



Bassett Creek Watershed Management Commission

MEMO

To: BCWMC Commissioners and Alternate Commissioners
From: Laura Jester, Administrator
Date: December 13, 2023

RE: Review of 2024 Draft Impaired Waters List and Recommendation to Submit Comment Letter

The Minnesota Pollution Control Agency (MPCA) recently released the 2024 draft impaired waters list (303(d) list) and requested comments from stakeholders. Commission Engineers and I reviewed the list, participated in a Metro-wide meeting regarding the list, had email correspondence with MPCA to gather more information about BCWMC resources included and not included on the proposed list, and met directly with the MPCA project manager to further discuss the proposed list. Below is an overview of the draft list and the attached figure shows the current and draft 2024 impairments and proposed comments on suggested additions to the impairment list. Staff recommends submitting the attached comment letter to the MPCA which is due January 12th.

1. The 2024 draft impaired waters list includes the following new impairments in the BCWMC:

Sweeney Branch of Bassett Creek for E. Coli (bacteria) - Consistent with BCWMC monitoring data

Lost Lake for nutrients - Consistent with BCWMC monitoring data

Plymouth Creek for benthic invertebrates - Consistent with BCWMC monitoring data

Medicine Lake for fish bioassessments – On September 1, 2020, the MNDNR Fisheries Index of Biological Integrity (FIBI) staff conducted a targeted survey of the nearshore fish community in Medicine Lake. Data from the targeted nearshore fish survey were combined with data from the standard fish survey completed in July 2020 to compute a Fish IBI score, assessing the aquatic life use in Medicine Lake. The Fish IBI score was 30 which was below the impairment threshold of 45 and the lower confidence limit of 36. Hence, the lake is listed as impaired for fish bioassessments.

2. The 2024 draft impaired waters list also proposes to remove Sweeney Lake from the list for nutrients due to improved water quality that now meets State standards for eutrophication (nutrient levels). Water quality improved significantly over the last few years as a result of city and BCWMC projects including carp management and an alum treatment, and residents agreeing to remove the year-round aeration system in the lake.
3. The 2024 draft impaired waters list does not include two waterbodies that BCWMC data indicate do not meet State standards and thus should be added to the impaired waters list.

Crane Lake for chlorides

North Branch of Bassett Creek for benthic invertebrates (aquatic bugs)



Bassett Creek Watershed Management Commission

December 22, 2023

Leya Charles Winyan
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155

Re: Bassett Creek Watershed Management Commission Comments on 2024 Draft Impaired Waters List

Dear Ms. Charles Winyan:

The Bassett Creek Watershed Management Commission (BCWMC) provides the following comments on the proposed listings on the Minnesota Pollution Control Agency's (MPCA) 2024 Draft Impaired Waters List. The comments involve the BCWMC's requests to add Crane Lake and the North Branch of Bassett Creek to the Impaired Waters List due to noncompliance with the water quality standards for chloride and benthic invertebrates, respectively:

- Crane Lake (chloride)—Due to the magnitude of the chloride pollution in Crane Lake and the significant increase in chlorides in the lake (concentrations doubled between 2016 and 2021), the BCWMC strongly advocates for including Crane Lake on the 2024 Impaired Waters List. We understand that MPCA's chemistry assessors received six (6) additional chloride data points from 2021, submitted from BCWMC on January 24, 2022, but that the data didn't make it into the MPCA's final assessments because the MPCA did not complete data quality checks. You indicated that you forwarded this data to your database team. We understand that the chemistry assessors initial review indicates that Crane Lake would meet the criteria for being listed as impaired, but that the data must be finalized before the MPCA can assess and consider it for this listing cycle. It is our strong preference that this data be finalized and assessed so Crane Lake can be included in the final 2024 Impaired Waters List.
- North Branch of Bassett Creek (benthic invertebrates)—For this stream reach, we collected and submitted biological monitoring data that MPCA staff scored and determined did not meet MPCA's standards for benthic invertebrates. However, the MPCA's biologist indicated that they could not use the data in the current assessment process because there were some incompatibilities with laboratory and data reporting methods, and it has been MPCA's policy not to include biological data from external sources in their assessment datasets. It is our preference that this reach be included in the final 2024 Impaired Waters List. However, we understand that MPCA intends to further develop and administer an external data training and certification process in the future to help non-MPCA organizations understand criteria that must be met in order for MPCA to integrate external data into the agency's data systems and assessment process.

