EPA Region 7 TMDL Review

TMDL ID: KS-SS-08-514_13 **State:** KS

Document Name: SMOKY HILL RIVER

Basin(s): LOWER SMOKY HILL

HUC(s): 10260008

Water body(ies): KENTUCKY CREEK, KENTUCKY CREEK, WEST, PAINT CREEK, PEWEE CREEK, SAND CREEK, SHARPES CREEK, SMOKY HILL RIVER, WILEY CREEK

Tributary(ies): KENTUCKY CREEK (17), PAINT CREEK (52), PEWEE CREEK (56), SAND CREEK (46), SHARPS CREEK (16), SMOKY HILL RIVER (13), SMOKY HILL RIVER (14), SMOKY HILL RIVER (15), WEST KENTUCKY CREEK (54), WILEY CREEK (47)

Pollutant(s): E. COLI

Submittal Date: 7/16/2010 **Approved:** Yes

Submittal Letter

State submittal letter indicates final Total Maximum Daily Load(s) (TMDL) for specific pollutant(s)/water(s) were adopted by the state, and submitted to EPA for approval under section 303(d) of the Clean Water Act [40 CFR § 130.7(c)(1)]. Include date submitted letter was received by EPA, date of receipt of any revisions, and the date of original approval if submittal is a phase II TMDL.

This TMDL document was formally submitted by the Kansas Department of Health and the Environment (KDHE). The United States Environmental Protection Agency (EPA) received this document by email on July 16, 2010. Revisions to this document were received by email on August 2 and 3, 2010.

Water Quality Standards Attainment

The water body's loading capacity (LC) for the applicable pollutant is identified and the rationale for the method used to establish the cause-and-effect relationship between the numeric target and the identified pollutant sources is described. TMDL and associated allocations are set at levels adequate to result in attainment of applicable water quality standards (WQS) [40 CFR § 130.7(c)(1)]. A statement that WQS will be attained is made.

The Lower Smoky Hill River TMDL was developed to address the impaired Primary Contact Recreation Class B use for Smoky Hill River segments 13, 14 and 15 and their tributaries starting near Mentor and extending to the headwaters below Kanapolis Lake.

In 2003, KDHE replaced fecal coliform bacteria (FCB) with *Escherichia coli* (*E. coli*) criteria as a better health indicator for human illness. Therefore, bacteria sampling data before 2003 were for FCB and not *E. coli*. In order to develop a more comprehensive TMDL, the previous FCB data was converted to estimated *E. coli* values using a recent comparative study that found about 80 percent of FCB are *E. coli*.

Sample data for the sampling sites were categorized for each of the three defined seasons: Spring (April – July), Summer-Fall (August – October) and Winter (November – March). Data for *E. coli* at ambient monitoring Site SC514 in the Smoky Hill River near Mentor was from 1990 to 2008. In 2006, this site was sampled intensively for *E. coli* (5 times in a 30-day period) four times (April, June, August and October) to determine impairment under the new *E. coli* WQS.

Of these intensive surveys, June's survey had a geometric mean of 393 colony forming units (CFUs) per 100 milliliters (ml), which was over the *E. coli* criterion of 262 CFUs/100 ml for Primary Contact Recreation "Class

B" use. During the period of 1990 to 2008, there were a total of twenty-three *E. coli* digressions recorded. The percentage of *E. coli* samples over the criteria of 262 CFUs/100 ml in April – July was about 61 percent. Seventy-four percent of these bacteria digressions occurred during the high flow conditions between 10 and 50 percent flow exceedance.

This use was determined to be impaired when average geometric means for *E. coli* exceeded the *E. coli* WQS criteria during the recreation season of April - October during 2003 to 2008. Data indicated that *E. coli* levels increased as total suspended solids (TSS) concentrations increased and were highest in spring with the highest stream flows. Also, most *E. coli* exceedances occurred during high flow conditions of 10 to 50 percent flow exceedance. This suggests that storm runoff plays an important role affecting *E. coli* levels.

