



December 27, 2024

Ms. Donya Dawson
Executive Aide to the MPCA Commissioner

RE: 2025-2027 Water Quality Triennial Standards Review Public Comment

The Vermillion River Watershed Joint Powers Organization (VRWJPO) appreciates the opportunity to review and comment on the November 2024 Draft Water Quality Standards Work Plan for 2025 to 2027. Staff have reviewed the draft work plan and have the following comments:

- 1) Group 1: Current and active development water quality standards include – “Use Classes 2A (cold water)/2B (cool and warm water) modifications, including, “Revisions needed to update and align these designations with the improved tools now used by MPCA to assess the condition of Minnesota’s waters, including the indices of biotic integrity and other biological criteria.” The Vermillion River Watershed has a mixture of 2A and 2B stream reaches. Since 2009, the VRWJPO has funded annual fish and aquatic macroinvertebrate monitoring. 2A streams in the watershed are designated as such primarily due to the presence of brown trout, which are a sensitive coldwater species; however, brown trout are not native to North America. For this reason, 2A streams within the watershed have consistently low scores for metrics relating to the native taxa portion of the IBI score. Similarly, other streams in the state, designated as Class 2A waters due to brown trout presence, have negatively impacted native taxa metrics and respective IBI scores while having non-native trout presence. The VRWJPO asks for the MPCA to consider revising the native taxa metrics for IBI scoring to account for this discrepancy.
- 2) Group 1: Current and active development water quality standards include – “Revisions to Class 1 rules... improving language to address surface water and groundwater interaction.” A section of the Vermillion River is a losing stream, contributing to groundwater sources. Will revisions to Class 1 waters to address surface water and groundwater interaction be only to those waterbodies that are known to contribute to aquifers that are known drinking water sources, instead of all surface waters that contribute to groundwater? Will surface waters that are groundwater-fed have similar standards? How will the amount of groundwater contribution sourced from surface waters be quantified to determine which waters will and won’t have standards applied?
- 3) Group 2: In technical development water quality standards include – New PFOS and PFOA standards to protect aquatic life states, “The EPA recently published aquatic life criteria for PFOS and PFOA. The addition of these standards is needed to maintain the consistency of Minnesota’s water quality standards with EPA criteria.” Does the MPCA envision including PFAS and PFOA monitoring within their 10-year monitoring cycle? Protocols for PFAS and PFOA monitoring are time consuming and stringent, and limited labs are currently able to process PFAS and PFOA sampling. Does MPCA envision adding this analysis matrix to labs well used for water quality analyses in the State of Minnesota?

Thank you for the opportunity to review and comment on the Draft Water Quality Standards Work Plan. Please feel free to contact Kelly Perrine at kelly.perrine@co.dakota.mn.us or 952.891.7002 if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Perrine', with a stylized flourish at the end.

Kelly Perrine
VRWJPO Senior Watershed Specialist