

# Watowan Comprehensive Watershed Management Plan Blue Earth County Review

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*Submitted by Julie Conrad, Land Use and Natural Resources Planner, Blue Earth County Property and Environmental Resources Department.*

## Wildlife habitat

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BWSR One Watershed One Plan Guidance – Plan Content Requirements.

In the event that conflicts exist in the interpretation of issues and/or selection of priority issues, consider whether the conflict can be addressed by defining both watershed-wide priorities as well as individual priorities of the participating local governments.

Plans that do not demonstrate a thorough analysis of issues, and that do not use available science and data, will not be approved. Please consult the *One Watershed, One Plan Guidebook* for more information on this requirement.

Blue Earth County does not find the Watowan 1W1P to be consistent with Blue Earth County priorities or the watershed priorities identified through the Watowan 1W1P public input process. The greatest conflict is with wildlife habitat and wetland priorities. Blue Earth County staff has consistently from the beginning of the planning process described the value and importance of wildlife habitat and wetland priorities. Blue Earth County staff review comments of HEI draft plan sections as well as the April 2020 version have clearly expressed disapproval of the lack of relevant wildlife habitat narrative and mapping that relate to the Tier 1 plan priorities.

Priority issues in Tier 1 and 2 were confirmed by the Policy Committee. Even though the list of priority issues was approved by the Policy Committee, in the final May 12, 2020, 60-day review draft, at least one of the priorities in Tier 1 was changed from all prior versions of the plan that were reviewed by the Steering Team and Advisory Committee. Specifically, in the final 60-day review version, “protection of species listed in Table 3.6” was added to Tier 1 priorities. Table 3.6 is list of “rare species and features” described and shown on pages 3-18 through 3-22. “Protection and restoration of declining and at-risk terrestrial species” is a Tier 2 priority as approved by the Policy Committee.

May 12, 2020 Draft	All previous versions
<b>Terrestrial habitat HR.2.1 page 4-4</b> Terrestrial habitat fragmentation and loss, <b>and the protection of species listed in Table 3.6.</b>  <i>Table 3.6. Watowan River Watershed documented rare species and features. Pages 3-17 to 3-20.</i>	<b>Terrestrial habitat HR.2.1 page 4-4</b> Terrestrial habitat fragmentation and loss.

Did the Policy Committee authorize changes in Tier 1 and Tier 2 priorities? If the Policy Committee did not authorize this change in priorities, why did HEI revise the plan to elevate Tier 2 priorities to Tier 1 without review and approval from any of the committees working in the interest of the Watonwan Watershed Planning Partnership?

The Watonwan 1W1P places significantly greater emphasis on endangered and threatened species than on more commonly known wildlife species. While wildlife species with significant need are important, more common wildlife species are equally important and have greater local public value. Public values in the Watonwan 1W1P were determined using results from a kick-off meeting and an online survey. The results were used to identify the list of Tier 1 and Tier 2 priorities.

Rare features and declining and at-risk species are a Tier 2 priority, but the Watonwan 1W1P devotes six of 21 pages (21%) of the Section 3 Land and Water Resources Narrative to rare natural features, including a four-page list of 61 rare species and features in Table 3.6. There is one sentence in the Land and Water Resource Narrative section about common wildlife species and habitat. In a paragraph describing aquatic wildlife habitat copied from the WRAPS, the plan states that “Other areas not identified in the WRAPS, specifically to bolster waterfowl production, include WMAs, WPAs, other wetlands, and some easements.” There are more terrestrial habitats in the watershed than these features waterfowl, wetlands and easements. The plan goes on, “See associated resource concern maps in Section 4 for more information, which includes data from the Minnesota Wildlife Action Plan (DNR, 2015).”