Rotational water quality sites SC748 and SC749 are located on the Smoky Hill River near Marquette and Sharps Creek, respectively. Both sampling sites were sampled starting in 2007. Sharps Creek is designated as a Secondary Contact Recreation stream with a WQS of a geometric mean of 3,843 CFUs/100 ml (January – December) taken from at least five samples within a 30-day period for Class b stream segments. Of 12 samples taken, two samples in July exceeded the WQS of 3,843 CFUs/100 ml. High flow appears to be a factor that contributes to the elevated *E. coli* in July because of the correlation of high *E. coli* values with 23 percent flow exceedance at both monitoring sites (SC748 and SC749) on July 30, 2007. Also, *E. coli* levels are positively correlated with total suspended solids (TSS) concentrations, which suggests that hydrology, i.e., storm runoff, play an important role affecting *E. coli* levels. The highest *E. coli* seasonal geometric mean (186 CFUs/100 ml) occurred in the spring which coincided with the highest stream flow (11,374 cubic feet per second (cfs)) while the lowest *E. coli* seasonal geometric mean (45 CFUs/100 ml) occurred when streamflow was the lowest during the winter (3,158 cfs).

The TMDL was set to values from monitoring site SC514 by multiplying the calculated stream flow by the WQS criteria and a conversion factor to determine a load duration curve (LDC). The LDC represents the LC in billions of colony forming units (BCFUs) of *E. coli* per day at any percent flow exceedance. Two LDCs were calculated to reflect the two Primary Contact Recreation Use Class B WQS criteria of 262 CFUs/100 ml during the recreation season (April - October) and 2,358 CFUs/100 ml for the non-recreation season (November - March).

The resulting LC for *E. coli* at the 50 percent flow exceedance during the recreation season is 999 BCFUs/day and 5,428 BCFUs/day during the non-recreation season. Achievement of these LCs should result in WQS attainment.

Numeric Target(s)

Submittal describes applicable WQS, including beneficial uses, applicable numeric and/or narrative criteria. If the TMDL is based on a target other than a numeric water quality criterion, then a numeric expression, site specific if possible, was developed from a narrative criterion and a description of the process used to derive the target is included in the submittal.

"Primary Contact Recreation Use for classified stream segments. At least five samples shall be collected during separate 24-hour periods within a 30-day period. A geometric mean analysis of these samples shall not exceed the criteria in Table 1i, as adopted in subsection (d) of this regulation, beyond the mixing zone." (KAR 28-16-28e (c)(7)(D))

The *E. coli* WQS criteria for classified stream segments with Primary Contact Recreation Use Class B is 262 CFUs/100 ml geometric mean from April 1 - October 31 and 2,358 CFUs/100 ml geometric mean from November 1 - March 31 (KAR 28-16-28e (d) Table 1i).

The designated beneficial uses for the Lower Smoky River and it's tributaries are:

Smoky Hill River (13, 14 & 15)

- Expected Aquatic Life Support,
- Primary Contact Recreation (Class B),
- Drinking Water,
- Food Procurement,
- Industrial Water Supply,
- Groundwater Recharge,
- Irrigation and
- Livestock Watering

West Kentucky Creek (54)

- Expeeted Aquatic Life Support,
- Secondary Contact Recreation (Class b),
- Drinking Watcr,
- Food Procurement,
- Industrial Water Supply,
- Groundwater Reeharge,
- Irrigation and
- Livestock Watering.

Sharps Creek (16), Sand Creek (46), Wiley Creek (47), Paint Creek (52) and Pewee Creek (56)

- Expected Aquatie Life Support and
- Secondary Contact Recreation (Class b).

Kentucky Creek (17)

- Expected Aquatic Life Support and
- Secondary Contact Recreation (Class b).

On July 7, 2003, Seeondary Contact Recreation was promulgated by EPA for Kentucky Crcek (17). Although KDHE has changed that use within their Surface Water Registcr to secondary contact "b" which corresponds to an *E. coli* WQS criteria of 3,843 colonies/100 ml, KDHE has not submitted a Use Attainability Analysis (UAA) to EPA which would allow EPA to approvc this revised use. In 2003, the designation for Kentucky Creek (17) was "Q" (the only secondary contact recreational use at that time) which corresponded to a FCB criteria of 900 CFU/100 ml. The *E. coli* WQS criteria for classified stream segments witb Secondary Contact Recreation Class b is 3,843 CFUs/100 ml geometric mean from January 1 - Decembcr 31. As this TMDL targets Primary Contaet Recreation Class B WQS criteria for *E. coli* for tlie whole segment, the ineorrect designated usc of Secondary Contaet Recrcation "b" in the TMDL has no impact on the LA, WLA or LC and the TMDL still protects all recreation uses.

