



North Dakota's Alternative Plans

HEATHER HUSBAND

NORTH DAKOTA DEPARTMENT OF HEALTH

WATERSHED MANAGEMENT PROGRAM

ND Alternative Plan

The What

- ▶ Section 319 Watershed Based Plan (9 Element Plan)
 - ▶ Our terminology : Project Implementation Plan (PIP)
 - ▶ Submitted as project proposal to Section 319 Task Force
- ▶ Modified current PIPs
- ▶ Modified proposal guidance to include all Region 8 EPA alternative plan considerations

ND Alternative Plan

The What

Introduction: This is an alternative plan submitted for the Phase II of the Maple River Watershed Project in the Buffalo Creek Subwatershed. The North Dakota Department of Health, Watershed Management Program believes that since Best Management Practices (BMPs) have already been initiated through a Section 319 Nonpoint Source Program grant, the watershed is moving towards meeting water quality standards. Monitoring will be conducted as a part of the grant to determine the effectiveness of the BMPs and the project. If the BMPs implemented do not resolve the E.coli impairment in a reasonable amount of time, a TMDL will be written. The data gathered as a part of this 319 grant will be beneficial to the creation of the TMDL.

This document is a modified version of the Section 319 Project Implementation Plan. A crosswalk for how this document meets EPA's considerations for an alternative plan is included in Appendix E.

1.0 PROJECT SUMMARY SHEET

LEAD PROJECT SPONSORS/SUBGRANTEES:

Address: Cass County Soil Conservation District
1665 43rd Street South, Suite 103
Fargo, ND 58103
Phone: (710) 282-2157 ext. 3
e-mail: eric.dahl@nd.nacndnet.net
Web: <http://www.cassscd.org/>

STATE CONTACT PERSON: Greg Sandness TITLE: Environmental Scientist
PHONE 701-328-5232 FAX 701-328-5200

STATE: North Dakota WATERSHED: Maple River
HYDROLOGIC UNIT CODE: 09020205 HIGH PRIORITY WATERSHED: No

PROJECT TYPES	WATERBODY TYPES	NPS CATEGORY
<input checked="" type="checkbox"/> STAFFING & SUPPORT	<input type="checkbox"/> GROUNDWATER	<input checked="" type="checkbox"/> AGRICULTURE
<input checked="" type="checkbox"/> WATERSHED RUNOFF	<input type="checkbox"/> LAKES/RESERVOIR	<input type="checkbox"/> URBAN
<input type="checkbox"/> GROUNDWATER	<input checked="" type="checkbox"/> RIVERS	<input type="checkbox"/> SILVICULTURE
<input checked="" type="checkbox"/> I & E	<input checked="" type="checkbox"/> STREAMS	<input type="checkbox"/>
CONSTRUCTION	<input type="checkbox"/> WETLANDS	<input type="checkbox"/> RESOURCE
	<input type="checkbox"/> OTHER	
EXTRACTION	<input type="checkbox"/> STORAGE/LAND DISPOSAL	
	<input type="checkbox"/> HYDRO MODIFICATION	
	<input type="checkbox"/> OTHER	

