

m DEPARTMENT OF
NATURAL RESOURCES

Division of Ecological & Water Resources
21371 Highway 15 South
New Ulm, MN 56073

July 10, 2020

David Haler
Watonwan County Land Management/SWCD
108 Eighth Street, Suite #2
St. James, MN 56081

Jill Eberhart
Board Conservationist
11 Civic Center Plaza, Suite #300
Mankato, MN 56001

RE: Draft Watonwan River Comprehensive Watershed Management Plan

Dear Mr. Haler and Ms. Sackett-Eberhart,

The Minnesota Department of Natural Resources (DNR) appreciates the opportunity to provide these comments for the Draft Comprehensive Watershed Management Plan for the Watonwan River Watershed dated May 12, 2020. We appreciate the collaborative efforts of those who participated and the public engagement in development of this plan. The DNR is committed to provide the necessary science to protect and improve the Watonwan River Watershed. We will continue to support the implementation of this plan.

DNR staff appreciate the opportunity to contribute to the development of this plan. A high level of coordination between plan participants and partners, including state agencies and local government units is critical to the success of this plan. Many of the concerns and priority resources issues included in our September 27, 2018, letter were included in the draft plan. Water issues are ripe with conflict. It is important that the plan align efforts within the watershed.

Our comments that follow are arranged in sync with the priorities in our letter submitted in September 2018. If you have any questions, please do not hesitate to contact DNR Area Hydrologist Katie Wigen at 507-389-8807.

Sincerely,



Scott W. Roemhildt
DNR South Region Director

Ec: Katie Wigen, MN DNR, Area Hydrologist
Todd Kolander, MN DNR, EWR District Manager
Robert Collett, MN DNR, EWR Regional Manager
Barbara Weisman, MN DNR, Clean Water Coordinator
Brooke Hacker, MN DNR, Clean Water Specialist
Jill Sackett-Eberhart, BWSR, Board Conservationist
Shaina Keseley, BWSR, Clean Water Specialist
Paul Davis, MPCA, Project Manager
Amanda Strommer, MDH, Planner

DNR General Plan Comments:

- **Planning Region Implementation Maps, starting on page 126:** The implementation maps do not seamlessly flow together. For example, when a sub watershed is introduced, the planning region priorities, wildlife and drinking water layers, and feasible practices are geographically mapped out. However, the feasible practices do not appear to align with locations for targeting implementation based on the best, most cost-effective management practices. DNR suggest the targeted practices map should be a subset of the feasible practices map.
- **Table 6-5 Capital Improvements Program Implementation, Page 158, Action #CI-5 and #CI-6:** In #CI-5, consider rephrasing to encompass all types of flood practices, rather than specifically large scale retentions and impoundments. In #CI-6, consider rephrasing to include floodplain culverts: *“Address failing culverts and fish barriers through engagement with county public works, townships and private landowners to accurately size bridges and culverts and where applicable, add floodplain culverts to allow for longitudinal connectivity and reduced road damage and maintenance.*

Hydrologic Condition

Adjust overall water volume and timing through water management and storage practices to improve the health and stability of the Watonwan Watershed.

The Watonwan River watershed has recorded continued increased annual discharge volumes of surface water flow. Finding water storage in headwater areas to benefit downstream areas with reductions in total flow and peak flows should be prioritized. Drainage repairs and improvements and other activities within the watershed may be in direct conflict as they often resulted in increased flow as shown in their own calculations. It is great to see this plan includes goals and implementation activities to work with drainage authorities on drainage management, culvert inventory, and floodplain connectivity, as well as using Natural Channel Design. Opportunities that provide multiple benefits are more important than ever. It is important to make improvements to hydrology, not simply off-set other forces. Both DNR Clean water specialists and area hydrologist can provide technical assistance with future implementation on priority stream channel restoration sites.

Natural Channel Design should be a priority restoration technique when there is adequate time for assessment and design. The outcome will have greater public benefit when the site involves public infrastructure or recreational uses, the site supports key natural resources or species, the site targets stream habitat improvement needs or specifically addresses WRAPS impairments for sediment, stream stability or habitat. Natural Channel Design techniques limits upstream or downstream impacts while improving stream stability and ecological function. Natural Channel Design incorporates site-specific dimensions for stable channel pattern, slope, and floodplain connectivity as key part of the restoration design.

