

# Bois de Sioux Watershed District

Comments are attached.



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Minnesota Pollution Control Agency  
c/o Leya Charles  
520 Lafayette Road  
Saint Paul, MN 55155

Dear Leya:

Thank you for the opportunity to provide additional information and comments on the draft 2024 Impaired Waters List. As part of Minnesota's systematic impairment process, the District and MPCA participated in an initial Professional Judgement Group (PJG) meeting held on May 9, 2023. Thank you also for the large number of State of Minnesota employees at this initial PJG meeting and follow-up meeting who participated in-person, virtually from the office, and virtually from people continuing to work remotely following the pandemic.

On behalf of the Bois de Sioux Watershed District, we have several suggestions to improve the PJG process, especially for watersheds with limited staff like the Bois de Sioux Watershed District. Many of these recommendations have been shared with select MPCA staff:

- Twelve working days was not enough time for limited watershed staff (1) to prepare for a discussion on twenty-four individual reaches, across two large watershed districts, with thirty-five proposed impairments. In contrast, MPCA was represented by no less than 20 specialized employees whose responsibilities were narrowed by impairment type or test result.
- District staff needed additional information for each reach including: Fish IBI and Macroinvertebrate IBI scores and classes, gradients, drainage areas, and dissolved oxygen scores. This request would have been made unnecessary if these figures were simply included in the MPCA reviewer comments. Some MPCA reviewer comments would state a numerical value in relation to the threshold (for eg, "4 below the threshold") – it is more helpful to simply put the numerical values of the score and the threshold, because it isn't always clear if the correct numerical standard is being used.
- It was helpful when MPCA reviewers included the monitoring station ID's in their comments, and it would be even more helpful if these station ID's could be searched for on MPCA's reference map (many were not found with the search feature, for eg, 21RD083).8
- MPCA reviewer comments are some of the most important information provided, and these comments were difficult to view, print and share from the Excel spreadsheets that were provided (Excel limits the number of characters that display and print for a cell).
- The maps would be more helpful if the user could discern where AUID reaches begin and end (currently, stretches are all the same color - the computer user has to randomly click on the reach to figure out if there are individual segments within a continuous line).
- It would be helpful to have a map layer added for proposed impairments.
- Prior to the meeting, it would be helpful for MPCA staff to provide a fixed, detailed agenda

- that includes the order in which AUID's will be discussed. From the spreadsheets that were initially provided by MPCA, it was not clear what reaches would be discussed at the PJG meeting. After many emails, staff determined that the discussion would include newly proposed impairments, new vs. carried forward/not new impairments for parent/child WIDs, barely impairments which are new impairments, nearly impairments which are not impairments, and 2Bg to 2Bm changes. It was not clear which impairments were going to be covered in the meeting, with an impairment even being added *during the meeting itself*.
- There were three agenda items at the PJG meeting that were not included on any of the pre-meeting agendas, so staff were not prepared for them: WIDs identified in the Watershed Assessment Team meeting requiring partner input, waters that the local resource managers have concern with, and proposed beneficial use recategorization.
  - Four hours was not enough time for the PJG to cover twenty-four individual reaches, across two large watershed districts, with thirty-five proposed impairments.
  - Showing pictures of the reaches and monitoring sites was extremely helpful during the PJG meeting. It would be helpful if these were provided ahead of the PJG meeting so that staff could confirm that the correct site is being references in comparison with the landscape.

The following comments are provided in response to the draft 2024 Impaired Waters List.

A. EPHEMERAL DITCHES & STREAMS – MPCA has failed to either demonstrate an effective method to identify ephemeral reaches prior to monitoring cycles or to communicate what their current method to accomplish this is and how selected reaches were qualified. This is important because MPCA does not have assessment criteria for ephemeral reaches and states more broadly that it does not assess ephemeral reaches. It seems that MPCA relies heavily upon its criteria of “sampleable” to determine that a reach is not ephemeral – but the definitions of what MPCA considers an assessable sample are not the same as what constitutes an ephemeral reach, and certainly there are times when an ephemeral reach will produce assessable samples. MPCA states that local knowledge is extremely helpful in making assessment determinations. Unfortunately, the local knowledge is sought by MPCA after monitoring, upon the point of impairment proposals.

