



April 6, 2012

Mr. Jerry Spetzman
Chisago County Water Resources
313 North Main Street
Center City, MN 55012

RE: Chisago County Priority Concerns
Local Water Management Program

Dear Mr. Spetzman:

The Minnesota Pollution Control Agency (MPCA) is pleased to provide priority concerns for consideration in Chisago County (County) Local Water Management (LWM) planning efforts. We trust these priority concerns will be helpful with developing the forthcoming Priority Concerns Scoping Document (PCSD) and LWM Plan.

1. Impaired Waters/Total Maximum Daily Loads

The federal Clean Water Act requires states to adopt water quality standards to protect the nation's waters. These standards define how much of a pollutant can be in a surface and/or groundwater while still allowing it to meet its designated uses, such as for drinking water, fishing, swimming, irrigation, or industrial purposes. Many of Minnesota's water resources cannot currently meet their designated uses because of pollution problems from a combination of point and nonpoint sources.

Addressing impaired waters in LWM plans is voluntary. However, the MPCA strongly encourages counties to consider how their LWM plans address impaired waters, as identified on the "Final List of Impaired Waters" available on MPCA's website at:

<http://www.pca.state.mn.us/water/tmdl/tmdl-303dlist.html#finalist>.

It is suggested the LWM Plan:

- identify the priority the County places on addressing impaired waters, and how the County plans to participate in the development of total maximum daily load (TMDL) pollutant allocations and implementation of TMDLs for impaired waters
- include a list of impaired waters and types of impairment(s) (see table below)
- identify the pollutant(s) causing the impairment (see MPCA website)
- address the commitment of the County to submit any data it collects to MPCA for use in identifying impaired waters, provide plans, if any, for monitoring as yet unmonitored waters for a more comprehensive assessment of waters in the County
- describe actions and timing the County intends to take to reduce the pollutant(s) causing the impairment, including those actions that are part of an approved implementation plan for TMDLs

Regional TMDL reports for mercury have been approved by the U.S. Environmental Protection Agency (EPA). The MPCA recommends counties address waters listed for pollutants/stressors other than mercury and polychlorinated biphenyls (PCB) in their LWM plans.

The 2010 list of Impaired Waters in the County are provided in the table below.

Clean Water Act Section 303 [d] List of Impaired Waters in the County.

Reach

Assessment Unit	ID	Impaired Use	Impairment Cause	Impairment Status
Goose Creek: Headwaters (Goose Lk 13-0083-01) to St Croix R	07030005-510	AqLife	Fishes Bioassessments	TMDL Required
Goose Creek: Headwaters (Goose Lk 13-0083-01) to St Croix R	07030005-510	AqLife	Aquatic Macroinvertebrate Bioassessments	TMDL Required
Hay Creek: Headwaters to CD 3 (Beaver Cr)	07030005-544	AqLife	Turbidity	TMDL Required
Rock Creek: Rock Lk to St Croix R	07030005-584	AqLife	Fishes Bioassessments	TMDL Required
Rock Creek: Rock Lk to St Croix R	07030005-584	AqLife	Aquatic Macroinvertebrate Bioassessments	TMDL Required
Rush Creek: Rush Lk to St Croix R	07030005-509	AqRec	Escherichia coli	TMDL Required
Rush Creek: Rush Lk to St Croix R	07030005-509	AqLife	Fishes Bioassessments	TMDL Required
Rush Creek: Rush Lk to St Croix R	07030005-509	AqLife	Aquatic Macroinvertebrate Bioassessments	TMDL Required
St Croix River: Goose Cr to Sunrise R	07030005-517	AqCons	Mercury in Fish Tissue	TMDL Approved
St Croix River: Goose Cr to Sunrise R	07030005-517	AqCons	PCB in Fish Tissue	TMDL Required
St Croix River: Rock Cr to Rush Cr	07030005-506	AqCons	Mercury in Fish Tissue	TMDL Approved
St Croix River: Rock Cr to Rush Cr	07030005-506	AqCons	PCB in Fish Tissue	TMDL Required
St Croix River: Rush Cr to Goose Cr	07030005-516	AqCons	Mercury in Fish Tissue	TMDL Approved
St Croix River: Rush Cr to Goose Cr	07030005-516	AqCons	PCB in Fish Tissue	TMDL Required
St Croix River: Sunrise R to Trade R (WI)	07030005-505	AqCons	Mercury in Fish Tissue	TMDL Approved
St Croix River: Sunrise R to Trade R (WI)	07030005-505	AqCons	PCB in Fish Tissue	TMDL Required
St Croix River: Taylors Falls Dam to Apple R (WI)	07030005-513	AqCons	Mercury in Fish Tissue	TMDL Approved
St Croix River: Taylors Falls Dam to Apple R (WI)	07030005-513	AqCons	¹ PCB in Fish Tissue	TMDL Required
St Croix River: Trade R (WI) to Taylors Falls Dam	07030005-518	AqCons	Mercury in Fish Tissue	TMDL Approved
St Croix River: Trade R (WI) to Taylors Falls Dam	07030005-518	AqCons	¹ PCB in Fish Tissue	TMDL Required
St Croix River: Wood R (WI) to Rock Cr	07030005-515	AqCons	Mercury in Fish Tissue	TMDL Approved
St Croix River: Wood R (WI) to Rock Cr	07030005-515	AqCons	PCB in Fish Tissue	TMDL Required
Sunrise River, North Branch: Headwaters to Sunrise R	07030005-501	AqLife	Fishes Bioassessments	TMDL Required

