their current manner.

6.3.1 TRANSFER OF MS4 LOADS

Future transfer of MS4 loads in this TMDL may be necessary if any of the following scenarios occur:

1. New development occurs within a regulated Municipal Separate Storm Sewer System (MS4). Newly developed areas that are not already included in the WLA must be given additional WLA to accommodate the growth. This will involve transferring LA to the WLA.
2. One regulated MS4 acquires land from another regulated MS4. Examples include annexation or highway expansions. In these cases, the transfer is WLA to WLA.
3. One or more non-regulated MS4s become regulated. If this has not been accounted for in the WLA, then a transfer must occur from the LA.
4. Expansion of an urban area encompasses new regulated areas for existing permittees. An example is existing state highways that were outside an Urban Area at the time the TMDL was completed, but are now inside a newly expanded Urban Area. This will require either a WLA to WLA transfer or a LA to WLA transfer.
5. A new MS4 or other stormwater-related point source is identified and is covered under a National Pollutant Discharge Elimination System (NPDES) permit. In this situation, a transfer must occur from the LA.

Load transfers will be based on methods consistent with those used in setting allocations in the TMDL. In cases where WLA is transferred from or to a regulated MS4, the permittees will be notified of the transfer.

6.4 REASONABLE ASSURANCE

When establishing a TMDL, reasonable assurances must be provided demonstrating the ability to reach and maintain water quality endpoints. Several factors control reasonable assurances including a thorough knowledge of the ability to implement BMPs as well as the overall effectiveness of the BMPs. This TMDL establishes load reduction goals in the Elk River watershed so that impaired waters can meet state standards.

The MPCA has jurisdictional capabilities to issue and enforce NPDES permits which are in place to meet TMDLs. The Elk River Watershed Association has the jurisdictional capabilities to implement other non point source activities necessary to meet TMDLs. They have existing watershed programs targeting water quality improvements. The necessary load reductions will amount to an expansion of the existing programs, leveraging to the maximum extent in place programs and introduction of new projects, and programs as identified in the implementation plan. Further, TMDL implementation will take place on an iterative basis, with interim evaluations and milestones so that implementation course corrections based on annual monitoring and reevaluation can adjust the strategies to meet the standards.

6.5 SEASONAL VARIATION

The daily load reduction targets for the nutrient TMDLs are calculated from the current phosphorus budget for each lake. The budget is an average of several years of monitoring data and includes both wet years and dry years to account for annual variation. The BMPs to address excess loads to the lakes will be designed for average conditions; however, the performance will be protective of all conditions. In dry years the watershed load will be naturally lower allowing internal loading to comprise a larger portion of the overall phosphorus budget. Consequently, averaging across several modeled years addresses annual variability in lake loading.

Seasonal variation is accounted for through the use of annual loads in Mayhew Lake and seasonal loads in Big Elk Lake and developing targets for the summer period where the frequency and severity of nuisance algal growth will be the greatest. Although the critical period is the summer, lakes are not sensitive to short term changes in water quality, rather lakes respond to long-term changes such as changes in the annual load. Therefore the seasonal variation is accounted for in annual loads. Additionally by setting the TMDL to meet targets established for the most critical period (summer), the TMDL will inherently be protective of water quality during all other seasons.

Seasonal variation for the bacteria TMDL was addressed in the accounting of *E. coli* sources, and the use of the flow duration curve. *E. coli* sources potentially available for runoff were varied seasonally to reflect the seasonality of practices in manure application and handling. Additionally, load and wasteload allocations were varied seasonally to reflect changes in stream loads and concentrations among seasons. The winter season is not included because the standard is for April 1 through October 31.

7.0 Public Participation

Public participation is critical to the process of implementing these TMDLs to meet water quality standards. The public participation conducted for this TMDL was an extension of work already underway by stakeholders concerned over declining water quality prior to the TMDL framework.