Bassett Creek Watershed Management Commission

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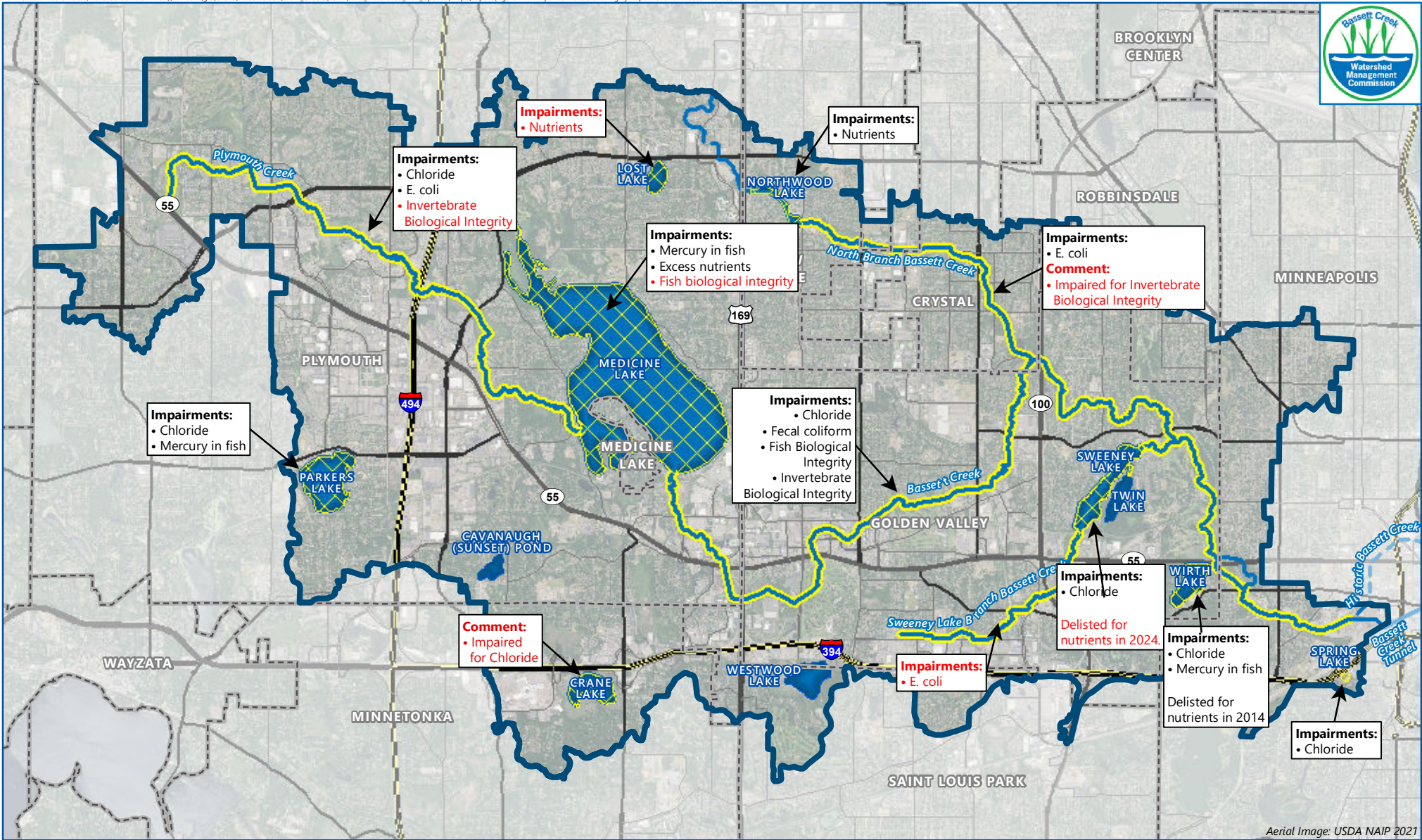
Crystal | Golden Valley | Medicine Lake | Minneapolis | Minnetonka | New Hope | Plymouth | Robbinsdale | St. Louis Park

If the stream is not included on the Impaired Waters List now, we are hopeful data collected by the BCWMC in the future can be considered for official assessment if it is collected through a certified process.

Thank you for the opportunity to comment. Please feel free to contact the Commission Administrator, Laura Jester at 952-270-1990 (laura.jester@keystonewaters.com) or the BCWMC Engineer, Greg Wilson at 952-832-2672 (gwilson@barr.com), if you have questions or would like further information.

Sincerely,

Catherine Cesnik, Chair
Bassett Creek Watershed Management Commission



Aerial Image: USDA NAIP 2021

- BCWMC Jurisdictional Boundary
- Impaired Lake (Draft 2024)
- Impaired Stream (Draft 2024)
- Municipal Boundary
- BCWMC Priority Lake
- Creek

NOTE:
 • Red text reflects 2024 changes and comments.

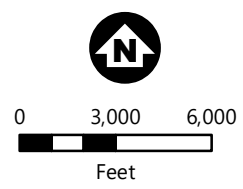


FIGURE 1
IMPAIRED WATERS
BACKGROUND INFORMATION
 Basset Creek Watershed Management Commission