

Commenter	Organization	Section #	Page (doc/PDF)	Comment	Text and/or evidence
MnDOT	MnDOT	4.6	68	Application of Baseline Year differs from TCMA Chloride	Duluth TMDL--While the period of record varies by stream, most of the chloride data are available from 2016-2018, and 2017 is the midpoint of that period. Any activities implemented during or after the baseline year that led to a reduction in pollutant loads to the water bodies may be considered as progress towards meeting a WLA or LA. If a BMP was implemented during or just prior to the baseline year, the MPCA may consider evidence presented by the MS4 permit holder to demonstrate that the BMP should be considered as progress towards meeting a WLA. TCMA Chloride TMDL--A standard approach to the TMDL implementation is to translate the WLA component of the TMDL directly to a numeric permit limit, which is typical for permitted facilities with monitoring requirements. In the case of urban stormwater regulated through a MS4 Permit, the WLA may be presented in the form of a percent reduction from a baseline condition. The specified percent reduction is then included in the MS4 Permit. With a performance-based approach, the numeric WLA is translated to a performance criterion. This can include the development and implementation of a winter maintenance plan which identifies a desired level of BMP implementation and a schedule for achieving specific implementation activities. Progress made towards those goals are documented and reported, along with annual estimates of salt usage and reductions achieved through the BMPs implemented.
MnDOT	MnDOT	Figure 34	47	MnDOT does not own or maintain the roadways labeled as state ownership in Tischer Creek (university campus). Correct the classification and change the legend from State to MnDOT-- "State" could mean DNR, U of M, etc... Also, label the subwatersheds.	
MnDOT	MnDOT	6.2.3	76/77	MnDOT should be added to Table 34 (details emailed 10/31/25 to MPCA). MnDOT has our own training program and should receive credit somewhere in the document for it.	
MnDOT	MnDOT	6.4.3	79	Add bullet to this section about MnDOT Training.	
MnDOT	MnDOT	Various		Given inaccuracies of MnDOT area on Figure 34, it is questionable whether MnDOT ROW calculations are accurate, especially for Tischer Creek. Please use MnDOT provided limits that was used for previous TMDL efforts by the MPCA in the MnDOT Duluth MS4 area. We can supply if needed.	
MnDOT	MnDOT	4.1.2		The Winter Season Runoff Approach is simplistic as stated in the TMDL. These are then used to calculate allowable loads which in turn are divided up among the sources including WLAs for MS4s.	
MnDOT	MnDOT	4.3.1		Are the estimated contributing areas accurate?	
MnDOT	MnDOT	4.8		Are the WLAs and % reductions stated in the TMDL Summary (4.8) realistically achievable?	
MnDOT	MnDOT	8.2.4		Says the one objective is to reduce the volume of chloride-based product applied and another is to limit dispersion (scatter). Moving from solid application to brine would increase volume of product applied but decrease dispersion, and thus reduce loading. May need to clarify. Other references to volume reduction should also be checked.	
MnDOT	MnDOT			MS4 Permit requirements are described in the document. I assume these reflect the existing permit? Are there any expected changes in the new permit that would be inconsistent with what has been stated in the TMDL? Or that would add substantive requirements on the MS4s?	
MnDOT	MnDOT	5.1		Since the new permit will likely reflect different census data and therefore different urbanized areas/MS4 areas, are these new areas included in the report? Or would they be subject to the new and expanded provisions of 5.1?	
MnDOT	MnDOT			It would be helpful if "road salt" was defined in the TMDL and not be overapplied to include everything...	The term "road salt" is not used as frequently as in the past. It appears that this paragraph on page xi is indirectly defining the terms such as "road salt", "deicing agents", but it would clear up confusion for reader to define these terms more directly. "The major sources of chloride causing impairment to Kingsbury, Keene, Miller, Chester, and Tischer creeks are (1) winter road maintenance (i.e., deicing or anti-icing agents [e.g., road salt, brine] applied to roads, parking lots, sidewalks, and driveways during the winter before and during snow events)..."
MnDOT	MnDOT	3.4.6	31	This is old data and MnDOT has made efforts to reduce chloride applications in the last 7 years and anticipate that local agencies and commercial applicators have as well.	
MnDOT	MnDOT	Exec Summary	xi	Reference the Smart Salting Tool appendix, instead of linking to the Smart Salting Tool in the Executive Summary section.	
MnDOT	MnDOT	Exec Summary	x	State the assumptions and why that yields larger chloride loads.	
MnDOT	MnDOT	Exec Summary	x	The use of maximums which are spikes during melt periods that also don't necessarily align with reproductive cycles or address that short exposure may not be as harmful to organisms seems overly conservative.	
MnDOT	MnDOT	Exec Summary		Reference section 2.4 in the executive summary, which addresses duration of exposure per the relevant chronic and acute standards.	
MnDOT	MnDOT	3.4	20	Should also state that concentrations would decrease with increased flow or due to changes in snow and ice operations including switching to non-chloride deicers and expansion of brine use which has a lower chloride concentration.	
MnDOT	MnDOT	3.4.1	33	Is there any data that supports the statements about fertilizer not be a major source of chloride in urban areas? It definitely has contributed to algae problems in urbanized areas.	
MnDOT	MnDOT	3.4.1	33	Fertilizer is not shown for residential applications in the conceptual model and should be for an urban area TMDL.	

MnDOT	MnDOT	3.5.1	34	There is inconsistency in describing the sources of fertilizer. In Figure 27., the model only includes fertilizer under the agricultural sector. This is contradicted later in Table 22. where the locations listed for fertilizer are cultivated crops, athletic fields, and grass lawns and in the Implementaion strategy summary under Turf management (8.2.2). Per prior comment the statement that fertilizer is not a source in urban areas since there are no agricultural activities is incorrect. It is unclear why this assessment does not look at residential and commercial business applications of fertilizers. MnDOT uses almost no fertilizer, except for new construction plant establishment.
MnDOT	MnDOT	3.5.2.4	41	Shouldn't assume lawn and turf grass sources and application are low without any supporting data.
MnDOT	MnDOT	3.5.2.4	41	Include an estimation of residential lawn applications in addition to academic and agency operations. As previously noted, MnDOT does minimal applications.
MnDOT	MnDOT			Please confirm that MPCA used 2.72 lbs NaCl for the brine conversion rate