Public input has been instrumental in guiding the decision making process and has been critical to the establishment of an effective implementation plan that will guide the listed water bodies and the Elk River watershed's future. Public participation for this project is ongoing. Citizen and governmental stakeholders have received information and provide input to the TMDL process through multiple technical advisory committee (TAC) and public meetings, articles in watershed association newsletters, electronic updates, informational pieces at annual watershed association meetings and newspaper articles. Table 7.2 lists stakeholder groups that were involved in the TMDL process; the groups/agencies identified were present at a minimum of one TAC or Public Meeting and were included in all E-updates.

Table 7.1. Summary of public participation meetings conducted for this TMDL project.

	Meeting Date	Description	Topic
PHASE I	8/4/08	TAC Meeting	Kick-Off; Data Needs
	1/9/09	TAC Meeting	Phase I Report
	2/11/09	Public Presentation	Farm Group Presentation
	3/19/09	Stakeholder Meeting	Project Introduction
PHASE II	4/15/10	TAC Meeting	Data Analysis Results
	5/4/10	Benton County Board	Draft Results
	5/5/10	Sherburne County Board	Draft Results
	2/23/10	Sherburne County Water Plan	Draft Results
	3/23/10	Benton County Water Plan	Draft Results
	6/8/10	TAC Meeting	Implementation
	7/21/10	Stakeholder Meeting (Benton Co.)	Draft Results & Implementation
	7/22/10	Stakeholder Meeting (Sherburne Co.)	Draft Results & Implementation
PHASE III	10/21/10	TAC Meeting	Phase III- load allocations & Implementation
	12/1/10	Stakeholder Meeting (Sherburne Co.)	Load allocations & Implementation
	12/3/10	Stakeholder Meeting (Benton County)	Load allocations & Implementation

Table 7.2. Stakeholders list / TAC participation.

Stakeholder	Public Meeting Participation	TAC Meeting Participation
MPCA	x	x
US Fish and Wildlife Service (USFWS)	x	x
City of Becker	x	
Sherburne County SWCD	x	x
Benton County SWCD	x	x
Minnesota DNR (Fisheries & waters)	x	x
Palmer Township	x	
Minden Township	x	
Briggs Lake Chain Association	x	
Benton County Board of Commissioners	x	
Sherburne County Board of Commissioners	x	
Benton SWCD Board of Commissioners	x	
Sherburne SWCD Board of Commissioners	x	
MN Agricultural Water Resources Coalition	x	
Sauk Rapids Township	x	
Haven Township	x	
University of MN Extension	x	
Sherburne/Benton Water Plan Subcommittee Group	x	
MN Potato Growers	x	
MN Rural Water Association	x	
Big Lake Township	x	
MN Irrigators Association	x	
MN Board of Water and Soil Resources	x	

8.0 Implementation

8.1 IMPLEMENTATION FRAMEWORK

Implementing the TMDL will be a collaborative effort between state and local government, and individuals led by the ERWSA. To meet water quality standards, ERWSA will leverage existing regulatory framework, existing funding sources, newly available grant funding, and relationships to generate support for TMDL implementation efforts. ERWSA will provide technical support, coordination, facilitation, monitoring and reporting as needed and as funding is available. Efficiency and cost savings are realized by using existing governmental programs and services for TMDL implementation to the maximum extent possible.

Priority management strategies (or priority BMPs) were identified through the TMDL to target the greatest load reduction benefit for their costs. Priority management zones were also identified through the TMDL studies. Data indicate that implementation of priority management strategies (BMPs) in priority management zones will yield the greatest progress towards water quality goals for the lowest cost. For example, Mayhew Lake is highly sensitive to spring watershed nutrient loads from riparian areas. As such BMPs that target reductions in spring watershed nutrient loads for the land uses in that subwatershed were identified along riparian areas.

Roles and responsibilities were also identified, as well as a schedule and milestones. These are discussed in the following section.