Despite repeated requests by Blue Earth County staff to include WPAs, there are two WPAs missing from the plan contents and maps. See the following:

- [Watonwan WPA](#)
  - [Lincoln WPA](#)
- [https://www.fws.gov/refuge/Minnesota\\_Valley\\_WMD/map.html](https://www.fws.gov/refuge/Minnesota_Valley_WMD/map.html)

Analysis of wildlife habitat and wetlands and available data are missing from the Watonwan 1W1P. Development of the Watonwan 1W1P did not use available science and data to analyze or provide an analysis of wildlife habitat other than copying MnDNR information about rare, threatened or declining species. At one of the last Steering Team meetings Blue Earth County staff concerns and comments about the lack of attention to wildlife habitat were discussed. It was our understanding that wildlife population scores from the Minnesota Wildlife action Plan, Appendix E, Figure E6, on page E-10 better shows wildlife populations instead of only species of concern, and would be incorporated in the plan and in the Planning Region Overview maps on pages 6-8 through 6-37. Instead HEI used the MnDNR Wildlife Action Plan network ranks which have been consistently of concern because the Minnesota Wildlife Action Plan is MnDNR plan for addressing These are Tier 2 priorities.

BWSR guidance suggests the Land and Water Resource Narrative should be 2-3 pages using typical and available information to inform the planning process, support actions in the plan and allow a shared

understanding of watershed characteristic. Land and water information critical to supporting the priorities and actions in the plan may need to be more thoroughly discussed in other sections of the plan.

## Watonwan Watershed Planning Partnership Public Input

The results of the Watonwan watershed online survey and public kick off meeting clearly demonstrate support of wildlife habitat and wetland priorities as well as groundwater and drinking water.

### Online Survey

There were 77 responses to the online survey. Survey respondents were asked to indicate their level of concern with subsets of resource concerns, choosing “very important”, “somewhat important” or “not important”.

The online survey results showed 61 of 77 respondents think wildlife and wildlife habitat is “very important.” This was second to groundwater and drinking water where 72 of 77 respondents thought groundwater and drinking water are “very important. (see the online survey results which were mentioned but not included in the Watonwan 1W1P.

### Kick Off Meeting

An estimated 100 people attended the kick-off meeting. Participants were given 5 colored dots and asked to place the dots next to issues of concern to them.

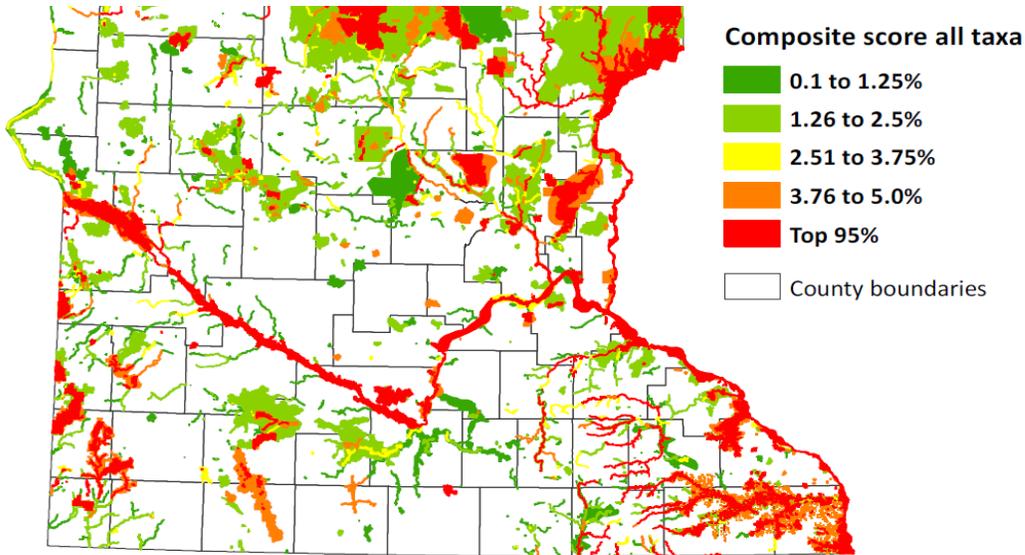
The resource concern receiving the most dots was Terrestrial Habitat, with 74. Of the 74 dots, three were for "Protection and restoration of declining and at-risk terrestrial species", and another three were "The need for continued protection, restoration and enhancement of high quality or sensitive natural resource areas." The resource concern with the second highest number of dots was Wetlands with 65. Third was Groundwater Quality with 63 dots. Also, of note, of the 38 colored dots for the Ag Drainage resource concern, 26 were for preserving and restoring wetlands for watershed storage. A summary table is shown on the following page based on the number of dots/votes shown in Appendix J.

