SUBJECT	Public Comments: 11/28/2012 Nonpoint Source Phosphorus meeting
Process	• Collaborative framework should be established early in the process. A proposed framework will be offered in writing. • Balanced approach, modeled after approach used for stream flow process. • Where is DEEP in developing a plan to assure verifiable nonpoint and point source P reductions to meet Water Quality Standards? • Recommend creation of a credit system based on nonpoint source and point source phosphorus mitigation where Municipalities have the ability to ascertain credits attributable to point and nonpoint source discharges.
Agriculture	• Density of cows per acre and proximity of operations to stream are important and this information should be used to adjust ranking of problem situations. • Operations on streambanks may have no fail-safe mechanism that can effectively prevent pollution, especially during storms. • A legal means is needed to regulate agricultural practices too close to streams. A farmer was offered compensation for losses if he established a buffer. The farmer's response, in defiance, was to move closer to stream. • Recommend establishing a buffer distance between streams and manure spreading areas. • Concerns expressed regarding spreading manure on frozen ground.
On-Site Sewage Disposal	• Recommend better definition of septic system "failure" and addressing of systems that pre-exist Public Health Code. • Is it really cheaper to sewer in situations such as concentrated lakeside developments? • On-site septic systems may need greater separation from water table in above situations. • Goal should be to make these systems work more effectively, and also factor in value of groundwater recharge. • Longstanding impression that septic systems are a source of phosphorus – especially with regard to lakes and lakeside communities, that P travels in sediments. Efficacy of phosphorus removal by septic systems was questioned. • Would like to see more consideration, and regulations developed to better utilize alternative treatment technologies for treating sewage on-site in problem areas.
Lakes	• More funding needs to be available through the Clean Lakes Program for projects to address lake management issues. • Request for education and outreach assistance –with issues such as detergent use and residential application of lawn fertilizers in lake community where lake also serves as drinking water supply. Algae blooms exist in front of homes that have the greenest lawns. • Important to consider internal phosphorus loading of lakes in models.
MS4s	• There appear to be two models with regard to MS4 communities – one which involves a cooperative low impact development approach, and one which focuses on permit requirements. Given that the second approach often results in permit challenges and litigation, how will the Agency promote the cooperative LID approach? • Request for clarification of MS4 general permit and upcoming revision process.

P/NPS

(11-28-12)

- on-site septic - is it cheaper to sewer in conc. dev. (ie- lake dev.)???
  - → More separation from water table
  - → Making systems work more effectively
- Ag Permit - concerns
  - → Proximity to stream important - adjust ranking of problem accordingly
  - → Spreading of manure w/in certain distance of stream - estab. of buffer distance? (problem w/ spreading manure on frozen ground)
- Surprise @ "low" signif. of on-site septic - Always understood major source - esp. the lake communities ... efficiacy of P removal?
  - → Explore alt. technologies to treat sewage in these situations
- Funding needed in Lakes Program to implement projects, etc. to address lakes mgt. issues

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ON site - definition of failure
more sep. from H_2O table

- VERIFIABLE DOCUMENTATION of REDUCTIONS
  STATUS of Plan + Modelling for NPS - public partnp.
- COLLABORATIVE FRAMEWORK - EARLY ESTABLISHMT.
  PROPOSAL: MODELLED AFTER STREAMFLOW PROCESS
  BALANCED APPROACH
- REASONABLE ASSURANCE - ASCERTAIN CREDITS to P.S. + NPS MITIG
- MS4^{s} - 2 MODELS - COOPERATIVE - LID
  RENEWAL ONGOING - PERMIT REQUIREMENTS
  HOW PROMOTE IMPLEMENTATION?
  IND. + CONST. PERMIT FRAMEWORK
  VOLUME RED. - PERF. STANDARDS LID - PUBLIC INV. TIME
  TOOL BOX
- ROGERS LAKE SMALL SCALE - LAWN FERTILIZER - contact Chuck Lee Lake Authority
  DRINKING WATER SOURCE
  RESIDENTIAL APPLICATION - Educate / Regulate
- LAKE FUNDING
  INTERNAL LOADING LAKES
  CREDITS FOR MUNI + WShed Activity