8.2 ROLES & RESPONSIBILITIES

8.2.1 MPCA

This TMDL project will be addressed in the state of Minnesota's new approach in surface water assessment, monitoring and implementation planning. This new MPCA approach addresses surface water resource restoration and protection strategies on a major (8 digit Hydrologic Unit Code- HUC) watershed level in a 10 year cycle. This process, called the "One Waters Approach" began for the Mississippi River St. Cloud Watershed (which includes the surface waters within the Elk River Watershed) in the fall of 2010. This approach will rely on local input and prioritization and state level funding to address all the impaired surface water resources within this watershed and prescribe protection measures for unimpaired surface water resources. Details of the approach can be found at the MPCA's web site:
<http://www.pca.state.mn.us/index.php/water/water-types-and-programs/surface-water/basins-and-watersheds/watershed-approach.html>.

The MPCA administers the NPDES program that will control loads from construction and industrial stormwater. Construction stormwater activities are considered in compliance with provisions of the TMDL if they obtain a Construction General Permit under the NPDES program and properly select, install, and maintain all BMPs required under the permit, including any applicable additional BMPs required in Appendix A of the Construction General Permit for discharges to impaired waters, or meet local construction stormwater requirements if they are more restrictive than requirements of the State General Permit. Industrial stormwater activities are also considered in compliance with provisions of the TMDL if they obtain an Industrial Stormwater General Permit or General Sand and Gravel general permit (MNG49) under the NPDES program and properly select, install, and maintain all BMPs required under the permit, or meet local industrial stormwater requirements if they are more restrictive than requirements of the State General Permit.

Although the TMDL's individual wasteload allocations are expressed in terms of both daily and annual terms, for implementation purposes, water quality based effluent limits (WQBELs) developed for NPDES permits do not necessary have to be expressed in terms of a daily limit. WQBELs should be consistent with the time increment assumptions upon which the TMDL was established. Additional considerations for the development of permit limits include the type of facility, the nature and frequency of the discharge and the compatibility with other applicable effluent limits.

8.2.2 ERSWA

The ERWSA will be lead organization in the 8-digit HUC working with other LGU's to prioritize funding allocation for the MPCA's new approach to meeting TMDL goals. In 1994 the Elk River Watershed Association Joint Powers Board was formed as a result of Local Water Planning efforts in Sherburne and Benton Counties. Concerned citizens identified the water quality of the Elk River and lakes in the Elk River Watershed as priorities for improvement. Thus, the two Counties determined that a watershed approach would be the most effective way to improve water quality. A Joint Powers Board was formed by Sherburne and Benton SWCDs and Counties for the purpose of coordinating efforts within the Elk River Watershed. The ERWSA recently retained a full time Watershed Coordinator to oversee conducting of TMDL studies and implementation. This Coordinator splits time between the Sherburne and Benton County SWCD offices and can bring to bear existing resources, as well as identify and bring to bear new resources and relationships necessary to implement the TMDLs described in this report.

The entities which partner to form the ERWSA JPB should continue to work together to implement the activities associated with this plan as determined to be applicable and as not to duplicate efforts. Such entities are identified below:

- **Sherburne County**
- **Benton County**
- **Sherburne SWCD**
- **Benton SWCD**

8.2.3 NRCS and USDA

Benton and Sherburne SWCDs have, and will continue to partner with the Natural Resources Conservation Service (NRCS) and the United States Department of Agriculture (USDA).

The NRCS and USDA administers federal programs such as Environmental Quality Incentive Program (EQIP), Conservation Stewardship Program (CSP), Conservation Reserve Program (CRP), and easement programs such as Grassland Reserve Program (GRP), Wetland Reserve Program (WRP), and Farm and Ranchland Protection program (FRPP). Using the information cultivated through the TMDL process, these dollars can be leveraged towards achieving water quality goals.

