



January 7, 2025

Jessica L. Collin-Pilarski  
Washington County Department of Public Health and Environment  
14949 62<sup>nd</sup> Street North  
Stillwater, MN 55082

RE: Washington County Groundwater Plan 60-day Review

Dear Mrs. Collin-Pilarski,

Thank you for submitting the Washington County Groundwater Plan 2025-2036 to the Brown's Creek Watershed District (BCWD) for review and comment. Overall, the Groundwater Plan is an excellent planning document: it is easy to read, well organized, has appropriate goals and policies and identifies a number of well-thought-out strategies to help achieve the County's vision and goals. In particular, the BCWD appreciates the approach the County took to evaluate Diversity, Equity and Inclusion (DEI), Environmental Justice and Climate Change as these impacts will become more pronounced over the next ten years,

As the County knows, the BCWD has an active interest in better understanding and preserving groundwater resources. The BCWD appreciates the note on page 61 of the Plan highlighting Brown's Creek, its status as a cold-water fishery, and its dependence upon a steady source of cold baseflow. As a result, the BCWD supports the adoption of this Groundwater Plan as well as the policies and strategies identified in the Plan.

Additionally, the BCWD commends the County's new strategy to "Encourage partners to implement stormwater best management practices that are protective of groundwater, including safe and feasible water reuse" as well as the supporting actions. The implementation of these types of stormwater management practices will improve the County's resilience to climate change and encourage others to adopt similar water conservation practices.

A couple of specific comments that the County may want to consider as it finalizes the Groundwater Plan (GWP) are articulated below:

- Page 21, Goal #2, C. Support stormwater retention, infiltration and opportunities to replenish aquifer storage. The BCWD is concerned that this strategy has been assigned low priority. This strategy and the corresponding actions are needed to achieve the County's vision, goals and other higher priority strategies identified in the plan.

- Page 22, Goal #2, D. Strategy: Protect, preserve, and restore resources that support groundwater dependent ecosystems. Suggest replacing the example “Minimum Impact Design Standards” to “Volume Control/Stormwater Infiltration” to emphasize the fact that this is what is needed to support groundwater recharge (see Section 4.4) in the face of land use and climate change. The Minimal (not Minimum) Impact Design Standards are a *minimum* requirement which can be used to achieve recharge, but it may not be enough in every situation.
- Page 24, Goal #3, A. Strategy: Inform and educate targeted audiences (e.g., well and septic owners, business, property managers, etc.), and encourage adoption of practices that are protective of groundwater quality and quantity, Action 3.A.2 – suggest adding the developers and the engineering and design community to the list of targeted audiences.
- Page 27 - Recent major groundwater modeling efforts have further refined and improved on the Metro Model. The Northeast Metro Lakes Groundwater-flow model includes roughly the north half of the county. This model is currently maintained by DNR. Another model was developed to address PFAS In the southern half of the county. This model is currently maintained by MPCA.
- Page 38, Watershed Management Organizations – There is a typo in the first bullet. It should read “Brown’s Creek Watershed District”.
- Page 46, Figure 9 – There should be local confirmation by watershed districts of the features included on Figure 9 such as karst features as they may have regulatory implications.
- It is recommended that the County consider including language speaking to the development of a cost-share program to fund the collection of additional groundwater level measurements in the County. The BCWD is interested in the collection of groundwater level measurements to better understand short- and long-term changes to the groundwater system and its corresponding impacts to groundwater dependent natural resources.

Please let me know if you have any questions about the comments or suggestions submitted for the Washington County Groundwater Plan.

Sincerely,

Karen Kill  
BCWD Administrator

Camilla Correll, P.E.  
BCWD Engineer