Serving as the Minnesota headwaters to the Red River Basin, the Mustinka River Watershed, and areas of the Bois de Sioux River Watershed, do not receive waters from any other district; sources for most reaches are snowmelt and precipitation. Very few stream miles are located at elevations through which groundwater can make contributions that bridge spring snowmelt and summer precipitation events. It is not uncommon for the last rain event of the season to take place in July, and for the next form of precipitation to occur much later in the year, in the form of snow. Many drainage ditches and some streams annually dry-up. Trout Unlimited estimates for Minnesota that there are 1.9 miles of ephemeral streams for every mile of intermittent streams; for the Bois de Sioux and Mustinka River waters, they estimate that intermittent streams make up 81% – 100%.

**Had it been conveyed to the watershed district that MPCA would require local evidence of ephemeral conditions at any point in the ten years prior, this data could have been collected.** Furthermore, if documentation is required by the District, it would be helpful for us to know ahead of time which reaches are of interest. We employ a 3-year inspection rotation for our legal public drainage ditches. Additionally, there are some legal public drainage ditches within our District that remain under the authority of Big Stone, Grant, and Stevens Counties. These highway department staff may have comments regarding drainage ditches that were assessed.

These AUID's, and their proposed reaches, should be pulled from the current assessment program because they are considered ephemeral, and MPCA does not have ephemeral assessment criteria:

09020102-532 Periods of no flow  
09020102-512 Periods of no flow; flashy due to snowmelt runoff events  
09020102-561 Drought conditions/lack of precipitation affected; reach dries up  
09020102-557 Low flow  
09020102-579 Low levels  
09020102-589 Following spring runoff, flow is from groundwater seeps  
09020102-563 Local officials report this reach dries up completely  
09020101-557 Goes dry  
09020101-512 No flow conditions  
09020102-589 Portions of this long reach go dry  
09020101-545 Goes dry

**Due to the ephemeral nature of these reaches, we oppose the following impairments:**

09020102-532: Unnamed creek. Benthic macroinvertebrates bioassessments.  
09020102-512: Judicial Ditch 4. Fish bioassessments.  
09020102-561: Unnamed creek. Fish bioassessments.  
09020102-589: County Drain 27. Fish bioassessments.  
09020102-563: Unnamed creek. Benthic macroinvertebrates bioassessments.  
09020102-563: Unnamed creek. Fish bioassessments.  
09020101-512: Rabbit River, South Fork. Benthic macroinvertebrates bioassessments.  
09020102-589: County Drain 27. Fish bioassessments.  
09020101-545: County Ditch 53. Fish bioassessments.  
09020101-545: County Ditch 53. Benthic macroinvertebrates bioassessments.

B. MODIFIED, CHANNELIZED DITCHES & STREAMS - MPCA proposes to change the uses from general to modified for the following AUID's: 09020102-589, 09020102-590, 09020102-593, 09020102-596, 09020102-579, 09020101-545, and 09020101-557. The District supports these changes, and would request that these AUID's be added to the list for proposed change: 09020102-564, 09020102-532, 09020101-539, 09020102-557. Drainage ditches that were legally established were built with grading designed to provide a temporary displacement of water and to stay empty otherwise – temporary sediment blockages may affect the design, but are remedied upon the three-year annual inspection schedule.

**Due to the extent these are man-made or modified channels, we oppose the following impairments based on 2Bg classification, and furthermore request that these reaches be reclassified as 2Bm:**

09020101-501: Bois de Sioux River. Benthic macroinvertebrates bioassessments.  
09020101-503: Bois de Sioux River. Benthic macroinvertebrates bioassessments.  
09020101-545: County Ditch 53. Fish bioassessments.  
09020101-545: County Ditch 53. Benthic macroinvertebrates bioassessments.  
09020101-557: Unnamed ditch. Dissolved oxygen.  
09020102-532: Unnamed creek. Benthic macroinvertebrates bioassessments.  
09020102-563: Unnamed creek. Benthic macroinvertebrates bioassessments.  
09020102-563: Unnamed creek. Fish bioassessments.  
09020102-564: Unnamed ditch. Dissolved oxygen.  
09020102-578: Unnamed creek. Benthic macroinvertebrates bioassessments.

09020102-582: Mustinka River. Benthic macroinvertebrates bioassessments.

09020102-589: County Drain 27. Fish bioassessments.