Kick off Meeting - Summary of Priority Issues Votes with Dots			
	Resource Concern	Number of dots	Notes on Issues
SW1	Drainage	38	26 dots for the need for increased water storage on the landscape by use of preserving and restoring wetland areas."
SW2	Lakes	26	
SW3	Rivers and Streams	42	
SW4	<b>Wetlands</b>	<b>65</b>	
SW5	Flood	20	
GW1	<b>Groundwater Quality</b>	<b>63</b>	
GW2	Groundwater Quantity	24	
FW1	Aquatic Habitat	23	
FW2	<b>Terrestrial Habitat</b>	<b>74</b>	3 dots for "Protection and restoration of declining and at-risk terrestrial species." high quality natural resources"
			3 dots for "The need for continued protection, restoration and enhancement of high quality or sensitive natural resource areas."
MCF	Planning and Coordination	31	
LDLS1	Urban Landscape	26	
LDLS2	Rural Landscape	34	
LDLS3	Shoreland and riparian areas	19	

Source: Appendix J

## Minnesota Wildlife Action Plan

<https://files.dnr.state.mn.us/assistance/nrplanning/bigpicture/mnwap/wildlife-action-plan-2015-2025.pdf>



**Figure E6.** Composite population scores for all taxa combined. Normalized scores of all taxa were combined with equal weighting among each taxon. The color scale represents the distribution of the scores among all composited polygons ranging from lowest 1.25 percent of composite scores (green) to the top 95 percent of composite scores (red). The top 95 percent score breakpoint represents what was chosen for inclusion in the network, as this generally represents areas with at least one “excellent” SGCN population or at least two “good” SGCN populations. The area in northeastern Minnesota delineating a portion of Lake Superior represents Minnesota’s managed area of the lake.

## Appendix E

Minnesota’s Wildlife Action Plan 2015-2025 **E10**

# Groundwater and drinking water

**Page 3-14** Ranney wells. The description of the City of Mankato Ranney wells on Page 3-14 is incorrect.

The Watonwan 1W1P states

“The Watonwan River feeds into the Blue Earth River, which is a source of drinking water for the City of Mankato. Mankato has two shallow aquifer Ranney wells that pull water from the Blue Earth and Minnesota Rivers. Portions of the spill management area buffer for the city of Mankato are within the Watonwan Watershed. Nitrate concentrations in Mankato Ranney Wells and in the City of Darfur has reached levels of concern. These areas will be of focus to install nitrogen BMPs due to the mutual benefits of protecting drinking water supplies.”

This statement should be clarified because it suggests that these wells take water from the Blue Earth and Minnesota rivers. The Mankato Ranney wells **do not** “pull water from the Blue Earth River or

Minnesota Rivers.” This type of misinformation about Mankato’s Ranney wells has been an ongoing problem for decades. A better description of the Ranney wells source water is in the Blue Earth County Water Management as prepared with assistance of the City of Mankato water supply managers in 2017.

#### “Shallow Wells – Surficial Sands Aquifer

The City operates two shallow wells located in surficial sands aquifers near the Blue Earth and Minnesota River. The two shallow wells provide 61% of the total water volume for the City. These unique wells are called Ranney® collector wells. Ranney® wells are not surface water wells; however, the Blue Earth and Minnesota Rivers do influence the shallow aquifers below the rivers and their banks.”

**Page 5-23 Arsenic.** How does the Watonwan watershed plan to achieve this measurable goal?

Reduce the number of drinking water wells that have elevated levels of arsenic and exceed the Safe Drinking Water Act standard of 10 µg/L by 25%.

Arsenic is a naturally occurring contaminant. Unlike wells with high nitrate, drilling a new well to a different depth or with different well casing will not necessarily result in lower arsenic in the well. Private well owners can procure expensive in-home treatment systems. But that won’t lower arsenic in the well. And those systems must be maintained. This is a public health goal.

## Section 3 and 4

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The Watonwan 1W1P appears to rely nearly exclusively on the MnDNR Minnesota Wildlife Action Plan (2015-2025), and the MnDNR Minnesota Prairie Conservation Plan. The 1W1P states that “these areas are hot spots in terms of conservation potential” and areas identified in the Minnesota Wildlife Action Plan and the declining species in Table 3.6 in Section 3, pages 3-19 to 3-22 should be priority areas.

**The Minnesota Wildlife Action Plan** is a statewide plan that focuses on species that are rare, declining or vulnerable to decline, referred to as Species in Greatest Conservation Need (SGCN).

