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July 9, 2021

Des Moines River One Watershed, One Plan Partnership  
C/O Sarah Soderholm, Murray County  
2500 28<sup>th</sup> Street PO Box 57  
Slayton, MN 56172

**Re: Response to request for priority issues and plan expectations (One Watershed, One Plan)**

Dear Sarah,

Thank you for the opportunity to provide priority issues and plan expectations for the development of the Des Moines River Comprehensive Watershed Management Plan (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 \(Version 2.0\)](#), adopted by the BWSR Board on March 28, 2018. 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 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 \(Version 2.1\)](#), adopted by the BWSR Board on August 29, 2019. More specifically, the plan must have:

- A thorough analysis of issues, using available science and data, in the selection of priority resource concerns.

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- 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:**

- **Surface and Groundwater Quality** – BWSR believes degraded water quality, both surface and groundwater, are significant issues in the watershed. The plan should examine current efforts to address these issues, and examine listed impairments and their locations, as strategies are developed to improve both surface and groundwater quality. BWSR advocates for efforts that will focus on reducing pollutant sources before they reach water resources as a key component of an overall strategy.
- **Altered Hydrology/Flooding/Water Quantity** – The hydrologic conditions of the Des Moines River watershed and lake sheds in this planning area have changed over time. In recent decades more precipitation, more runoff, and more runoff per unit of precipitation has been observed. BWSR believes the watershed plan should examine these causes and identify specific areas within the watershed where implementation of BMPs could help contribute to the reduction of peak flows, frequency of flooding events, and streambank/riparian erosion and sedimentation. Significant artificial drainage that has occurred in the watershed, primarily for more productive agricultural land and infrastructure; this should be examined for impacts to increased peak flows and flooding as well as opportunities for wetland restorations [and water storage](#) in targeted areas as one component. These hydrologic changes as well as others have contributed to instability of natural and artificial watercourses, degradation of wetland habitats, loss of agricultural productivity, and increased the risk of flood damages. Recognizing altered hydrology as a priority issue in the plan will help ensure that a driving factor behind many related issues is directly addressed.
- **Drainage** - The drainage authorities within the planning area 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 criteria outlined in Minnesota Statutes §103E.011, Subd. 5 and §103E.015. As the 1W1P plan is formulated, BWSR suggests the following:
  - Chapter 103E drainage authorities (who are also water planning authorities) be fully engaged from the early stages of the planning process. Use Section 103E.015 CONSIDERATIONS BEFORE DRAINAGE WORK IS DONE and other provisions of drainage law identified below to capture both the extent and limitations of drainage authority responsibility, authority and opportunity for participating in the planning and implementation of conservation practices involving public drainage systems and their associated drainage areas.
  - Prioritization within the watershed include identification of Chapter 103E drainage systems and their drainage areas; consider using or encouraging the development of a separate planning to systematically prioritize select 103E systems that will accelerate plan goals the greatest.

- Multipurpose drainage management be included in the approach for targeting best management practices (BMPs) within the drainage area of Chapter 103E drainage systems. Lay out a coordinated approach for how implementation of multipurpose drainage management practices identified in the plan can be coordinated with, and/or integrated into Chapter 103E processes and proceedings [through early coordination](#). When projecting funding needs for BMP implementation along, or within the drainage area of, public drainage systems, incorporate applicable Sections of Chapter 103E.

#### ■ **Groundwater**

- **Groundwater Coordination and Prioritization:** Work with BWSR staff and agency partners (MDH, DNR, MDA, and MPCA) to outline any groundwater – related priority issues for the planning area. Take into account identified Groundwater Management Areas, Drinking Water Supply Management Areas, wellhead protection areas, areas with direct connection to the water table, and other areas of groundwater concern. Address specific concerns about groundwater contamination and overuse identified and documented. Groundwater and surface water interactions in Drinking Water Supply Management Areas (DWSMAs) should be considered, as this can be a pathway for pollutants to reach groundwater. Special consideration should be made for the Red Rock Rural Water Source wells and City of Windom DWSMAs that intersect with the Des Moines River channel, Balaton’s wellhead source area, and perhaps the groundwater source area for the town of Alpha near the East Fork of the Des Moines River.
- **Groundwater References:** The Greater Des Moines River Watershed areas of Minnesota has a number of references and data available. Be sure to make use of existing groundwater data and publications. These include maps, data layers, and publications available from the Minnesota Geological Survey, Mn DNR, Mn Dept. of Health, US Geological Survey, and other sources.

- **Wetlands** – Protection and restoration of wetlands provides benefits for water quality, flood damage reduction, and wildlife habitat. The plan should support the continued implementation of the Wetland Conservation Act 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 such areas. The state is embarking on a new wetland prioritization plan that will guide wetland mitigation in the future. Wetland restoration and preservation priorities in this plan may be eligible for inclusion in this plan in the future.

- **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 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 from being placed under permanent vegetative cover. Another factor to consider is the acres of Conservation Reserve Program (CRP) practices that are scheduled to expire within the partnership’s counties. The plan should recognize the potential impact of these expiring contracts may have in the planning area and consider prioritizing working with producers regarding the management of those acres.

- **Lakes** – Lakes in the watershed are a major component to the overall land area relative to other southwest Minnesota watersheds. They are very important to the local quality of life and local economies and are sensitive to nutrient enrichment and runoff from both shoreland and watershed sources. Several of the lakes within the watershed are listed as impaired. The watershed plan should consider prioritizing practices that meet the Lake Restoration and Protection Strategies listed in the Watershed Restoration and Protection Strategies (WRAPS) and the 2018 Nonpoint Priority Funding Plan (NPPF). Consideration should be given to the following lakes with Eutrophication impairments: Yankton, Shetek, Sarah, Bloody, Fox, Talcot, North Oaks, East and West Graham, North and South Heron, Okamanpeedan, and many others.