8.2.4 Lake Associations

The primary lake association that will be involved in implementation of these TMDLs is the Briggs Lake Chain Association which is comprised of residents living on Briggs Lake, Lake Julia and Rush Lake (the Briggs Chain). The entire Briggs Lake Chain is currently impaired for nutrients and these lakes discharge into Big Elk Lake. Meeting water quality goals in the Briggs Lake Chain is critical to meeting downstream water quality goals for Big Elk Lake and the Elk River.

8.2.5 US Fish and Wildlife Service

The USFWS, a land owner in the watershed, participated in the TAC meetings and provided input throughout the TMDL process. As a land-owner, they are a potential partner for capital projects where land may be utilized, or other USFWS resources may be leveraged meeting water quality goals overlaps with improving targeted habitats.

8.2.6 Minnesota DNR Fisheries and DNR Waters

The Minnesota DNR is a full partner with the ERWSA and has participated in the TAC meetings providing input and data collection assistance throughout the TMDL process. The ERWSA looks to the DNR to continue to provide assistance with monitoring associated with the impaired lakes and streams in the watershed, and assistance guiding the ERWSA and its partners in seeking grants.

8.2.7 Other Local and State Partners

Other local and state partners/ stakeholders are listed in Table 7.2 of this report. Implementation will rely on cooperation from these stakeholders, and perhaps partnerships in funding and on grant applications to implement watershed projects towards load reduction goals.

8.2.8 Private Landowners

Because watershed load reductions are significant, and most of the land is privately owned, the ERWSA will have to cultivate relationships with private landowners to motivate implementation of best management practices, and potentially capital projects towards achieving water quality goals. Education and outreach will be the primary driver behind partnership on this level.

8.3 PRIORITY LOAD MANAGEMENT STRATEGIES

8.3.1 Mayhew Lake Nutrient Impairment

Mayhew Lake is impaired for aquatic recreation and requires the reduction of both internal and external loading of nutrients to meet TMDL requirements. The following table shows the existing average-year phosphorus loads and required phosphorus load reductions by source.

Table 8.1. Mayhew average year phosphorus and load reductions.

Category	Description	Drainage Area (ac)	Pounds of Phosphorus/ Yr			Load Reduction %
			Existing	Goal	Reduction	
Watershed Loads	Mayhew Direct	809	824	115	709	86%
	Mayhew 1	16,768	4,104	575	3,529	86%
	Mayhew 2	361	308	43	265	86%
	Mayhew 3	442	865	121	744	86%
SSTS			5	0	5	100%
Atmospheric			30	30	0	0%
Groundwater			186	186	0	0%
Internal Load			1,587	635	952	60%
Total			7,910	1,706	6,204	78%

T:\2378_ERWSA\Lake Response Models\LRM Mayhew_mmb Calib 1.xls]Summary

The dominant land use in the Mayhew Lake subwatershed is corn and soy bean rotation agriculture (40%), followed by pasture/ hay (25%). Data collected in this watershed indicates that spring phosphorus loads from the watershed are the dominant source of watershed loads. As such BMPs will target this source. Refer to Figure 3.1 for Mayhew 1, 2 and 3 locations.

8.3.1.1 Internal Phosphorus Cycling

The most cost effective tools to control internal loading within a short time frame is sediment phosphorus inactivation, where phosphorus is permanently bound in the sediment using chemical addition. One of the most common chemicals used for phosphorus inactivation is aluminum sulfate or alum. The aluminum-phosphorus bond is very stable under typical environmental conditions and provides a long term sink for phosphorus in the lake. The process of applying alum to a lake typically includes injection of liquid alum just below the surface of the lake. The alum quickly forms a floc and settles to the bottom of the lake, forming a sediment seal while stripping phosphorus from the water column on the way down to the sediments. The undisturbed floc provides a sediment barrier that binds any phosphorus released from the sediment, essentially eliminating internal phosphorus loading from that portion of the lake. Studies have shown that alum dosing will typically reduce sediment phosphorous release by 80 – 90 percent for several years.

