



**Minnesota
Pollution
Control
Agency**

Feb. 26, 2013

The Minnesota Pollution Control Agency received hundreds of comments from individuals that addressed both the draft South Metro Mississippi TMDL for Total Suspended Solids and draft Minnesota River TMDL for Turbidity. Their submissions are included in the comments for the South Metro Mississippi TMDL, as follows.

From: [Randall Arnold](#)
To: [Gunderson, Larry \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Thursday, May 17, 2012 12:06:25 PM

Mr Gunderson

I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life & health to these vital water resources.

However, the draft TMDLs provide little assurance that these goals will be met. My daughter attends college in NW Iowa and I have had occasion over the past four years to make the drive through the Minnesota River valley and parts of SW Minnesota on my trips between Minnetonka and Storm Lake, IA. I grew up in outstate MN and am a lover of wide open spaces. I am alarmed by the changing landscape of farm fields in the Minnesota River valley and elsewhere throughout our state. The wetlands and low lying areas which once dotted these farm fields have been drained and on each successive trip through the area I see one or two more farm fields which are being 'tiled' to quickly remove any excess moisture. Water which once had a chance to set and soak into the soil is now channeled to drainage ditches and eventually the Minnesota River and other state waters where it causes them to overflow their banks and wash tons of sediment downstream. If it was a municipality causing this sort of problem, you can be sure that there would be legislation, lawsuits, and action taken to change this situation. Farmers keep taking out ads claiming to be 'lovers of the land' but, their actions in this area point to a different conclusion. It is time the rules and regulations are enacted to ensure that the actions of those person upstream when it comes to water drainage do not have a negative impact on those downstream. Please act before every farm field in MN is tiles and every wetland is drained for the sake of getting one more bushel of corn from our land.

Randall Arnold
12605 Hilloway Rd. W.
Minnetonka, MN 55305-2440

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

From: [Michele Bevis](#)
To: [Finley, Robert \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Thursday, May 17, 2012 1:18:07 PM

Mr. Finley

In addition to the comments below, it is only fair that agriculture be held accountable for its sediment curtailment, just as cities currently are. Cities are required to comply by permit; why does agriculture not have equivalent requirements. Conservation and clean up requirements must apply to ALL polluters, not only some.

I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life & health to these vital water resources.

However, the draft TMDLs provide little assurance that these goals will be met. I recommend three fundamental changes to the draft TMDLs as written.

1. Provide Accountability for Farm Operations: Minnesotans value clean water and expect everyone to do their part to clean up polluted waterways. However, while cities and point sources are required to meet TMDL goals, field agriculture operations are given voluntary reductions with no effective accountability mechanism in place - and no contingency plan should these voluntary actions fail to achieve pollution reduction goals.

The MPCA should amend the TMDLs to include reasonable assurance that agricultural reductions can be achieved. This includes:

. Enforce & strengthen existing laws: Set a goal of 100% statewide compliance with existing shoreland rules (Minn. R. 6120.3300, Subp. 7), soil loss ordinance (Minn. Stat. § 103F.405), and wetland protections rules within the next five years.

. Measure, monitor & report: Develop a framework for accurately measuring agricultural pollution on a watershed basis. The MPCA should provide detailed annual reporting on watershed progress toward agricultural pollution load reductions through these TMDLs.

. Hold agriculture operations accountable: The MPCA should provide detailed plans for educating farmers on the pollution reductions they must achieve, and then hold them accountable to that standard. Voluntary approaches have proven ineffective at achieving water quality standards. The MPCA should develop a system for holding agricultural operations accountable for meeting watershed-specific goals, and fully implement that system within five years.

2. Target Conservation Funding for Maximum Impact: Minnesotans expect our taxpayer resources to be used wisely. The MPCA should target limited resources, including Clean Water, Land, & Legacy money, for maximum water quality impact. This includes:

. Use public dollars wisely: The MPCA should commit to target limited resources, including Legacy Amendment money, to the projects with the best 'pollution-reduction-per-dollar' value for taxpayers, rather than spread

resources around the state equally.

. Target priority projects: Target the money to where it will do the most good. The state should commit to developing a "project priority list" for each watershed in the Mississippi & Minnesota River basins - and commit to fund the most effective pollution reduction projects first.

. Conservation compliance: Public resources should not be used to pay for practices already required by law. Conservation compliance should be a prerequisite for access to any and all taxpayer-supported conservation resources.

3. Set Milestones & Timelines: If we wish to achieve long-term goals, we must measure our progress toward those goals, and inform the public on our progress. This includes:

. Benchmarks & milestones: The TMDLs as written lack specific timelines and milestones for progress. The MPCA should amend the TMDLs to include aggressive but achievable benchmarks and milestones - and measure our progress toward those goals.

. Measure & report: Develop and distribute comprehensive annual reports on progress toward TMDL benchmarks and milestones, including funding allocations, policy initiatives, and water quality outcomes.

I believe that these changes to the TMDLs will ensure that our badly needed river clean up plans yield positive results for Minnesota's freshwater resources.

Thank you.

Michele Bevis
3442 35th Ave. S.
Saint Paul, MN 55101

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

Comments on draft TMDL reports

Note: Written comments become part of the report's public record

Title of draft TMDL report: South Metro Mississippi River TSS TMDL

Name:

Beth Brombach

Address:

2714 Goodrich Ave
St Paul, MN 55105

Please explain your interest in this TMDL report:

I'm interested in the health of the river because it's such a vital natural resource. Too important not to do something!!

Any recommended changes to the report? If so, please include references to specific sections.

If recommending changes to the report, please list specific reasons for the changes.

Other Comments:

Signature:

Beth Brombach

From: [Ellen Brown](#)
To: [Finley, Robert \(MPCA\)](#)
Subject: River TSS TMDL's
Date: Thursday, May 17, 2012 3:46:59 PM

Mr. Finley

We are blessed to have both a home in Saint Paul and a condo on the Mississippi River in Wabasha. In both locations, we are frequent users of the river.

The decline in the health of the Mississippi, which we know is greatly exacerbated by pollution entering from the Minnesota, concerns us greatly. We are very concerned about the sediment that is clogging Lake Pepin as well as the general degradation of the Rivers' waters. We know that much of the problem is caused by poor agricultural practices.

We urge the MPCA to ensure that pollution from agriculture is addressed in the TDML plans.

Sincerely,
Peter and Ellen Brown

Ellen Brown
874 Fairmount Ave
Saint Paul, MN 55105-3117

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

Comments on draft TMDL reports

Note: Written comments become part of the report's public record

Title of draft TMDL report: South Metro Mississippi River TSS TMDL

Name:

Ralph Butkowski

Address:

852 Brenner Ave, Roseville MO 65113

Please explain your interest in this TMDL report:

Personal interest in seeing improvements to water quality

Any recommended changes to the report? If so, please include references to specific sections.

I plan to review the report on-line & ~~report~~ comment at that time.

If recommending changes to the report, please list specific reasons for the changes.

Other Comments:

It appears the scientific data is sound. I was hoping to hear some more specific examples for improvements.

Signature:

From: [Mike Cochran](#)
To: [Finley, Robert \(MPCA\)](#)
Subject: Additional comments on the South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Tuesday, May 22, 2012 11:29:57 AM

Mr. Finley

This is a form letter, but I want to point out one particular point of it before you proceed to check the box that I was one of hundreds of people who said the same thing. Agriculture is the 3000 pound gorilla in the room. As someone who once worked in decentralized wastewater in MN, I know that there are a lot of good regulations out there that help reduce pollution already for much of MN watersheds. However, if no one addresses agricultural runoff, it will only continue to get worse until it either can't be ignored or something happens that forces a federal agency to step in. Be proactive. Try to establish some agricultural guidelines with more teeth than what currently exists. Thank you very much for your work. Form letter as follows.

I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life & health to these vital water resources.

However, the draft TMDLs provide little assurance that these goals will be met. I recommend three fundamental changes to the draft TMDLs as written.

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I believe that these changes to the TMDLs will ensure that our badly needed river clean up plans yield positive results for Minnesota's freshwater resources.

Thank you.

Mike Cochran
9190 Olalla Canyon Road
Cashmere, WA 98815

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

From: [Kyle Crocker](#)
To: [Stine, John \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Friday, May 18, 2012 7:10:32 PM

(FYI, I am sending you a copy of this message.)

Mr. Finley

I have lived for some years within the Mississippi Headwaters. I have continually observed the increasing threats to the health of this 'Father of Wsters.'

I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life & health to these vital water resources.

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Thank you.

Kyle Crocker
806 Balsam Ridge Rd NW
Bemidji, MN 56601-5587
218-444-2589

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

From: [Kate Crowley](#)
To: [Gunderson, Larry \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Thursday, May 17, 2012 1:29:08 PM

Mr Gunderson

As a resident of Minnesota and a strong believer in the health of our great river, I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life & health to these vital water resources.

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Thank you.

Kate Crowley
82119 Bennett Rd
Willow River, MN 55795-3079

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

From: [Mike Denney](#)
To: [Finley, Robert \(MPCA\)](#)
Subject: Fw: Lake Pepin sedimentation issue
Date: Wednesday, April 25, 2012 10:22:32 AM

Mr. Finley,

I think Trout Unlimited has been doing this for years. I'd like to see these techniques utilized on all rivers and streams throughout Minnesota where erosion is an issue. I think the only thing needed is advice and counsel from the Soil and Water Conservation folks in each district to spread the word. But they need education first. There was a stream feeding into the Zumbro river at the entrance to Oxbow park that had severe erosion problems. The SWCD answer to the farmer was to rock the entire stream, which the farmer promptly said, "No way!". Too much work and too expensive.

Mike Denney
<http://w3.rchland.ibm.com/~denney/>

"Everybody should believe in something, I believe I'll go fishing"- thoreau

----- Forwarded by Mike Denney/Rochester/IBM on 04/25/2012 10:12 AM -----

From: Laura Denney <ldenny6455@gmail.com>
To: Mike Denney/Rochester/IBM@IBMUS
Date: 04/25/2012 10:00 AM
Subject: Fwd: RE: Lake Pepin sedimentation issue

----- Forwarded message -----

From: "Finley, Robert (MPCA)" <robert.finley@state.mn.us>
Date: Apr 25, 2012 9:03 AM
Subject: RE: Lake Pepin sedimentation issue
To: "Laura Denney" <ldenny6455@gmail.com>

Mr. Denney,

Thank you for your comments. It sounds like you've come up with a very sensible and practical solution to a common problem; one that others could replicate. I'd be interested to learn what sort of changes in the river you observe in future years as a result of this project.

Bob

From: Laura Denney [mailto:ldenny6455@gmail.com]
Sent: Tuesday, April 24, 2012 9:31 PM
To: Finley, Robert (MPCA)
Subject: Lake Pepin sedimentation issue

Mr. Finley,

I read the Lake Pepin study briefly, but it seemed to be a bit over my head with detail. I live on the South Branch of the Middle Fork of the Zumbro River near Oxbow Park 5 miles north

of Byron. The river there is pretty nice, but the banks are in horrible shape. For the most part, this is due to the fact that the 'buffer zone' on each side of the river is mostly vegetated with Box Elder trees. These trees are a huge detriment to the health of the river because they have no fibrous root system and they produce so much shade that insufficient vegetation grows beneath them.

Any river restoration project should begin with the remove of all Box Elders. Willows, Cottonwoods, Walnuts, and Silver Maples can be left, but sparingly. The major vegetation along our prairie rivers should be prairie grass. I've seen areas opened up by tree removal and the vegetation of grasses and forbs exploded, covering all the bare dirt, even some of the almost vertical cliffs. With a little help (seeding and bank tapering), the river could be fixed to reduce the erosion by 90-95 percent, in my opinion.

I did such a project, minus the bank tapering because of high water all last year. I had a team of 20 volunteers and we cleared and planted 500 feet X 50 feet on once side of the river in about 4 hours. The only power equipment we had were lawnmowers and chainsaws. There was little vegetation to remove, so the prairie grass seed was pretty easy to rake in.