C. FLOOD AVENUES - Several of the reaches with proposed impairments are major spring snowmelt flood avenues. Flood conditions in the Red River Valley are naturally occurring throughout history. Springmelt floods are regular and substantial, and are the result of at least four conditions. First, the headwater region sits at the southernmost point of the Red River Basin, with water flowing eventually to the Red River of the North and to Canada. Because the basin headwaters are typically several degrees warmer than lands north during the transition from winter to spring, snowmelt from the headwaters melts and rushes onto frozen snow, ice, and ground, causing flooding. Second, the elevation change within Red River Valley is miniscule – “valley” is a misnomer – our geology is simply the very flat floor of the prehistoric Lake Agassiz bed. In our Bois de Sioux and Mustinka River watershed districts, surface elevations can change less than 6” over the course of a mile. This means flooding may not be deep, but may be very wide. Spring runoff events turn a 50’ wide channel to that of one flooding adjacent lands over a mile wide, sometimes two! Thirdly, rivers in the Red River Valley basin are very young, and have not cut their own floodplains and adequate river channels; without incised channels, flow overcome existing river channel banks. This process of pursuit for equalization also explains how standard statewide TSS expectations are likely to be misapplied. Fourth, the distribution of ice and snow jams make flood conditions unpredictable – it is impossible to model from year-to-year how subtle changes in freezing and thawing can impact the flow of snowmelt. Unexpected areas can be flooded if snowmelt flows are impeded by snow and ice blockages. In addition to a significant change in width, channels experience dramatic changes in water flow depth and speed – expanding and contracting rapidly as snowmelt passes through. Channel erosion is severe and occurs in both predictable locations or new locations (depending on snow and ice jams).

In the past 7 years, we have had two federal-disaster level snowmelt flood events, one state-disaster level flood event, and one projected flood event that would have dwarfed the record-breaking 1997 flood event except that we had a perfectly timed, thaw-during-the-day and freeze-overnight slow, gradual melt. The bulk of the damage in both districts is the result of channel cutting and sedimentation. It is disingenuous to assert that these cataclysmal-sized events are exacerbated by human impacts. In the Mustinka and Bois de Sioux River watersheds, the opposite is true – roads, culverts, bridges, impoundments, dams and drainage systems are designed to the extent possible to meter and store floodwaters. We are very aware of the responsibility of the Lake Traverse and Mud Lake Impoundments to store floodwaters to protect downstream life and property. It is also true that no matter what is constructed, there is always a flood event than can occur that is larger than a project’s design.

It is also disingenuous to ignore substantial impacts to watercourse ecology following significant flood events. It is actually unbelievable that watercourses that change so dramatically and quickly would be immediately subjected to statewide water quality standards based on stable perennial stream conditions, without exception, consideration, conversation or frankly, even curiosity.

For this evaluation round, the following AUID’s could be designated as major flood avenues: 09020102-557; 09020102-579; 09020102-594; 09020102-590; 09020101-512; 09020101-502; 09020101-503; 09020101-535; 09020101-540. These reaches fail to meet nearly every MPCA staff standard for which MPCA staff assessed. For public drainage systems, drainage authorities have the authority to remove siltation, repair eroded channel banks, and reestablish vegetation. Outside of public drainage ditches (on DNR controlled public waters), no LGU has independent authority to make repairs or improve water quality conditions. District staff strongly urge MPCA staff to consider the consequences of frequent,

natural, substantial flooding and its impact on our waterway's ability to meet MPCA's fixed statewide water quality standards. Additionally, District staff are interested in further information as to how long it takes following an extreme event for the water's chemistry and biology to return to a stable condition. We strongly encourage that MPCA staff implement a more flexible assessment system that incorporates concessions for the temporary consequences and disturbances of large, naturally occurring floods. In watercourses that experience dramatic flood responses, our opposition isn't to consideration for water quality, the opposition is the application of inflexible standards that make no allowances or considerations for the consequences of flooding on a human-defined water quality assessment system with many water quality attributes but very few attribute classification categories.

**Based on snowmelt floods that are normal, typical, and naturally occurring we oppose the following impairments:**

- 09020102-590: Fivemile Creek. Benthic macroinvertebrates bioassessments.
- 09020102-594: Twelvemile Creek, West Branch. Benthic macroinvertebrates bioassessments.
- 09020102-594: Twelvemile Creek, West Branch. Fish bioassessments.
- 09020101-503: Bois de Sioux River. Fish bioassessments.
- 09020101-503: Bois de Sioux River. Benthic macroinvertebrates bioassessments.
- 09020101-512: Rabbit River, South Fork. Benthic macroinvertebrates bioassessments.
- 09020101-535: Unnamed creek. Benthic macroinvertebrates bioassessments.
- 09020101-540: County Ditch 52. Benthic macroinvertebrates bioassessments.