Carp management can also be implemented in Mayhew Lake to reduce the internal loading of phosphorous. Migration barriers can prevent carp from migrating into and out of the lake for effective management. Rotenone or harvesting may be used to reduce the carp population.

Vegetation in the lake is currently minimal due to low clarity; however the nutrient rich substrate could provide an ideal habitat for curly leaf pond weed if clarity improves. As clarity improves in Mayhew Lake due to reduced watershed and internal loads, plant populations should be monitored. If curly leaf pond weed becomes a dominant plant community, it could exacerbate internal loading issues and chemical control should be considered.

8.3.1.2 External (Watershed)

Because the Mayhew watershed is dominated by agricultural land uses, agricultural priority management strategies will be critical towards achieving goals. The lake is sensitive to spring time watershed nutrient loads. Priority management strategies will need to target those that can reduce spring time loads. Including but not limited to:

- Manure management practices such as application after the spring melt to reduce the amount of runoff loading, incorporation of manure and setbacks from waters.
- Management of runoff from feedlots.
- Riparian grazing should be managed to protect riparian areas as part of a buffer management plan.

Necessary repairs to leaking SSTs are recommended to reduce nutrient loading into Mayhew Lake. State law prohibits discharge from septic systems so a 100% reduction of the nutrient load contribution is required.

Riparian buffers and filter strips can improve water quality by reducing nutrient runoff and soil erosion along the riparian zones. Uniformly graded areas of deep rooted, dense vegetation reduce erosion as well as the nutrient loads to lakes from runoff by slowing runoff velocities and trapping sediment and other pollutants and providing some infiltration. They are used to treat sheet flow off agricultural lands as well as flow entering lakes and streams and prevent shoreland erosion. Filter strips should be designed utilizing species that will function in the spring such as switch grass which remains stiff when dormant. A typical lake or stream buffer zone ranges from 15 to 100 feet with corresponding removal efficiencies for phosphorus for appropriately designed and maintained buffers of 50 to 70% (Met Council 2000).

8.3.1.3 Mayhew Lake Implementation Schedule and Costs

Table 8.2 summarizes the specific elements of the recommended implementation activities, a proposed schedule, and associated costs for Mayhew Lake. Milestones completing the tasks in the allotted time and achieving participation level from the target percentage of the land owners identified in the priority management zones.

Table 8.2. Mayhew Lake nutrient impairment implementation summary.

Mayhew Lake- Nutrient Impairment							
Priority Level	BMP	Annual Cost	Schedule	Duration (yrs)	Extended Cost	Outcome	Note
1	GIS/ Air Photo (BING) Survey Tier 1 & 2 Implementation Areas to identify opportunities for feedlot and riparian grazing management	\$5,500	Year 1	1	\$5,500	GIS-based prioritized database of tier 1 and 2 implementation areas	4 weeks of County staff, SWCD staff or intern time, plus 2 large computer screens, GIS and internet connection with available GIS information (Computer equipment not included). It is advisable to wait until LiDar is available. Additional time to develop criteria and evaluate function of database.
1	Outreach & grant opportunities plus inspections	\$13,000	Year 1	1	\$13,000	Staff to develop a plan for 20% of parcels (27 parcels)	~7 weeks of County staff, SWCD staff or intern time
1	Alum treatment of Mayhew	\$20-\$50k	Year 5	30	\$20-\$50k plus design & permitting	Target internal load reduction of 900 lbs (load reduction is only 60% of internal, this targets entire internal load)	
1	Education and Outreach: Implement watershed-wide advocacy of cover crops and stopping winter spreading	\$6,320	Year 0-5	5	\$31,600	Literature distribution twice per year timed to target practices, plus outreach to 10% of tier 1 and 2 implementation areas	~ 3 weeks of County staff, SWCD staff or intern time plus expenses
2	Cost for per acre for grants/ loans, etc.	\$72,632	Year 0-10	10	\$726,319	Implement protection strategies on 5% of land in Tier 1 and 2 Implementation Areas, \$250/acre	Can the nutrient management plans be implemented effectively on site without cost share?
2	Staff time for inspections (Nutrient Management)	\$3,500	Year 0-10	10	\$35,000	Staff inspections (also yields farmer outreach)	2 weeks of staff time per year
				Total	\$811,419		

