Project Priority List scoring worksheet - stormwater

Guidance document

PLEASE NOTE: THE MINNESOTA STATE FISCAL YEAR IS FROM JULY 1 – JUNE 30

The first step towards receiving either a low-interest loan through the Clean Water Revolving Fund or a Point Source Implementation Grant is to get your project scored by the Minnesota Pollution Control Agency (MPCA) for placement on the Project Priority List (PPL) for that Fiscal Year (FY). The questions on the scoring worksheet are intended to create a priority ranking of projects eligible for grants or loans to determine the order in which eligible projects will receive funding when the available funds for that FY are distributed by the Public Facilities Authority (PFA).

It is important to note that placement on the PPL does not guarantee that your project will get funded in that FY. There is a great demand for financial assistance for clean water projects—as such, the PFA must set a fundable range for eligible projects each FY. The fundable range is not a set point value. There are a number of factors that affect where the cutoff line is drawn each year, including how much total funding is available for the PFA to distribute. The finalized PPL for the current FY is usually published by the MPCA in the month of September.

This document is intended to provide additional information for the questions on the PPL scoring worksheet to help your project be scored accurately. It is important that you complete the scoring worksheet fully and provide any requested attachments when you submit the worksheet to the MPCA by the submittal deadline (first Friday in March). This gives the MPCA engineer that will be scoring your project the time and information necessary to score your project by the June 2 deadline for PPL placement for the coming FY.

If you are interested in reading the Minnesota Administrative Rule that is applicable to the PPL scoring worksheet, you can find it here: Minn. R. 7077.0119

Questions [160] – [170]: Questions completed by the MPCA

Minn. R. 7077.0119, subp. 1-2

The first three questions on the scoring worksheet are **not** meant to be completed by the applicant. The MPCA has water resources staff that have the detailed maps and knowledge needed to accurately classify the proposed receiving waters for your project and so can accurately determine the appropriate points to award to your project for these questions.

Question [175]: Project implements corrective measures

Minn. R. 7077.0119, subp. 3

Your project will receive 5 points on the PPL scoring worksheet if the proposed stormwater treatment system contributes to the correction of a water quality problem identified in one or more of the following studies or an equivalent study:

- A clean water partnership project pursuant to chapter 7076
- An impaired water (assessment)
- A U.S. Environmental Protection Agency (EPA)-approved watershed restoration action strategy pursuant to section 319 of the federal Clean Water Act

Question [180]: Points reduction for new/expanded diversion of stormwater into one or more of the following waters

Minn. R. 7077.0119, subp. 5

Your project will be subject to a 5-point reduction if it results in a new or increased stormwater discharge into a receiving water body (or the subwatershed of a water body) that is included in the following list:

- Outstanding resource value waters
- Impaired waters
- Classification 2A
- Wetlands
- Lakes

This point reduction is due to the fact that large increases in the volume and pollutant load of stormwater directed to a receiving water body can be damaging to the water body. Even if the water is treated by your project's proposed stormwater treatment system, the increased volume can create problems like higher velocities and erosion or altered hydrology in the receiving water body.

A new diversion of stormwater discharge would be diverting water that never made it to a particular water body in the past but now, because of the proposed project, it will. The new outlet from the diversion may be right next to the water body or somewhere further up in the watershed but eventually makes it to a different water body than before the project started.

Question [190]: Project helps meet total maximum daily load for receiving water

Minn. R. 7077.0119, subp. 6

For applicants that hold a National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) permit, your project can earn 18 points if the proposed treatment system is addressing requirements that resulted from a Total Maximum Daily Load (TMDL) waste load allocation. For example, if an MS4 has a river running through it that has a completed TMDL for turbidity, and they propose to install a large wet sedimentation basin that will reduce the discharge of sediment and help to address the requirements of the TMDL, the project would be eligible for these points.

It is important to note that your proposed project must be located *within* the boundaries of the MS4 in order to receive these points. You can find the boundaries of your MS4 using the MS4 mapping tool here: http://pca-gis02.pca.state.mn.us/ms4/index.html

Question [200]: Impervious surface ratio

Minn. R. 7077.0119, subp. 7

Your project can receive points in this question depending on the characteristics of the project area that the proposed stormwater treatment system for your project will be serving. This question is intended to award more points to project areas with larger amounts of impervious surface as the runoff from impervious surface is usually of greater quantity and higher pollutant concentrations than the runoff that comes from pervious surfaces.

