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September 28, 2018

Watonwan Watershed Planning Partnership
C/O Heidi Rudolph, Watonwan County Land Management / SWCD
108 8th Street South, Suite 2
St. James, MN 56081

RE: Response to request for priority issues and plan expectations for One Watershed, One Plan planning

Dear Ms. Rudolph and the Watonwan Watershed Planning Partnership,

Thank you for providing the opportunity to provide priority issues and plan expectations for the development of the Watonwan comprehensive watershed management plan under Minnesota Statutes section 103B.801.

The Board of Water and Soil Resources (BWSR) has the following overarching expectations for the plan:

Process

The planning process must follow the requirements outlined in the *One Watershed, One Plan Operating Procedures Version 1.0*, adopted by the BWSR Board on March 23, 2016, or its successive document, available on the BWSR website: www.bwsr.state.mn.us/planning/1W1P/index.html. More specifically, the planning process must:

- Involve a broad range of stakeholders to ensure an integrated approach to watershed management.
- Reassess the agreement established for planning purposes when finalizing the implementation schedule and programs in the plan, in consultation with the Minnesota Counties Intergovernmental Trust (MCIT) and/or legal counsel of the participating organizations, to ensure implementation can occur efficiently and with minimized risk. This step is critical if the plan proposes to share services and/or submit joint grant applications.

Plan Content

The plan must meet the requirements outlined in *One Watershed, One Plan – Plan Content Requirements Version 1.0*, adopted by the BWSR Board on March 23, 2016, or its successive document, available on the BWSR website: www.bwsr.state.mn.us/planning/1W1P/index.html. More specifically, the plan must have:

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- A thorough analysis of watershed issues, using available science and data, in the selection of priority resource concerns.
- Sufficient measurable goals to indicate an intended pace of progress for addressing the priority issues.
- A targeted and comprehensive implementation schedule, sufficient for meeting the identified goals.
- A thorough description of the programs and activities required to administer, coordinate, and implement the actions in the schedule; including work planning (i.e. shared services, collaborative grant-making, decision making as a watershed group and not separate entities) and evaluation.

BWSR has the following specific priority issues:

- **Conservation Easements** – The State’s [Re-Invest in Minnesota \(RIM\) Reserve easement program and the Conservation Reserve Enhancement Program \(CREP\)](#) in partnership with the United States Department of Agriculture (USDA) considers several site specific and landscape scale factors when funding applications. Though it is dependent on specific program terms, the State considers local prioritization of areas for easement enrollment. The watershed plan should take into account areas with a higher risk of contributing to surface and subsurface water degradation, such as highly erosive lands and wellhead protection areas that would benefit being placed under permanent vegetative cover.
- **Drainage** – The Watonwan River watershed has an abundance of surface and subsurface drainage infrastructure. The Chapter 103E drainage authorities within the watershed should be included as stakeholders in the plan development process. This inclusion should ensure that the [Chapter 103E](#) processes and proceedings as well as the extent and the limitations of drainage authority responsibility are adequately included in the final plan. Additionally, the planning partners are strongly encouraged to include projects and activities consistent with multipurpose drainage management criteria outlined in Minnesota Statutes §103E.011, Subd. 1a and §103E.015, Subd. 1.
- **Groundwater Quality and Quantity** – Work with gency partners and local communities and private citizens to outline any groundwater-related priority issues within the Watonwan River watershed. Take into account any Groundwater Management Areas, areas of groundwater concern, wellhead protection areas, and Drinking Water Supply Management Areas (DWSMAs) that have been identified. Address specific concerns about groundwater contamination and overuse that have been identified. Be sure to make use of existing groundwater data and publications. These include maps, data layers, the Department of Health’s [Groundwater Restoration and Protection Strategies \(GRAPS\)](#), and other publications available from the Minnesota Geological Survey (MGS), Department of Natural Resources (DNR), US Geological Survey (USGS), and others. Implementation actions to address these issues should be addressed in the watershed plan.
- **Invasive Species and Landscape Management** – Aquatic and terrestrial invasive species are becoming more prevalent in Minnesota. A cooperative approach across the watershed is recommended for invasive species, noxious weeds, and specially regulated plant management. Invasive species should be prioritized based on their risk to ecosystems, agriculture, recreation, and human health. Adaptive management strategies should be used to address invasive species and maintain ecological functions and services within the landscape. Helpful resources for invasive species in Minnesota can be found at the [Minnesota Invasive Species Advisory Council](#), the [Minnesota DNR](#), the [Minnesota Aquatic Invasive Species Research Center](#), and the [National Invasive Species Information Center](#).

