

Maple Plain WHPP Part 2 Draft Feedback

Note: page numbers refer to the numbers on the pages of the plan themselves, not the pages of the PDF.

Required Changes

The following are required to be addressed for the plan to receive approval from MDH:

- Be sure to update the dates on page v – the plan was submitted to LGUs on February 5, 2025, and review was open through April 6, 2025.
- The unique well number listed for Well #3 on page 4 is incorrect. Change to 112238 and ensure all well numbers are correct throughout the plan.
- The text in the first paragraph on page 10 appears to match Figure 5, however, this does not match what is in Table 1. Ensure the same dataset was used for the text, figure, and table and update accordingly.
- Many measures in the Plan of Action use “As/If Needed” or “Ongoing”. In order to keep on track and to pass an audit should the city be selected for a WHPP Audit in the future, change at least a couple of these measures to have a specific checkpoint or a few checkpoints throughout the process. You can add this in addition to what you have (“As/If Needed” or “Ongoing”) if you like that flexibility, but this way you have a timeframe to aim for. Examples I was thinking you could do this with:
 - Measure #A5: Maybe mark this one as annual or every other year to review status of existing wells and such? Then can be ongoing for new wells?
 - Measure #B1: Can also include “as needed”, but should call out a year or two where you will investigate the potential unsealed wells previously discussed – the potential creamery well noted in the Old Municipal Well Report and the potential well(s) identified by staff at the Scoping 2 Meeting.
 - I did notice that the Old Municipal Well Report was included as an Appendix, but not mentioned anywhere in the plan.
 - Measure #B6: Would like to see this one more specific. Can a timeframe be picked for when the system will first be assessed? Could be “as needed” after that.
 - Measure #C3: Can there be specific years city practices and plans will be looked at/evaluated (for the “identify” portion of the measure)? And then also “Ongoing” for the implementation part?
- Contingency Plan:
 - Table 3 is incomplete. The WHP Rule says to “prioritize water uses and demands into low, medium, and high categories”. At minimum, fill in the “Prioritization Rank” for each priority use category.
 - Table 6 is incomplete. The WHP Rule indicates a public health contact is necessary (“the names, addresses, telephone numbers, and response assignments of personnel for public health, water supply operations, and public relations;”). At minimum, fill in the public health/medical contact information.

Recommended Changes

The following are highly recommended to be addressed to improve the plan:

- On page vi, eliminate the abbreviations not used anywhere in the plan. I noticed many such abbreviations and it can add confusion for the reader.
 - Also, WHPP should be Wellhead Protection Plan.
- Consider specifying on page 4 that the “aquifer exhibits a low geologic sensitivity throughout the DWSMA and is isolated from any [*direct*] surface water recharge interaction.
- More information than required was provided for various data elements, particularly regarding Water Resources. This is OK to do but focus on or come back to and highlight the impact to drinking water. For example, BMPs and water quality improvements surrounding surface water may have benefits to surface water quality and biological communities within the DWSMA, but will that influence the management of the DWSMA? Will that impact the confined aquifer in the next 10 years?
 - Also in the Water Resources section (page 4), it was a bit confusing to read about the land uses in this section. It is very helpful to note the close proximity of Highway 12 and the BNSF Railroad to the wells, but this is not the location I would look for this information. Recommend relocating this information.
 - The presence of a flood area in the DWSMA is noted – will this influence management of the DWSMA? If not, why not and if yes, how? What management is needed?
 - What documents are being referred to in the first full paragraph on page 5? Recommend specifying to provide context.
 - The watershed management plan is not available on the website linked in the last paragraph on page 5.
- The link on page 11 to Maple Plain’s 2040 Comprehensive Plan does not work. Replace with correct link.
- Reword the text in the first paragraph on page 15 that says, “each of the wells located within the DWSMA”. Wells 1 and 2 are not in the DWSMA, and there are non-city wells also within the DWSMA (they were just not deep enough to inventory in the PCSI).
 - Also, Well #2 was sealed in 2024 – refer to this date in addition to or instead of the date of the well being “capped”, as it was not properly sealed until 2024.
- Recommend clarifying in the second paragraph on page 15 that the other high-capacity wells included in the delineation are not within the DWSMA itself.
- Reword the first sentence under “Groundwater Quality” on page 16. Water samples collected from wells #3 and #4 were analyzed for these parameters. The table represents the available chemical and isotopic information from the wells.
- Large chunks of text were directly copy-and-pasted from the Part 1 plan. This is the city’s plan, so it is OK to do so, but ensure it makes sense to do so. Examples of issues with this:

- The last paragraph under “Well Vulnerability Assessment” on page 17 refers to Table 2. This is the Table 2 from the Part 1 plan, as Table 2 in this plan is “Zoning in the Maple Plain DWSMA”. Delete this reference or refer to the correct table. The paragraph also includes in-text citations for two sources cited in the Part 1 – either delete or include a full citation somewhere in this plan.
- The first full paragraph on page 18 starts with “once the geologic sensitivity was determined...” but then goes on to explain how this was determined. Ensure copy-and-pasted sections of text make sense.
- Other sentences and groups of sentences in the plan appear to be copy-and-pasted from other sources as well. Recommend citing sources as a best practice, but also to help staff, partners, and other readers find the information referenced in the future.
- Not all sources in Table 7 have a level of risk assigned. Recommend assigning at least a Medium to FD1 and RSS could be Medium or Low.
- Regarding the statement on page 23 “The city does not have authority over proposed wells drilled within the area”, does the city have any ordinances requiring connection to city water if available? The city is within its rights to deny a property owner to drill a well as a land use authority.
- In Table 10, consider if the issues identified in the first column are really issues – is water quality monitoring per MDH the actual issue to be addressed? How about aquifer and water conservation measures – are the measures really the issue or is demand on the aquifer the issue?

Plan of Action

- The subject heading of “Aquifer Testing” doesn’t really make sense for measure #A4 since the measure is not an aquifer test. I think this is due to removing some other measures per advice of MDH Hydro. It would make a lot more sense to be under the “Groundwater Quality & Quantity Monitoring” subject heading. Recommend rearranging this.
- Measure #A6 was a recommendation from the MDH Hydro – recommend changing to a Medium priority.
- Measure #B3: Recommend just having the “X” in year 7. You can always do it earlier, but this could commit you to doing this twice or earlier than you want to.
- Recommend a measure for implementing the measures listed out in the IWMZ reports. We have some standard suggested language for such a measure if the team wants to use that.

Contingency Plan

- Regarding the references to MNWARN, I believe MNWARN can only be utilized by cities that are members. Is Maple Plain a member?

MAPLE PLAIN WHPP PART 2 DRAFT FEEDBACK

- Various tables in the plan are not complete. Recommend continuing to fill these out as much as possible. If any blanks remain, consider putting “TBD” instead and have city staff make a plan to address these in the near future. If I can be of assistance in identifying any contacts or other information, please let me know. See above for a few instances that are required to be completed.
- On the last page, under “Emergency or backup wells” list Well 1 and its unique well number. If something happens to wells 3 and 4, the city could use Well 1 before having to purchase and distribute bottled water.
- Lots of “TBD” in the plan – I know I said above to put TBD instead of blanks, but I encourage the team to see if any of these “TBDs” can be thought out a bit more before finalizing this plan. Either way, have staff make a plan to address the rest of the TBDs in the near future to have a robust contingency plan.