For example, your proposed best management practice (BMP) serves a drainage area of 40 acres (this is the project service area) and within that area there are 10 acres of impervious surface. The equation would be 20 x (10 acres of impervious/40 total acres) = 5 points.

Please note that 10 points is the maximum amount that your project is eligible to receive, even if your calculation using the equation provided on the scoring worksheet results in a number higher than 10.

For example, if your proposed BMP serves a drainage area of 40 acres with 30 acres of impervious surface within that area, the equation would be 20 x (30 acres of impervious/ 40 total acres) = 15. The project in this scenario would receive the maximum 10 points for this question, even though the equation shows 15.

Question [210]: Volume reduction

Minn. R. 7077.0119, subp. 8

In order to receive volume reduction points, your project must incorporate BMPs that reduce the volume of stormwater discharged from your site by attenuating the water through processes such as infiltration, stormwater capture and re-use, or reduction of impervious surfaces. The volume reduction practices must be a major component of the treatment system or volume reduction must comprise a majority of the overall cost of the project. Below is a list of examples of BMPs that could qualify as volume reduction practices:

- Rain gardens
- Bioretention basins designed to infiltrate
- Enhanced swales designed to infiltrate
- Tree boxes (if designed to capture a certain volume)
- Stormwater capture and re-use
- Porous pavement designed to infiltrate
- Redevelopment strategies designed to reduce impervious surfaces
- Green roof technology

This list is not exhaustive. You may be able to qualify for volume reduction points with other types of BMPs. An MPCA engineer will determine if your selected BMPs qualify for these points based on the information that you submit with your application. Some examples of BMPs that would **not** qualify as volume reduction practices are:

- Standard stormwater ponds (wet detention basins)
- Sand filters (with impervious bottom)
- Ravine stabilization
- Constructed wetlands

It is important to repeat that just having a qualifying volume reduction practice is not sufficient to earn your project volume reduction points – the volume reduction practice must comprise a majority of your project. You can achieve this in two ways:

1. The volume reduction component of the project treats a majority of the stormwater volume that will be treated by the proposed stormwater treatment system.
2. Constructing the volume reduction component of the project requires the majority of the total cost of the project.

All proposed systems must be designed using accepted engineering practices.

Example project – eligible for volume reduction points:

A community surrounds a lake and all of the stormwater runoff from that community enters the lake through two outfalls, both presently untreated. The proposal is to construct an infiltration basin at one of the outfalls and a wet detention basin at the other outfall. The drainage area for the infiltration basin consists of 25 acres of impervious surface. The drainage area for the detention basin consists of 20 acres of impervious surface. This project would be eligible to receive the volume reduction points as the volume reduction BMP system (the infiltration basin) receives more runoff from impervious surface than the non-volume reduction BMP system (the detention basin).

In addition to impervious surfaces treated, cost can also be considered. In this example, if the installation of the infiltration basin represents the majority of the overall project cost, the project would be eligible regardless of the amount of impervious surfaces treated by each system.

Example project – ineligible for volume reduction points:

A 100-acre parcel (40 acres of impervious surface) currently discharges untreated stormwater directly to a stream near a large parking lot. The proposal includes modifying an existing wet detention pond that is undersized for the area. The wet detention pond collects drainage from 36 acres of impervious surfaces. The primary goal of the project is to make the pond longer and wider. Making the pond longer and wider accounts for more than 90% of the project costs. The proposal also includes the addition of a rain garden that will treat 4 acres of drainage from impervious surfaces. In this example, the rain garden is not a major component of the treatment system because it does not represent a majority of either treatment or overall cost for the project. The project would not be eligible for the volume reduction points.

Question [220]: New treatment systems

Minn. R. 7077.0119, subp. 9

In order for your project to receive new treatment system points, it must treat stormwater that has previously been discharging directly into a receiving water without any kind of treatment. Any type of BMP may be used to treat this previously untreated stormwater as long as the design adheres to accepted engineering practices. The goal would be to achieve a BMP design that provides a level of treatment normally required for the drainage area as per the Minnesota Construction Stormwater (CSW) General Permit.