With trained workers (I had all office-type workers) I could imagine much higher productivity.

So I think the priority should be:

1. Kill the box elders and any other trees that are too close together.
2. Plant an inexpensive mixture of prairie grasses (switch grass, big bluestem, wheatgrass, etc)
3. Taper the banks that are vertical and over 3 feet tall. (less than 3 feet will probably self-taper quick enough once the prairie grasses take hold).

I think these 3 things will produce excellent results and a pretty reasonable price. With this greatly improved protection, the farmers can probably leave most of their tiling where it makes economic sense.

Thank you,

Mike Denney

6455 Co Rd 105 NW

Byron, MN 55920

[\(507\) 775-7481](tel:(507)775-7481)

From: [TOM DIMOND](#)
To: [Finley, Robert \(MPCA\)](#)
Subject: South Metro Mississippi River TMDL Draft comments
Date: Sunday, May 27, 2012 5:17:11 PM

Tom Dimond
2119 Skyway Drive
Saint Paul, MN 55119

May 27, 2012

Robert Finley
MN Pollution Control Agency
12 Civic Center Plaza, Suite 2165
Mankato, MN 56001

RE: South Metro Mississippi River TMDL Draft

I would like to express my strong support of clean water in our Mississippi River. The standard of water quality clean enough to grow aquatic vegetation that benefits fish and wildlife is the minimum standard that we should strive for. I appreciate that your report provides the reference that when the first European settlers arrived they reported the water as crystal clear. Establishment of the State Critical Area, MNRRA and sewer separation have made great strides to restore this unique natural resource and the ecological, recreational and economic benefits it offers us. Addressing the TMDL is an important next step.

In order to be successful we need everyone to do their fair share. It is only fair that all participate in this effort. Accountability will depend on quantifiable results. The plan must include accurate evaluation, public monitoring, and detailed public reports. The MPCA should hold an annual public meeting to present and discuss the annual report. The meeting would provide an opportunity to celebrate what has worked, explore alternatives to what has not worked and serve as an opportunity to increase awareness and engage the public.

On page 5 the draft wording should be changed from - *In the highly urbanized portion of the river channel, limited opportunities for habitat restoration exist. However, from approximately River Mile 832 on south – downstream of the Interstate 494 Bridge – such opportunities exist in the shallower areas of the main channel, side-channels and backwaters.* The wording should be - *Habitat restoration opportunities exist in the shallower areas of the main channel, side-channels and backwaters.* The Saint Paul section of the Mississippi River is every bit as important as other sections. Most of the shore between the confluence and Downtown is Regional Park. South of the waste treatment facility is Regional Park and a State Scientific and Natural Area. There are islands, shallow areas, and backwaters. Pig's Eye Lake is a backwater and the largest lake in Saint Paul. Saint Paul should be included in the opportunity to restore habitat.

Asian Carp have raised the awareness that habitat restoration can enhance native fish populations and help limit invasive species. Saint Paul should be part of efforts to enhance native fish populations.

On page 75, bluff stabilization practices it should include bluff setback requirements. Protecting and restoring native vegetation and the control of invasive species should be

included in bluff best management practices. The artificial drainage of groundwater seeps should be removed from the draft. Seeps do not generally contribute to erosion but they do provide unique native habitat for flora and fauna that the Critical Area supports protecting.

On page 82 the draft asserts that the MN Clean Water Fund and State shoreland protection regulations provide a reasonable assurance of implementation. Minnesota requires communities to adopt a shoreland ordinance, but Saint Paul has not done so.

On page 83 the draft lists State policy that the PCA will pursue with State agencies. Critical Area policy should be included.

Comments on draft TMDL reports

Note: Written comments become part of the report's public record

Title of draft TMDL report: South Metro Mississippi River TSS TMDL

Name: George Dunn

Address: 901 Aldine St. St. Paul MN 55104

Please explain your interest in this TMDL report:

I am concerned with water quality in the Mississippi River and for that matter all the water in MN.

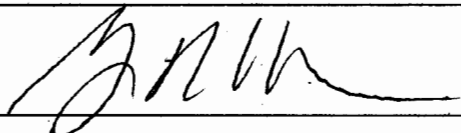
Any recommended changes to the report? If so, please include references to specific sections.

If recommending changes to the report, please list specific reasons for the changes.

Other Comments:

- I think it is important to not only study the problem but implement a plan that will help to correct the problem.
- we need to have follow-up studies to track what is being done or not being done
- We need to hold people (and Businesses) accountable

Signature:



The economic externalities need to be taken into account to make sure those that are causing the problem are part of the solution

From: [Joel Dunnette](#)
To: [Gunderson, Larry \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Tuesday, May 29, 2012 10:27:11 AM

Mr Gunderson

I have lived in SE MN all my life, and have observed the quality of the natural environment with great interest. While some measures have improved, others continue to decline. I feel we need to expand the factors that we regulate, so future generations can have a Minnesota that is near as good as we have enjoyed.

So, I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life & health to these vital water resources.

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Thank you.

Joel Dunnette
4526 County Road 3 SW
Byron, MN 55920-6208
507-269-7064

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

From: [Gregory Eggers](#)
To: [Finley, Robert \(MPCA\)](#)
Subject: Ag fields as point sources
Date: Tuesday, May 22, 2012 8:37:04 AM

Mr. Finley

We need to start treating all Ag fields as point sources and our public and private drainage systems as stormwater utilities. We will never reduce sediment delivery to our streams until we get serious about controlling water at its source.

We have the assessment tools/models that will allow us to do a better job of predicting outcomes from a suite of BMPs on the landscape. We must embrace this science and use it to expand our research efforts and augment the monitoring and field plot research that is targeted toward improving current Ag practices.

Gregory Eggers
500 Lafayette Rd
St. Paul, MN 55155-4001
651-259-5726

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

From: [Thomas Eland](#)
To: [Gunderson, Larry \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Tuesday, May 22, 2012 7:20:53 AM

Mr Gunderson

The wording below is from the Minnesota Environmental Action Network. I have read over the issues and their recommendation and I find them very convincing and support them in order to make the draft TMDLs better.

I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life & health to these vital water resources.

However, the draft TMDLs provide little assurance that these goals will be met. I recommend three fundamental changes to the draft TMDLs as written.

1. Provide Accountability for Farm Operations: Minnesotans value clean water and expect everyone to do their part to clean up polluted waterways. However, while cities and point sources are required to meet TMDL goals, field agriculture operations are given voluntary reductions with no effective accountability mechanism in place - and no contingency plan should these voluntary actions fail to achieve pollution reduction goals.

The MPCA should amend the TMDLs to include reasonable assurance that agricultural reductions can be achieved. This includes:

- . Enforce & strengthen existing laws: Set a goal of 100% statewide compliance with existing shoreland rules (Minn. R. 6120.3300, Subp. 7), soil loss ordinance (Minn. Stat. § 103F.405), and wetland protections rules within the next five years.

- . Measure, monitor & report: Develop a framework for accurately measuring agricultural pollution on a watershed basis. The MPCA should provide detailed annual reporting on watershed progress toward agricultural pollution load reductions through these TMDLs.

- . Hold agriculture operations accountable: The MPCA should provide detailed plans for educating farmers on the pollution reductions they must achieve, and then hold them accountable to that standard. Voluntary approaches have proven ineffective at achieving water quality standards. The MPCA should develop a system for holding agricultural operations accountable for meeting watershed-specific goals, and fully implement that system within five years.

2. Target Conservation Funding for Maximum Impact: Minnesotans expect our taxpayer resources to be used wisely. The MPCA should target limited resources, including Clean Water, Land, & Legacy money, for maximum water quality impact. This includes:

- . Use public dollars wisely: The MPCA should commit to target limited resources, including Legacy Amendment money, to the projects with the best 'pollution-reduction-per-dollar' value for taxpayers, rather than spread resources around the state equally.

- . Target priority projects: Target the money to where it will do the most

good. The state should commit to developing a "project priority list" for each watershed in the Mississippi & Minnesota River basins - and commit to fund the most effective pollution reduction projects first.

. Conservation compliance: Public resources should not be used to pay for practices already required by law. Conservation compliance should be a prerequisite for access to any and all taxpayer-supported conservation resources.

3. Set Milestones & Timelines: If we wish to achieve long-term goals, we must measure our progress toward those goals, and inform the public on our progress. This includes:

. Benchmarks & milestones: The TMDLs as written lack specific timelines and milestones for progress. The MPCA should amend the TMDLs to include aggressive but achievable benchmarks and milestones - and measure our progress toward those goals.

. Measure & report: Develop and distribute comprehensive annual reports on progress toward TMDL benchmarks and milestones, including funding allocations, policy initiatives, and water quality outcomes.

I believe that these changes to the TMDLs will ensure that our badly needed river clean up plans yield positive results for Minnesota's freshwater resources.

Thank you.

Thomas Eland
3529 46th Ave. S.
Minneapolis, MN 55406-2932

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

May 29, 2012

Robert Finley

Minnesota Pollution Control Agency

12 Civic Center Plaza

Mankato, MN 56001

Re: South Metro Mississippi River TSS TMDL

Dear Mr. Finley:

I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life & health to these vital water resources.

I have been retired from the MDNR for the last 15 months, but was a Stakeholder Advisory Committee member for the Lake Pepin and South Metro TMDLs until that time. My Major Rivers Survey Project also worked with Pat Bailey, formerly with the MPCA, during the field studies and report preparations for the Minnesota River Assessment Project (MRAP) (1989-1992). We prepared the report chapter "A Fish Community Analysis of the Minnesota River Basin" which was the first application of the *Index of Biotic Integrity* for a Minnesota watershed area. As you are aware, many state and federal agencies, colleges and universities and private citizens were heavily committed to this governor declared initiative to clean up the nonpoint pollution of the Minnesota River. Despite the continued coordination of a Citizens Advisory Committee following submission of the MRAP report to the legislature, very little was ultimately accomplished in implementing existing or new regulation for addressing the nonpoint loadings to the river. This has been a miscarriage of the public trust and funding since that time. The state agencies failed to coordinate appropriately and even implement existing regulations throughout the basin. The current TMDL documents need to better demonstrate that these major initiatives will not follow that same path of failure, but instead outline clear authorities, interagency cooperative agreements, swift basin wide implementation of existing regulatory authorities with implementation schedules, and the assuredness of legislative initiatives for regulatory measures as necessary to provide reasonable assurance that this time the public water resources will be restored as expediently as possible.

In Section 7.1 of the South metro TMDL, the agency states that "the MPCA will emphasize linking TSS load-reductions strategies for the TMDL to implementation planning in the major watersheds contributing high sediment loads". This is very problematic as Table 11. of this section shows the monitoring, planning, and implementation schedules for the major watersheds with timelines going out to 2029. As an example the implementation schedule for the Blue Earth River basin is 2021-2026. This is one of the largest watersheds and an extremely high sediment producer. Cooperators need to see more timely

implementation and it needs to be made clear that in the interim there will be basin scale modifications applied and that there will be rapid implementation of existing authorities such as those for agricultural buffers and ditches.

My concern for the draft TMDLs is that they provide insufficient or protracted implementation schedules, and reasonable assurance that contingency measures are in place if goals are not being met on schedule. The timelines for the Implementation Plan process should also be clearly stated.

I have reviewed comments prepared by the Minnesota Environmental Action Network regarding the Minnesota River and South Metro TMDLs and concur with many of their recommendations. For that reason, I have incorporated portions of their draft letter in my following comment.