- **Connectivity (SW 3.3) Page 9, 89:** We are pleased that both lateral connectivity for floodplain access and longitudinal connectivity for aquatic organism passage are identified as a Tier One Priority issue. To avoid confusion, the SW 3.3 Issue Statement *Loss of lateral and longitudinal floodplain access and connectivity* may be better phrased as ***Loss of lateral connectivity for floodplain access and longitudinal connectivity for aquatic organism passage.***

- DNR can assist with a culvert and crossing inventory, either by gathering survey data, offering training to complete inventory, and/or incorporating data into the culvert inventory app database. For additional information, please see the DNR Culvert Inventory Application Suite website: https://www.dnr.state.mn.us/watersheds/culvert_inventory/index.html
- **Figure 3-11: Surface water and ditches in the WRW, page 39:** While this figure shows surface waters, it can be misleading that the County Drainage Systems shown does not show underground public tile. Please consider adding the entire public drainage systems to the map, adding a separate map of public tile drainage, or including an explanation such as *“A significant portion of the County Drainage Systems resides in underground tile and is not represented on this map.”*
- **Stormwater Systems, Drainage Systems, and Control Structures, (SW 3.8) Page 38:** The ‘Wood Lake Diversion’ listed in the plan is no longer in place. The dam and water diversion structure on the North Fork Watonwan was removed in 2016-2017 and replaced with a rock riffle. Please update the plan and map (**Figure 4-8**) accordingly. When considering barriers to fish passage, please add the culvert on the Watonwan River in Nelson Township (township road 67) as a current fish passage barrier.
- **Table 6-5 Capital Improvements Program Implementation, Page 158, Action #CI-5 and #CI-6:** In #CI-5, consider rephrasing to encompass all types of flood practices, rather than specifically large scale retentions and impoundments. In #CI-6, consider rephrasing to include floodplain culverts: *“Address failing culverts and fish barriers through engagement with county public works, townships and private landowners to accurately size bridges and culverts and where applicable, add floodplain culverts to allow for connectivity and reduced road damage and maintenance.”*

Water Quality

Reduce nutrient and sediment loading to improve the biology and health of the watershed.

We are pleased to see lakes in the watershed identified for protection or restoration in the draft plan. Working to address the water quality goals established in the Watershed Restoration and Protection Strategies (WRAPS) report and TMDL studies to improve habitat, prevent future impairments, and promote watershed health and resilience to invasive species is a priority.

- **Resource Concern: Aquatic Habitat (HR 1.3):** Regarding invasive species, the species listed read as though they all have been found in the watershed; however, Spiny Water Fleas have not yet been recorded in the Watonwan River Watershed. Suggest rephrasing to note that spiny water flea has not been found in the watershed yet.
- **Table 6-5 Capital Improvements Program Implementation, CI-1, Page 158:** The first goal-related action in the Capital Improvements table is to *“Support lake associations and other landowners in lake-based decision making (e.g. alum, drawdowns, fish management) for lakes with high internal phosphorus loading.”* To this point, internal loading was not addressed in this plan. Consider rewording action items to coordinate with lake associations on lake management plans regarding internal loading. Additional work will need to go into identifying both internal and external stressors, monitoring needs, zoning, and improved in-lake and lake-watershed management.

Outdoor Recreation and Natural Heritage

Promote and increase opportunities for outdoor recreation. Protect and restore perennial vegetation.

The Watonwan River Watershed offers varied opportunities for outdoor recreation. Land use conversion pressure remains a threat to already fragmented ecosystems; land use ordinances should protect large tracts of floodplain and other natural areas to prevent fragmentation. Additionally, DNR would like to further expand opportunities to promote state and local programs, such as the Walk in Access (WIA) program, to increase outdoor recreation activities while maintaining private property ownership.

- **Table 6-6 Research and Monitoring Program Implementation, RM-9, Page 160:** DNR can assist with prioritization and mapping of areas adjacent to existing public lands that contain unique habitat features.
- **Table 6-6 Research and Monitoring Program Implementation, RM-10, Page 160:** Please change the wording *shoreland maintenance* to ***shoreland ordinance***.

###