

March 18, 2024

Middle St. Croix Watershed Management Organization
Board Managers
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
Review Period – MPCA Priority Concerns Letter

Dear Rebecca Oldenberg-Downing,

The Minnesota Pollution Control Agency (MPCA) appreciates the opportunity to provide input throughout your Middle St. Croix Watershed Management Organization's Watershed Management Plan (Plan) development process. As part of the MPCA's review we are providing the following comments as part of the official Priority Issues and Concerns Review and Comment Period. The MPCA has developed technical information, reports, total maximum daily load (TMDL) studies, tools, and potential strategies for the protection and restoration of water bodies that may be useful for inclusion in a local water plan.

- TMDL reports can be found at: <https://www.pca.state.mn.us/business-with-us/total-maximum-daily-load-tmdl-projects>
- Monitoring and assessment, stressor identification, and watershed restoration and protection strategy (WRAPS) reports for watersheds in the Lower St. Croix can be found at: <https://www.pca.state.mn.us/watershed-information/lower-st-croix-river>

We recommend:

- Incorporating and implementing strategies and goals from completed TMDL's and implementation plans or WRAPS.
- Determine quantitative accounting of efforts and reductions you hope/intend to accomplish over the 10-year plan cycle relative to water quality targets.
- Identify geographic priority areas and implementation to match those prioritized waters.

The MPCA has identified several strategic goals including and areas for partnership.

- Assisting local partners to accelerate targeted reductions for identified priority impaired waters
- Assisting to develop strategies to protect priority waters that are meeting water quality goals
- Reduce chloride to surface and ground water
- Incorporate environmental justice into planning
- Increase community and environmental resilience to climate change

Environmental Justice

The MPCA has resources to assist in identifying areas with environmental justice concerns. The MPCA is committed to making sure that pollution does not have a disproportionate impact on any group of people — the principle of environmental justice. This means that all people — regardless of their race,

color, national origin or income — benefit from equal levels of environmental protection and have opportunities to participate in decisions that may affect their environment or health. The MPCA considers tribal areas and census tracts with higher concentrations of low-income residents, people of color, or limited English proficiency as areas of increased concern for environmental justice.

- [Understanding environmental justice in Minnesota \(arcgis.com\)](https://arcgis.com) - This screening tool allows users to identify census tracts where additional consideration or effort is warranted to ensure meaningful community engagement and to evaluate the potential for disproportionate adverse impacts using four criteria:
- [MPCA and environmental justice | Minnesota Pollution Control Agency \(state.mn.us\)](https://state.mn.us)

Climate Change

Planning should incorporate changing weather patterns to help our communities be prepared for extreme weather events.

- <https://www.pca.state.mn.us/air/climate-resilient-communities>
- <https://www-dev.pca.state.mn.us/air-water-land-climate/climate-vulnerable-populations-and-strategies-to-reduce-risk>

Chloride Reduction

The major sources of chloride around the state include application of chloride-based salts for winter maintenance activities, residential and commercial water softening, and agricultural inputs. Chloride reduction at the source is key to protecting water quality, as there are currently no known economically feasible remediation strategies to remove chloride once it enters the environment.

- The MPCA maintains resources (technical, educational, and financial) that may be of use to local partners in designing ways to reduce chloride.
- <https://www.pca.state.mn.us/water/statewide-chloride-resources>.
- Smart Salting Training Opportunities for property managers, business owners, and environmental professionals. <https://www.pca.state.mn.us/business-with-us/smart-salting-training>

Stormwater

With much of the seven-county metropolitan land use categorized as developed, the MPCAs stormwater manual and financial assistance webpage may be helpful resources for including stormwater management practices and research.

- https://stormwater.pca.state.mn.us/index.php?title=Main_Page
- <https://www.pca.state.mn.us/business-with-us/wastewater-and-stormwater-financial-assistance>

Concerns Surrounding PFAS

The presence of per- and polyfluoroalkyl substances (PFAS) contamination affecting communities in the east-metropolitan area requires a coordinated state level approach, with multiple agencies and interests working together to put forth strategies for preventing, managing, and cleaning up PFAS. PFAS in fish tissue is one such impairment that affects fish consumption and fish advisories in surface water resources. For more information about the plans and resources available, please visit the MPCAs PFAS webpage (<https://www.pca.state.mn.us/pollutants-and-contaminants/pfas>), which also provides links to Minnesota's PFAS blueprint including monitoring plan.

Eric Alms
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Again, thank you for the opportunity to provide initial priority comments on your draft Plan. If we may be of further assistance, please contact Eric Alms at Eric.Alms@state.mn.us at the MPCA's St. Paul regional office.

Sincerely,

Eric Alms

This document has been electronically signed.

Eric Alms
Environmental Specialist
Watershed Division

EA:jdf