



Northwest Regional Operations
2115 Birchmont Beach Road NE
Bemidji, MN 56601

February 14, 2023

Tracy Halstensgard
RRWD Administrator
714 6th St. SW
Roseau, MN 56751

Matt Fischer
BWSR Board Conservationist
403 4th St. NW, Room 200
Bemidji, MN 56601

RE: FINAL Roseau River Comprehensive Watershed Management Plan (1W1P)

Dear Ms. Halstensgard and Mr. Fischer,

The Minnesota Department of Natural Resources (DNR) appreciates the opportunity to provide these comments for the draft Comprehensive Watershed Management Plan (CWMP) for the Roseau River Watershed (RRW) received December 16, 2022. We also want to acknowledge the collaborative efforts of those who participated in the plan's development. The DNR is committed to providing the necessary information to protect and improve resource conditions and opportunities within the Roseau River Watershed. We will continue to support the implementation of this plan.

A high level of coordination between plan participants and partners, including state agencies and local units of government is a must in order to make this plan a success. Please continue to include the DNR in early coordination and collaboration on projects within each of the Roseau River Watershed planning regions.

Most of the concerns and priorities included in our November 9, 2021, letter to the planning group were addressed during the development of the draft plan. The plan does a good job of balancing typical watershed management challenges. The draft CWMP provides guidance and realistic targets for water quality and habitat improvement over the next ten years in the Roseau River Watershed.

Below please find comments about the overall plan and specific sections. If you have any questions or concerns related to these comments, please do not hesitate to contact Area Hydrologist Stephanie Klamm at 651-587-5448 or stephanie.klamm@state.mn.us.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Nathan Kestner'.

Nathan Kestner
NW Regional Manager | Division of Ecological and Water resources

cc: Stephanie Klamm (DNR), Theresa Ebbenga (DNR), Barbara Weisman (DNR), Henry Van Offelen (BWSR), Cary Hernandez (MPCA), Dan Disrud (MDH), Jeff Berg (MDA), Janine Lovold (Roseau SWCD), Torin McCormick (Roseau River WD), Moriya Rufer (HEI)

Overall Plan

- The overall look of the plan is appealing. The color scheme used to show priorities A and B is easy to understand and the maps are crisp and clear. However the maps and graphics for Section 2: Land and Water Resources Narrative could be a little larger and clearer.
- The DNR appreciates seeing soil health as a goal in the plan. Soil health will provide multiple benefits within some of the other goals and strategies in the plan as well.
- Many of the implementation activities in the plan are intertwined and overlap with other benefits in the watershed. Prioritization efforts could be enhanced by drawing attention to these relationships throughout the plan and highlighting opportunities that provide multiple benefits. For example, habitat and biodiversity opportunities in riparian vegetation restorations/naturalizations on streams also incorporate strategies for floodplain connectivity and habitat; and soil health practices improve agricultural land in ways that increase soil water retention and reduce downstream peak flows.
- Much of the plan focuses on restoration projects. Are there areas of the watershed where protection projects could be considered?
- There is little discussion in the plan about early coordination with local partners and state and federal agencies. Good working relationships are a must in the early planning process for many of the projects listed in the plan. Please continue to foster communication, early coordination, and collaboration with all potential partners on all projects in the plan.

Section 1. Executive Summary

- **pg. 1, Watershed Vision Statement:** Should it read “Roseau River Watershed Partners” instead of “Roseau Watershed Partners”?

Section 3. Priority Issues

- **pg. 51-52, Invasive Species:** Consider adding aquatic invasive species (AIS) to the last paragraph. With Lake of the Woods so close by, AIS could become a concern, with significant boat traffic and movement of invasives.

Section 4. Measurable Goals

- **pg. 56, Agronomic Protection:** The Long-Term Goal states that all public drainage systems will be managed to provide adequate protection of agricultural lands. Should the statement specify that “adequate” means protection from a 10-year, 24-hour storm event?
- **Increase Storage:**
 - **pg. 58:** The Long-Term Goal is to increase storage by 27,985 acre-feet based on storing 0.5 inches across the watershed. Will 0.5 inches be enough when precipitation in the Roseau River Watershed has increased more than any other watershed in the state in the last 40 years?
 - **pg. 59, Figure 4.6:** There are many ditches in the Lost River State Forest in the northeastern part of the watershed. Consider abandonment of these ditches to create storage in this part of the watershed, which might reduce the need for storage downstream. For example, ditch abandonment could be added to the strategies tables for the Lake Bottom Subwatershed Planning Region. Less water flowing out of the forest will reduce flood volumes/flows and even improve water quality. If abandonment of ditches in the Lost River State Forest is a strategy for water storage, please add the ditch systems to the map for Figure 4.6.
- **pg. 64-65, Stream Stabilization and Restoration:**
 - The Long-Term Goal is to stabilize or restore all unstable stream reaches. Clarify what is meant by “unstable.” Have reaches been assessed to see if they are geomorphically unstable or does this just refer to areas with washed out banks? If assessments have not been conducted on

streams in the watershed, it maybe a good practice to assess stream reaches and create a priority list of those unstable reaches.

- **Figure 4.12:** The map shows locations to focus on for this goal. The orange lines indicate impaired streams. However, these impairments, for Index of Biological Integrity (IBI) fish and macroinvertebrates, do not necessarily mean that the streams are unstable and need restoration or bank stabilization.
- **pg. 69, Phosphorus Reduction, Figure 4.16:** In the map, the dark polygon near Badger stands out. Has the cause of high phosphorus there been investigated?
- **pg. 71, Bacteria Reduction, Figure 4.18:** The map shows only the Hay Creek subwatershed as an area in which to focus efforts. Should other subwatersheds be looked at? The Badger subwatershed is high in phosphorus, which sometimes goes hand in hand with bacteria issues. Consider focusing on bacteria reductions there as well.
- **pg. 73, Land Protection, Figure 4.20:** The map shows locations in which to focus efforts. Will efforts include easement opportunities? Easements do not need to be strictly conservation or habitat related. They can also be for grazing or specific farming practices, for example. We recommend adding easements to the land protection strategies for the entire watershed.

Section 5. Targeted Implementation Schedule

- **pg. 91-92, Watershed-wide Implementation Table:**
 - **pg. 91, Add a groundwater observation well:** In the Responsibility column, a local partner should be listed as the Lead, with the DNR as a secondary partner. The DNR can help, but it is not the DNR's role to request or monitor or the well.
 - **pg. 92, Connectivity enhancements:** The DNR can assist with culvert replacements and dam modifications but should not be listed as a Lead partner.
 - **pg. 92, Coordinate road projects:** The DNR should not be not be listed as a Lead partner but can assist with road projects in the capacity for culvert/bridge replacements.
- **pg. 93, Overall Plan Costs, Table 5.1:** Fix the table numbering (there is another "Table 5.1" on page 75).

Sections 6. Implementation Programs

- **Regulation and Enforcement:**
 - **pg. 100-101, Aggregate Management:** Add a statement that any aggregate washing over 10,000 gallons a day or 1 million gallons a year will require a DNR Water Appropriation permit.
 - **Public Waters:** Add a section/paragraph about 103G Public Waters regulations.