

394 South Lake Avenue, Room 403  
Duluth, MN, 55802

July 12<sup>th</sup>, 2019

One Watershed One Plan Planning Work Group / Nemadji River Watershed  
C/O Melanie Bomier, Water Resources Technician Carlton SWCD  
808 3<sup>rd</sup> Street  
Carlton, MN 55718

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

Dear Melanie,

Thank you for providing the opportunity to provide priority issues and plan expectations for the development of the Nemadji River Comprehensive Watershed Management Plan under Minnesota Statutes section 103B.101, Subd. 14. We appreciate the partners' willingness to participate in development of a watershed-based plan.

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 (1W1P) – Operating Procedures document, adopted by the BWSR Board on March 28, 2018 and available on the BWSR website: [www.bwsr.state.mn.us/planning/1W1P/index.html](http://www.bwsr.state.mn.us/planning/1W1P/index.html). 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 the 1W1P – Plan Content Requirements document, adopted by the BWSR Board on March 28, 2018 and available on the BWSR website: [www.bwsr.state.mn.us/planning/1W1P/index.html](http://www.bwsr.state.mn.us/planning/1W1P/index.html). Specifically, the plan must have:
  - A thorough analysis of issues, using available science and data, in the selection of priority resource concerns.
  - Sufficient measurable goals to indicate an intended pace of progress for addressing the priority issues.

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- 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:**

- **Forestland Management:** Coordination of public land management between various authorities within the watershed. On private lands, preliminary analysis shows an opportunity to increase private forestland management through forest stewardship planning, enrollment in Sustainable Forest Incentives Act and targeted easements and potential acquisitions. The combined goals should be to minimize habitat fragmentation, maintain sustainable forestland diversity, protect water quality and work toward a watershed goal of 75% lands under protection.
- **Stream and River Crossings:** The topography and fragile soils within the watershed can contribute to sedimentation and erosion if not properly managed. Culverts and bridges that are improperly sized, installed or aligned can contribute to stream instability, sediment impairments and habitat fragmentation. Infrastructure installations have a long lifespan and should be designed and installed with future rainfall and runoff conditions in mind.
- **Livestock and Pasture Management:** Agriculture land use is a significant part of the Nemadji Watershed. Streambank erosion, nutrient and sediment enrichment and bacteria loading can be side effects of livestock access to streams and rivers. The watershed partnership should explore ways to assist landowners in ways that maintain this important land use while protecting water quality.
- **Lakes:** While lakes are not a major aquatic resource within the watershed. They are sensitive to nutrient enrichment and runoff from both shoreland and watershed sources. Shoreland habitat is also a crucial part of lake health. Shoreland management, wastewater management and protecting watershed forestland will help to provide long term protection for this aquatic resource.
- **Watershed runoff and storage:** The topography and fragile soils within the watershed are sensitive to changes in runoff. Land use changes over time have likely increased runoff volume and changed the timing of runoff. Reducing stream flows through reforestation, wetland restoration and runoff management should be addressed in the plan.
- **Ditch and Drainage Management:** Concentrated flows from impervious surfaces and landscape drainage can create gullies and contribute sediment to watershed streams and rivers as well as influencing stream flows. Managing erosion and uncontrolled flows will benefit downstream water quality and quantity.

## General Watershed Considerations:

### Vegetation Management

- **Natural Habitat Protection/Restoration:** Protecting and restoring diverse forests and other habitats has multiple benefits including water quality protection for groundwater and surface water, stable plant composition to resist invasive species, protecting pollinator populations, wild rice beds, and wildlife habitat and increasing resiliency to weather extremes. The plan should identify high priority natural habitats including wildlife and water quality complexes and corridors, and promote a combination of forest stewardship, conservation plantings, wetland projects and riparian activities that will protect, restore and link water quality and habitat corridors. [Minnesota's Wildlife Action Plan](#) is a resource that can be used.
- **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's [Pollinator Toolbox](#) provides guidance for projects and a [Minnesota State Agency Pollinator Report](#) is focused on meeting pollinator goals identified in Governor Dayton's Executive Order "[Directing Steps to Reverse Pollinator Decline and Restore Pollinator Health in Minnesota](#)".
- **Invasive Species and Landscape Management:** A cooperative approach across the watershed is recommended for invasive species management to address invasive species and [noxious weeds](#) or specially regulated plants across the watershed. Invasive species should be prioritized based on their risk to ecosystems, agriculture, recreation, and human health, as well as focusing on emerging weed threats. Adaptive management [strategies](#) should be used to address invasive species and maintain ecological functions and services within landscapes.
- **Soil Health:** The use of cover crops and perennial vegetation is recommended to promote good soil structure, organic content and microorganism populations that promote soil health and sustain productive ecological and agricultural landscapes. More vegetation more of the time increases evapotranspiration during the spring and fall seasons, reduces runoff and erosion and helps recycle nutrients. More roots more of the time increases organic matter in the soil profile, which increases infiltration and water holding capacity for plant available water, and also reduces runoff, erosion and nutrient transport.
- **Riparian Management:** Protecting and restoring riparian areas, including adjacent floodplains, have multiple benefits by reducing soil erosion, stream channel instability, phosphorus and nitrogen loading, and restoring flood attenuation, wildlife habitat and wetland functions. The Plan should identify high priority areas for riparian buffer easements, riparian erosion and sediment reduction, wetland restoration and other water storage and nutrient treatment opportunities, and target implementation efforts to those areas.

### 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 this planning area. The Groundwater Restoration and Protection Strategies report will provide groundwater data, and outline key issues and strategies to address them. State agency staff will provide support for the information contained in the report.

### **Wetlands**

- **Wetland Management:** Protection and restoration of wetlands provides benefits for water quality, peak flow reduction, habitat and wildlife. 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 one resource that can be used to help identify areas for wetland restoration.
- **Wetland Prioritization:** The state is embarking on a wetland prioritization plan that will guide wetland mitigation in the future. Wetland restoration and preservation priorities you identify in your plan may be eligible for inclusion in this statewide plan in the future.

### **Easements**

- **Re-Invest in Minnesota (RIM):** The State’s Re-Invest in Minnesota (RIM) Reserve easement program considers several site specific and landscape scale factors when funding applications. Though it is dependent on specific program terms, the State does consider local prioritization of areas for easement enrollment.

### **Additional Considerations**

- **Review of the Nonpoint Priority Funding Plan:** The state’s Nonpoint Priority Funding Plan (NPPF) outlines a criteria-based process to prioritize Clean Water Fund investments—if planning partners are intending to pursue Clean Water Fund as a future source of funding, partners are strongly encouraged to consider the high-level state priorities, keys to implementation, and criteria for evaluating proposed activities in the NPPF.
- **Climate Change Review:** Please review the ‘Climate Change Trends and Action Report-Updated December 13, 2016’ and incorporate climate change information within your planning effort. This document includes information related to mitigation and adaptation.
- [http://www.bwsr.state.mn.us/native\\_vegetation/BWSR\\_Climate\\_Change.pdf](http://www.bwsr.state.mn.us/native_vegetation/BWSR_Climate_Change.pdf)
- **Historical Watershed Reports:** The Nemadji Watershed has been the subject of several intense studies over time. The 1998 NRCS Erosion and Sediment in the Nemadji Basin Report, and the Nemadji River WRAPS completed in 2017 all provide valuable data and watershed

recommendations that should be considered in the development of the Nemadji Comprehensive Watershed Management Plan.

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 either Erin Loeffler at 218-723-4607 or Jeff Hrubes at 218-203-4478.

Sincerely,

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