The use that is impaired is Primary Contact Recreation.

Pollutant(s) of concern

An explanation and analytical basis for expressing the TMDL through surrogate measures (e.g., parameters such as percent fines and turbidity for sediment impairments, or chlorophyll-a and phosphorus loadings for excess algae) is provided, if applicable. For each identified pollutant, the submittal describes analytical basis for conclusions, allocations and margin of safety (MOS) that do not exceed the LC. If submittal is a phase II TMDL there are refined relationships linking the load to WQS attainment. If there is an increase in the TMDL there is a refined relationship specified to validate the increase in TMDL (either load allocation (LA) or waste load allocation (WLA)). This section will compare and validate the change in targeted load between the versions.

The link between the *E. coli* impairment and TMDL is direct. The TMDL was set at monitoring sitc SC514 by multiplying calculated stream flow by the WQS criteria and a conversion factor to determine the LDCs which represent the LC in BCFUs of *E. coli* per day at any percent flow exceedance. Two LDCs were calculated to reflect the two Primary Contaet Recreation Use Class B WQS criteria of 262 CFUs/100 ml during tlie recreation season (April - October) and 2,358 CFUs/100 ml for thc non-recreation season (November - March).

Source Analysis

Important assumptions made in developing the TMDL, such as assumed distribution of land use in the watershed, population characteristics, wildlife resources, and other relevant information affecting the characterization of the pollutant of concern and its allocation to sources, are described. Point, nonpoint and background sources of pollutants of concern are described, including magnitude and location of the sources. Submittal demonstrates all significant sources have been considered. If this is a phase II TMDL any new sources or removed sources will be specified and explained.

Within the watershed tliere are five municipal and industrial National Pollution Discharge Elimination System (NPDES) permitted facilities (Table 1). There are no municipal separate storm sewer systems (MS4s) that diseharge into this part of Smoky Hill River.

Three of the permitted facilities are munieipal wastewater treatment plants (WWTP) in the cities of Assaria, Lindsborg and Marquette that directly dischargc to the Smoky Hill River and may contribute significant *E. coli* loads during bascflow and low flow periods. The city of Assaria bas a 2-cell lagoon system while the eity of Marquette has a 3-cell lagoon. Both require quarterly *E. coli* sampling but have no specific *E. coli* limits in the permits. The city of Marquette typically discharges one quarter per year based on their discharge monitoring reports. In total, they have only sampled for *E. coli* twice with both samples being high for April and Oetober.

The city of Assaria facility has a design flow of 0.060 million gallons/day (MGD) but the permit only allows 0.0414 MGD. The city of Lindsborg uses an oxidation ditch with a two phase permit. The two-phase permit contains a description and design flow for their current facility, along with a description of an upgraded design with additional improvements. Currently, the design flow is 0.418 MGD. When upgrades and improvements take place their permitted design flow (phase two) increases to 0.55 MGD. The TMDL was calculated using the current permitted design flows of 0.0414 MGD for the city of Assaria and 0.418 MGD for the city of Lindsborg.

The Ellsworth County Rural Water District (RWD) 1- Post Rock also has a NPDES permit without any bacteria limits or bacteria monitoring. This facility treats raw water with lime, aluminum, various polymers, chlorine dioxide, fluoride, ammonia sulfate and polyphosphate as it passes through the various treatment processes. It is not expected that this facility is a contributing source of *E. coli*.

The last is McPherson County Rest Area which is a non-overflowing facility and is prohibited from discharging except in extreme precipitation or flooding events. Such extreme events are not expected to occur at a frequency or duration to contribute to the *E. coli* impairment.

