



**TO:** WI DNR  
**FROM:** Zach Regnier P.E., Sr. Civil Engineer  
**DATE:** October 27, 2021  
**TITLE:** **TMDL Implementation Plan**

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### **PERMIT REQUIREMENTS**

A.5.2 By October 31, 2021, the permittee shall submit a TMDL Implementation Plan to the Department identifying and describing the actions that the permittee shall undertake, including a proposed schedule and milestones, to achieve the following by the end of the term of this permit:

- a. A level of reduction that achieves at least 20% of the remaining reduction needed beyond the current 20% TSS reduction required under s. NR 151.13 (2)(b)1.b., Wis. Adm. Code, to achieve full compliance in sediment or TSS.
  
- b. A level of reduction that achieves at least 10% of the remaining reduction needed beyond 15% TP reduction to achieve full compliance in TP.

### **IMPLEMENTATION PLAN**

Currently the City of River Falls is in compliance with the permit requirements of section A.5.2; below are justifications for this. As such, the City's implementation plan is to continue to look for ways to increase TP removal. This includes completing infiltration tests in ponds and other BMPs to update our modeling with better data. It also includes updating the modeling with new developments that include stormwater treatment. Finally, it includes the design and construction of a large corporate park with regional stormwater treatment on land that is currently agricultural land use.

The City is required to achieve a TSS removal rate of 40% to meet the full TMDL. Currently the City's modeling shows a TSS removal rate of 42%. Therefore, the City meets the full requirements for TSS including the requirement of A.5.2(a).

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The City is required to achieve a TP removal rate of 47% to meet the full TMDL. Currently the City's modeling shows a TP removal rate of 38%. Per section A.5.2(b), the City needs to achieve 18.2% removal by the end of the permit term;  $0.15 + 0.10(47-15) = 0.182 = 18.2\%$ . Therefore, the City meets the requirements of A.5.2(b).