

March 29, 2021

Zach Gutknecht
Beltrami Soil and Water Conservation District
701 Minnesota Ave NW, Ste 113
Bemidji, MN 56401

Chad Severts
BWSR Board Conservationist
4 West Office Building
403 4th St NW, Room 200
Bemidji, MN 56601

RE: Mississippi River Headwaters Watershed Comprehensive Plan 60-day review

Dear Zach Gutknecht and Chad Severts:

The Minnesota Pollution Control Agency (MPCA) has reviewed your draft Mississippi River Headwaters Watershed (MRHW) One Watershed, One Plan (Plan) dated March 11, 2021, and we are providing the following comments as part of the official 60-Day review and comment period.

The MPCA appreciates the opportunity to provide input throughout your Plan development process. As part of the MPCA's review we are providing the following comments as part of the official 60-day Review and Comment Period.

1. Simply put, the MRHW is one of the finest watersheds in the country. The MRHW is a heavily forested watershed, with approximately 58% of the land within this cover type. The high quality of the MRHW is a direct correlation to the natural hydrological benefits that a forested landscape provides. In addition to protecting the high quality water resources of the area, the MRHW forestlands support the economy of the region through various forest products and recreational use, while providing critical habitat for numerous flora and fauna species and cultural resources that characterize this region of the state. With the multitude of benefits provided by these forestlands, it is critical that we work to sustain these lands within the MRHW to the extent possible into the future.
2. As the name MRHW applies, this watershed contains the Headwaters of the Mississippi River. Along with the numerous recreational opportunities that this iconic river provides and supports, approximately 1.5 million Minnesotans downstream of the MRHW rely on the Mississippi River for their drinking water supply, as do several million more citizens in states south of our border. It is of essential importance that the protection of this vital resource remains a high priority within the MRHW and throughout the Upper Mississippi River Basin.

3. While the vast majority of the surface water resources within the MRHW are meeting Minnesota's surface water quality standards for conventional parameters (not including mercury), some resources within the MRHW are in need of critical protection and/or restoration. Water quality data collected on Lake Bemidji suggests that it is currently near the state impairment threshold for nutrients. Collaboratively working together towards improving the water quality upstream within the Lake Irving Subwatershed (Lake Irving TMDL) will help towards protecting Lake Bemidji. Conversely, there are resources (Schoolcraft River – 07010101-751, Deer Lake 31-0719-00) where their water quality and/or habitat far exceed the existing state standards to the point where they have been designated as supporting exceptional aquatic life. Working to maintain the high quality of waters within the MRHW will present challenges into the future as the demands for increases in land use intensify and the effects of a changing climate continue. The perpetual challenge is to make improvements and keep up with new problems as they develop. Consequently, it may take decades to fully restore impaired waters. For these reasons, it is much more cost-effective to protect clean waters while we can, such as those in the MRHW.
4. The MPCA congratulates you in doing a commendable job in coordinating this important effort with the Plan team and getting this comprehensive MRHW draft Plan to this stage. The MPCA greatly looks forward to our continued relationship working as a watershed partner going into the future. The MPCA's Cycle 2 of the Intensive Watershed Monitoring and Watershed Restoration and Protection Strategy is currently set to begin in the MRHW in 2024. Monitoring planning and site selection communication with MRHW partners will begin prior to that timeframe. You and other Plan team members will be contacted by the MPCA in preparation of this process and will be encouraged to participate and provide input.

Again, thank you for the opportunity to review and comment on the draft Plan. If we may be of further assistance, please contact Phil Votruba at 218-316-3901 at the MPCA's Brainerd Regional Office.

Sincerely,

Theresa Haugen

This document has been electronically signed.

Theresa Haugen
Manager
North Section
Watershed Division

cc: Chad Anderson, MPCA
Phil Votruba, MPCA

TH/PV:jdf