Table 1. NPDES Permitted Municipal and Industrial Facilities

Facility	Permit #	Stream Reach	Segment #	Design Flow
city of Assaria	KS0082295	Smoky Hill River	14	0.0414 MGD
Ellsworth County RWD 1-Post Rock	KS0099287	Tributary to Smoky Hill River	15	0.0255 MGD
city of Lindsborg	KS0022462	Smoky Hill River	14	0.4180 MGD
city of Marquette	KS0021873	Smoky Hill River	15	0.0670 MGD
McPherson County Rest Area	KSJ000652	Non-discharging	N/A	N/A

There are 22 confined animal feeding operations (CAFOs) that are state certified or permitted: 2 dairy, 16 beef, 3 swine and 1 mixed beef and horses (See TMDL, Appendix B). Three of the 22 CAFOs also have NPDES permits: Beef (2,000) KS0099597, Beef (10,000) KS0116351 and Swine (11,364) KS0086291. All facilities have waste management systems designed to minimize runoff entering the facility or to detain runoff leaving their operations. These systems are designed to retain a 25-year, 24-hour rainfall/ runoff event and two weeks of wastewater from normal operations. Such an extreme rainfall event is expected to occur when flow exceedances are less than 1-5 percent.

Another potential source of *E. coli* are on-site waste systems. Most of the population lives in urban areas where public sewer systems are used, and estimated failing rates of individual septic systems are 0.93 percent. Individual septic systems scattered through the watershed are seen as a minor source.

The land uses within the Smoky Hill River watershed are grassland (52 percent), cultivated cropland (37 percent), deciduous forest (4 percent), pasture / hay (0.5 percent) and urban area consisting of residential, commercial, industrial, roads and lawns (about 5 percent).

With grassland and pastured areas estimated to be more than half the watershed area, anticipated livestock grazing density would be moderate in summer and high in winter. Livestock numbers for the entire watershed are estimated at 6,340 beef, 306 dairy, 7,869 swine, 1,198 sheep, 338 horses and 77 chickens. At these values, grazing density is estimated at 0.18 head/acre in McPherson County, 0.06 head/acre in Ellsworth County, 0.07 head/acre in Rice County and 0.10 head/ acre in Saline County.

Given the dominance of grassland and cropland in the watershed, grazing areas and cropland with manure application are believed to primarily contribute to elevated *E. coli* pollution in the Smoky Hill River. In addition, about 98 percent of the watershed has soil permeability values less than or equal to 1.71 inches/hour. This means that storms that produce 0.57"/hour of rain will generate overland runoff in 20 percent of the watershed area. *E. coli* pollution is frequently seen in the spring and likely comes from winter feeding areas where livestock are congregated and raised in small areas in cold weather.

In the absence of an NPDES permit, the discharges associated with sources were applied to the LA, as opposed to the WLA for purposes of this TMDL. The decision to allocate these sources to the LA does not reflect any determination by EPA as to whether these discharges are, in fact, unpermitted point source discharges within this watershed. In addition, by establishing these TMDLs with some sources treated as LAs, EPA is not determining that these discharges are exempt from NPDES permitting requirements. If sources of the allocated pollutant in this TMDL are found to be, or become, NPDES-regulated discharges, their loads must be considered as part of

the calculated sum of the WLAs in this TMDL. WLA in addition to that allocated here is not available.

Any CAFO that does not obtain an NPDES permit must operate as a no discharge operation. Any discharge from an unpermitted CAFO is a violation of Section 301. It is EPA's position that all CAFOs should obtain an NPDES permit because it provides clarity of compliance requirements, authorization to discharge when the discharges are the result of large precipitation events (e.g., in excess of 25-year and 24-hour frequency/ duration) or are from a man-made conveyance.

Permitted CAFOs identified in this TMDL are part of the assigned WLA. AFOs and unpermitted CAFOs are considered under the LA because we do not currently have enough detailed information to know whether these facilities are required to obtain NPDES permits. This TMDL does not reflect a determination by EPA that such facility does not meet the definition of a CAFO nor that the facility does not need to obtain a permit. To the contrary, a CAFO that discharges or proposes to discharge has a duty to obtain a permit. If it is determined that any such operation is an AFO or CAFO that discharges, any future WLA assigned to the facility must not result in an exceedance of the sum of the WLAs in this TMDL as approved.

All known sources have been considered.

Allocation - Loading Capacity

Submittal identifies appropriate WLA for point, and load allocations for nonpoint sources. If no point sources are present the WLA is stated as zero. If no nonpoint sources are present, the LA is stated as zero [40 CFR § 130.2 (i)]. If this is a phase II TMDL the change in LC will be documented in this section.

The LC for *E. coli* at the 50 percent flow exceedance during the recreation season is 999 BCFUs/day and 5,428 BCFUs/day during the non-recreation season. Since the MOS is implicit, LAs were calculated as the difference between the LC and the WLA at any given flow on the LDC. Achievement of these LCs should result in WQS attainment.

