



March 14, 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,

Thank you for the opportunity to submit our priority concerns for inclusion in the Middle St. Croix Management Organization's (MSCMO) updated Watershed Management Plan (Plan), as well as the Metropolitan Council's (Met Council) expectations for the Plan outcomes. I have included a list of Met Council resources that may be of use in the Plan preparation.

### **Council Expectations and Priorities for Plan Preparation and Review**

Met Council staff will review the plan through the lens of the Council's *Thrive MSP 2040* document which is the Regional Development Framework for the seven county Twin Cities Metropolitan Area and the *2040 Water Resources Policy Plan*, both of which can be found on the Council's web page ([www.metrocouncil.org](http://www.metrocouncil.org)).

In particular, the *2040 Water Resources Policy Plan* (Policy Plan) includes policies and strategies to achieve the following goal:

*To protect, conserve, and utilize the region's groundwater and surface water in ways that protect public health, support economic growth and development, maintain habitat and ecosystem health, and provide for recreational opportunities, which are essential to our region's quality of life.*

The Policy Plan takes an integrated approach to water supply, water quality, and wastewater issues. This approach moves beyond managing wastewater and stormwater only to meet regulatory requirements by viewing wastewater and stormwater as resources, with the goal of protecting the quantity and quality of water our region's needs now and for future generations.

The Policy Plan includes policies and strategies to:

- Maximize regional benefits from regional investments in the areas of wastewater, water supply and surface water management and protection.
- Pursue reuse of wastewater and stormwater to offset demands on groundwater supplies.
- Promote greater collaboration, financial support, and technical support in working with partners to address wastewater, water quality, water quantity and water supply issues.
- Promote the concept of sustainable water resources through collaboration and cooperation, with the region taking steps to manage its water resources in a sustainable way with goals of:

- Providing an adequate water supply for the region
- Promoting and implementing best management practices aimed at protecting the quality and quantity of our resources
- Providing efficient and cost-effective wastewater services to the region
- Efficiently addressing nonpoint and point sources pollution issues and solutions, and,
- Assessment and monitoring of lakes, rivers, and streams to direct adequate management, protection, and restoration of the region's valued water resources.

The updated watershed management plan should include policies related to the protection of area water resources with these strategies in mind, with the end goal of water sustainability.

In addition to being consistent with the Met Council's policy plan, the Plan also should include quantifiable and measurable goals and policies that address water quantity, water quality, recreation, fish and wildlife, enhancement of public participation, groundwater, wetlands, and erosion issues.

Met Council staff will be looking for the Plan to address the issues and problems in the watershed and to include projects or actions and funding to address them. At a minimum the Plan should address:

1. Any problems with lake and stream water quality and quantity, including information on impaired waters in the watershed and the Organization's role in addressing the impairments,
2. Flooding issues in the watershed,
3. Climate and resilience planning,
4. Information on emerging contaminants within the watershed, outlining watershed district and partners' roles.
5. Stormwater rate control issues in the watershed,
6. Impacts of water management on the recreation opportunities,
7. Impact of soil erosion problems on water quantity and quality,
8. The general impact of land use practices on water quantity and quality,
9. Policies and strategies related to monitoring of area water resources,
10. Policies and strategies related to use of best management practices,
11. Issues concerning the interaction of surface water and groundwater in the watershed,
12. Erosion and sediment control standards and requirements,
13. Volume reduction goals at least as restrictive as requirements in the NPDES construction general permit, and,
14. Capital improvement plan with itemized list of actions, estimated costs, and timeline.
15. Specifics on long-term maintenance of projects identified in the capital improvement plan, including identification of entities responsible for funding and conducting maintenance, as well as how long-term maintenance will be documented,
16. Specify to what degree the Plan may be adopted by reference by a local government unit for all or part of its local water plan. Additionally, please include information in the Plan on what information local municipalities must include in their local water management plans to receive approval from MSCWMO.

The Met Council also encourages the plan to leverage partnership opportunities where possible and to state them clearly within the Plan. We believe that to achieve productive and effective water governance within Minnesota we must all work together, this includes partnering with the cities and townships within the watershed.

