



MN Board of Water and Soil Resources
520 Lafayette Road North
St. Paul, MN 55155

March 8, 2024

Board Managers, Middle St. Croix Watershed Management Organization
c/o Rebecca Oldenburg-Downing
Washington Conservation District
455 Hayward Ave N
Oakdale, MN 55128

RE: Middle St. Croix Watershed Management Organization’s Watershed Management Plan Update

Ms. Oldenburg-Downing,

This letter is in response to your January 10, 2024, email soliciting input for the next iteration of Middle St. Croix Watershed Management Organization’s (WMO) Watershed Management Plan (Plan). Thank you for the opportunity to provide preliminary input. The WMO will be preparing the Plan update in accordance with Minnesota Rule 8410 (<https://www.revisor.mn.gov/rules/8410/>) and Minnesota Statute 103B (<https://www.revisor.mn.gov/statutes/?id=103B>). Please reference these documents as you go through the process and reach out with any questions.

The Board of Water and Soil Resources (BWSR) expectations for the Plan update focus on: 1) Process – an opportunity to talk about the right things and affirm, align, or change direction based on the upfront input and issue identification that is brought forward; 2) Coordination – good planning feels collaborative from the beginning, involving multiple local government units and stakeholders, and multiple levels of planning; 3) Plan Contents – revolving plans around priority issues, capturing clear 5-10 year intent, data analysis with trends, short/mid/long-term measurable goals based on science, priorities and frequently updated targeted implementation plans; and 4) Organization Capacity – increased self-evaluation, accountability and efficiency of implementation.

A few specific comments as the WMO begins the planning effort are provided below.

- Implementation Actions (please refer to MN Rule 8410 for additional requirements):
 - Prioritized Implementation Program (Capital Improvement Program). The implementation program should be clear in identifying what implementation actions the WMO will accomplish in the next ten years regardless of whether or not they receive any new grant funding. Be realistic in what the WMO has the capacity to accomplish, but at the same time, do not be afraid to stretch those capabilities.

- Include a procedure to evaluate progress for implementation activities at a minimum of every two years.
 - Define the WMO's process for evaluating implementation of local water plans.
 - Define who is responsible for inspection, operation and maintenance of stormwater facilities in the WMO.
 - If the WMO has or proposes an incentive type program it needs to be defined in the plan (the plan can also include a reference to WMO website for more detailed information on the program).
- Optional Plan development suggestions. While not required, the following are examples of strategies that watersheds have employed and have proven useful and/or are best practices:
 - Informal review. Once a first draft of the Plan has been prepared, submit this to required review agencies, Advisory Committee(s), and other means of public participation to gather feedback to be incorporated into the final draft that is released for the official 60-day comment period.
 - Plan overview. Host a meeting (virtual or in-person) to review and answer questions on the draft Plan with reviewers.
 - When drafting the Plan, consider the various WMO audiences and strive to write the Plan with plain language principles in mind. Resources can be found at: [plainlanguage.gov](https://www.plainlanguage.gov)
 - Ensure the Plan is Americans with Disabilities Act (ADA) compliant.
 - Workload analysis. As the WMO develops their goals and strategies for the next 10 years, we encourage them to do a workload analysis and/or strategic planning exercise to assess the resources needed to accomplish those goals. To aid local governments in this work, BWSR offers Performance Review and Assessment Program (PRAP) grants. More information can be found at: bwsr.state.mn.us/prap-grants
 - Chlorides. Chloride pollution continues to be a growing concern particularly in urban communities, and according to the Minnesota Department of Employment and Economic Development's (DEED) county profiles, Washington County's population was the 4th fastest growing in the state from 2010-2020. We recommend the WMO utilize the Twin Cities Metropolitan Area Chloride TMDL and Chloride Management Plan (MPCA) and the Regional Assessment of Chloride in Select Twin Cities Metro Streams (Met Council) in addressing chloride issues and priorities in the Plan.
 - As communities within the WMO continue to grow and develop, demands on groundwater for private and public water supplies are likely to increase, as well as potential for pollution. The current WMO Plan includes a groundwater goal, strategies, and policies. In development of the Plan update, we encourage the WMO to work collaboratively with partners to assess the success of past strategies, and to continue to plan for potential challenges related to groundwater quantity and quality in the next ten years.
 - In development of the Plan update, we encourage the WMO to work with partner municipalities and others to address climate change and resiliency, including aging infrastructure and continued changes in precipitation patterns.

- We encourage the WMO to consider elements of environmental justice and diversity, equity, and inclusion in their Plan update. The Environmental Protection Agency's EJSscreen: Environmental Justice Screening and Mapping Tool can be a helpful tool in this work.
- As the WMO develops its plan development timeline and public input process, please submit them for BWSR review. In this process, I encourage you to consider diversity, equity, and inclusion elements to ensure robust stakeholder engagement, representative of a community which has seen growth in diversity over the last ten years. Additionally, the process should identify what steps the WMO will take if the first try does not generate the desired participation and input.

I would like to recognize the excellent work that the WMO has done in implementation of its current Plan and appreciate the opportunity to provide comments and preliminary input. I look forward to continuing to work with you through the rest of the Plan development process. Please invite me to Board workshops, Citizen Advisory Committee meetings, public input events and opportunities, and Technical Advisory Committee (TAC) meetings. My priority will be the TAC meetings, but I will likely try to attend some of the other input meetings and opportunities as well. If you have questions or need additional information, feel free to contact me by phone at 651-308-6724 or email at michelle.jordan@state.mn.us.
Sincerely,



Michelle Jordan
Board Conservationist

CC: Marcey Westrick (Central Region Manager, BWSR, via email)
State Review Agencies and MNDOT (via email)

- Megan Moore (DNR)
- Abby Shea (MDH)
- Jeffrey Berg (MDA)
- Maureen Hoffman (METC)
- Jeff Risberg (MPCA)
- Katie Kowalczyk (MNDOT)