WLA Comment

Submittal lists individual WLAs for each identified point source [40 CFR § 130.2(h)]. If a WLA is not assigned it must be shown that the discharge does not cause or contribute to WQS excursions, the source is contained in a general permit addressed by the TMDL, or extenuating circumstances exist which prevent assignment of individual WLAs. Any such exceptions must be explained to a satisfactory degree. If a WLA of zero is assigned to any facility it must be stated as such [40 CFR § 130.2(i)]. If this is a phase II TMDL any differences in phase I and phase II WLAs will be documented in this section.

Within the watershed there are five municipal and industrial NPDES permitted facilities (Table 1). There are also 22 CAFOs that are state certified or permitted: 2 dairy, 16 beef, 3 swine, 1 mixed beef and horses (See TMDL, Appendix B). Three of the 22 CAFOs also have NPDES permits.

The total WLA is based upon the *E. coli* limits established in the city of Lindsborg's NPDES permit of 160 CFUs/100 ml during April - October. The total WLA during November - March is based upon a discharge limit of 2,358 CFUs/100 ml. For the Smoky Hill River, the 7Q10 value of 10.2 cfs only occurs 0.3 percent of the time and is ten times greater than the combined design flow of all facilities in the TMDL, i.e., 0.85 cfs. The seven-day, 10-year low flow or 7Q10, is the discharge below which the annual 7-day minimum flow falls in 1 year out of 10 on the long-term average. Therefore, the WLA is established for low flow conditions, i.e., 95 - 100 percent exceeded flows, which are most strongly affected by point sources. This resulted in a total WLA for the four facilities of 3.19 BCFUs/ day from April - October and 47 BCFUs/ day from November - March.

Table 2. Individual *E. coli* WLAs for Municipal and Industrial Facilities and CAFOs

Facility	Permit #	Design Flow	April - October (BCFUs)	November - March (BCFUs)
city of Assaria	KS0082295	0.0414 MGD	0.25	3.70
Ellsworth County RWD 1 - Post Rock	KS0099287	0.0255 MGD	0	0
city of Lindsborg	KS0022462	0.4180 MGD	2.53	37.30
city of Marquette	KS0021873	0.0670 MGD	0.41	6.0
McPherson County Rest Area	KSJ000652	N/A	0	0
22 CAFOs	see TMDL	N/A	0	0

The McPherson County Rest Area and the 22 CAFOs are given a WLA of zero given that these facilities will not discharge to receiving streams except in extreme high flow situations. The frequency of these events is expected to be in the 1 to 5 percent flow exceedance range.

LA Comment

Includes all nonpoint sources loads, natural background, and potential for future growth. If no nonpoint sources are identified the LA must be given as zero [40 CFR § 130.2(g)]. If this is a phase II TMDL any differences in phase I and phase II LAs will be documented in this section.

The LA is set by the LA = LC - WLA since the MOS is implicit. At the 50 percent flow exceedance, this results in an *E. coli* LA during the recreation season of 995.81 BCFUs/day and 5,380.92 BCFUs/day during the non-recreation season.

Margin of Safety

Submittal describes explicit and/or implicit MOS for each pollutant [40 CFR § 130.7(c)(1)]. If the MOS is implicit, the conservative assumptions in the analysis for the MOS are described. If the MOS is explicit, the loadings set aside for the MOS are identified and a rationale for selecting the value for the MOS is provided. If this is a phase II TMDL any differences in MOS will be documented in this section.

An implicit MOS was incorporated based upon conservative assumptions in the assessment of attaining WQS under this TMDL. The TMDL is established using individual samples against the WQS criteria although the WQS is meant to be assessed by geometric means of samples taken in 30-day periods. This approach ensures the WQS will be attained since using individual samples are much more stringent than assessing the geometric mean. Also, the WLAs were calculated for the recreation season using the existing permit limits for the city of Lindsborg which are 160 CFUs/100 ml rather than the WQS criteria of 262 CFUs/100 ml. Third, the TMDL endpoints were set to fully support Primary Contact Recreation Uses for the Smoky Hill River and its tributaries. This is more protective of the tributaries as they are designated for Secondary Contact Recreation Use which has lower WQS criteria for *E. coli*.