D. DISSOLVED OXYGEN ASSESSMENTS - Dissolved Oxygen scores were not included in Professional Judgement Group pre-meeting reports, so District staff were unable to confirm whether the Dissolved Oxygen standard was exceeded, or to what degree the standard was exceeded for these AUID's: 09020102-561, 09020102-564, 09020102-593, 09020102-594, 09020102-596, 09020102-595, 09020101-512, 09020101-557.

According to MPCA guidance:

"After many years of investigating impaired streams, the Minnesota Pollution Control Agency (MPCA) saw a greater need to consider in a more formal manner natural conditions that may be responsible for low dissolved oxygen concentrations observed in some stream reaches. In some cases, there were indications that natural background conditions were wholly responsible for river dissolved oxygen impairments. As of early 2009, there was no written procedure for considering natural background conditions during assessment or for re-assessing resources already on the 303(d) list. The distinction between whether a resource is impaired due to natural or anthropogenic factors is an important one. If a resource is determined to not meet water quality standards due to natural conditions, a Total Maximum Daily Load (TMDL) study is not required and the natural background condition becomes the standard (Minn. R. 7050.0170). Natural background standards have consequences for future sources since loading increases that result in a "discernable impact from point or nonpoint source pollutants attributable to human activity" are not permissible. It was essential for the MPCA to develop a clear procedure and a way to formally document the review of a resource for natural background to ensure a rigorous and transparent process that could be consistently applied from case to case."

<https://www.pca.state.mn.us/sites/default/files/wq-s1-63.pdf>

**Based on MPCA's recognition that knowledge of local conditions are needed to evaluate natural conditions that may be responsible for low dissolved oxygen concentrations, and the failure for MPCA to collect this information via the formal process that they established through implementation of the**

**Professional Judgement Group this round, we oppose the following impairments:**

09020102-561: Unnamed creek. Dissolved oxygen.

09020102-564: Unnamed ditch. Dissolved oxygen.

09020101-557: Unnamed ditch. Dissolved oxygen.

E. DISSOLVED OXYGEN & LOW GRADIENTS – Understanding that a defining feature of both watersheds is extremely flat topography, District staff did request and receive from MPCA monitoring station gradients.

09020102-561 Low Gradient; Low Flow

09020102-564 Low gradient; Directly downstream of the Niemackl chain and wetland complexes

09020102-597 Low Gradient; Directly downstream from wetlands and this year is a waterfowl production area

09020101-512 Low Flow; So affected by drought conditions, that readings could not be taken

09020102-593 Directly downstream from a wetland

09020102-594 Low gradient

09020102-595 Directly downstream from a wetland complex

09020102-596 This reach sits at the bottom of a bowl and the channel cuts through densely grassed areas

09020102-597 Low Gradient; Directly downstream from wetlands - literally a waterfowl production area

**Existing**

09020101-501 EXTREMELY low gradient

09020101-502 EXTREMELY low gradient

MPCA staff stated that “low gradient” AUID’s that are not classified as “low gradient” receive a modified fish score to account for their low gradient state. It is important to note that this low gradient accommodation was offered only for fish assessment scores. District staff have learned through MPCA guidance documents that MPCA policies recognize that low gradients are a limiting factor for dissolved oxygen in both rivers and streams. MPCA guidance does not identify a limitation for small drainage areas; both rivers and streams are specifically described. MPCA proposed the TALU framework with the purported advantage that:

“...low gradient, wetland influenced rivers and streams in Minnesota tend to have unique biological assemblages and chemical expectations including a lower DO expectation than the current DO standard for class 2B waters would allow. In a TALU system, these low gradient streams would have their own set of biological and chemical standards. Impairment decisions would be only be made after the correct classification and designated use is assigned.”  
<https://www.pca.state.mn.us/sites/default/files/wq-s1-62.pdf>

According to MPCA, flow, gradient, and surrounding landscape/contributing watershed information (including wetland influence) were reviewed and taken into consideration outside of the Professional Judgement Group and without local knowledge or input. This process is in contradiction to MPCA’s statement above, that impairment decisions would only be made after low gradient streams were identified, and then a special set of standards would be applied. The Mustinka and Bois de Sioux Watershed Districts are some of the flattest areas in the world – so if “low gradient” isn’t a recognizable condition under the TALU framework here, then the use of this special case – used in-part to justify the implementation of the TALU framework – is in question.

