



BLUE EARTH COUNTY

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July 20, 2020

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Sent via email

The purpose of this letter is to provide review comments on the Watonwan Comprehensive Watershed Management Plan (1W1P). It is our understanding that the Watonwan Watershed Planning Partnership will hold a public hearing on the Watonwan 1W1P in the coming months, and that in accordance with Minnesota Statute 103B.801, the purpose of a 1W1P is to serve as a substitute for local water management plans.

Blue Earth County's Local Water Management Plan was developed with extensive stakeholder and public input, was approved by the BWSR Board, and was adopted by the County Board of Commissioners on December 19, 2017. A water plan task force and a technical team of advisors from the MnDNR, BWSR, MPCA, USFWS, conservation organizations, local officials, and citizens were involved in a years-long process to develop science-based, replicable methods used to identify priority areas and subwatersheds for conservation, wetland protection and restoration, and groundwater and drinking water protection. Goals and strategies were then developed for these priority areas.

The Watonwan 1W1P does not align with or support some of the Blue Earth County Water Management Plan goals and strategies, and the County's priority areas were not included in the plan. We expected the 1W1P to be inclusive and build on priorities established through local and state planning efforts.

This letter focuses on wildlife habitat and wetlands, groundwater, and plan administration and coordination. County staff will provide a more detailed review of the Watonwan 1W1P and supporting information.

Wildlife Habitat and Wetlands

There are two Wildlife Production Areas (WPAs) in Blue Earth County that are missing from the plan that should be added to the Watonwan 1W1P maps and lists of wildlife areas (website addresses provided for additional information). For more general information about the county's WPA's, see https://www.fws.gov/refuge/Minnesota_Valley_WMD/map.html.

Historic Courthouse

204 S. Fifth St.
 PO Box 8608
 Mankato, MN 56002
Administration
 TEL: 507-304-4150
 FAX: 507-304-4344

Extension
 TEL: 507-304-4325
 FAX: 507-304-4059

Finance
 TEL: 507-304-4182
 FAX: 507-304-4077

Physical Plant
 TEL: 507-304-4249

Taxpayer Services
 PO Box 3567
 TEL: 507-304-4251
 FAX: 507-304-4075

Government Center

410 S. Fifth St.
 Mankato, MN 56001

Human Services
 PO Box 3526
 TEL: 507-304-4319
 FAX: 507-304-4379

Environmental Services
 PO Box 3566
 TEL: 507-304-4381
 FAX: 507-304-4431

**Taxpayer Services/
License Center**
 PO Box 3524
 TEL: 507-304-4340
 FAX: 507-304-4396

Veterans Services
 PO Box 8608
 TEL: 507-304-4246
 FAX: 507-304-4225

Information Technology
 PO Box 8608
 TEL: 507-304-4204
 FAX: 507-304-4355

Public Works

35 Map Dr.
 PO Box 3083
 Mankato, MN 56002
 TEL: 507-304-4025
 FAX: 507-304-4049

Justice Center

401 Carver Road
 PO Box 8608
 Mankato, MN 56002

Sheriff's Office
 PO Box 228
 TEL: 507-304-4800
 FAX: 507-304-4818

County Attorney
 PO Box 3129
 TEL: 507-304-4600
 FAX: 507-304-4620

Probation
 PO Box 3543
 TEL: 507-304-4750
 FAX: 507-304-4710

Library

100 E. Main St.
 Mankato, MN 56001
 TEL: 507-304-4001
 FAX: 507-304-4009
 www.beclibrary.org
 TDD: 507-304-4399

- Watonwan WPA (<https://www.fws.gov/uploadedFiles/Watonwan%2010-06-11compressed.pdf>)
- Lincoln WPA (https://www.fws.gov/uploadedFiles/Lincoln_10-06-11compressed.pdf)

Blue Earth County wildlife and wetland protection and restoration goals, strategies, priority areas, and functional classifications should be included in this plan as shown in the County's Greenprint and wetlands sections in the Water Management Plan. Refer to these pages in the County's water plan.

- Wetlands: pages 75-77, 85-98, and 251-275
- Greenprint: pages 78 – 84 (map on page 79)

We recommend that all partners' wildlife habitat and wetland priority areas be included in this plan in addition to other sources. To display existing wildlife habitat, we recommend using data shown in Figure E6 of Minnesota's Wildlife Action Plan Appendix E, page E10, as was suggested by County staff to the Watonwan 1W1P Steering Team.

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.

Local wildlife and wildlife habitat priorities were identified in the Watonwan 1W1P kick-off meeting and the online survey results. At the public kickoff meeting, terrestrial habitat received significantly more priority marks compared to all other resource concerns as shown in Appendix J. The online survey results showed 61 of 77 respondents think wildlife and wildlife habitat is "very important" which was followed by 72 of 77 respondents who think groundwater and drinking water are "very important. The results of the public input process placed "terrestrial habitat fragmentation and loss" as a Tier 1 Priority Issue and "protection and restoration of declining and at-risk terrestrial species" in Tier 2 as described on page 1-4 and 1-5.

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. 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.

Blue Earth County identified and prioritized existing and potential conservation areas in the Greenprint and potentially restorable wetlands in a years-long planning process. 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. A technical and stakeholder advisory committee that included local officials, citizens and representatives of the MnDNR, USFWS, BWSR, MPCA, and Minnesota Pheasants Blue Earth County Chapter. 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.

Groundwater Recharge

Groundwater protection and recharge is a high priority. The Watonwan 1W1P should include groundwater recharge priority areas. Groundwater recharge of buried sands aquifers is described on page 50 in the Blue Earth County Water Management Plan. The accompanying map on pages 50 and 87 was developed using a compilation of pollution sensitivity of buried sands aquifers maps on pages 42-47 in the Geologic Atlas of Blue Earth County, Minnesota, Part B.

Plan Administration and Coordination

It appears there is a considerable amount of decision making needed to complete this section of the plan before implementation. The Blue Earth County Board of Commissioners adopted a resolution to support the Watonwan Watershed Planning Partnership working with the GBERBA and updating the GBERBA joint powers agreement to provide reporting and other functions for the Watonwan 1W1P. We request an update on the progress and the timeline with respect to the public hearing dates and submitting the plan to BWSR.

The partnership assessments, five-year evaluations, and enhanced reporting to the partners and the public will help support continued watershed cooperation among the partners during the implementation phase. Blue Earth County supports a plan amendment process that involves all planning partners.

We look forward to seeing the Watonwan Comprehensive Watershed Management Plan (1W1P) completed and approved by the Board of Water and Soil Resources and beginning the next phase of implementation and continued cooperation in the watershed.

Please contact the County staff member for the Watonwan 1W1P, Julie Conrad, with any questions or to discuss further. She may be reached at 507-304-4386 or Julie.Conrad@blueearthcountymn.gov.

Sincerely,



Michael Stalberger
Director
Property and Environmental Resources
Michael.Stalberger@blueearthcountymn.gov
507-304-4257

cc: Blue Earth County Commissioner Will Purvis
Blue Earth County Administrator Bob Meyer