**The Minnesota Prairie Conservation Plan** is a plan to create a connected landscape from Canada to Iowa, and as stated on page 44, it is not intended to identify where conservation activities should be located within major watersheds, as these decisions depend on local circumstances and opportunities and agreements with landowners. The Minnesota Prairie Conservation Plan does recommend that “To ensure conservation representation in all parts of the state, a minimum of 10% of the terrestrial lands in each major watershed outside the core areas, corridors and strategic habitat complexes should be set aside for soil, water and wildlife conservation purposes.”

If HEI was going to utilize the concepts in the Minnesota Prairie Conservation Plan, why wasn’t the 10% terrestrial lands recommended? Why wasn’t the Watonwan 1W1P consistent with recommendations in the Minnesota Prairie Conservation Plan? Why didn’t HEI use the criteria for choosing small conservation projects. See the following related excerpts from the Minnesota Prairie Conservation Plan.

**Minnesota Prairie Conservation Plan** <https://www.dnr.state.mn.us/prairieplan/index.html>

The Minnesota Prairie Conservation Plan is a plan to create a connected landscape from Canada to Iowa. The plan is not intended to identify priorities for meeting goals in watershed plans, as small conservation projects should be made considering local circumstances, opportunities and landowners. As stated on page 44 of the Minnesota Conservation Plan:

<https://www.dnr.state.mn.us/prairieplan/index.html>

### **Small Conservation Projects**

This plan does not attempt to identify particular places where conservation activities should be located to meet the perennial vegetation goals within major watersheds. These choices will be made over time and depend on local circumstances, opportunities and agreements with landowners.

However, we do suggest priorities to guide the selection of projects. The permanent protection projects chosen for local conservation efforts in the agricultural matrix should be in areas with the highest probability of building wetland and grassland habitat complexes over time; protecting rare communities, including forests, savannas, lakes and streams; and achieving the greatest possible improvement in water quality and fisheries habitat. Much of this voluntary, private lands conservation work will be done by Soil and Water Conservation Districts, Watershed Districts, and other local units of government working with state and federal agencies. Protection may use funds from federal farm programs and easement programs such as RIM/WRE and CREP (Table 7) and state funds such as the Clean Water Legacy.

Some criteria that could be employed to select projects are listed here in unranked order:

1. Close to native prairie
2. Designated as an Area of High or Outstanding Biodiversity Significance (according to Minnesota Biological Survey)
3. Contains restorable wetlands
4. Contains priority basins or basins with portfolio lakes
5. Close to high-priority shallow lakes
6. Adjacent to high-priority warm-water streams
7. Adjacent to other watercourse or water body
8. Lies within a Grassland Bird Conservation Area (HAPET) or Important Bird Area (Audubon)
9. Contains known populations of Species of Greatest Conservation Need
10. Borders public conservation land
11. Does not contain highly productive agricultural soils

### **The Minnesota Prairie Plan Goals for the Agricultural Matrix Page 39**

To ensure conservation representation in all parts of the state, a minimum of 10% of the terrestrial lands in each major watershed outside the core areas, corridors and strategic habitat complexes should be set aside for soil, water and wildlife conservation purposes. As many private grasslands and wetlands have been and will continue to be managed well as working pasture lands, a protection goal of only 5%, half the habitat goal, is needed to maintain the desired level of herbaceous perennial vegetation in each major watershed. The 5% should be

protected either in conservation areas such as Wildlife Management Areas or through conservation easements or contracts on private lands. These acres do not need to be left fallow but can be used for managed grazing or haying.

The 10% perennial habitat goal should be viewed as a starting point. Local decision makers, with research-validated support tools, need to determine the percentage of perennial cover that is needed in any given watershed to achieve the desired environmental results. The justification for maintaining at least 10% of each watershed in grassland, wetland or other appropriate perennial cover is based on recent scientific studies that suggest only 10% of a small watershed needs to be in perennial prairie strips to reduce sediment loss by 90–95% (Jarchow & Liebman, 2010).

It is essential to conserve land in the correct areas of the watershed. Projects must be located strategically to achieve the desired positive environmental impacts (Harris, Iyer, & Miller, 2014).