**Based on low gradient and wetland complex impacts respectively, we oppose the following impairments:**

- 09020102-561: Unnamed creek. Dissolved oxygen.
- 09020101-502: Rabbit River. Nutrients.
- 09020102-564: Unnamed ditch. Dissolved oxygen.
- 09020102-561: Unnamed creek. Fish bioassessments.
- 09020102-561: Unnamed creek. Dissolved oxygen.
- 09020102-564: Unnamed ditch. Dissolved oxygen.
- 09020102-594: Twelvemile Creek, West Branch. Benthic macroinvertebrates bioassessments.
- 09020102-594: Twelvemile Creek, West Branch. Fish bioassessments.
- 09020102-597: Mustinka River. Benthic macroinvertebrates bioassessments.

F. OVERALL AND BENEFICIAL USE REQUEST FOR 4C CATEGORIZATION - Per page 46 of the MPCA Guidance Manual for Assessing the Quality of Minnesota Surface Waters for Determination of Impairment, a 4C use category can be applied where reaches are influenced by dams, impoundments or other anthropogenic factors affecting stream connectivity or flow. MPCA has identified four possible reaches for reclassification (09020102-538, 09020102-578, 09020101-535, 09020101-540). The District supports this change, and also makes the following requests:

IMPOUNDMENTS – The District requests 4C use categorization for 09020101-559 as it is used as an outlet for the North Ottawa Impoundment and is nearly wholly influenced by North Ottawa release operations.

DAMS - The District requests 4C use categorization for three reaches that are strongly influenced by dam operations for flow. Two of these three reaches are immediately downstream of the Federal 401/404 Army Corps of Engineers' Lake Traverse Reservoir-Reservation Dam-Mud Lake Reservoir-White Rock Dam (09020101-503; 09020101-501). These dams are completely closed for significant amounts of time throughout the year, resulting in shallow downstream conditions and low flows. The third dam-influenced reach is affected by the Pine Ridge Dam: 09020102-582.

**Both our impoundments and their associated dams are substantial water infrastructure projects implemented in response to natural snowmelt flood conditions. Their functions, and the release of their waters, are controlled anthropogenically. It should be no surprise to MPCA water quality analysts that the operation of these impoundments and their dams can absolutely influence a wide variety of parameters, including the level of TSS, DO and eutrophication. An example of this fact was pointed-out to watershed officials by MPCA's TMDL subcontractor Emmons & Olivier Resources, Inc. as stated in the Bois de Sioux Watershed District Wraps, "Lake Traverse and Mud Lake flood control structures limit internal load management activities in these lakes, such as whole-lake drawdowns and carp control. Internal phosphorus loads are the dominant source of phosphorus in these lakes (MPCA, March 20218)."**

CULVERTS – The District requests 4C use categorization for 09020102-563, as flows are limited by at least two permanent Texas crossings. The District requests 4C use categorizations for 09020102-589, 09020101-512, 09020101-545 due to perched culverts.

When one takes some time to more closely understand the function and operation of these water



infrastructure projects, it should be no surprise that these limitations have resulted in several types of systematic “impairments.” What is surprising is that water quality monitors only noted the presence of one these conditions during their assessments. These facilities and their operations are permanent and are not expected to change. It would be beneficial for monitors to gather more information about the functional effects of this infrastructure so that monitoring and evaluation resources are not wasted pursuing dead ends.

**Based on a request for reclassification for 4C categorization, we oppose the following proposed impairments:**

- 09020101-501: Bois de Sioux River. Benthic macroinvertebrates bioassessments.
- 09020101-503: Bois de Sioux River. Fish bioassessments.
- 09020101-503: Bois de Sioux River. Benthic macroinvertebrates bioassessments.
- 09020102-578: Unnamed creek. Benthic macroinvertebrates bioassessments.
- 09020102-582: Mustinka River. Benthic macroinvertebrates bioassessments.