8.3.2 Big Elk Lake Nutrient Impairment/ Elk River Turbidity

The Big Elk Nutrient impairment and resulting turbidity impairment in the Elk River are driven by mid to late summer phosphorus loads from the watershed. Load reductions must be achieved by reducing watershed loads from the direct tributary watersheds and by achieving state standards in upstream water bodies such as the Briggs-Julia Chain of Lakes as well as Mayhew Lake. Internal load management is not feasible in Big Elk Lake due to the short residence time. Table 8.3 summarizes load reductions required by source.

Table 8.3. Big Elk Lake average year phosphorus and load reductions.

Category	Pounds of Phosphorus / year			% Reduction
	Existing	Goal	Reduction	
Watershed Load	15,533	3,728	11,806	76%
	SSTS 529	0	529	100%
Atmospheric & Groundwater	1,365	1,365	0	0%
Internal Load	4,069	4,069	0	0%
Total	21,497	9,163	12,334	57%

8.3.2.1 BMPs in the Big Elk Lake Subwatershed

Because the lake is sensitive to mid to late summer watershed loads agricultural BMPs should be directed towards reducing these loads from high priority areas. Priority areas were identified as those riparian to surface waters directly tributary to Big Elk Lake not upstream of another major impoundment.

Priority BMPs will include management of crop farming and livestock in riparian areas. Grant dollars directed through the ERWSA will be targeted to priority BMPs in priority areas.

Lakeshore buffers can improve water quality by reducing nutrient runoff and soil erosion along the riparian zones. Uniformly graded areas of deep rooted, dense vegetation reduce erosion as well as the nutrient loads to lakes from runoff by slowing runoff velocities and trapping sediment and other pollutants and providing some infiltration. They are used to treat sheet flow off agricultural lands as well as flow entering lakes and streams and prevent shoreland erosion. A typical lake or stream buffer zone ranges from 15 to 100 feet with corresponding removal efficiencies for phosphorus for appropriately designed and maintained buffers of 50 to 70% (Met Council 2000).

Necessary repairs to leaking SSTs are recommended to reduce nutrient loading into Big Elk Lake. State law prohibits discharge from septic systems so a 100% reduction of the nutrient load contribution is required

8.3.2.2 Briggs-Julia Chain of Lakes Improvement

As stated above, the Briggs-Julia Chain of Lakes must meet state standards in order for Big Elk Lake to meet standards. Target load reductions required to meet in-lake standards for the Briggs-Julia Chain of Lakes will be determined through the MPCA’s One-Waters approach currently underway for this 8-digit HUC. Specific implementation strategies to meet the required load reductions and high-priority areas will be identified during this process.

8.3.2.3 Other Watershed BMPs

Implementing an ordinance requiring permits for development and re-development in the watershed is recommended. Such ordinances can be written to require implementation of best management practices to the maximum practical extent and guided by performance design standards. These design standards should be targeted toward meeting the load reduction goals of these TMDLs. The State of Minnesota is currently working on standards for minimal impact design, recognizing the need for higher clean water performance goals. The potential load reduction from implementing such an ordinance is dependent on the amount of development and re-development that occurs in the watershed and the level of controls required.

8.3.2.4 Big Elk Lake/ Elk River Turbidity Implementation Schedule and Costs

Table 8.4 shows the specific implementation measures and associated costs and schedule for the implementation plan for Big Elk Lake and the Elk River.

Table 8.4. Big Elk Lake nutrient impairment/Elk River turbidity impairment implementation schedule and costs.