1. Provide Accountability for Farm Operations: Minnesotans value clean water and expect everyone to do their part to clean up polluted waterways. However, while cities and point sources are required to meet TMDL goals, field agriculture operations are given voluntary reductions with no effective accountability mechanism in place – and no contingency plan should these voluntary actions fail to achieve pollution reduction goals. The MPCA should amend the TMDLs to include reasonable assurance that agricultural reductions can be achieved. This includes:

- Enforce & strengthen existing laws: Set a goal of 100% statewide compliance with existing shoreland rules (Minn. R. 6120.3300, Subp. 7), soil loss ordinance (Minn. Stat. § 103F.405), and wetland protections rules within the next five years.
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- Hold agriculture operations accountable: The MPCA should provide detailed plans for educating farmers on the pollution reductions they must achieve, and then hold them accountable to that standard. Voluntary approaches have proven ineffective at achieving water quality standards. The MPCA should develop a system for holding agricultural operations accountable for meeting watershed-specific goals, and fully implement that system within five years.

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- Measure & report: Develop and distribute comprehensive annual reports on progress toward TMDL benchmarks and milestones, including funding allocations, policy initiatives, and water quality outcomes.

I appreciate the opportunity to comment on these documents and look forward to clarifications and additions to the final documents that provide reasonable assurance of an aggressive

Sincerely,

Jack Enblom

Comments on Draft Minnesota River TMDL
Les Everett, University of Minnesota Water Resources Center
29 February 2012

1. The TMDL report is well written regarding the sources and load allocations.
2. There are two changes that are needed with regard to implementation planning, both having to do with phasing of implementation. The first is phasing by major watershed and the second is phasing by BMP class. On pages 192-193 (report page number)/202-203 (pdf page number), implementation is projected to be phased in by major watershed based on the PCA monitoring cycle, with the Blue Earth watershed not beginning implementation until 2021. On the other hand, implementation of BMPs is projected to start in five year phases based on BMP class, with water storage and infiltration not beginning until 2020, and bank and bluff stabilization until 2025. These two methods of phasing (by major watershed and by BMP class) are not compatible and neither is useful. Instead, the following implementation statement from the South Metro Mississippi River TSS TMDL should be substituted for the current phasing statements in the MN River Turbidity TMDL: p. 74/84 "Local partners in priority watersheds will work in cooperation with MPCA project managers to develop detailed implementation plans. They will develop a Phase One component first by 2013, using load-reduction goals allocated to the watershed as water quality targets to achieve by 2020.They will develop Phase Two and subsequent phases in accordance with the MPCA's watershed approach to studying all major watersheds in the state on a 10-year cycle." Therefore, Phase One starts immediately for all priority watersheds and Phase Two starts with the 10-year cycle. Likewise, phasing by BMP type is counter-productive and would delay start of the BMPs that take the longest to complete. Funding sources and rules differ by BMP type (EQIP, CCRP, CRP-CP39, WRP-RIM, BMP-loans, shoreland rules, etc.) and each of these sources must be tapped for the entire period of implementation, not an artificial BMP phasing period which would severely under-utilize those funds and interfere with the full suite of tools needed in redressing impairments.
3. Achievable and visible goals are needed for the intermediate term. The following report statement is not an achievable intermediate term goal and is discouraging to those reading the report: p. 176/186 "The TMDL target scenario results in a large reduction in the total sediment export at Jordan. The average annual load (over water years 2001-2006) is reduced to 86,375 tons/yr, or only 10 percent of the baseline load for existing conditions." Instead, substitute the intermediate goals of **a. Water quality standards will be met for the impaired reaches of the Minnesota River west of Mankato by 2025. b. A 50% reduction in sediment load at Jordan will be achieved by 2030 in order to achieve the TSS standard for the South Metro Mississippi River and Lake Pepin.**
4. The reader of the two concurrent Draft TMDL reports (Minnesota River, and South Metro Mississippi River) will be easily confused by the selection of Scenario 5 in the Minnesota River Turbidity TMDL report (p. 173/183), while Scenario 4 is cited as the reference scenario for the MN River in the South Metro Mississippi River TSS TMDL report (p. 47/57). How can that be reconciled? At a minimum, some statement needs to be in both reports explaining the dichotomy.

5. The implementation planning section of the report does not address who will be responsible for HUC 8 planning and implementation in the absence of watershed districts or other watershed organizations with the capacity and authority to manage it. Weak organization at the HUC 8 should be addressed and dealt with in the report. Part of the implementation plan should be development of watershed districts or watershed organizations with similar capacity and authority at the major watershed level. Absent that, there is little chance of successful planning and implementation.

Comments on draft TMDL reports

Note: Written comments become part of the report's public record

Title of draft TMDL report: South Metro Mississippi River TSS TMDL

Name: PAUL FRIEDLAND

Address: 118 VIRGINIA ST.
ST. PAUL, 55102

Please explain your interest in this TMDL report:

I SUPPORT THE NEED TO CLEAN/IMPROVE
THE RIVER

Any recommended changes to the report? If so, please include references to specific sections.

If recommending changes to the report, please list specific reasons for the changes.

Other Comments:

I SEE A NEED FOR A FURTHER PLAN. I DIDN'T SEE IT.
LIKE WAS DONE FOR FLECKING/DAMS YEARS AGO/AND FURTHER
EMPHASIZE OUTCOMES FOR USERS OF RIVER.

Signature:

Paul Friedland

Comments on draft TMDL reports

Note: Written comments become part of the report's public record

Title of draft TMDL report: South Metro Mississippi River TSS TMDL

Name:

TIM GRIFFIN

Address:

200 SPRING ST #227
SAINT PAUL MD 21102

Please explain your interest in this TMDL report:

LIVE ON A LIVE MISSISSIPPI

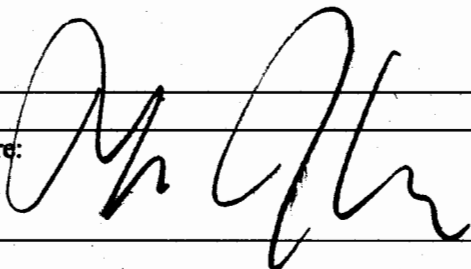
Any recommended changes to the report? If so, please include references to specific sections.

INCREASE URBAN STANDARDS

If recommending changes to the report, please list specific reasons for the changes.

Other Comments:

Signature:



From: [Chris Gulden](#)
To: [Gunderson, Larry \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Tuesday, May 22, 2012 12:17:04 PM

Mr Gunderson

There is an easy solution to this, but in turn hampering farmers trying to make a living. We need to start pulling thousands of miles of drain tile out of the ground immediately. This problem will never go away until this happens. Instead of paying out millions of dollars every year due to flooding damage, why don't we take that money and give to farmers that pull their drain tile out and put in buffer areas around the sloughs and ponds that return? Take a look at aerial photo's from the 50's and compare them to today. Very sad.

I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life & health to these vital water resources.

However, the draft TMDLs provide little assurance that these goals will be met. I recommend three fundamental changes to the draft TMDLs as written.

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I believe that these changes to the TMDLs will ensure that our badly needed river clean up plans yield positive results for Minnesota's freshwater resources.

Thank you.

Chris Gulden
209 summit dr
st michael, MN 55376-9630
651-266-9786

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

Mr. Finley,

4-5-2014

As a field worker and strategic planner in the water resources field I have several concerns with the TMDL proposed. Thank you for the opportunity to comment on the proposed South Metro Mississippi TMDL.

Comment 1: The extremely ambitious sediment reduction goals identified for the Minnesota River are not likely to be achieved within our current social and economic context. The DNR Fisheries analysis "Suggested Approaches for Watershed Protection and Restoration of DNR Managed Fish Lakes in Minnesota" by Duval and Jacobson 3-8-11 describes restoration of highly disturbed watersheds such as this as "probably not realistic". This is highlighted by the multiple challenges to achieving these goals listed below.

To accomplish a 50% reduction in low flow sediment loads in the Minnesota River would likely require the installation of BMP's on 15-30% of the acreage currently yielding sediment to the Minnesota River. This 15-30% of the watershed to be treated would be those identified through a critical source analysis as being the highest yielding acres. The BMP's installed on these critical source acres would need to completely eliminate the sediment yield from these acres. The accomplishment of each of these steps could result in the reductions proposed for the Minnesota River. However if any partner organization were to fail to implement each of these steps in its entirety through improper targeting, insufficient acreage enrollment, or inadequate BMP design the reductions needed would not be realized.

Given the extremely limiting circumstances of nearly complete watershed disturbance, current socio-economic factors, and required partner organization commitments I feel the only reasonable approach is to take a headwaters first approach to treatment. Implementation starting with the headwaters contributing basins and proceeding downstream after BMP's are installed on all the critical source areas in these headwaters basin is the only process likely to show any appreciable water quality results. Piecemeal implementation will rapidly drawdown available BMP and project Clean Water funding without producing any water quality results. If partner organizations in the headwaters basins cannot achieve the reductions necessary there is no reason to fund BMP's further downstream since even if those downstream basins accomplish their reductions completely the results will not be sufficient to delist the Minnesota River.

A 50% low flow sediment reduction goal for the Minnesota River is likely unachievable and commencement of a project with this reduction as the required minimum goal could be seen as poor stewardship of the public trust and funds.

Thank You,
Steve Henry
Otter Tail County Shoreland Specialist
(218)-346-4260 x111
801 Jenny Ave SW Suite 2
Perham, MN 56573

From: [Katie Himanga](#)
To: [Finley, Robert \(MPCA\)](#)
Subject: South Metro Miss TSS TMDL
Date: Tuesday, May 29, 2012 1:21:48 PM

Mr. Robert Finley:

These comments are for the South Metro Mississippi River Total Suspended Solids (TSS) Total Maximum Daily Load (TMDL).

I am former mayor (2005-2008) of the City of Lake City located on Lake Pepin. Tourism is among the economic cornerstones of the community and the region and depends on the health and aesthetic of Lake Pepin. The City operates a large marina from which it derives direct financial benefit.

Since 2004 I've been actively engaged in the planning process for protection of Lake Pepin. This includes participating in events sponsored by the Minnesota Pollution Control Agency and the Lake Pepin Legacy Alliance. I currently serve as a member of the Citizen Advisory Group (CAG) for the Mississippi Makeover Project coordinated by the Dakota County Soil and Water Conservation (SWCD) and funded by the Minnesota Pollution Control Agency.

I recommend that changes be made to Section 7.5 Reasonable Assurance of Nonpoint Source Controls. The section lacks target dates that are necessary for accountability.

Without target dates for completion of tasks outlined in Section 7.5, the public has no means of measuring progress toward goals or holding state officials, both elected and appointed, accountable for achieving sediment reductions in the South Metro Mississippi River.

Thank you for consideration of these comments.

Katie Himanga
1114 Valley View Road
Lake City, MN 55041

Comments on draft TMDL reports

Note: Written comments become part of the report's public record

Title of draft TMDL report: South Metro Mississippi River TSS TMDL

Name:

Angele Hong

Address:

1380 W. Frontage Rd Hwy 36, Stillwater, MN 55082 (work)

664 148th St W, Savage, MN 55378 (home)

Please explain your interest in this TMDL report:

I coordinate water education and outreach in communities in Washington County, am on the metro Watershed Partners steering committee, and a resident of the greater Miss River watershed.

Any recommended changes to the report? If so, please include references to specific sections.

It doesn't appear that the report splits out non-point source input from agriculture vs from non-regulated communities and rural non-agriculture areas. This is confusing if findings indicate that increased volume of runoff and changes in hydrology are as much or more to blame than ag field runoff.

If recommending changes to the report, please list specific reasons for the changes.

I think it is important to break down exactly where ~~excess~~ increased volume and sediment is coming from so that we know where to focus efforts. Right now it seems vague to say "ag" is the problem. There should be specific areas identified so outreach can be targeted to the right landowners.

Other Comments:

I was pleasantly surprised at how easy to read and non-technical this TMDL report is. Actually, more so the fact sheet - the actual report I read on-line + it was quite long ~~and~~ technical. I didn't see an executive summary on-line.