You can find the CSW General Permit here: https://www.pca.state.mn.us/sites/default/files/wq-strm2-68a.pdf

If site conditions limit the amount of treatment that is feasible for your project and your BMP design will achieve less than 50% of the CSW General Permit requirements for the drainage area, or proposes a treatment practice that is not included in the CSW General Permit – please contact MPCA stormwater engineering staff to see if your design may still be eligible for these points. Limiting site conditions may include features such as available space, geographic conditions, or soil conditions.

If your project *is* eligible to receive points for being a new treatment system, there are two potential point values that your project may earn – 1 point or 18 points. The difference in which point value your project will earn depends on the applicant. To earn 1 point on this question, you must be a regulated MS4 program permittee and you must have a load reduction requirement under an EPA-approved TMDL. All other applicants that are eligible to receive new treatment system points are awarded 18 points.

The disparity in points arises from the fact that if you are a regulated MS4 with a waste load allocation under an approved TMDL, you will receive additional points under question [190].

Example project – eligible for new treatment points (18 points)

The applicant proposes to install a wet sedimentation pond and a few rain gardens to treat runoff from a city prior to discharge into a stream that runs through town. Currently, the runoff from impervious surfaces is discharged directly to the stream without treatment. The city has an existing MS4 NPDES permit, but it does not have a stormwater load reduction requirement based on an EPA-approved TMDL. This project example is eligible for new treatment points because it includes the installation of new stormwater treatment systems where there was none before. The city **does** have an existing MS4 NPDES permit but, because it does **not** have a waste load allocation from an EPA-approved TMDL, this type of project is not required and therefore would score 18 points.

Example project – eligible for new treatment points (1 point)

The applicant proposes to install pervious pavement and rain gardens at a local shopping mall in an effort to reduce runoff and pollutant loading to a nearby lake. Currently, the stormwater from the parking lot is discharged directly to the lake with no treatment. The city has an existing MS4 NPDES permit and a TMDL has

just been completed and approved for the lake. The TMDL contains a required phosphorus load reduction of 40% for all areas of the city that discharge to the lake. This project is eligible for new treatment points because it is installing new treatment where none existed before. Because this applicant has an existing MS4 NPDES permit and is required to reduce its load to the lake under an EPA-approved TMDL, this project would score 1 point.

Example project – ineligible for new treatment points

The applicant proposes to stabilize a ravine that is eroding and to clean out a wet sedimentation pond located at the bottom of the ravine that has become filled with sediment from erosion. The ravine stabilization consists of bio-stabilization techniques and hard armoring with riprap. The pond will be cleaned out prior to construction and again at the end of construction. This project is ineligible because, even though stabilizing the ravine and cleaning out the pond will greatly improve the water quality discharging from the area, there was already stormwater treatment provided in a wet sedimentation basin and the ravine stabilization would not be considered "new" treatment as the water going through the ravine was already being treated by the existing pond.

Question [230]: Multiple environmental benefits

Minn. R. 7077.0119, subp. 10

The purpose of this question is to award points to projects that incorporate BMPs that result in additional environmental benefits beyond the stormwater treatment itself. Multiple environmental benefits are additional benefits that are not required by a permit or by an EPA-approved TMDL. These benefits may target environmental goals and objectives of the watershed or the community, or may result in protecting or conserving natural resources.

Some examples of BMPs that may be eligible for multiple environmental benefits include:

- Stormwater capture and reuse
- Creation of wildlife habitat that benefits and improves regional function, quality, or connectedness

  Note: The habitat created must be beyond that offered by standard/typical stormwater ponds or raingardens
- Creation of a wildlife corridor or preservation of open or connected green space
- Reduced use or need for water, energy, or consumption of other natural resources
- Green roof technology that results in measureable reductions to stormwater volume

This list is not exhaustive. It is important to note that having a project that is composed of multiple BMPs does not necessarily qualify your project for multiple environmental benefits points—it depends on which BMPs included in the design and will be evaluated on a case-by-case basis by an MPCA engineer. Please note that flood protection is considered a primary goal of stormwater management and will **not** count as an additional environmental benefit.