Sunrise River, North Branch: Headwaters to Sunrise R	07030005-501	AqRec	Fecal Coliform	TMDL Approved
Sunrise River, North Branch: Headwaters to Sunrise R	07030005-501	AqLife	Aquatic Macroinvertebrate Bioassessments	TMDL Required
Sunrise River, West Branch: Martin Lk to Sunrise R (Pool 1)	07030005-529	AqLife	Fishes Bioassessments	TMDL Required
Sunrise River, West Branch: Martin Lk to Sunrise R (Pool 1)	07030005-529	AqLife	Turbidity	TMDL Required
Sunrise River, West Branch: Martin Lk to Sunrise R (Pool 1)	07030005-529	AqLife	pH	TMDL Required
Sunrise River: Kost Dam to N Br Sunrise R	07030005-542	AqLife	Aquatic Macroinvertebrate Bioassessments	TMDL Required
Sunrise River: Pool 3 to Kost Dam Reservoir	07030005-540	AqLife	Oxygen, Dissolved	TMDL Required
Sunrise River: Upstream from Comfort Lk	07030005-526	AqRec	Escherichia coli	TMDL Required
Unnamed creek: Birch Lk to School Lk	07030005-521	AqLife	Oxygen, Dissolved	TMDL Required
Unnamed creek: Headwaters to South Center Lk	07030005-572	AqLife	Turbidity	TMDL Required
Unnamed creek: School Lk to Little Comfort Lk	07030005-522	AqRec	Escherichia coli	TMDL Required
Unnamed creek: School Lk to Little Comfort Lk	07030005-522	AqLife	Oxygen, Dissolved	TMDL Required
Unnamed creek: Unnamed lk to Birch Lk	07030005-641	AqRec	Escherichia coli	TMDL Required
Unnamed ditch: T34 R21W S24, east line to Sunrise R	07030005-723	AqLife	Ammonia (Un-ionized)	TMDL Required
Unnamed ditch: T34 R21W S24, east line to Sunrise R	07030005-723	AqLife	Oxygen, Dissolved	TMDL Required

Lakes

Assessment Unit	ID	Impaired Use	Impairment Cause	Impairment Status
Comfort	13-0053-00	AqRec	Nutrient/Eutrophication Biological Indicators	TMDL Required
Comfort	13-0053-00	AqCons	Mercury in Fish Tissue	TMDL Approved
East Rush	13-0069-01	AqRec	Nutrient/Eutrophication Biological Indicators	TMDL Required
East Rush	13-0069-01	AqCons	Mercury in Fish Tissue	TMDL Approved
Fish	13-0068-00	AqCons	Mercury in Fish Tissue	TMDL Approved
GOOSE: NORTH BAY	13-0083-01	AqRec	Nutrient/Eutrophication Biological Indicators	TMDL Required
GOOSE: NORTH BAY	13-0083-01	AqCons	Mercury in Fish Tissue	TMDL Required
GOOSE: SOUTH BAY	13-0083-02	AqRec	Nutrient/Eutrophication Biological Indicators	TMDL Required
GOOSE: SOUTH BAY	13-0083-02	AqCons	Mercury in Fish Tissue	TMDL Required
Horseshoe	13-0073-00	AqRec	Nutrient/Eutrophication Biological Indicators	TMDL Required