G. OVERALL AND BENEFICIAL USE REQUEST FOR 4D CATEGORIZATION - Per page 46 of the MPCA Guidance Manual for Assessing the Quality of Minnesota Surface Waters for Determination of Impairment, a 4D use category can be applied where reaches are influenced by wetlands that contribute to naturally low dissolved oxygen. The District requests 4D use categorization for:

- 09020102-564 Directly downstream of the Niemackl chain and wetland complexes
- 09020102-597 Directly downstream from wetlands - literally a waterfowl production area
- 09020102-594 Directly downstream from wetland complex

**Based on the request for 4D recategorization, we oppose the following impairments:**

- 09020102-564: Unnamed ditch. Dissolved oxygen.
- 09020102-594: Twelvemile Creek, West Branch. Benthic macroinvertebrates bioassessments.
- 09020102-594: Twelvemile Creek, West Branch. Fish bioassessments.
- 09020102-597: Mustinka River. Benthic macroinvertebrates bioassessments.

H. OVERALL AND BENEFICIAL USE REQUEST FOR 4E CATEGORIZATION - Per page 51 of the MPCA Guidance Manual for Assessing the Quality of Minnesota Surface Waters for Determination of Impairment, a 4E use category can be applied where data strongly suggests that an impairment is due to natural conditions; a final category determination will be made pending confirmation from additional data collect. The District requests 4E use categorization for the following proposed E. *Coli* impairments: 09020102-590, 09020102-593, 09020102-594, 09020102-596, 09020102-597, 09020102-595, 09020101-501. It is easily demonstrable that both the Bois de Sioux and Mustinka River Watersheds have sparse human populations and very limited livestock production – what we do have are flourishing wildlife communities. Deer, goose and bird feces were observed this spring by District staff at several monitoring sites. The new impairments proposed above are located in areas that attract and shelter wildlife. The District strongly supports further efforts for data collection on these reaches to identify source species and use of the 4E category to facilitate further inquiry into these E. *Coli* impairments.

**Based on the request for 4E recategorization, we oppose the following impairments:**

I. PARENT TO CHILD IMPAIRMENTS – The District opposes any and all impairments proposed to be transferred to a child AUID where the applicable monitoring station that reports impaired conditions is upstream or downstream of the bounds of the child AUID. What parent/child split parameters prevent MPCA from assigning an AUID to the entire Red River of the North, setting up one monitoring site, designating impairments, and later splitting the AUID into parent/child AUIDs, with the possibility that monitoring stations great distances from child AUIDs result in impairments for the child AUIDs? Although MPCA makes an argument that carry-forward assignments where the monitoring station is downstream of the new child WID and there are no data now associated with the new upstream child WID could be abandoned, the same argument could be made for upstream stations at distance from a child WID.

Furthermore, MPCA can be absolutely assured that many BMP's have been implemented over the past 10 year period: for a start, both the landmark Buffer Rule and Nitrogen Fertilizer Rule were implemented statewide.

**For the reasons stated above, we oppose the following impairments:**

- 09020102-590: Fivemile Creek. Escherichia coli (E. coli).
- 09020102-591: Fivemile Creek. Escherichia coli (E. coli).
- 09020102-592: Fivemile Creek. Escherichia coli (E. coli).
- 09020102-593: Twelvemile Creek, West Branch. Escherichia coli (E. coli).
- 09020102-593: Twelvemile Creek, West Branch. Dissolved oxygen.
- 09020102-594: Twelvemile Creek, West Branch. Escherichia coli (E. coli).
- 09020102-594: Twelvemile Creek, West Branch. Dissolved oxygen.
- 09020102-595: Mustinka River. Escherichia coli (E. coli).
- 09020102-595: Mustinka River. Dissolved oxygen.
- 09020102-595: Mustinka River. Turbidity.
- 09020102-596: Mustinka River. Fish bioassessments.
- 09020102-596: Mustinka River. Escherichia coli (E. coli).
- 09020102-596: Mustinka River. Dissolved oxygen.
- 09020102-596: Mustinka River. Turbidity.
- 09020102-597: Mustinka River. Fish bioassessments.
- 09020102-597: Mustinka River. Escherichia coli (E. coli).
- 09020102-597: Mustinka River. Dissolved oxygen.
- 09020102-597: Mustinka River. Turbidity.

Again, thank you for this opportunity to provide our comments.

Sincerely,



Linda Vavra  
President



Jamie Beyer  
Administrator