Signature:

Angele Hong

Comments on draft TMDL reports

Note: Written comments become part of the report's public record

Title of draft TMDL report: South Metro Mississippi River TSS TMDL

Name:

Eri Hayer

Address:

1435 Albany Ave
St. Paul MN 55108

Please explain your interest in this TMDL report:

clean water & healthy Miss. River for future generations

Any recommended changes to the report? If so, please include references to specific sections.

If recommending changes to the report, please list specific reasons for the changes.

Other Comments:

In the ag sector - targeting will be critical & that is not usually how NRCS doles out their cost share funds. Also a limiting factor will be outreach to the ag sector. critical concentrated targeting can work. I think we also need to find ways to spread out the cost of getting this done across the population.

Signature:

Eri Hayer

May 26, 2012

Gary G. Joachim
1135 Hidden PI NE
Owatonna, MN 55060

Robert Finley
Minnesota Pollution Control Agency
12 Civic Center Plaza, Suite 2165
Mankato, MN 56001
Phone: (direct)507-344-5247
Minnesota Toll Free: 1-800-657-3864
Fax: 507-389-5422
E-mail: Robert.finley@state.mn.us

Subject: Comments regarding Draft South Metro Mississippi River Total
Suspended Solids Total Maximum Daily Load Report

Dear Mr. Finley:

I am a farmer with land in the Cannon River Watershed and have attended meetings and read many interim reports during the development of the South Metro Suspended Solids Total Maximum Daily Load Report.

In the Executive Summary the Report states that the TMDL is designed to address listed impairments in the described stretch of the Mississippi River as well as the accelerated in-filling of Lake Pepin with sediment. I will first submit comments to the TMDL listed impairments. Then I will comment on the section of the Draft Report that addresses the in-filling of Lake Pepin. It is my understanding that the in-filling of Lake Pepin is not a listed impairment.

The TMDL Impairments

I believe the report to be flawed because there is no effort made to quantify and distinguish between the organic and inorganic components of the sediment load. Research by Dr. Robert Megard and a US Geological Survey report from 2010 on river pools in the Upper Mississippi both show the organic component to

contribute more to turbidity by up to a factor of 15 compared to the inorganic portion. This is important to the efficacy of any proposed reduction strategies. For example increases in un-harvested grasslands and wetlands could very well increase the organic component of the sediment load and work counter to the goal of reducing turbidity and improving Submerged Aquatic Vegetation.

Especially in urban areas the organic fraction of sediment delivered needs to be taken into account. Impervious surfaces are a fast track for leaves, grass clippings, and other organic debris to the nearest river system. Much progress has been made but the report should account for both past and current loading from these sources.

To summarize a simple goal of a percentage reduction in Total Suspended Solids without taking into account the organic fraction may not achieve actual impairment reductions. It would make more sense to separate the organic and inorganic components and develop a more cost effective attainable strategy to reduce the listed impairments.

Lake Pepin Sedimentation

There is no listing as part of the TMDL process for the in-filling of Lake Pepin with sediment. The coverage in the press that I have seen has given much more coverage to Lake Pepin than the listed impairments for the Mississippi River north of Lake Pepin. This confusion is apt to be compounded as the TMDL moves into the implementation phase. What is more important—the listed impairments or slowing down the in-filling of Lake Pepin? Nevertheless I would like to address some assertions and assumptions in the Report as regards Lake Pepin.

The Report could and should have done a better job of basic river science. For instance in a system such as the Minnesota River Basin that flows through an area of soils mostly formed in glacial till what is the basic relationship between rainfall, river flow, and sediment load? What are the accepted equations that govern the sediment carrying capacity of a river? The report in one place uses a ten-fold increase in sediment delivery to Lake Pepin compared to pre-settlement by Europeans. Is that possible using basic river flow and sediment carrying equations?

The Report puts much weight on core studies in Lake Pepin to determine sediment delivered to Lake Pepin. Assumptions are then made about changes in sediment delivery from the Minnesota River to Lake Pepin since European settlement. **The Report makes the assumption that the ratio of sediment delivered to Lake Pepin compared to the sediment delivered to the Mississippi at the mouth of the Minnesota River has remained constant.** The Report disregards all the modifications that have been made to the Mississippi since European settlement.

For instance according to river maps from the 1880's drawn by Henry Bosse for the Army Corp of Engineers there were 300 wing dams between the mouth of the Minnesota River and the head of Lake Pepin. Photographs taken by Bosse show large amounts of sediment trapped behind the wing dams. How much of this sediment would otherwise have gone into Lake Pepin? Is it possible that if rainfall and its effect on river flow are accounted for the sediment load at the mouth of the Minnesota River has been relatively constant and that a good portion of that load stayed in the Mississippi River valley north of Lake Pepin? It should be possible to estimate the volume of material deposited in the river valley at various times. Core borings should be available from road construction and other construction. Where they are not available old maps and measurements can be used to make an estimate.

I would have great concern with accepting the report until these deficiencies are addressed.

Gary G. Joachim
1135 Hidden PI NE
Owatonna, MN 55060

507-250-4428 Cell
soygary@charter.net

From: [Georgia Joachim](#)
To: [Finley, Robert \(MPCA\)](#)
Subject: South Metro Comments
Date: Tuesday, May 29, 2012 4:32:36 PM

Georgia Jane Joachim
1135 Hidden PI NE
Owatonna, MN 55060

Mr. Robert Finley
Southeast Regional Manager
Minnesota Pollution Control Agency
12 Civic Center Plaza, Suite 2165
Mankato, MN 56001

Dear Mr. Finley:

I am a tax paying United States Citizen and a farmer with some land in the Cannon River Watershed. I want to do what I reasonably can do to protect the land, the water, and the air. For instance, my husband and I began no-tilling some of our land several years ago to protect the soil, the water and the air quality. This helps to hold the soil and reduces the wind and water erosion of the soil. We try to be good stewards of the land.

I have attended several TMDL meetings for which I did not apply for reimbursement nor was I reimbursed for attending. It appeared to me that the meetings had a large number of employees from one government agency or another with only a few farmers and others there. Perhaps there is some way to better balance the stakeholders meetings so that the number of government employees are not of greater number than all the other participants combined.

At more than one of the meetings the presentations stated that the "then current goals" for phosphorus had been met. That is good. However, when one goal for Lake Pepin eutrophication had been met, they would change the goal to turbidity to meet submerged aquatic life standards. There may be times when it is necessary to adjust goals. This should not be done just because of what some appear to view as a "bottomless pit of money". The "5.5 billion dollar Legacy Fund was even mentioned in the report. It appears to me that the government agencies look on that Legacy Fund as their money. It seems to me that the government agencies and their employees already have taxpayer funded dollars in the other existing budgets. I do not believe the taxpayer funded Legacy Fund was to go specifically to government agencies and their employees.

Respectfully submitted,

Georgia Jane Joachim

From: [Gregory King](#)
To: [Finley, Robert \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Tuesday, May 29, 2012 3:03:32 AM

Mr. Finley

As a lifelong Minnesotan, a father of three, and a member of the Friends of the Mississippi River, I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life & health to these vital water resources.

However, the draft TMDLs provide little assurance that these goals will be met. I recommend three fundamental changes to the draft TMDLs as written.

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3. Set Milestones & Timelines: If we wish to achieve long-term goals, we must measure our progress toward those goals, and inform the public on our progress. This includes:

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. Measure & report: Develop and distribute comprehensive annual reports on progress toward TMDL benchmarks and milestones, including funding allocations, policy initiatives, and water quality outcomes.

I believe that these changes to the TMDLs will ensure that our badly needed river clean up plans yield positive results for Minnesota's freshwater resources.

Thank you.

Gregory King
5116 17th Ave S
Minneapolis, MN 55417-1214

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

Comments on draft TMDL reports

Note: Written comments become part of the report's public record

Title of draft TMDL report: South Metro Mississippi River TSS TMDL

Name:

Peggy Kaapp

Address:

*2150 3rd Ave N #101
Anoka, MN 55303*

Please explain your interest in this TMDL report:

As Director of Programs at the Freshwater Society, protection of MN's waters is my job. As a resident of the Upper M.S.S. watershed, clean water is central to my quality of life.

Any recommended changes to the report? If so, please include references to specific sections.

Translate the plan so my aging father and my 6th grade neighbor can understand it. Make it accessible. Make sure that money is set aside for education. The education challenge here is enormous. Budget for it!

If recommending changes to the report, please list specific reasons for the changes.

Because the plan won't work unless voters can understand it and vote for policy/policies that support the plan. Change will require a broad base of support.

Other Comments:

It's time to require the agricultural sector to implement, ~~to~~ comply with, or exceed, water quality BMPs. I support the PCA and the state doing everything necessary to achieve water quality standards. Rewrite the Farm Bill, raise my taxes. Do what is necessary.

Signature:

Peggy Kaapp

Comments on draft TMDL reports

Note: Written comments become part of the report's public record

Title of draft TMDL report: South Metro Mississippi River TSS TMDL

Name: JANA LARSON

Address: 1467 Hewitt Avenue MS-A1760
St. Paul, MN 55104

Please explain your interest in this TMDL report:

Clean water is vital to our communities, economy, public health, and Minnesota way of life. I ~~live~~ live along the Mississippi river AND want the water to be clean for citizen and environmental health

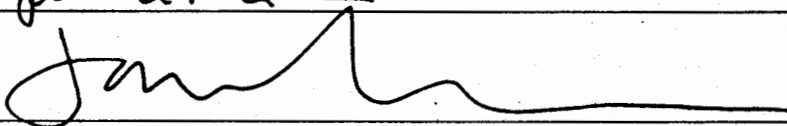
Any recommended changes to the report? If so, please include references to specific sections.

If recommending changes to the report, please list specific reasons for the changes.

Other Comments:

- I support the goals of the TMDL.
- I support efforts to clean up "non-point" run off pollution in urban and rural areas.
- I support efforts to clean up point - source pollution

Signature:



From: [Tom Lenertz](#)
To: [Gunderson, Larry \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Thursday, May 17, 2012 3:31:22 PM

Mr Gunderson

I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life & health to these vital water resources.

However, the draft TMDLs provide little assurance that these goals will be met. I recommend three fundamental changes to the draft TMDLs as written.

1. Provide Accountability for Farm Operations: Minnesotans value clean water and expect everyone to do their part to clean up polluted waterways. However, while cities and point sources are required to meet TMDL goals, field agriculture operations are given voluntary reductions with no effective accountability mechanism in place - and no contingency plan should these voluntary actions fail to achieve pollution reduction goals.

The MPCA should amend the TMDLs to include reasonable assurance that agricultural reductions can be achieved. This includes:

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I believe that these changes to the TMDLs will ensure that our badly needed river clean up plans yield positive results for Minnesota's freshwater resources.

I am very interested in this as I'm planning to move to Lake City and currently have my boat there and fish Lake Pepin!!

Thank you.

Tom Lenertz
511 Euclid Ave
Crookston, MN 56716-2509

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

From: [Lynn Lindsay](#)
To: [Gunderson, Larry \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Thursday, May 17, 2012 6:10:49 PM

Mr Gunderson

After the Wilf family recently received assurances from our Governor that hundreds of millions in public funds will be allocated for the erection an entertainment palace as well as for the creation of minimum-wage jobs at the sports palace, would it not be great if we averted our attention to longer-range, more compelling projects in the public interest?

I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life & health to these vital water resources.

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I believe that these changes to the TMDLs will ensure that our badly needed river clean up plans yield positive results for Minnesota's freshwater resources.

Thank you.

Lynn Lindsay
613 Goodrich Ave
Saint Paul, MN 55102-2813

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

From: [Renee Lorenz](#)
To: [Stine, John \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Saturday, May 19, 2012 1:25:26 AM

(FYI, I am sending you a copy of this message.)