Seasonal Variation and Critical Conditions

Submittal describes the method for accounting for seasonal variation and critical conditions in the TMDL(s) [40 CFR § 130.7(c)(1)]. Critical conditions are factors such as flow or temperature which may lead to the excursion of WQS. If this is a phase II TMDL any differences in conditions will be documented in this section.

Seasonal variation has been considered by using a LDC which represents a continuum of desired loads over all flow conditions, rather than at a fixed, single value. The TMDL also considers seasonality in the recreation season of April 1- October 31 and non-recreation season November 1 - March 31. Critical conditions have been addressed since WLAs are set at low flow conditions when water quality conditions are most susceptible to point source discharge impacts.

Public Participation

Submittal describes required public notice and public comment opportunity, and explains how the public comments were considered in the final TMDL(s) [40 CFR § 130.7(c)(1)(ii)].

A public hearing was held for the Smoky Hill-Solomon River Basin TMDL in Assaria on February 11, 2010. KDHE met with their Watershed Management Section staff in October 2009, and with the Upper Lower Smoky Hill River Watershed Restoration and Protection Strategy (WRAPS) on August 13 and October 22, 2009. The Smoky Hill-Saline River Basin Advisory Committee met to discuss the TMDLs in the basin on July 7, 2009 and October 1, 2009 in Hays. The TMDL was posted on the KDHE TMDL Web site, http://www.kdhe.state.ks.us/TMDL, on January 25, 2010. KDHE received two comments, including EPA Region 7, and responded by making clarifications in the TMDL.

Monitoring Plan for TMDL(s) Under Phased Approach

The TMDL identifies a monitoring plan that describes the additional data to be collected to determine if the load reductions required by the TMDL lead to attainment of WQS, and a schedule for considering revisions to the TMDL(s) (where phased approach is used) [40 CFR § 130.7].

Ongoing monitoring at Site SC514 will continue and water quality samples will be collected bimonthly. Future

stream sampling will also occur bimonthly at rotational sites (SC748 and SC749) in 2011, 2015 and 2019. Monitoring of tributary levels of *E. coli* during runoff events will help direct abatement efforts toward major contributors. Additionally, tracking of *E. coli* loadings from the existing municipal systems should be done to confirm their small contribution to the river. Intensive geomean sampling will occur in 2018 where at least five samples are taken within a 30-day period.

Reasonable Assurance

Reasonable assurance only applies when less stringent WLAs are assigned based on the assumption of nonpoint source reductions in the LA will be met [40 CFR § 130.2(i)]. This section can also contain statements made by the state concerning the state's authority to control pollutant loads.

Reasonable assurances are not required for this TMDL because permitted facilities WLAs are set to meet WQS. However, the TMDL states that effluent limits on NPDES permits will remain in force and any state permits will be conditioned such that discharges from the permitted facilities will not cause violations of applicable bacteria criteria. Ongoing inspections and monitoring of these systems will be made to ensure that minimal contributions have been made by these sources.

KDHE has the authority to issue and enforce state operating permits. Inclusion of effluent limits into a state operating permit and requiring that effluent and instream monitoring be reported to KDHE should provide reasonable assurance that instream WQS will be met. Section 301(b)(1)(C) requires that point source permits have effluent limits as stringent as necessary to meet WQS. However, for WLAs to serve that purpose, they must themselves be stringent enough so that (in conjunction with the water body's other loadings) they meet WQS. This generally occurs when the TMDL's combined nonpoint source LAs and point source WLAs do not exceed the WQS-based LC and there is reasonable assurance that the TMDL's allocations can be achieved.

Kansas has also identified several Federal, State, local and non-government organizations that may be included in the implementation process, as well as enforcement and compliance measures as needed for NPDES permits.

Additionally, this TMDL will be incorporated into the WRAPS in the Continuing Planning Process for Kansas in 2010. Recommendations of this TMDL will be considered in the *Kansas Water Plan* implementation decisions under the State Water Planning process after Fiscal Years 2012-2019.

The State Water Plan Fund annually generates $16-18 million and is the primary funding mechanism for implementing water quality protection and pollution reduction activities in the state through the *Kansas Water Plan*. This state water planning process coordinates and directs programs and funding toward watersheds and water resources of highest priority and typically the state allocates at least 50 percent of the funds to WRAPS programs. This watershed and TMDL are a High Priority consideration for funding.