Kroon	13-0013-00	AqRec	Nutrient/Eutrophication Biological Indicators	TMDL Required
Little	13-0033-00	AqRec	Nutrient/Eutrophication Biological Indicators	TMDL Required
Little	13-0033-00	AqCons	Mercury in Fish Tissue	TMDL Approved
Moody	13-0023-00	AqRec	Nutrient/Eutrophication Biological Indicators	TMDL Required
North Center Lake	13-0032-01	AqRec	Nutrient/Eutrophication Biological Indicators	TMDL Required
School	13-0057-00	AqRec	Nutrient/Eutrophication Biological Indicators	TMDL Required
Skogman	30-0022-00	AqRec	Nutrient/Eutrophication Biological Indicators	TMDL Required
South Center	13-0027-00	AqRec	Nutrient/Eutrophication Biological Indicators	TMDL Required
South Center	13-0027-00	AqCons	Mercury in Fish Tissue	TMDL Approved
Wallmark	13-0029-00	AqRec	Nutrient/Eutrophication Biological Indicators	TMDL Required
West Rush	13-0069-02	AqRec	Nutrient/Eutrophication Biological Indicators	TMDL Required
West Rush	13-0069-02	AqCons	Mercury in Fish Tissue	TMDL Approved

Draft/public noticed TMDL studies and approved TMDLs and implementation plans can be viewed on MPCA's website at: <http://www.pca.state.mn.us/index.php/water/water-types-and-programs/minnesotas-impaired-waters-and-tmdls/tmdl-projects/tmdl-projects-and-staff-contacts.html>.

The County should consider participating with other units of government in the watershed to develop and implement TMDL implementation plans once TMDL studies receive final approval from the EPA. Grant funding applications for TMDL impaired water implementation projects may request citations from local water plans identifying water bodies as County priorities. This documented commitment by a County may improve an application's ranking and ultimately the County's ability to secure implementation funding.

MPCA Environmental Data Access System

The water quality section of MPCA's Environmental Data Access (EDA) system allows visitors to find and download data from surface water monitoring sites located throughout the state. Where available, conditions of lakes, rivers or streams that have been assessed can be viewed. We encourage the County to visit this site for water quality monitoring data which may be useful with LWM planning efforts: <http://www.pca.state.mn.us/data/edaWater/index.cfm>.

Areas of the County that should be considered priority waters are the impaired water bodies and reaches of impaired water bodies on the Clean Water Act 303 [d] TMDL List. We believe the County should consider impaired waters as a top priority for discussion in the LWM Plan.

2. Approved TMDL Studies Underway in the County and Watershed

There are two approved TMDLs and implementation plans (North Branch of the Sunrise River Bacteria TMDL Study and the Comfort Lake Forest Lake Watershed District Lakes Nutrient TMDL Study and Implementation Plan) and additional TMDL studies underway in the County. The TMDLs under development include:

- Chisago Chain of Lakes Multi Lakes TMDL
- Sunrise River Watershed Restoration and Protection Project
- Goose Creek Watershed Restoration and Protection Project
- Lake St. Croix TMDL

Recommended actions include:

- Involvement in the projects
- Prioritizing work around the study areas to work towards restoring the resources

When the implementation plans are approved, funding will be available in the form of grants for the County and others to apply and act on the activities identified in the plans.

Within these TMDL areas, priorities for the County should be:

- Developing local zoning and rules to ensure future development does not cause further problems with these waterbodies.
- Work with citizens in the agricultural community and cities including lake home owners, and others to better understand the issue of impaired waters and what they can do to help meet the goals of all the TMDLs throughout the County.

If we may be of further assistance, please contact Chris Klucas in the St. Paul Office at 651-757-2498 or Dave L. Johnson in the St. Paul Office at 651-757-2470.

Thank you and we look forward to reviewing the forthcoming PCSD and LWM Plan.

Sincerely,



Rebecca J. Flood
Assistant Commissioner

RJF/DLJ:kb

cc: Chris Klucas, Minnesota Pollution Control Agency, St. Paul Office