Big Elk Lake Nutrient Impairment/ Elk River Turbidity Impairment							
Priority Level	Priority BMP	Annual Cost	Schedule	Duration (yrs)	Extended Cost	Outcome	Note
1	Upper Watershed Tier 1 and 2 Implementation Areas Inspection SSTS inspections	\$25,000	Years 0-2	1.4	\$35,000	at a rate of 300 Inspections/ yr of Tier 1 and 2 Implementation Areas (413 parcels), at 25% failure rates yields 103 replacements	Inspections conducted May to November.
1	Tier 1 and 2- Implementation Areas SSTS Inspections (Big Elk Lake tributary watershed)	\$25,000	Years 0-2	1.7	\$42,500	at a rate of 300 Inspections/ yr of Tier 1 and 2 Implementation Areas (504 parcels), at 25% failure rates yields 126 replacements	Inspections conducted May to November.
1	Tier 1 and 2 Implementation Areas SSTS Inspections, (Briggs-Julia chain tributary watershed)	\$25,000	Years 0-2	1.5	\$37,500	at a rate of 300 Inspections/ yr of Tier 1 and 2 Implementation Areas (453 tier 1 and 2 parcels), at 25% failure rates yields 113 replacements	Inspections conducted May to November.
1	GIS/ Air Photo (BING) Survey Tier 1 & 2 Implementation Areas to identify opportunities for feedlot and riparian grazing management	\$37,170	Years 0-1	1	\$37,170	GIS-based prioritized database of tier 1 and tier 2 implementation areas	12 weeks of County staff, SWCD staff or intern time, plus 2 large computer screens, GIS and internet connection with available GIS information (Computer equipment not included). It is advisable to wait until LiDar is available. Additional time to develop criteria and evaluate function of database. QA/QC.
1	Outreach & grant opportunities plus inspections	\$37,350	Years 0-1	1	\$37,350	Staff to develop a plan for 20% of parcels (83 parcels)	~ 21 weeks of County staff, SWCD staff or intern time
1	Education and Outreach: Implement watershed-wide advocacy of cover crops and stopping winter spreading	\$7,478	Years 0-5	5	\$37,390	Literature distribution twice per year timed to target practices, plus outreach to 10% of tier 1 and 2 parcels	~ 3 weeks of County staff, SWCD staff or intern time plus expenses
2	Cost for per acre for grants/ loans, etc.	\$169,680	Years 0-10	10	\$1,696,801	Implement protection strategies on 5% of land in tier 1 and 2 parcels, \$250/ acre	Can the nutrient management plans be implemented effectively on site without cost share?
2	Staff time for inspections (Nutrient Management)	\$3,735	Years 0-10	10	\$37,350	Staff inspections (also yields farmer outreach)	2 weeks of staff time per year
Updated: April 27, 2011					Total	\$1,961,061	

8.3.3 Elk River Bacteria Impairment

To achieve the state standard for bacteria in the Elk River, it is recommended to manage grazing in the riparian area and to focus on replacing failing septic systems in the priority management zones. Priority management zones are those located adjacent to the main stem, and direct tributaries to the Elk River.

8.3.3.1 Riparian pasture management

Riparian livestock were determined to be the primary cause of the bacteria impairment in this reach. As such a riparian pasture management plan will be implemented to control livestock in riparian areas, manage grazing, and provide water sources outside riparian area.

8.3.3.2 SSTS Inspection/ Replacement/ Loans

Necessary repairs to leaking SSTSs are recommended to reduce nutrient loading into Big Elk Lake and the 579 reach of Elk River. State law prohibits discharge from septic systems so a 100% reduction of the nutrient load contribution is required.

8.3.3.3 Bacteria TMDL Implementation Schedule and Costs

Table 8.5 shows the schedule, milestones and associated costs for the specific implementation activities necessary to achieve the bacterial load reductions.

