



Bassett Creek Watershed Management

January 31, 2022

Mr. Mike Trojan
Minnesota Pollution Control Agency
520 Lafayette Road North
St Paul, MN 55155

Dear Mr. Trojan:

The Bassett Creek Watershed Management Commission extends its appreciation and thanks to you and the MPCA for your work over the last two years to develop credits and guidance for Manufactured Treatment Devices (MTDs) in the MN Stormwater Manual. In response to a July 2019 letter from the BCWMC and five other watershed organizations, you and your team worked diligently to fulfill our request for statewide guidance on the use of MTDs, including putting together an advisory group and facilitating numerous meetings to collaboratively develop the useful guidance. We understand this project was a big undertaking and we appreciate your work and dedication.

This new guidance will streamline development reviews, provide consistency across jurisdictions, and provide succinct guidance to project proposers.

Thank you for your leadership and partnership on this effort!

Sincerely,

A handwritten signature in black ink that reads "Laura Jester".

Laura Jester
Administrator

CC: Ryan Anderson, Minnesota Pollution Control Agency
John Jaschke, Minnesota Board of Water and Soil Resources
Randy Anhorn, Nine Mile Creek Watershed District
Tina Carstens, Ramsey Washington Metro Watershed District
Terry Jeffery, Riley Purgatory Bluff Creek Watershed District
R. A. Polzin, Shingle Creek Watershed Management Organization
Gerald E. Butcher, West Mississippi Watershed Management Organization



Bassett Creek Watershed Management Commission

July 26, 2019

Mr. Mike Trojan
Minnesota Pollution Control Agency
520 Lafayette Road North
St Paul, MN 55155

Re: Verification and Certification of Stormwater Manufactured Treatment Devices (MTDs)

Dear Mr. Trojan:

The Bassett Creek Watershed Management Commission (BCWMC) and many other watershed districts and organizations (watersheds) across the metro area have seen an increase in the use of proprietary stormwater manufactured treatment devices (MTDs) proposed in development and redevelopment projects. Although some MTDs undergo testing and third party review, there are no widely accepted levels of treatment or pollutant removal efficiencies associated with these devices. Hence, the watersheds are forced to independently determine the pollutant removal efficiency of each device to evaluate whether a proposed project meets the watersheds' water quality standards.

The BCWMC and the watersheds listed below, recognize that this issue extends beyond our respective boundaries. We concluded that, ideally, there should be a nationwide, regional, or statewide program developed to evaluate and certify MTDs, including a determination of how the devices perform in Midwestern climates. In recognition of this need, we formally request that the MPCA take one of the following actions to address this issue at a broad level:

- 1) Cooperate with and support the implementation of the Water Environment Federation's (WEF) Stormwater Testing and Evaluation of Products and Practices (STEPP) verification program, currently under development. We prefer this option because the STEPP verification program is already well along in its development, it will be a nationwide program, and we understand that MPCA staff are already engaged in the program. Once implemented, the STEPP verification program would validate MTD performance; it would be up to the states (e.g., the MPCA) to certify the MTDs.
- 2) Develop its own statewide program for evaluating and certifying stormwater MTDs.

In either scenario, we also request that the MPCA include verified/certified MTDs in the Minnesota Stormwater Manual, if appropriate.

If you have questions, please contact me or any of the following watershed contacts to discuss.

Sincerely,

Laura Jester
Administrator,
BCWMC

Randy Anhorn
Administrator, Nine
Mile Creek WD

Tina Carstens
Administrator,
Ramsey Washington
Metro WD

Claire Bleser
Administrator,
Riley Purgatory
Bluff Creek WD

R. A. Polzin
Chair, Shingle
Creek WMO

Gerald E. Butcher
Chair, West
Mississippi WMO

c: Ryan Anderson, Minnesota Pollution Control Agency
John Jaschke, Minnesota Board of Water and Soil Resources