Mr. Finley

Will we ever learn that human health and that of all creatures is strongly influenced by the HEALTH OF OUR RIVERS? The water used to be so clean the Indians could dip a cup in it and drink...we have gone so far down hill as to our water quality that we are accepting the UNACCEPTABLE. We need to control how much sediment goes into our rivers. It isn't smart to put short term profits for agribusiness before our long term health, in fact I'd go as far as to say that it is STUPID. I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life & health to these vital water resources.

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I believe that these changes to the TMDLs will ensure that our badly needed river clean up plans yield positive results for Minnesota's freshwater resources.

Thank you.

Renee Lorenz
78 10th St E Unit 1106
Saint Paul, MN 55101-2249

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

BIG RIVER

May 29, 2012

Robert Finley
Minnesota Pollution Control Agency
18 W. Lake Dr.
Rochester, MN 55904

Dear Mr. Finley,

I have lived near the Mississippi River and considered myself a river user for the last 37 years. I have written about river issues for numerous publications for the last 32 years and served as publisher and editor of Big River Magazine for the last 19 years. Big River covers the river from the Twin Cities to the Quad Cities. So, you can see why I feel very invested in the success of the plan implemented from the Total Maximum Daily Load study.

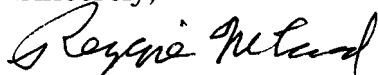
Over the last 37 years I have watched the Upper Mississippi backwaters steadily fill with sediment and islands erode. A few restoration programs have repaired a very small part of the damage at a great expense. It seems obvious that an effective solution to the degradation of our river has to affect the source of the problem to be effective. The enormous research efforts that went into the TMDL study provides the best information that has been gathered to date to solve these problems. Reducing the sediment load by 50 percent will dramatically improve the stretch of river between Fort Snelling and the upper end of Lake Pepin, but it will also dramatically improve the Minnesota River and probably lower the nitrogen load in the Mississippi River all the way to the dead zone, in the Gulf of Mexico.

This process of using the insights that were illuminated by the TMDL study and applying adaptive management techniques will be an important test of whether federal, state and local agencies can work together effectively to solve a complex problem. If the plan is seriously and honestly implemented and the goals met, it will serve as a model for improving the health of rivers around the country and the world. Conversely, its failure would be disheartening on a very large scale.

I am excited and encouraged by the progress so far and looking forward to the next steps and, ultimately, seeing and writing about the dramatic improvements in the health of two of Minnesota's most important and valued rivers.

Thank you for your efforts. We look forward to the next chapters of the story.

Sincerely,



Reggie McLeod

Received

MAY 31 2012

Rochester Office
MPCA

Comments on draft TMDL reports

Note: Written comments become part of the report's public record

Title of draft TMDL report: South Metro Mississippi River TSS TMDL

Name:

Debbie Meister

Address:

1312 Portland Ave, St. Paul, MN 55104

Please explain your interest in this TMDL report:

Concern about water quality.

Any recommended changes to the report? If so, please include references to specific sections.

If recommending changes to the report, please list specific reasons for the changes.

Other Comments:

We need to move beyond voluntary compliance for agriculture + ~~the~~ other known pollution sources. Adhere to the scientific ^{hydrologic} rigor of the report.

Signature:

Debbie Meister

From: [Joel Mielke](#)
To: [Gunderson, Larry \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Tuesday, May 29, 2012 3:20:00 PM

Mr Gunderson

Dear Mr. Swenson,

I concur with the recommendations outlined in detail below. It is clear that the majority of the sediment in the Mississippi River is a result of agricultural practices in the Minnesota River watershed. If the project goals are to be met, agricultural practices will need to change. To that end, agricultural entities will need to be held accountable for tangible and measureable results.

Thank you for your consideration of this matter.

Sincerely,
Joel Mielke

I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life & health to these vital water resources.

However, the draft TMDLs provide little assurance that these goals will be met. I recommend three fundamental changes to the draft TMDLs as written.

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I believe that these changes to the TMDLs will ensure that our badly needed river clean up plans yield positive results for Minnesota's freshwater resources.

Thank you.

Joel Mielke
3101 68th Street East
Inver Grove Heights, MN 55076-2132
651-437-0615

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

From: [Nathan Mitchell](#)
To: [Stine, John \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Friday, May 18, 2012 4:21:10 PM

(FYI, I am sending you a copy of this message.)

Mr. Finley

As someone who paddles often in the Mississippi and Minnesota and who swam across it once, I strongly support efforts to clean up the rivers for everyone. I also advocate for the following principles in TMDL's:

- Hold agricultural entities responsible for meeting goals
- Allocate resources to generate maximum pollution reduction
- Set specific timelines for accomplishing goals

Thank you.

Nathan Mitchell
3136 32nd Ave S
Minneapolis, MN 55406-2011
612-722-1191

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

From: [Paul Mitchell](#)
To: [Gunderson, Larry \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Thursday, May 24, 2012 4:40:13 PM

Mr Gunderson

Please do what is necessary to reduce the amount of sediment in the Minnesota River. Farm operations are allowing topsoil to migrate into the Minnesota, on to the Mississippi, and into Lake Pepin. This is not good! And the farms need to retain this topsoil.

Thanks for helping correct this problem,
Paul D. Mitchell

Paul Mitchell
1480 Applewood Ct #302
St Paul, MN 55113-6286
651-633-1915

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

Comments on draft TMDL reports

Note: Written comments become part of the report's public record

Title of draft TMDL report: South Metro Mississippi River TSS TMDL

Name:

Chuck Nelson

Address:

*2699 Apache Rd.
North Saint Paul MN 55109*

Please explain your interest in this TMDL report:

I care on our MN lakes and rivers, It is my hope that water quality improvement will become a priority.

Any recommended changes to the report? If so, please include references to specific sections.

If recommending changes to the report, please list specific reasons for the changes.

Restore the rapids at Coon Rapids.

Other Comments:

If we continue to consider the Mississippi River as primarily a commercial route and as a sewer, looking for ways to relax standards, MN will lose its reputation as the beautiful recreation state, the land of sky blue waters.

Signature:

Chuck Nelson

Comments on draft TMDL reports

Note: Written comments become part of the report's public record

Title of draft TMDL report: South Metro Mississippi River TSS TMDL

Name:

Chuck Nelson

Address:

*2694 Apache Road
North St. Paul, MN 55109*

Please explain your interest in this TMDL report:

The State of Minnesota has natural attributes that have contributed to its reputation as a good place to live. One of these is the best natural farmland in the world. In misguided attempts to enhance the productivity of the land we have allowed draining of marshes, tiling of prairie lands and other harmful agribusiness practices. Now we see the unintended consequences of these actions. Before it is too late we need government to take protective action.

Any recommended changes to the report? If so, please include references to specific sections.

If recommending changes to the report, please list specific reasons for the changes.

Other Comments:

Adopt an action plan and act based on informed real science. Undo the practices that fill the Minnesota River with sediment and chemicals.

Signature:

Chuck Nelson

Comments on draft TMDL reports

Note: Written comments become part of the report's public record

Title of draft TMDL report: South Metro Mississippi River TSS TMDL

Name: JASON PAPERFUSS

Address: 2719 HAYES ST NE, MPLS, MN 55418

Please explain your interest in this TMDL report:

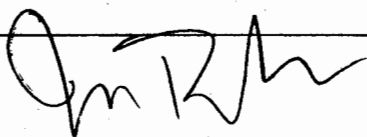
I CARE ABOUT THE ENVIRONMENT, I CARE ABOUT THE MISSISSIPPI RIVER AND WATER QUALITY IN GENERAL. I ALSO GO FISHING ON THE RIVER SEVERAL TIMES/WK.

Any recommended changes to the report? If so, please include references to specific sections.

If recommending changes to the report, please list specific reasons for the changes.

Other Comments: I SUPPORT THE TMDL! PLEASE CLEAN UP THE RIVER

Signature:



From: [Michelle Piotrowski](#)
To: [Stine, John \(MPCA\)](#)
Subject: Changes to South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Wednesday, May 23, 2012 5:12:54 PM

(FYI, I am sending you a copy of this message.)

Mr. Finley

I care about the health of our waterways, demonstrated at home by having implemented stormwater and pollution abatement practices in my own yard such as turning 50% of the yard space into thick native plantings instead of lawn and installing several rain barrels. I also dedicate my spare time assisting in volunteer projects along the rivers through both Friends of the Mississippi River and Great River Greening.

I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life & health to these vital water resources.

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Thank you.

Michelle Piotrowski
399 Sterling St South
Maplewood, MN 55119-5545
651-252-8285

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

From: [Jan Pohlen](#)
To: [Stine, John \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Wednesday, May 23, 2012 7:22:05 PM

(FYI, I am sending you a copy of this message.)

Mr. Finley

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3. Set Milestones & Timelines: If we wish to achieve long-term goals, we must measure our progress toward those goals, and inform the public on our progress. This includes:

. Benchmarks & milestones: The TMDLs as written lack specific timelines and milestones for progress. The MPCA should amend the TMDLs to include aggressive but achievable benchmarks and milestones - and measure our progress toward those goals.

. Measure & report: Develop and distribute comprehensive annual reports on progress toward TMDL benchmarks and milestones, including funding allocations, policy initiatives, and water quality outcomes.

I believe that these changes to the TMDLs will ensure that our badly needed river clean up plans yield positive results for Minnesota's freshwater resources.

As a life long resident, I can say this action is way over due!

Thank you.

Jan Pohlen
8706 Norway St NW
Coon Rapids, MN 55433-8018
763-717-9927

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

Comments on draft TMDL reports

Note: Written comments become part of the report's public record

Title of draft TMDL report: South Metro Mississippi River TSS TMDL

Name: ERIC RAMSTAD

Address: 2316 28 AV S
MPLS MN 55406

Please explain your interest in this TMDL report:

LIVE NEARBY AND LOVE THE RIVER

Any recommended changes to the report? If so, please include references to specific sections.

If recommending changes to the report, please list specific reasons for the changes.

Other Comments: I SUPPORT YOUR WORK - Keep it up.

Signature:

Eric Ramstad

From: [Brian Raney](#)
To: [Gunderson, Larry \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Monday, May 21, 2012 3:58:37 PM

Mr Gunderson

Being a resident of Eagan and a cabin owner on the Mississippi in Wabasha, I am greatly impacted by Mississippi River quality. I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life & health to these vital water resources.

However, the draft TMDLs provide little assurance that these goals will be met. I recommend three fundamental changes to the draft TMDLs as written.

1. Provide Accountability for Farm Operations: Minnesotans value clean water and expect everyone to do their part to clean up polluted waterways. However, while cities and point sources are required to meet TMDL goals, field agriculture operations are given voluntary reductions with no effective accountability mechanism in place - and no contingency plan should these voluntary actions fail to achieve pollution reduction goals.

The MPCA should amend the TMDLs to include reasonable assurance that agricultural reductions can be achieved. This includes:

- . Enforce & strengthen existing laws: Set a goal of 100% statewide compliance with existing shoreland rules (Minn. R. 6120.3300, Subp. 7), soil loss ordinance (Minn. Stat. § 103F.405), and wetland protections rules within the next five years.

- . Measure, monitor & report: Develop a framework for accurately measuring agricultural pollution on a watershed basis. The MPCA should provide detailed annual reporting on watershed progress toward agricultural pollution load reductions through these TMDLs.

- . Hold agriculture operations accountable: The MPCA should provide detailed plans for educating farmers on the pollution reductions they must achieve, and then hold them accountable to that standard. Voluntary approaches have proven ineffective at achieving water quality standards. The MPCA should develop a system for holding agricultural operations accountable for meeting watershed-specific goals, and fully implement that system within five years.

2. Target Conservation Funding for Maximum Impact: Minnesotans expect our taxpayer resources to be used wisely. The MPCA should target limited resources, including Clean Water, Land, & Legacy money, for maximum water quality impact. This includes:

- . Use public dollars wisely: The MPCA should commit to target limited resources, including Legacy Amendment money, to the projects with the best 'pollution-reduction-per-dollar' value for taxpayers, rather than spread resources around the state equally.