Elk River- Bacteria Impairment							
Priority Level	Priority BMP	Annual Cost	Schedule	Duration (yrs)	Extended Cost	Outcome	Note
1	Inspection On-site SSTS inspections	\$50,000	Years 0-2	2	\$100,000	300 Inspections/ yr of tier 1 and 2 implementation areas (366 parcels), at 25% failure rates yields 75 replacements per year	May to November inspections.
1	GIS/ Air Photo (BING) Survey tier 1 & 2 implementation areas to identify opportunities for feedlot and riparian grazing management	\$15,000	Years 0-1	1	\$15,000	GIS-based prioritized database of tier 1 and 2 implementation areas	10-12 weeks of County staff or intern time, plus 2 large computer screens, GIS and internet connection with available GIS / parcel information (Computer equipment not included). It is advisable to wait until LiDar is available. Additional time to develop criteria and evaluate function of database. QA/QC.
1	Outreach & grant opportunities plus inspections	\$35,000	Years 0-1	1	\$35,000	Staff to develop a plan for 20% of parcels (75 parcels)	20 weeks of County staff, SWCD Staff or intern time
2	Cost per acre for grants/ loans, etc.	\$56,000	Years 0-10	10	\$560,000	Implement protection strategies on 5% of land in tier 1 and 2 Areas, \$250/ acre	
2	Staff time for inspections (Nutrient Management)	\$3,500	Years 0-10	10	\$35,000	Staff inspections (also yields farmer outreach)	2 weeks of staff time per year
Total					\$745,000		

9.0 Monitoring

Follow up monitoring is required as part of the TMDL process. Monitoring is essential to track trends and progress towards goals, to evaluate the efficacy of selected BMPs and determine if course corrections (adaptive management) are needed to meet stated endpoints. Going forward, an on-going annual base-line monitoring program is recommended, to track trends and progress towards goals with additional monitoring added as needed to track efficacy of specific BMPs. Annual evaluation of monitoring data and reporting is recommended to document the process of adaptive management.

Annual reporting should include results of data collection, documentation of the type, location, quantity, costs, and load reductions of every BMP implemented in the watershed as well as an assessment and recommendations for the following years. This annual reporting process will provide the framework for adaptive management. Specific monitoring recommended is listed below:

Table 9.1. Baseline water quality monitoring plan.

Resource	Parameter	Location/ Frequency	Monitoring Period
Mayhew Lake	TP	Surface/ Monthly	May- September
	Secchi Depth	Surface Monthly	April- October
	Chlorophyll-a	Surface /Monthly	May- September
Big Elk Lake	TP	Weekly	May- September
	Secchi Depth	Monthly to weekly	April- October
	Chlorophyll-a	Weekly	May- September
Elk River	E. coli	3 stations in the listed reach, twice monthly	April- October
	Transparency	3 stations, twice monthly	April- October
	VSS	3 stations, twice monthly	April- October
	TP	3 stations, twice monthly	April- October

Table 9.2. Sample BMP documentation table.

BMP	Location	Size	Drainage Area (ac)	Cap Cost	Maintenance Cost	Pollutant Removal	Target TMDL
Rain garden	1234 Johnson Lane, Map ID 1	1,500 sq. ft	0.5 acre	\$500	Landowner	.02lbs TP/yr	Big Elk Lake Nutrient/Elk River Turbidity
Crop Nutrient Management	Township Range Section, Map ID 2	24 acres	NA	\$1,200	\$300/ acre/year	.01 lbs/TP/ acre/year	Big Elk Lake Nutrient/Elk River Turbidity

Table 9.3. Sample implementation progress table.

BMP	Target Implementation	Historical Progress	2010 Progress	Total Progress
Nutrient Management,	400 acres Priority zone 1	200 acres	140 acres	340 acres
Riparian Buffers	100 acres, Priority Zones 1 & 2	20 acres	5 acres	25 acres

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