PROJECT: LATITUDE 46 MIN. 45 LONGITUDE -97 MIN. 33

ND Alternative Plan

The What

What our EPA Regional Office Gave Us

Table 1. EPA Region 8 Summary of the Alternative (Alt) Plan Considerations¹

Alt Plan Considerations Number	Alt Plan Considerations Summary Description	Potential Information to Include an Alternative Plan
1	Identify the specific impaired waters, causes, and sources	<ul style="list-style-type: none"> Assessment Unit (AU) numbers, descriptions and pollutants that match state's most recent 303(d) list Include a list or table of all contributing permitted point sources Identify general nonpoint source (NPS) contributors by category Include relative source contribution estimates
2	Clearly identify the target(s), consistent with water quality standards (WQS), which will be used to demonstrate restoration. Provide an analysis that shows how planned implementation actions can meet that target(s).	<ul style="list-style-type: none"> Clear target(s) consistent with WQS Load reduction estimates needed to meet the target Description of the management measures that will need to be implemented to achieve load reductions
3	Provide an implementation plan to address all sources and a schedule with milestones and target dates	<ul style="list-style-type: none"> A schedule with proposed controls and target dates A description of interim measurable milestones
4	Identify sources of available funding to implement the plan	<ul style="list-style-type: none"> A table, list, or description of the available funding sources
5	Identify all parties committed to or assisting in implementation	<ul style="list-style-type: none"> A table, list, or description of all parties that are committed to or assisting in implementation
6	Provide an estimate or projection of time when WQS will be met	<ul style="list-style-type: none"> An estimated date or number of months/years
7	Describe the plans for effectiveness monitoring to show restoration progress and identify corrective measures	<ul style="list-style-type: none"> A plan for effectiveness monitoring designed to show restoration progress and identify corrective measures
8	Describe the plans to periodically evaluate the alternative plan to determine if it's on track to more immediately meet WQS, or if adjustments need to be made, or if impaired water should be assigned a higher priority for TMDL development.	<ul style="list-style-type: none"> A plan to periodically evaluate the alternative plan to determine if it's on track to meet WQS or if adjustments need to be made

¹ Table 1 is Region 8's summary of the alternative plan considerations and potential information to include in an alternative plan. The full description of the alternative restoration approach, the circumstances to consider, the elements to consider and the use of the 5-alternative IR category is contained in the 2016 IR memorandum, available at: https://www.epa.gov/sites/production/files/2015-10/documents/2016-ir-memo-and-cover-memo-8_13_2015.pdf

ND Alternative Plan

The What

What Our Crosswalk Looks Like

Crosswalk for Buffalo Creek Alternative Plan and EPA Region 8's Consideration Table

This crosswalk was developed to summarize how the Buffalo Creek Alternative Plan addresses the considerations put forth in EPA Region 8's discussion of alternative plans (Table 1.) The number in the summary corresponds to the Alt Plan Considerations Number in the table that follows.

- 1) This information is provided on page 2 as well as in Section 2.2 Watershed Description and Section 2.5 Water Quality.
- 2) The WQS are identified in Section 2.5 Water Quality, and the target is identified in Section 3.2 Objectives and Tasks, Objective 2. Management measures are also identified in this Section and Objective. Specific practices are also mentioned at the end of Section 2.2.
- 3) Implementation goals are provided in Section 3.2 as well as the milestone table in Appendix B.
- 4) Funding sources are provided in the budget table in Appendix B.
- 5) Project Sponsors are listed in Section 3.5 and the coordination plan is discussed in Section 4.0.
- 6) The timeframe of when WQS will depend on many factors such as landowner interest, economic conditions, weather, etc. To address this, as identified in Section 3.2, Objective 4, it states that water quality sampling will be conducted as BMPs are installed to monitor effectiveness. Section 5.0 discusses how monitoring and evaluation will be conducted to describe progress towards the established targets. If progress is not deemed sufficient, a TMDL will be completed. The Implementation Project will run from 2014 to 2018.
- 7) Effectiveness monitoring is described in #6 above.
- 8) This will be done as a part of the effectiveness monitoring. As stated in Section 5.0, at the end of the project a larger report summary will also be written to see if sufficient progress towards the targets has been made. If E. coli water quality standards are not met within a reasonable period of time after implementation is complete, a TMDL will be developed.

ND Alternative Plan

The Why

- ▶ Water Quality Division Improvement
 - ▶ Focus on Stakeholder Involvement and Transparency
- ▶ Multiple New Activities
 - ▶ Nutrient Criteria Development/Strategy
 - ▶ Water Quality Basin Management Framework
 - ▶ TMDL Vision/Prioritization
 - ▶ Vision much better for us than pace

ND Alternative Plan


The Why

- ▶ Challenges to Address
 - ▶ Very small staff and budget cuts
 - ▶ Program Integration
 - ▶ Implementation/Restore WQ Impaired Waters Always #1 Priority
 - ▶ Public Recognition

ND Alternative Plan

EPA's Thoughts

- ▶ Worked with several EPA R8 folks in both TMDL and 319 programs
- ▶ Concerns
 - ▶ Expectations from EPA HQ
 - ▶ Will the Alt Plans be good enough, or create more problems
 - ▶ How will EPA R8 evaluate the plans
 - ▶ How will improvement be measured and tracked. How will we know if it doesn't work



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Questions?