1. It would be helpful to better describe how this TMDL fits into the overall scheme of addressing impairments in the Red River. Are the subject tributaries identified in this TMDL firewall tributaries (i.e. smaller tribs that directly enter a mainstem waterbody) that are not included in the 17 major Red River watersheds? I'm having trouble sorting out how you have approached TMDL development for all impairments in the Red River mainstem and where this effort fits.

2. **Section 1.1** Suggest this statement be clarified: *Cycle 1 watershed restoration and protection strategy (WRAPS) reports have been completed in all 17 major watersheds in the Red River Basin.* It would be more helpful for those not versed in MPCA processes to restate this. For example: *During Cycle 1, TMDLs have been developed for all 17 major watersheds in the Red River Basin. Implementation plans for these TMDLs have also been completed. These plans are called watershed restoration and protection strategy (WRAPS) reports. This TMDL addresses small tributaries to the Red River not captured by the previously completed TMDLs.* The reader needs to understand the link between TMDL development and its implementation. Repeating this relationship in the document would also be helpful.

3. **Section 2.0** The statement… *TMDLs are developed to protect the most sensitive use of a water* body…seems misleading. TMDLs are developed to address impairments to beneficial uses. They can be developed to protect sensitive uses but that is not the case in this TMDL, correct? This distinction is important because the sentence implies to me that reductions in sediment loading to the Red River fall into the category of "above and beyond what is necessary". Which is false.

4. **Section 3.2** Please fully discuss why North Dakota is not required to meet a downstream state's (MN) Water Quality Standards? Other states are subject to the more stringent standards of neighboring states at their boundary, why not ND? Even though it might be more fully discussed in another TMDL study, there should be more of an explanation here of this critical point. It would also be helpful here to add a link to the document where a detailed answer to this basic question can be found.

5. **Section 3.2** Sentence: *Permitted sources within Minnesota's major tributaries that are designated as boundary conditions are not addressed in the WLAs because these permits have already been addressed in previous TMDL studies.* My questions are: (1) What are the previous TMDL studies that this sentence is referring to? I can only find one Red River TMDL study dated December 2017 which lists two permitted sources, but they are discharges to tributaries, not to the mainstem. A link to the TMDLs referenced in this sentence would be helpful here. (2) Do existing mainstem MS4 permits already have provisions to meet TMDL limits? (3) Are there compliance schedules for these sources? (4) Have the TSS reductions in the 2017 TMDL been achieved? A more robust discussion here would be helpful.

6. Are subwatersheds located entirely within MN required to meet MN WQS in this TMDL or are their LAs calculated to meet boundary conditions in the Red River? What criteria are you calling boundary conditions? It sounds like you just made up one, the 100mg/l TSS. What legal mechanism exists to disregard state standards (30mg/l) and substitute it

with boundary conditions? I guess I am not understanding your description of boundary conditions.

7. **Section 3.5.1** Sentence: *The VSS consists of organics that are not the purpose of the TSS water quality standard.* This discussion of VSS is confusing. It seems to want to absolve organically derived suspended load from negative effects and place all the blame on inorganic suspended load. Do fish really discriminate between the two types of suspended sediment when trying to sight feed? How about aquatic organisms with gills or filter feeders? Do fish embryos and larval fish survive better with their habitat obscured with VSS rather than inorganic TSS? Was there leniency given to dischargers of VSS in this TMDL?

8. **Section 3.6.1.1** (1) Aren't there any industrial process water dischargers? Only WWTP are mentioned and to me at least, that refers to municipal wastewater. (2) Under Regulated Industrial Stormwater the value of less than 0.1% of the study area is given, presumably to dismiss it as a significant source. What is the criteria for TSS applied to stormwater dischargers? Are these dischargers presently in compliance with this permit? There is still 28% of TSS loading that isn't associated with agricultural runoff. Is this just ignored?

9. **Section 3.6.1.2** The sentence: *Both municipal and industrial wastewater are generally subject to TSS effluent limits, which are protective of the Red River's 100 mg/L TSS water quality standard.* This is a vague weak statement presumably meant to dismiss the significance of these facilities as contributors of TSS to the Red River. It would be helpful to reference Table 39 in this discussion. Based on this table, the combined contribution of TSS from permitted wastewater dischargers is 5.48 tons/day. A significant amount no matter what waterbody receives it.
10. **Section 3.6.1.4** Are there no other individual NPDES permits to the Red River? Why is this facility singled out?