- **Landscape Resiliency and Climate Adaption** – BWSR encourages the planning partners to consider the potential for more extreme weather events and their implications for the water and land use resources of the watershed. The meteorological record for the Watonwan River watershed shows increased frequency and severity of extreme weather events which has a direct effect on issues in local water planning. Adjustments involving conservation and fieldwork planning and implementation should be explored; for instance, the use of an updated precipitation frequency chart such as the [NOAA Atlas 14](#) when designing conservation projects. An additional source of information for use in the planning process is the [BWSR Landscape Resiliency Toolbox](#).
- **Local Controls** - Gaps or inconsistencies in between the partnership’s local ordinances, policies, or enforcement could affect the success of your plan’s implementation. Examples that should be explored during plan development include, but are not limited to: Buffer Law compliance process, feedlot inventories, redetermination of benefits, SSTS compliance inspection requirements (property transfer, variance, etc.), and shoreland regulations.
- **Manure and Nutrient Management** – The Watonwan River watershed is primarily agricultural. There is a prevalence of row crop production as well as numerous livestock operations. The watershed plan should take into account the importance of implementing proper manure management and nutrient management on private and public lands. A review of local and state requirements should be conducted during the planning process. Additional information on recommended rates, dates, and application for [manure](#) and [nutrients](#) can be found on the University of Minnesota Extension website, the [Minnesota Pollution Control Agency](#) website, and the [Minnesota Department of Agriculture](#) website.
- **Monitoring and Data Collection** – Data collection and monitoring activities necessary to support the targeted implementation schedule and to reasonably assess and evaluate plan progress are required in the planning process. The plan should explore any gaps in information needed to accomplish assessments. The data collection and monitoring needed to fill the gaps should be coordinated with the existing information. As part of the plan, devise methods that the planning partnership can follow to ensure adherence to the planned activities and that allow for reassessment of the plan as implementation occurs in the future.
- **The Nonpoint Priority Funding Plan (NPPF)** – The [NPPF](#) outlines a criteria-based process to prioritize Clean Water Fund investments. Planning partners intending to pursue Clean Water Fund dollars are strongly encouraged to consider the high-level state priorities, keys to implementation, and criteria for evaluating proposed activities in the NPPF.
- **Regional Priorities** – On a regional level, the Watonwan River watershed is part of the Greater Blue Earth River Basin (GBERB). A number of plans, reports, and studies have been developed for the GBERB. As the Watonwan River watershed planning moves forward, partners should be cognizant of the information and goals within these regional works and attempt to include them when possible.
- **Restoration and Protection** – Although surface water degradation is prevalent in the watershed and restoration is often the primary focus, there are areas that are barely impaired, nearly impaired, and unimpaired. Special focus should be paid to these areas for implementation of BMPs that will aid in the delisting and/or the continuing the un-impairment of these waters. This would also align with the high-level state priorities of the state’s NPPF.

- **Soil Health** – The majority of the landuse in the Watonwan River watershed is agriculture. The concept and the associated practices of soil health have the potential to positively change the interaction of agriculture and the natural system at the soil level. Common soil health practices include the use of reduced or no tillage, the use of cover crops, increased areas of continuous living cover, and extended crop rotations. Improving soil health can decrease soil erosion, increase water infiltration, provide nutrient scavenging, and increased soil organic matter. In addition, there seems to be an increased interest from landowners and operators about soil health. It is recommended that soil health be considered as a potential nonstructural BMP to be implemented in the watershed.
- **Surface Water Quality and Quantity** – Degraded surface water quality and issues with water quantity are a problem in the watershed. Many rivers, streams, and lakes are impaired due to nutrients, sediment, and/or bacteria. Surface waters in the Watonwan River watershed have also experienced damaging high flow and/or flood events. There are several causes for these issues including, but not limited to: altered hydrology, increased peak flows, runoff, and streambank/bluff/ravine erosion. BWSR believes it important that the watershed plan examine the causes of these surface water concerns and identify specific areas where implementation of specific BMPs could help decrease these issues.
- **Wastewater and Subsurface Septic Treatment System (SSTS) Management** – Proper wastewater and SSTS management and disposal is important to surface and groundwater quality and drinking water supplies. It is recommended that the plan evaluate the current and future effectiveness of management efforts within the watershed and conduct a comparative review of local ordinances.
- **Wetlands** – Protection and restoration of [wetlands](#) provides benefits for water quality, flood damage reduction, and habitat/wildlife. The plan should support continued implementation of the Wetland Conservation Act (WCA) and look for opportunities to improve coordination across jurisdictional boundaries. The plan should also identify high priority areas for wetland restoration and strategically target restoration projects to those areas. The [Restorable Wetland Prioritization Tool](#) is an example resource that can be used to help identify areas for wetland restoration. The state is also embarking on a wetland prioritization plan that will assist in guiding wetland mitigation. Wetland restoration, protection, and/or preservation priorities identified in your watershed plan may be eligible for inclusion in this statewide plan in the future. Other local, regional, and state inventories and information is also available.
- **Wildlife/Habitat** – The planning partners are encouraged to identify opportunities to benefit wildlife populations and habitat. Wildlife of concern should include, but not be limited to, Blanding turtles, fisheries, fowl, and pollinators. The partnership is encouraged to work with a wide variety of partners and utilize a wide variety of plans, studies, and information to increase habitat acres and/or quality. Examples include: The [Minnesota Prairie Conservation Plan](#), the [BWSR Pollinator Initiative](#), and [Minnesota’s Wildlife Action Plan 2015-2025](#).
- **WRAPS** – The [Watonwan River Watershed Restoration and Protection Strategies \(WRAPS\)](#) is planned for completion in 2018. This information should be reviewed and incorporated into watershed planning efforts. The current draft includes a list the primary stressors and sources of pollution; therefore, implementation actions to address the stressors and pollutant sources should be addressed in the plan.

We commend the watershed partners for their participation in the planning effort. BWSR looks forward to working with you through the rest of the plan development process. If you have any questions, please feel free to contact me [Telephone 507-344-2825. Email Jill.Sackett.Eberhart@state.mn.us].

Sincerely,



Jill Sackett Eberhart
Board Conservationist

cc: Watonwan Watershed Planning Partnership Steering Team (via email)
Ed Lenz, BWSR (via email)
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