



September 14, 2022

Commissioner Fran Miron
 Lower St. Croix Watershed Partnership Policy Committee
fran.miron@co.washington.mn.us

Dear Commissioner Miron,

The Valley Branch Watershed District (VBWD) requests that the Lower St. Croix Watershed Partnership Policy Committee approve an amendment to the Lower St. Croix River Comprehensive Watershed Management Plan (The Plan) to:

- 1) Add Valley Creek and Kelle’s Creek to the other regionally significant streams listed in Table 5-2 and Figure 5-2.
- 2) Add completed subwatershed assessments and inventories to Table 7-1 and Figure 7-1.

Regionally Significant Streams

Page 34 of The Plan says, “Regionally significant streams (Table 5-2 and Figure 5-2) were identified as those contributing the highest amount of total phosphorus in the Lake St. Croix Total Maximum Daily Load (TMDL) Study (MPCA, 2012).” Table B-7 of that study shows that Valley Branch (also known as Valley Creek) has a larger total phosphorus load and load reduction to the St. Croix than other streams currently listed in Table 5-2 and shown in Figure 5-2, such as Trout Brook, Browns Creek, Rock Creek, Rush Creek, and Goose Creek. Based on the figure in Appendix B, Washington County, page 2, of the Lake St. Croix TMDL Implementation Plan (MPCA, 2013), Kelle’s Creek was included in the Valley Branch watershed rather than separated into its own watershed.

The VBWD submitted a similar comment during the comment period for The Plan, yet The Plan was not modified.

Subwatershed Assessments

Please also add the following to Table 7-1. We can provide data for updating Figure 7-1.

Title	Description	Author and Link
Kelle’s Creek/Sunfish Lake TMDL	Identifies sources of pollution and an implementation plan to reduce pollution	Minnesota Pollution Control Agency Valley Branch Watershed District Total Maximum Daily Load (TMDL) (state.mn.us)
Valley Branch Watershed District Watershed Restoration and Protection Strategy Report Lower St.	Assessed nutrient loads and identified implementation projects for Sunfish Lake (impaired), Eagle Point Lake, Lake Edith, Silver Lake (impaired), and Horseshoe Lake, and assessed bacteria	Minnesota Pollution Control Agency Valley Branch Watershed District Watershed Restoration and Protection

Title	Description	Author and Link
Croix River-Major Watershed	source and identified implementation projects for Kelle's Creek	Strategy (WRAPS) Report (state.mn.us)

The VBWD submitted a similar comment regarding these subwatershed assessments during the comment period of The Plan, but these assessments were not included in The Plan before it was adopted.

Thank you for considering these requests. If you or the Policy Committee need additional information, please contact John Hanson at jhanson@barr.com.

Sincerely,

Ed Marchan
Board President

c: Angie Hong, East Metro Water Resources Education Program
Michelle Jordan, Minnesota Board of Water and Soil Resources
Barb Peichel, Minnesota Board of Water and Soil Resources