



## Bassett Creek Watershed Management Commission

December 22, 2023

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

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

Dear Ms. Charles Winyan:

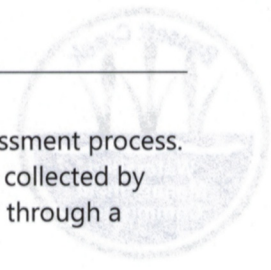
The Bassett Creek Watershed Management Commission (BCWMC) provides the following comments on the proposed listings on the Minnesota Pollution Control Agency's (MPCA) 2024 Draft Impaired Waters List. The comments involve the BCWMC's requests to add Crane Lake and the North Branch of Bassett Creek to the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

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

**Bassett Creek Watershed Management Commission**

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**Bassett Creek Watershed Management Commission**

order for MPCA to integrate external data into the agency's data systems and assessment process. If the stream is not included on the Impaired Waters List now, we are hopeful data collected by the BCWMC in the future can be considered for official assessment if it is collected through a certified process.

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

Sincerely,

Catherine Cesnik, Chair  
Bassett Creek Watershed Management Commission

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

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Water List

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