



## Bassett Creek Watershed Management Commission

May 16, 2014

Ms. Barb Peichel  
Minnesota Pollution Control Agency  
520 Lafayette Road North  
St. Paul, MN 55155-4194

### Re: Comments on Upper Mississippi River Bacteria TMDL Study and Protection Plan

Dear Ms. Peichel:

The Bassett Creek Watershed Management Commission (BCWMC) is committed to improving and protecting water quality in all of its water resources. The BCWMC installs approximately \$1 million of water quality improvement projects annually, implements a rigorous monitoring program each year, implements TMDLs, and cooperates with its nine member cities on multiple best practices and programs.

The BCWMC supports MPCA's efforts to address bacteria impairments in the Upper Mississippi River basin, but has concerns about the efficacy of the MPCA's source identification, which leads to concerns about the MPCA adequately targeting and monitoring the success of future implementation efforts within the watershed. As a result, the BCWMC has specific questions, comments and suggestions on the draft report as it pertains to the three impaired reaches within BCWMC—Bassett Creek, AUID#07010206-538; Plymouth Creek, #07010206-526; and North Branch Bassett Creek, #07010206-552; please see these listed below.

1. Impaired waters listings for bacteria in Plymouth Creek, #07010206-526 and North Branch Bassett Creek, #07010206-552—our experience has been that both of these stream reaches routinely go dry each year. In addition, both of these reaches are highly channelized and have been significantly altered by ditching. It is suggested that these listings be considered as Category 4C water bodies. The category applies to both Plymouth Creek and North Branch Bassett Creek because the non-attainment of the applicable water quality standard is not caused by a pollutant. Examples of circumstances where an impaired segment may be placed in Category 4C include waterbodies impaired solely due to lack of adequate flow or to stream channelization.
2. Bacteria delivery factor (p. 84)—the Water Quality Risk GIS layer, despite the adjustment for imperviousness, represents a questionable basis for the bacteria delivery factors in urbanized watersheds because these areas are mostly serviced by storm sewer systems that can deliver various sources of bacteria several miles, regardless of proximity or terrain. As a result, we are concerned that this GIS data was used to develop the list of relative potential bacteria sources in Tables 4-15 and 4-16, which could result in misallocating resources (funding, staffing, etc.) for future implementation efforts.
3. Tables 4-15 and 4-16—we question why any kind of livestock (registered or otherwise) are depicted in either table for any of the three impairments in the Bassett Creek watershed, since it is not expected that any of these animals are present. Table 4-15 indicates that all three of the Bassett Creek

**Bassett Creek Watershed Management Commission**

7800 Golden Valley Road | Golden Valley, MN 55427 | [www.bassettcreekwmo.org](http://www.bassettcreekwmo.org) | Established 1968

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

subwatersheds have a low potential of delivery from land application of septage. Do you have documented examples of this practice anywhere within these subwatersheds? If not, please remove any indication of septage from the corresponding subwatershed(s). Based on our review of Table 4-3, we understand why Table 4-15 depicts illicit connections as having low potential for delivery within all three of the BCWMC impaired subwatersheds, but do not understand why humans are depicted as having medium-low potential for the respective subwatersheds in Table 4-16, when Table 4-9 indicates that this source should represent a low relative rank among all potential sources. In Table 4-16, please change humans to having low potential for the subwatersheds.

4. Plymouth Creek TMDL loading capacity, existing geometric means and percentage reductions (pp. 167, 168, 184, 185, 217, 226)—Appendix C, Table C-1 does not indicate any monitoring sites for the source of the E. coli data for Plymouth Creek, but Figures 6-60 and 6-61, and Table D-1 show existing monitoring data for portions of 2008, 2009 and 2010. Please indicate which monitoring stations were used for the analysis of Plymouth Creek. Table C-1 also indicates that you are using flow data from the Bassett Creek WOMP station in Minneapolis to develop the loading capacity for Plymouth Creek in Plymouth. It is strongly recommended that you use more representative flow monitoring data to determine the loading capacity and allocations for Plymouth Creek since the WOMP station and Plymouth Creek are far apart and separated by Medicine Lake. It is expected that the City of Plymouth and/or Three Rivers Park District have collected flow data from the impaired reach of Plymouth Creek during the open water periods between 2001 and 2013 that would be better suited for this TMDL.
5. Monitoring Plan (Section 11)—Given the spatial/temporal limitations of the microbial source tracking study, and its limited ability to differentiate human and pet sources of bacteria, it is unclear how the intensive watershed monitoring approach prescribed for the next ten-year cycle will significantly improve on the current understanding of the problem and better inform future implementation efforts, despite the potential for assistance from local partners. It is recommended that MPCA devote more resources to better understanding the sources, fate and transport of pathogens at an appropriate scale for BMP implementation and source reduction, including a better understanding of the legacy effects of past discharges (such as septic systems, land application of septage or biosolids, etc.). In the Bassett Creek watershed, it will be important for future assessments of TMDL compliance to include flow monitoring data for all three of the impaired reaches addressed in this report, since the flow-duration characteristics of the upper subwatersheds cannot adequately be characterized by the MCES WOMP monitoring in the downstream reach. In addition, dispensation should be given for the fact that the upstream reaches are not likely to maintain flow throughout the year.

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

Sincerely,

Jim de Lambert, Chair  
Bassett Creek Watershed Management Commission

CC: BCWMC Commissioners and Alternate Commissioners  
BCWMC Technical Advisory Committee