## Specific Priority Issues

Based on Council policies, the following issues are specific to the Middle St. Croix watershed and are viewed as priorities by the Council for inclusion in the Plan:

- The Met Council has updated its Priority Waters list, formerly known as the Priority Lakes list, which now includes rivers and streams. It will provide a key lens for developing policies and activities to include in the 2050 Water Resources Policy Plan. It will inform how the Met Council can align with the priorities of local and state partners, like MSCWMO, and provide value for the region.

The list includes the St. Croix River and Lily Lake.

While the list was developed after the adoption of the 2040 Policy Plan and is a foundational dataset for the 2050 Policy Plan, it would be appreciated if the MSCWMO could include these water designations in the Land and Water Resources Inventory.

## Available Council Resources

The Council has collected monitoring data for several water bodies within the Middle St. Croix watershed from 1995-2021.

Waterbody Type	Site	ID	Monitoring Program†	Years of data
Lake	Lily Lake	82002300	CAMP	1995-2021
Lake	McKusick Lake	82002000	CAMP	1994-2021
Lake	Brick Pond	82030800	CAMP	2008-2013
Lake	St. Croix Lake	82000100	CAMP	2002-2021
River	St. Croix River			

†CAMP = Citizen Assisted Monitoring Program; MCES = Environmental Services Lake Monitoring Program; WOMP = Watershed Outlet Monitoring Program

River, stream, and lake data can be downloaded by visiting the Met Council's EIMS website:

<https://eims.metc.state.mn.us/>.

- **Local Planning Handbook:** The Met Council provides information about the cities and townships within your watershed boundaries, including community designations, forecasted population counts, generalized land uses, and other information that might be useful in your planning efforts.

[Local Planning Handbook – Metropolitan Council \(metrocity.org\)](https://metrocity.org/Local-Planning-Handbook)

- **Place-based equity research dataset:** The Met Council has published a new dataset, “Equity Considerations for Place-Based Advocacy and Decisions in the Twin Cities Region,” that provides equity-relevant characteristics for each of the 704 census tracts in the Twin Cities region. Formerly known as the Areas of Concentrated Poverty dataset, it has been expanded to provide a much more nuanced portrait of neighborhoods and their residents.

[Place-based Equity Research - Metropolitan Council \(metrocity.org\)](https://metrocity.org/Place-based-Equity-Research)

- **Climate vulnerability assessment (CVA):** The CVA is a tool that can assist in Met Council and community planning efforts in preparing and adapting to climate change because the CVA can reveal system vulnerabilities to currently occurring and, to some extent, expected climatic changes. Tools and resources currently include an extreme heat map tool and localized flood map screening tool.

[Climate Vulnerability Assessment - Metropolitan Council \(metrocity.org\)](https://metrocity.org/Climate-Vulnerability-Assessment)

- **Growing shade, tree canopy enhancement and preservation tool:** Growing Shade combines local stories and an interactive mapping tool to inform tree canopy enhancement and preservation. The tool, designed in partnership with The Nature Conservancy and Tree Trust, allows users to generate reports based on various presets like climate change, conservation, environmental justice, and public health at a range of scales from city-township to census block groups. By combining different variables of your choosing, you can generate data to meet your specific needs, whether you want to set canopy goals for a community or produce supporting data for grant applications.

[Tree Canopy - Metropolitan Council \(metro council.org\)](https://metro council.org)

The Council is in the process of updating the 2050 Regional Development Guide and associated Water Policy Plan. It will be adopted in early 2025. If there are any significant changes to regional water policy that may affect the content of the Plan, we will bring them to your attention. Additionally, I will be happy to direct you to load spreadsheets and any other Environmental Services' data and analyses, as well as any spatial data, and look forward to serving on the Technical Advisory Committee during plan preparation.

Sincerely,

Jen Kader  
Senior Planner  
Water Resources Policy and Planning  
Metropolitan Council Environmental Services

cc: Michelle Jordan, Board of Soil and Water Resources  
Water Resources Reviews, Metropolitan Council