- . Target priority projects: Target the money to where it will do the most good. The state should commit to developing a "project priority list" for each watershed in the Mississippi & Minnesota River basins - and commit to fund the most effective pollution reduction projects first.

. Conservation compliance: Public resources should not be used to pay for practices already required by law. Conservation compliance should be a prerequisite for access to any and all taxpayer-supported conservation resources.

3. Set Milestones & Timelines: If we wish to achieve long-term goals, we must measure our progress toward those goals, and inform the public on our progress. This includes:

. Benchmarks & milestones: The TMDLs as written lack specific timelines and milestones for progress. The MPCA should amend the TMDLs to include aggressive but achievable benchmarks and milestones - and measure our progress toward those goals.

. Measure & report: Develop and distribute comprehensive annual reports on progress toward TMDL benchmarks and milestones, including funding allocations, policy initiatives, and water quality outcomes.

I believe that these changes to the TMDLs will ensure that our badly needed river clean up plans yield positive results for Minnesota's freshwater resources.

Thank you.

Brian Raney
704 Oxford Rd
Eagan, MN 55123-3940

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

From: [Dorie Reisenweber](#)
To: [Stine, John \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Thursday, May 17, 2012 3:08:33 PM

(FYI, I am sending you a copy of this message.)

Mr. Finley

The goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs are vital. Attaining these goals will restore aquatic life & health to crucial water resources.

There is a problem, however. The draft TMDLs provide little assurance that these goals will be met. Three changes to the draft TMDLs as written would alleviate this.

1. Provide Accountability for Farm Operations: Minnesotans value clean water and expect everyone to do his share to clean up polluted waterways. But, while cities and point sources are required to meet TMDL goals, field agriculture operations are allowed voluntary reductions with no effective accountability mechanism in place - and no contingency plan in case these voluntary actions do not achieve pollution reduction goals.

The MPCA should amend the TMDLs to include reasonable assurance that agricultural reductions can be achieved. These include:

- . Enforcement & strengthening existing laws: Set a goal of 100% statewide compliance with existing shoreland rules (Minn. R. 6120.3300, Subp. 7), soil loss ordinance (Minn. Stat. § 103F.405), and wetland protections rules within the next five years.

- . Measure, monitor & report: Establish a framework for accurately measuring agricultural pollution on a watershed basis. The MPCA should provide detailed annual reporting on watershed progress toward agricultural pollution load reductions through these TMDLs.

- . Hold agriculture operations accountable: The MPCA should provide detailed plans for educating farmers on the pollution reductions they must achieve, and then hold them accountable to that standard. Voluntary approaches have proven ineffective at achieving water quality standards. The MPCA should develop a system for holding agricultural operations accountable for meeting watershed-specific goals, and fully implement that system within five years.

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- . Target priority projects: Target the money to where it will do the most good. The state should commit to developing a "project priority list" for

each watershed in the Mississippi & Minnesota River basins - and commit to fund the most effective pollution reduction projects first.

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. Measure & report: Develop and distribute comprehensive annual reports on progress toward TMDL benchmarks and milestones, including funding allocations, policy initiatives, and water quality outcomes.

I believe that these changes to the TMDLs will help to ensure that much-needed river clean up plans yield better results for Minnesota's freshwater resources.

Thank you.

Dorie Reisenweber
111 Garden St
Duluth, MN 55812-1142
1-218-728-1508

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

From: [Julie Rocheleau](#)
To: [Stine, John \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Friday, May 18, 2012 6:19:58 AM

(FYI, I am sending you a copy of this message.)

Mr. Finley

ATTENTION:::::

I live in Carver County.... I thought that there was suppose to be "NO" New Field Tile ! That they could only fix existing tile lines. Well all the big farmers have their own tile equipment and they are tiling everything in site, running it to their ditch systems and right into the crow river. I called our farm agency. The seemed Less than interested in the location that I saw this going on at in particular. I have not reported all the others I see. Whats the point? The fact is, I see it going on all over the place. Investigate how much tile line is sold and then tell me where the hell is it going? Why do we even have people we pay to come up with this shit and we pay for people to enforce this shit and nobody does a damn thing about it?

I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life & health to these vital water resources.

However, the draft TMDLs provide little assurance that these goals will be met. I recommend three fundamental changes to the draft TMDLs as written.

1. Provide Accountability for Farm Operations: Minnesotans value clean water and expect everyone to do their part to clean up polluted waterways. However, while cities and point sources are required to meet TMDL goals, field agriculture operations are given voluntary reductions with no effective accountability mechanism in place - and no contingency plan should these voluntary actions fail to achieve pollution reduction goals.

The MPCA should amend the TMDLs to include reasonable assurance that agricultural reductions can be achieved. This includes:

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. Measure, monitor & report: Develop a framework for accurately measuring agricultural pollution on a watershed basis. The MPCA should provide detailed annual reporting on watershed progress toward agricultural pollution load reductions through these TMDLs.

. Hold agriculture operations accountable: The MPCA should provide detailed plans for educating farmers on the pollution reductions they must achieve, and then hold them accountable to that standard. Voluntary approaches have proven ineffective at achieving water quality standards. The MPCA should develop a system for holding agricultural operations accountable for meeting watershed-specific goals, and fully implement that system within five years.

2. Target Conservation Funding for Maximum Impact: Minnesotans expect our taxpayer resources to be used wisely. The MPCA should target limited resources, including Clean Water, Land, & Legacy money, for maximum water quality impact. This includes:

- . Use public dollars wisely: The MPCA should commit to target limited resources, including Legacy Amendment money, to the projects with the best 'pollution-reduction-per-dollar' value for taxpayers, rather than spread resources around the state equally.

- . Target priority projects: Target the money to where it will do the most good. The state should commit to developing a "project priority list" for each watershed in the Mississippi & Minnesota River basins - and commit to fund the most effective pollution reduction projects first.

- . Conservation compliance: Public resources should not be used to pay for practices already required by law. Conservation compliance should be a prerequisite for access to any and all taxpayer-supported conservation resources.

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- . Measure & report: Develop and distribute comprehensive annual reports on progress toward TMDL benchmarks and milestones, including funding allocations, policy initiatives, and water quality outcomes.

I believe that these changes to the TMDLs will ensure that our badly needed river clean up plans yield positive results for Minnesota's freshwater resources.

Thank you.

Julie Rocheleau
17860 102nd St
Young America, MN 55397-9426
952-467-3535

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

Comments on draft TMDL reports

Note: Written comments become part of the report's public record

Title of draft TMDL report: South Metro Mississippi River TSS TMDL

Name:

Geoffrey Saigh

Address:

1342 W. MAYNARD DR Apt 405
St Paul MN 55116

Please explain your interest in this TMDL report:

Writer, citizen, sailor, nature lover, environmentalist

Any recommended changes to the report? If so, please include references to specific sections.

If recommending changes to the report, please list specific reasons for the changes.

Other Comments:

Keep the plan strong!
way overdue -

Signature:

Geoffrey Saigh

Comments on draft TMDL reports

Note: Written comments become part of the report's public record

Title of draft TMDL report: South Metro Mississippi River TSS TMDL

Name: MARTIN SCHUB

Address: 3616 45TH AVE S.
MINNETONKA, MN 55406

Please explain your interest in this TMDL report:

I CARE ABOUT WATER QUALITY AND THE PRESERVATION OF LAKE PEPIN

Any recommended changes to the report? If so, please include references to specific sections.

If recommending changes to the report, please list specific reasons for the changes.

Other Comments:

I SUPPORT THE TMDL GOALS OF THE REPORT.
I WOULD LIKE FUNDING TO BE ALLOCATED TOWARDS FIXING THE BIGGEST PROBLEMS.

Signature:



Comments on draft TMDL reports

Note: Written comments become part of the report's public record

Title of draft TMDL report: South Metro Mississippi River TSS TMDL

Name: Daniel Schultz

Address: 4209 44th Ave S.
Minneapolis, MN 55406

Please explain your interest in this TMDL report:

I have always lived close to the Mississippi and Minnesota Rivers, so the clean vibrant life of the river is vital for its economic, health, recreational, and cultural impacts on human society, especially if you live close to these rivers.

I also have a keen interest in restoring wildlife Habitat, & volunteer often to achieve this.

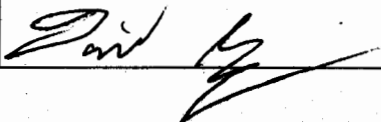
Any recommended changes to the report? If so, please include references to specific sections.

If recommending changes to the report, please list specific reasons for the changes.

Other Comments:

I support the goals of the TMDL, and solving the non-point runoff dilemma would be a major achievement for our natural resources and local communities. And it could ultimately be a model for other watersheds, too. While regulation is important, and setting standards, this effort will take much more - a whole shift in mindset - education and volunteerism will also be needed, and support for organizations that facilitate this.

Signature: such as MN Master Naturalist Program, Great River Greening, and Friends of the Mississippi



Norman Senjem
27 Viking Village NW
Rochester, MN 55901

May 26, 2012

Mr. Robert Finley,
Minnesota Pollution Control Agency
12 Civic Center Plaza, Suite 2165
Mankato, MN 56001

Dear Mr. Finley

The forthcoming approval of the South Metro Mississippi Total Maximum Daily Load for Total Suspended Solids by the U.S. Environmental Protection Agency should be anticipated as a milestone event in decades-long efforts to restore the aquatic life of an important segment of our nation's greatest river – the 64-mile stretch from Pike Island, a sacred site for the Mendota Mdwakanton, to River Mile 780 in upper Lake Pepin. The Minnesota Pollution Control Agency has spent eight years and several million dollars on this project, and has engaged thousands of interested citizens and scientists along the way in a deliberately open process. The science behind the numbers in the TMDL is sound; the process is transparent; and the general publicity on the problem, often cast as the filling-in of Lake Pepin, is relatively high. For many, the prospect of a restored Mississippi River and Lake Pepin has become a passionate pursuit and a real possibility.

Yet despite all of this, the odds are slim that the TMDL will lead to sustained improvement in water quality through reductions in sediment inputs to the Mississippi River. The most likely outcome, I fear, is that nothing will happen – nothing except expensive reductions in urban stormwater, a minor or negligible source compared with the major source – agricultural watersheds in the Minnesota River Basin. These forebodings arise from two decades of experience trying to reduce nonpoint source pollution at the MPCA and BWSR, including seven years as coordinator of the TMDL project.

These forebodings are painfully supported by the new MPCA commissioner's lame assertion in a recent Associated Press article that voluntary measures will be sufficient to induce needed changes in land and water management in agricultural watersheds. There is no evidence to support such an assertion.

Nothing will happen as a result of the TMDL study. The state's agricultural leadership will keep fighting good science with pseudo-science and endless questioning in order to create doubt about the sources of sediment. Agricultural leaders have figured out that by its nature, nonpoint source pollution is difficult to trace to specific fields or stream banks. Under the current state of environmental resource management, this creates the quandary of a problem without a responsible party – a comfortable state of affairs for Agriculture. Agricultural leadership in Minnesota will continue to produce evidence to

counter MPCA information on sediment sources in the TMDL, and will continue to insist that unless the pollutant can be traced to a specific field, it is conjectural to label it as agricultural in origin. They have set up an impossible standard of evidence in hopes of endlessly delaying the day of reckoning when farmers will be required to accept responsibility for the downstream impacts of conventional crop production in the Minnesota River, Mississippi River and northern Gulf of Mexico.

