

Dereck Richter



Protecting, Maintaining and Improving the Health of All Minnesotans

April 25, 2025

To whom it may concern,

I was recently made aware of the Wisconsin Central Ltd./Canadian National Railroad (Rainy River Bridge partial replacement) - 401 Water Quality Certification permit. The permit details renovations and updates to the bridge crossing over Rainy River which includes pillar replacements, removal of old concrete, and dredging.

The City of International Falls uses the Rainy River as a source water to supply its citizens with clean drinking water. They are considered a surface water system that draws water directly from the Rainy River. The above permit proposal activities could have unforeseen impacts to water quality, which could cause treatment issues, complications in taste and odor, and/or contamination.

The city is currently in the process of updating their Source Water Assessment and we have determined that the bridge where the work will be occurring is inside an 8-hour time of travel protection area, which is described in the Minnesota Department of Health (MDH) surface water guidance as an Emergency Response Area. The project's activities would be considered a high priority for the public water supplier, and they should be made aware of any significant construction updates or spill events.

MDH is not recommending any conditions be put on the permit, but rather inform you and Aneesh Bethi (Project Engineer, Wisconsin Central Limited Railroad) that the City of International Falls draws water from the Rainy River downstream of the bridge where the renovations are planning to occur. At a minimum, any type of spill, failure of fencing, failure of water booms, emergency response, etc. that occurs during the project should activate a plan to notify the City of International Falls Director of Public Works, Ted Brokaw, and myself immediately. There is limited time to react to a spill or issue based on flow models. This time of travel can be affected by the annual flow rate, which can be determined by a downstream USGS gauging station. It is very important that if something was to occur, the City of International Falls is the first point of contact. Please take this into consideration after the permit has been approved and is active.

It is our goal to protect the public health and work with you to make sure that communication is used for any potential contamination that has occurred.

Sincerely,

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