### *Blue Earth County Greenprint and Wetland priorities*

Blue Earth County used a landscape planning approach to develop science based, replicable methods for identifying and prioritizing wildlife habitat, wetlands, potentially restorable wetlands and sensitive features in a years long process that utilized BWSR grant funds for part of the process. A technical and stakeholder advisory committee that included local officials, citizens and representatives of the MnDNR, USFWS, BWSR, MPCA, Minnesota Pheasants Blue Earth County Chapter. The result of this effort is a science-based and replicable landscape planning approach that produced the Greenprint and priority areas to restore wetland functions with the greatest local public value as indicated in a public input process. It is worth noting that the criteria recommended by the MnDNR **Minnesota Prairie Conservation Plan** regarding small conservation projects are the same type of criteria incorporated in numerous other state and federal plans that Blue Earth County used for the Greenprint and wetland priorities.

- MnDNR Minnesota Working Lands Initiative
- Minnesota Pheasants Summit Action Plan
- DNR Duck Recovery Plan
- US Fish and Wildlife Service Minnesota Valley Waterfowl Management District – Small Wetlands Acquisition Program
- Minnesota Biological Survey
- Minnesota Audubon Society Important Bird Areas Upper Minnesota Valley and Blueprint for Minnesota Prairie Parkland Region
- MnDNR regional wildlife plans

Blue Earth County identified and prioritized existing and potential conservation areas in the Greenprint and potentially restorable wetlands in a years-long planning process. State and federal plans and priorities were used such as the MnDNR Minnesota Working Lands Initiative, Minnesota Pheasants Summit Action Plan, the DNR Duck Recovery Plan, the US Fish and Wildlife Service Minnesota Valley Waterfowl Management District – Small Wetlands Acquisition Program, Minnesota Biological Survey,

Minnesota Audubon Society Important Bird Areas Upper Minnesota Valley and Blueprint for Minnesota Prairie Parkland Region and MnDNR regional wildlife plans.

## Section 4

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### Maps and GIS.

The plan states that “Maps were developed for resource concerns and issues identified within the Issues Table when Geographic Information System (GIS) data was available.” HEI relied only on GIS data available from the State of Minnesota. Lack of data or data gaps related to Tier 1 watershed priority issues were not described in the plan.

Blue Earth County has GIS data available for groundwater recharge priority areas, wetlands, potentially restorable wetlands, wildlife and conservation. These were offered for the Watonwan 1W1P, but HEI told Blue Earth County staff they would not use this data because it was not available for the entire watershed.

Pages 4-14, Figure 4-10, potentially restorable wetlands. While there are many restorable wetlands based on DU, but Blue Earth County has prioritized restorable basins to provide important wetland functions with the greatest local public value. These public values are the same in Blue Earth County and the Watonwan watershed.

Figure 4-8 This map places emphasis on native plants, rare plants and rare animals, and the MnDNR Minnesota Wildlife Action Plan that focuses on “species in greatest conservation need.” In the Watonwan watershed, the public and the Policy Committee identified rare species as lower, Tier 2 priorities. There are no maps or analysis in this plan that describe wildlife habitat. This is a data gap or a data deficiency that should have been described in this plan.

## Section 5

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### Wetlands.

On page 5-16 the plan states that “This measurable goal is centered on preserving and restoring existing quality wetland areas and restoring previously existing wetlands.” While there was opposition from the farmers on the Advisory Committee who didn’t think there should be any new wetlands, this is inconsistent with public input from many more individuals who participated in the public kick off meeting and completed the online survey. It is also inconsistent with the voluntary approach to conservation which is assumed in all the County and SWCD partners in the Watonwan River watershed.

Also refer to Blue Earth County's comments about wildlife habitat.

## Section 6

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The Planning Region Overview habitat priorities for wildlife habitat are not consistent with the Watonwan 1W1P Tier 1 priorities. Instead the wildlife priorities stated in each Planning Region Overview are those identified by the MnDNR Minnesota Wildlife Action Network which focuses on "species in greatest conservation need" or rare, threatened, endangered and declining wildlife species. Protecting these species are lower, Tier 2 priorities as determined with public input and as approved by the Watonwan Watershed Planning Partnership Policy Committee.

We recommend that Blue Earth County priorities and wildlife and habitat priorities from all the partners' comprehensive and local water plans be included in the Watonwan 1W1P.