Nothing will happen as a result of the TMDL study: State government is not under pressure to achieve water quality standards for the Mississippi River. Legislative scrutiny has applied some pressure to achieve performance goals related to administrative efficiency, such as the time it takes to issue a wastewater discharge permit. However, state agencies such as the MPCA, the Board of Water and Soil Resources and the Department of Natural Resources are faced with no specific expectation or demand to improve the water quality of a specific river or stream – or else! It is enough, it seems, to keep meeting the promised quota to USEPA for completing TMDL studies. Preparation of TMDL implementation plans is a secondary priority for the MPCA. Even when completed, such plans are not considered as important as local water plans by the main implementation agency, the BWSR. In summary, state agencies are under no compulsion to achieve the goals of the dozens of TMDL studies being churned out like sausages by the MPCA and contractors. In most cases, this would require dealing more strictly with nonpoint sources in agricultural watersheds, which the current legislature and administration seem loath to do.

Nothing will happen as a result of the TMDL study. The USEPA is indifferent to whether nonpoint source pollutant loads will be reduced, and instructs state agencies not to include a detailed implementation plan for nonpoint sources in the TMDL. Point sources, on the contrary, are subject to close scrutiny by the USEPA, regardless of whether they are responsible for a significant portion of the total pollutant load. For instance, TSS discharges from hundreds of wastewater treatment facilities in the watershed of the South Metro Mississippi had to be estimated for the TMDL in order to calculate individual waste load allocations for them, even though in the vast majority of cases TSS is discharged at a concentration of 30 parts per million or less, which is less than the 32 parts per million standard for the Mississippi River which is the goal of the TMDL. In other words, wastewater treatment plant discharges act to slightly dilute the receiving water rather than increasing its TSS concentration. Nevertheless, the MPCA had to spend many months to determine how to define allocations for insignificant sources. Had the same time been spent in attempting to find ways to use existing authorities and resources to reduce nonpoint source pollution, the TMDL study might have been much more effective as a guide for actually improving water quality, rather than simply complying with the letter of the Clean Water Act.

There is a way out of the quandary that is available to the State of Minnesota. It will require the state to go beyond the bare minimum requirements of a TMDL study. It will require state agencies to operate under a public demand to produce real results – cleaner water as defined by water quality standards. It will require interest groups and the public to demand real performance of our state agencies, not simply that they satisfy requirements of a federal Clean Water Act that gives most of crop production agriculture a free ride.

Recent experience with urban stormwater pollution control points the way. In Phase I of the federal storm water program, only cities with a population of 100,000 or greater were required to control surface runoff under a National Pollutant Discharge Elimination System permit. Stormwater runoff from smaller cities – all but Minneapolis and St. Paul – was considered nonpoint source pollution, and was “managed” under the watershed/nonpoint source programs of the MPCA – which is to say, nothing much happened. Then, around 2002, in Phase II of the stormwater program, US EPA announced that all cities with a population exceeding 10,000 would be required to control surface runoff under an NPDES permit. Suddenly, by fiat, nonpoint source pollution was transformed into point source pollution. And what a difference that has made. After a decade of Phase II experience, cities have made a lot of progress in curtailing surface runoff. It is now common for new urban developments to be required to neutralize their predicted hydrologic impacts. Requirements for urban stormwater will become still stricter in the second-generation general permit for stormwater dischargers, which is almost ready for implementation.

Recent experience with agricultural feedlots tells a similar story. Until federal requirements for permitting of larger livestock facilities, called Confined Animal Feedlot Operations, took effect, the livestock sector was considered a nonpoint source of pollution. Very little progress was made in Minnesota and other states. But when feedlot pollution became a prominent public issue in the early 1990s, all of that changed in Minnesota. Our state now has in place the most effective regulatory apparatus for feedlot runoff pollution control in the United States. The livestock sector remains and flourishes, subject to the normal cyclical price swings to which livestock production has always been subject. The experience of regulation of the largest facilities, under federal regulation, and smaller facilities under Minnesota Rule 7020, has inculcated a new level of environmental consciousness – and conscientiousness – among the state’s feedlot operators, according to county and state feedlot officials. The lesson we can draw from this experience is that practical, responsible regulation gradually has the effect of instilling in the individual regulated parties a new awareness of the environmental consequences of how they manage their operations.

There is no reason to expect measurable improvement in row crop nonpoint source pollution until it, too, is transformed into point source pollution and regulated accordingly. The MPCA now has tried for about 25 years variations on the information-education-incentives triad, most recently with a “civic engagement” twist, to little avail. Agriculture is the greatest single source of sediment pollution to the Minnesota and Mississippi Rivers. It includes field erosion and near-channel erosion caused by altered hydrology on agricultural landscapes. This has been demonstrated by competent scientists with appropriate credentials in a series of recent studies in Minnesota. Crop production agriculture remains the only major economic sector for which surface runoff is largely unregulated.

The South Metro Mississippi River includes west-central Wisconsin. Appropriately, the TMDL includes discussion of Wisconsin’s approach to nonpoint source pollution control through performance standards. The standards include tolerable soil loss (“T”) for field erosion, equivalent to the rate at which the soil replaces itself; makes use of a phosphorus index of pollution potential similar to one developed by the University of Minnesota; and specifies manure management practices required to minimize nitrogen runoff.

The State of Minnesota either needs to take Wisconsin's approach by instituting agricultural performance standards, or adopt the provision of the Minnesota Water Sustainability Framework dealing with controlling flow and pollutants at the discharge points of Minnesota's 81 major watersheds. Without one or the other framework in place, it is pure wishful thinking to believe that the substantial reductions in sediment load called for by the South Metro Mississippi River TMDL will be attained – ever. Let alone the 90 percent reductions called for by the Minnesota River Turbidity TMDL and the Blue Earth River Turbidity TMDL.

The South Metro Mississippi River TMDL lists several statutes and rules which afford partial regulatory authority over agricultural runoff. These should be implemented. In addition, the MPCA should consider a re-interpretation of relevant portions of the Clean Water Act which supposedly exempt agricultural runoff from federal regulation. It is debatable whether the agricultural exemption is so broad as to encompass drain tile discharge carrying dissolved pollutants and often exacerbating sediment losses from ravines into which they discharge. A precedent supporting this view is provided by the NPDES permit granted by the MPCA to the City of Montgomery. It includes a total phosphorus limit of 1 part per million for discharge from the tile lines which drain the fields on which the city's wastewater is spread by spray irrigation.

The MPCA should also begin using its authority to regulate nonpoint source pollution under Minn. R. 7050.0210, subp. 2. This spring should afford ample opportunities to identify clearly serious sites warranting compliance actions: crop fields are mostly black, residue-free as in the 1970s, in some of the highest producing sediment watersheds of the Minnesota River – testimony that educational and incentive approaches to soil conservation are not effective enough. Heavy rains are washing over the watershed in late May. The MPCA has in its possession GIS locational data on eroding ravines that could be of use in locating potential sites for enforcement action. Not that severe regulation is the best or only approach. But without *some* probability of regulation, no combination of incentives and education will succeed in effecting real change. No other sector has done so, and there is no reason to expect agriculture to do so either.

We know how difficult it is for the MPCA to address the questions raised in this letter through the TMDL report. The EPA will not be supportive, nor will powerful interests in the state. The reason why it is still worth the attempt is that, under the current rules of the game, the completion of a TMDL does little or nothing in itself to act as a catalyst for nonpoint source pollution reductions. Unless this changes, the complicated, expensive TMDL approach in which the state has invested heavily in terms of money and public expectations will eventually show itself to be a useless exercise, a pretentious display of computer wizardry, and in the end a farce.

Karl Marx is reputed to have said that history repeats itself first as tragedy and second as farce. The brief history of nonpoint source pollution "control" in Minnesota seems now utterly tragic – a series of failures with just enough exceptions to paint a bright picture when required. I have taken part in this tragedy, and have no interest in blaming anyone for it but "circumstances". However, repeated attempts to apply variations on the same formula in hopes of a breakthrough are on the verge of turning tragedy into farce. How often have we seen the slide of Dr. Einstein along with the quote that to repeat

the same thing over and over with expectations of a different outcome is the definition of insanity? The most recent tiresome variation, the agricultural certification program, sponsored by the USDA and EPA in Minnesota, just might have the high profile required to produce clear farce, if people can be persuaded to contemplate the painful process of failure to its bitter end rather than ramping up some new approach with great fanfare to hide the embarrassment of failure. Then hope may follow despair, as we wipe clean the slate of pretended solutions and confront failure eye to eye.

My one practical request having to do with the TMDL is just this: don't send it to the USEPA. Don't react endlessly to their picayune legalistic comments. Deliberately step out of the deadening treadmill. Make this TMDL a project by Minnesotans for the USA to clean up the nation's mighty Mississippi by removing the stain on our state's name which the Minnesota River represents. Do not be inhibited by threats from Big-Bucks Agriculture. Start with the presumption that success in the form of water quality standards attainment is non-negotiable, deadlines are real, and failure has consequences. I think, I hope, I pray, that if you can hold the forces of fear and greed and retrogression at bay, progressives will rally to the cause and watch your back. Survey after survey shows that Minnesotans care deeply about the quality of our water. Let this be their test.

Well, Minnesotans, help your water quality agency to do its job! Get on it now. Stick to it; see it through. If "we" fail to restore the Mississippi and save Lake Pepin from an ugly premature end, don't blame the Minnesota Pollution Control Agency. Blame the visage that looks back at you from the mirror.

Take care, my friend.

Yours Truly,

Norman Senjem

From: [Deb Stancevic](#)
To: [Stine, John \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Tuesday, May 22, 2012 9:17:40 AM

(FYI, I am sending you a copy of this message.)

Mr. Finley

After decades of pollution, the Mississippi & Minnesota Rivers need strong advocacy for clean-up. Being at the headwaters, we should improve the rivers' water quality dramatically. I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life & health to these vital water resources.

However, the draft TMDLs provide little assurance that these goals will be met. I recommend three fundamental changes to the draft TMDLs as written.

1. Provide Accountability for Farm Operations: Minnesotans value clean water and expect everyone to do their part to clean up polluted waterways. However, while cities and point sources are required to meet TMDL goals, field agriculture operations are given voluntary reductions with no effective accountability mechanism in place - and no contingency plan should these voluntary actions fail to achieve pollution reduction goals.

The MPCA should amend the TMDLs to include reasonable assurance that agricultural reductions can be achieved. This includes:

- . Enforce & strengthen existing laws: Set a goal of 100% statewide compliance with existing shoreland rules (Minn. R. 6120.3300, Subp. 7), soil loss ordinance (Minn. Stat. § 103F.405), and wetland protections rules within the next five years.

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- . Hold agriculture operations accountable: The MPCA should provide detailed plans for educating farmers on the pollution reductions they must achieve, and then hold them accountable to that standard. Voluntary approaches have proven ineffective at achieving water quality standards. The MPCA should develop a system for holding agricultural operations accountable for meeting watershed-specific goals, and fully implement that system within five years.

2. Target Conservation Funding for Maximum Impact: Minnesotans expect our taxpayer resources to be used wisely. The MPCA should target limited resources, including Clean Water, Land, & Legacy money, for maximum water quality impact. This includes:

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good. The state should commit to developing a "project priority list" for each watershed in the Mississippi & Minnesota River basins - and commit to fund the most effective pollution reduction projects first.

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3. Set Milestones & Timelines: If we wish to achieve long-term goals, we must measure our progress toward those goals, and inform the public on our progress. This includes:

. Benchmarks & milestones: The TMDLs as written lack specific timelines and milestones for progress. The MPCA should amend the TMDLs to include aggressive but achievable benchmarks and milestones - and measure our progress toward those goals.

. Measure & report: Develop and distribute comprehensive annual reports on progress toward TMDL benchmarks and milestones, including funding allocations, policy initiatives, and water quality outcomes.

I believe that these changes to the TMDLs will ensure that our badly needed river clean up plans yield positive results for Minnesota's freshwater resources.

Thank you.

Deb Stancevic
4457 44th Ave S
Minneapolis, MN 55406-4060
612-722-6425

cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

Comments on draft TMDL reports

Note: Written comments become part of the report's public record

Title of draft TMDL report: South Metro Mississippi River TSS TMDL

Name:

Sheila Sullivan

Address:

1653 Ashland Ave.
St. Paul, MN 55104

Please explain your interest in this TMDL report:

This is "The" Mississippi River. It is our responsibility to help protect the MS. as a natural resources for aesthetic and health reasons.