Example project – eligible for multiple environmental benefits points

The project proposes the re-development of a commercial area adjacent to a city park. Municipal road right of way will include curb cuts and a series of city owned rain gardens to infiltrate 80% of all the stormwater generated from the watershed. The proposed redevelopment will remove a substantial amount of impervious surfaces and these areas will be redeveloped with rain gardens and replanted with native vegetation. The area where impervious surfaces were removed is strategically located to connect parkland with other open spaces that are adjacent to the commercial property, resulting in a green corridor. This project is eligible because it provides the creation of a wildlife corridor connecting open/green spaces, which is considered to be a multiple environmental benefit.

Example project – ineligible for multiple environmental benefits points

The project proposes to excavate three existing stormwater retention ponds to remove accumulated sediment and to reshape them to look more like a natural wetland or lake. The project objective includes a three-foot buffer around all three of the retention ponds to stabilize banks and discourage pedestrians from accessing the pond. The applicant claims that multiple environmental benefits will be achieved by the project by establishing a buffer zone using native prairie grass that will provide wildlife habitat. In addition, the applicant claims there is a public health benefit related to the buffer zone that reduces human contact with contaminated sediments in the pond. This project is ineligible for the points in this subpart because removing sediment and reshaping ponds may improve the pollutant removal of the pond, but it will do very little to provide other environmental benefits. Additionally, the three-foot buffer strip around the pond is not recognized as providing valuable wildlife habitat as it is very small in size and a recommended part of any pond project. Finally, while the public may benefit from limiting access to contaminated sediment, a public health benefit is not considered a multiple **environmental** benefit.

Question [240]: Structural improvements to existing stormwater ponds

Minn. R. 7077.0119, subp. 11

Your project can receive points for structurally improving an existing stormwater pond—however, it is important to note that a project that addresses **only** maintenance issues with the old pond will not be eligible to receive these points. Maintenance activities that would not be eligible to receive structural improvement points include activities that simply restore the pond's function to its original design capacity rather than improving the pond beyond the original design capacity.

Example project – eligible for structural improvement points

The project proposes to replace an existing straight pipe outlet structure on a stormwater detention pond with a structure that incorporates a V-notch weir. The design and configuration of the weir will change the pond from a dead storage only pond to one with additional storage during storm events. Small rain events will be discharged slowly through the bottom of the V-notch weir while larger rain events will be discharged at a higher rate as the weir is overtopped. This increases the detention time during storm events and allows more sediment and related pollutants to settle out. The new outlet structure enhances the performance of the pond and improves water quality. This project qualifies for structural improvement points as it includes improvements beyond its original specifications which not only restore function, but increase the performance by increasing the detention time and capture of pollutants.

Example project – ineligible for structural improvement points

The project proposes to replace existing inlet and outlet structures on a stormwater detention pond. The existing structures are 16-inch diameter concrete pipes that are more than 30 years old and have significantly deteriorated affecting the function of the detention pond. The proposed improvements include replacing the inlet and outlet structures with 16-inch diameter PVC pipes. The improvements are expected to help restore proper function of the detention pond, and the planned PVC structures will be less susceptible to deterioration. The new outlet structures will enhance the performance of the deteriorated pond but this project example only provides maintenance of existing structures. This project is not eligible for points under this section because it only restores original function and does not increase the performance of the pond beyond its original specifications.

Stormwater project information

The stormwater project information component of your PPL scoring worksheet submittal is important because it provides the MPCA engineer who will be scoring your project with the information that is needed to accurately determine the receiving water(s) for your proposed project. It is important that the information that you provide in this section is as exact as possible at the time of your application. It is particularly important for you to clearly note, both in the table and as a marker on the map, the existing discharge points for your project and the

proposed discharge points for your project. Many times the existing and proposed discharge points are the same. The location at which the stormwater exits your treatment system determines which bodies of water are classified as receiving water bodies for your project. This determination has a great effect on the first three questions on the scoring worksheet that are completed by water resources staff at the MPCA. Listing accurate discharge locations is essential in awarding your project the appropriate amount of points in questions [160]-[170]. If the discharge point does not change as a result of your project, please note that the listed discharge point that you list is both the existing **and** proposed discharge point.