### General Comments:

- **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.
- **GRAPS** - The [Groundwater Restoration and Protection Strategies \(GRAPS\)](#) for the Des Moines watershed will be available in the near future. This report will help identify specific groundwater issues in the planning area; therefore, implementation actions to address these issues should be addressed in the plan. The Department of Natural Resources (DNR) now hosts groundwater and drinking water information in their Watershed Health Assessment Framework (WHAF) tool <https://arcgis.dnr.state.mn.us/ewr/whaf2/> which provides an organized approach for understanding natural resource conditions and challenges.
- **WRAPS** - The Watershed Restoration and Protection Strategies (WRAPS) for the Des Moines River Watershed is complete and is available from the MPCA. The WRAPS outlines water quality reduction goals for excess sediment, phosphorus, nitrogen, and E. coli Bacteria. It also identifies areas for protection within the watershed and goals to address degraded stream habitat. These recommended strategies to meet restoration goals and protection targets, should be reviewed and incorporated into your planning effort. A reference to how WRAPS Reports can be incorporated within your One Watershed One Plan effort can be found: [Using WRAPS Reports in Local Water Planning](#)
- **Landscape Resiliency and Climate Adaption** – BWSR strongly encourages your planning partnership to consider the potential for more extreme weather events and their implications for the water and land resources of the watershed in the analysis and prioritization of issues. The weather record for the planning area shows increased frequency and severity of extreme weather events, which has a direct effect on local water management. 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](#). Finally, a new white paper from the Minnesota Interagency Climate Adaptation Team titled “[Building Resiliency to Extreme Precipitation in Minnesota](#)” also provides resiliency strategies related to this topic.
- **Local Controls** – BWSR suggests a comparative review of local ordinance and regulations across the watershed with the purpose of identifying commonalities, significant differences as well as

opportunities for coordination. Gaps or inconsistencies within local ordinances, policies, or enforcement could affect the success of your plan's implementation. Examples of this evaluation include (but are not limited to) redetermination of ditches, SSTS compliance inspection requirements (property transfer, variance, etc.), shoreland regulations, level III feedlot inventories. The purpose of this effort is to identify commonalities, differences, and opportunities for coordination when planning implementation goals.

- **Soil Erosion/Soil Health** – BWSR believes that accelerated soil erosion, leading to turbidity and other water quality issues, is a significant issue in the watershed. Most of the land use in the Des Moines River planning area 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 reduce or no tillage, the use of cover crops, increased areas of continuous living cover, and extended crop rotations. Improving soil health can help decrease soil erosion, increase water infiltration, provide nutrient scavenging, and increase soil organic matter. In addition, there seems to be increased interest from landowners and operators about soil health. It is recommended that these soil health practices be prioritized for implementation in the plan.
- **Protecting Pollinator Populations** - Projects should identify opportunities to benefit pollinator populations through creating areas of refuge and providing floral resources that can benefit a wide range of pollinators. BWSR also has a [BWSR Pollinator Toolbox](#) that provides guidance for project planning, implementation and management.
- **Aquatic and Terrestrial Invasive Species**- A cooperative approach across the watershed is recommended for invasive species management to address both aquatic and terrestrial invasive species and weed issues across the planning boundary. Invasive species should be prioritized based on their risk to ecosystems, agriculture, recreation, and human health. There should also be a focus on emerging weed threats such as Palmer amaranth that pose a significant risk to agricultural production. Adaptive management strategies should be used to address invasive species and also maintain ecological functions and services within landscapes.
- **Urban Stormwater/MS4s** – Urban stormwater runoff frequently contains pollutants such as pesticides, fertilizers, sediment, salt, and other debris, which can contribute to excess algae growth and poor water clarity/quality in our water resources. Poorly managed urban stormwater can also drastically alter the natural flow and infiltration of water, scour stream banks and harm or eliminate aquatic organisms and ecosystems. Municipal Separate Storm Sewer System (MS4) General Permits is owned/operated by the City of Worthington within the planning area. The MS4 permit holder should be invited to participate in the planning effort to ensure that their Stormwater Pollution Prevention Programs are incorporated into the plan.
- **Data Collection and Monitoring**- Data collection and monitoring activities necessary to support the targeted implementation schedule and reasonably assess and evaluate plan progress are required and should be coordinated with other data collection and monitoring efforts. As part of the plan, devise methods that the planning group can follow to ensure adherence to the planned activities and reassess the plan as implementation occurs in the future.

We commend the partners for their participation in the planning effort. We look forward to working with you through the rest of the plan development process. If you have any questions, please feel free to contact us via email at [Douglas.Goodrich@state.mn.us](mailto:Douglas.Goodrich@state.mn.us) or [Mark.Hiles@state.mn.us](mailto:Mark.Hiles@state.mn.us), or via telephone at (507-537-6636).

Sincerely,

Douglas Goodrich, *Board Conservationist*

Mark Hiles, *Clean Water Specialist*



Attachments: Des Moines 1W1P Wetland Section Comments

cc: Ed Lenz, BWSR (via email)  
Barbara Weisman, Tom Kresko, and Elizabeth Harper, DNR (via email)  
Margaret Wagner and Kevin Hauth, MDA (via email)  
Carrie Raber and Amanda Strommer, MDH (via email)  
Juline Holleran, Katherine Pekarek-Scott, and Bryan Spindler MPCA (via email)

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