Any recommended changes to the report? If so, please include references to specific sections.

If recommending changes to the report, please list specific reasons for the changes.

Other Comments:

I am a high school science teacher and I would like to know the essentials to teach my students about this issue. It is a complex issue but I believe my students should have a good base understanding.

Signature:

Sheila Sullivan

Comments on draft TMDL reports

Note: Written comments become part of the report's public record

Title of draft TMDL report: South Metro Mississippi River TSS TMDL

Name: Lyndon Torstenson

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Please explain your interest in this TMDL report:

- Educator bringing ~19000 students onto the Mississippi each year. *
 - Citizen involved with neighborhood river stewardship group.
- *I often ask students, "if you could change one thing about the river, what would that be?" They always say "the river should be a lot cleaner." Students see the sediment-laden Minnesota River at the Mississippi confluence and they expect adults to take meaningful action to improve it.

Any recommended changes to the report? If so, please include references to specific sections.

If recommending changes to the report, please list specific reasons for the changes.

Other Comments:

I strongly support the goals of the TMDL and the strategic targeting of money and resources for maximum results, starting with high pollutant contribution areas first.

I'm concerned that reliance on voluntary and incentive measures alone will be insufficient to realize the necessary improvements. There needs to be a regulatory recourse if targets are not met voluntarily.

Lowering speed limits for recreational boating could reduce sediment re-suspension.

Signature:

Lyndon Torstenson

Comments on the South Metro Mississippi River TMDL
Dave Werbach 6/15/12

1. Table 1: To clarify, this TMDL does not address the Wisconsin portion of the Mississippi River?
2. Section 5.1.2: This section should include an examination of loads as well as reductions. The reductions for the watersheds is based upon each watershed meeting its' own NTU/TSS target, not the South Mississippi Metro target, which is considerably smaller. For example, the Load Capacity at Very High flows in the Minnesota River is 5.37 million kg/d, while the load capacity in the Metro TMDL for high flows is 1.4 million kg/d (Table 8). The Cannon River TMDL reductions are to achieve the WQS of 25 NTU, not the Mississippi River TSS standard. A cursory review of the Cannon River TMDL and the Minnesota River TMDL indicates that the loads at the two higher flow regimes exceeds the allocations in the Mississippi Metro TMDL.
3. Section 6.0: How was the MS4 baseline year of 2002 selected?
4. Table 7 and 8: The LA and Total Loading Capacity for several of the subwatersheds seemingly show an inconsistency. In Table 7 for the Minnesota River, the high flow load allocation is 266,000 metric tons/yr, while the moderate flow load allocation is 290,000 metric tons/yr. Is there a reason why the loads are higher under lower flows? This issue also occurs for several other subwatersheds.
5. Section 6.3: How was the annual median export rate of 225 lbs/acre determined? Review of the USCOE report seems to indicate a wide range of event mean concentrations. The MPCA stormwater Best Practices Manual contains event mean concentrations more specific to MN waters – is there a reason why the national numbers were used instead of Minnesota numbers? In addition, justification is needed on why the MS4 WLA was aggregated in the TMDL. The process used to determine land use (low, medium, high density) required use of detailed GIS information and as stated on page 56 of the draft TMDL; “Using a Geographic Information System (GIS), NLCD developed land uses were clipped using the regulated MS4 boundaries. “ This indicates the boundaries are known, and suggests that the MS4 stormwater WLAs could be broken down further. While the 2002 EPA stormwater memo “Establishing Total Maximum Daily Load (TMDL) Wasteload Allocations (WLAs) for Storm Water Sources and NPDES Permit Requirements Based on Those WLAs “ allows aggregate WLAs, the memo states that the WLAs should be defined as narrowly as possible.
6. Page 57, middle of page: The language that states “MS4 permittees will be deemed to be achieving their waste load allocation if they are in compliance with their NPDES permit“ needs to be deleted. Compliance with an MS4 permit or WLA is determined by the NPDES program, not the TMDL program. Similar language in the Construction Stormwater (Section 6.4) and Industrial Stormwater (Section 6.5) needs to be deleted as well.

From: [Graden West](#)
To: [Stine, John \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Sunday, May 20, 2012 7:28:28 PM

(FYI, I am sending you a copy of this message.)

Mr. Finley

I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life & health to these vital water resources.

However, the draft TMDLs provide little assurance that these goals will be met. I recommend three fundamental changes to the draft TMDLs as written.

1. Provide Accountability for Farm Operations: Minnesotans value clean water and expect everyone to do their part to clean up polluted waterways. However, while cities and point sources are required to meet TMDL goals, field agriculture operations are given voluntary reductions with no effective accountability mechanism in place - and no contingency plan should these voluntary actions fail to achieve pollution reduction goals.

The MPCA should amend the TMDLs to include reasonable assurance that agricultural reductions can be achieved. This includes:

- . Enforce & strengthen existing laws: Set a goal of 100% statewide compliance with existing shoreland rules (Minn. R. 6120.3300, Subp. 7), soil loss ordinance (Minn. Stat. § 103F.405), and wetland protections rules within the next five years.

- . Measure, monitor & report: Develop a framework for accurately measuring agricultural pollution on a watershed basis. The MPCA should provide detailed annual reporting on watershed progress toward agricultural pollution load reductions through these TMDLs.

- . Hold agriculture operations accountable: The MPCA should provide detailed plans for educating farmers on the pollution reductions they must achieve, and then hold them accountable to that standard. Voluntary approaches have proven ineffective at achieving water quality standards. The MPCA should develop a system for holding agricultural operations accountable for meeting watershed-specific goals, and fully implement that system within five years.

2. Target Conservation Funding for Maximum Impact: Minnesotans expect our taxpayer resources to be used wisely. The MPCA should target limited resources, including Clean Water, Land, & Legacy money, for maximum water quality impact. This includes:

- . Use public dollars wisely: The MPCA should commit to target limited resources, including Legacy Amendment money, to the projects with the best 'pollution-reduction-per-dollar' value for taxpayers, rather than spread resources around the state equally.

- . Target priority projects: Target the money to where it will do the most good. The state should commit to developing a "project priority list" for each watershed in the Mississippi & Minnesota River basins - and commit to

fund the most effective pollution reduction projects first.

. Conservation compliance: Public resources should not be used to pay for practices already required by law. Conservation compliance should be a prerequisite for access to any and all taxpayer-supported conservation resources.

3. Set Milestones & Timelines: If we wish to achieve long-term goals, we must measure our progress toward those goals, and inform the public on our progress. This includes:

. Benchmarks & milestones: The TMDLs as written lack specific timelines and milestones for progress. The MPCA should amend the TMDLs to include aggressive but achievable benchmarks and milestones - and measure our progress toward those goals.

. Measure & report: Develop and distribute comprehensive annual reports on progress toward TMDL benchmarks and milestones, including funding allocations, policy initiatives, and water quality outcomes.

I believe that these changes to the TMDLs will ensure that our badly needed river clean up plans yield positive results for Minnesota's freshwater resources.

I have heard that a person can tile their land anytime they wish without any application. If true this is an open door to allow soil loss into our waters. Some of these tiles are open. They are generally marked by a vertical post topped with a marker like a milk jug. They are everywhere around farm land in our West Central area of MN.

To me this should not be allowed. All tiling should be controlled by the state. It should be retroactive so there is less, not more.

Buffer strips should be mandatory. Someone must make it known that we do not have the right to pollute the water leaving our state!

Thank you.

Graden West
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cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

Comments on draft TMDL reports

Note: Written comments become part of the report's public record

Title of draft TMDL report: South Metro Mississippi River TSS TMDL

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Kayyanisch

Address:

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Please explain your interest in this TMDL report:

I live by the River and want to clean it up

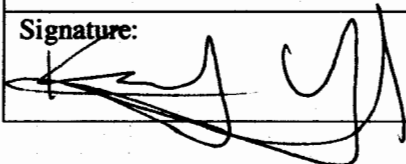
Any recommended changes to the report? If so, please include references to specific sections.

If recommending changes to the report, please list specific reasons for the changes.

Other Comments:

I support the goals of the TMDL and efforts to
cleanup non-point source pollution

Signature:



From: [Russell Yttri](#)
To: [Finley, Robert \(MPCA\)](#)
Subject: South Metro Mississippi River & Minnesota River TSS TMDLs
Date: Sunday, May 20, 2012 11:51:17 AM

Mr. Finley

Now that we have the knowledge of what is creating the problems downriver, I believe it is our responsibility to react to remedy these water quality issues for this generation and the futures.

I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River & Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life & health to these vital water resources.

However, the draft TMDLs provide little assurance that these goals will be met. I recommend three fundamental changes to the draft TMDLs as written.

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good. The state should commit to developing a "project priority list" for each watershed in the Mississippi & Minnesota River basins - and commit to fund the most effective pollution reduction projects first.

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. Measure & report: Develop and distribute comprehensive annual reports on progress toward TMDL benchmarks and milestones, including funding allocations, policy initiatives, and water quality outcomes.

I believe that these changes to the TMDLs will ensure that our badly needed river clean up plans yield positive results for Minnesota's freshwater resources.

Thank you.

Russell Yttri
718 9th St
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cc: Commissioner John Linc Stine
Peter Swenson
Mr. David Werbach

The comment below was submitted as separate emails from the following people on the draft reports for the Minnesota River and South Metro Mississippi Total Maximum Daily Loads (TMDLs) for turbidity:

I strongly support the goals established in the Minnesota Pollution Control Agency's Draft South Metro Mississippi River and Minnesota River TSS TMDLs. Achieving these TMDL goals will restore aquatic life and health to these vital water resources.

However, the draft TMDLs provide little assurance that these goals will be met. I recommend three fundamental changes to the draft TMDLs as written.

1. Provide Accountability for Farm Operations: Minnesotans value clean water and expect everyone to do their part to clean up polluted waterways.

However, while cities and point sources are required to meet TMDL goals, field agriculture operations are given voluntary reductions with no effective accountability mechanism in place – and no contingency plan should these voluntary actions fail to achieve pollution reduction goals.

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- Enforce and strengthen existing laws: Set a goal of 100% statewide compliance with existing shoreland rules (Minn. R. 6120.3300, Subp. 7), soil loss ordinance (Minn. Stat. § 103F.405), and wetland protections rules within the next five years.
- Measure, monitor and report: Develop a framework for accurately measuring agricultural pollution on a watershed basis. The MPCA should provide detailed annual reporting on watershed progress toward agricultural pollution load reductions through these TMDLs.
- Hold agriculture operations accountable: The MPCA should provide detailed plans for educating farmers on the pollution reductions they must achieve, and then hold them accountable to that standard. Voluntary approaches have proven ineffective at achieving water quality standards. The MPCA should develop a system for holding agricultural operations accountable for meeting watershed-specific goals, and fully implement that system within five years.

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Mississippi and Minnesota River basins – and commit to fund the most effective pollution reduction projects first.

- Conservation compliance: Public resources should not be used to pay for practices already required by law. Conservation compliance should be a prerequisite for access to any and all taxpayer-supported conservation resources.

3. Set Milestones and Timelines: If we wish to achieve long-term goals, we must measure our progress toward those goals, and inform the public on our progress. This includes:

Benchmarks and milestones: The TMDLs as written lack specific timelines and milestones for progress. The MPCA should amend the TMDLs to include aggressive but achievable benchmarks and milestones – and measure our progress toward those goals.

Measure and report: Develop and distribute comprehensive annual reports on progress toward TMDL benchmarks and milestones, including funding allocations, policy initiatives, and water quality outcomes.

I believe that these changes to the TMDLs will ensure that our badly needed river cleanup plans yield positive results for Minnesota's freshwater resources.

Thank you.

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