



November 16, 2021

Roseau River Planning Partnership
C/O Tracy Halstensgard, Roseau River Watershed District
714 6th Street Southwest
Roseau, MN 56751

Dear Roseau River Planning Partnership,

Thank you for providing the opportunity to provide priority issues and plan expectations for the development of the Roseau River Comprehensive Watershed Management 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*, adopted by the BWSR Board on March 24, 2021, available on the BWSR website:

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.

The planning boundary that was submitted on November 8, 2021, after working to get concurrence of all participants and required participants in adjacent planning boundaries that would be affected, conforms with the requirements of Minnesota Statutes §103B.101 Subd. 14 and the *One Watershed, One Plan Operating Procedures*. The boundary change will become official upon approval of the plan.

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, available on the BWSR website:

www.bwsr.state.mn.us/planning/1W1P/index.html. More 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 evaluation.

BWSR has the following specific priority issues:

- **Non-point source loading (sediment, nutrient, and bacteria) to surface waters** – Improving and protecting water quality should be a primary goal within the planning area. Impaired waters and prioritized protection waters have been identified by the MPCA in the Watershed Restoration and Protection Strategies (WRAPS) process. The State’s Nonpoint Priority Funding Plan (NPPF) recommends that highest priority waters for protection and restoration are those which are listed as impaired but nearly meet standards, and those waters not listed as impaired that barely meet standards. The NPPF outlines a criteria-based process to prioritize Clean Water Fund investments which can be found at <http://www.bwsr.state.mn.us/reports>.
- **Drainage system instability and inadequacy** - Drainage system instability and inadequacy contribute to flood damages and influence surface water quality throughout the planning area. The planning partners are encouraged to identify and prioritize specific resources impacted by this issue and develop implementation strategies consistent with multipurpose drainage management principles and the Basin Technical and Scientific Advisory Committee papers related to surface and sub-surface drainage. This would ensure that the plan provides comprehensive solutions to drainage water management.
- **Unstable river and stream channels** – Rivers and streams in this planning area provide outlets for many drainage systems and habitat for diverse aquatic communities. Many streams and rivers in the planning area are unstable, and bed and bank erosion contribute to water quality issues. The planning partners are strongly encouraged to prioritize specific resources impacted by this issue and utilize a holistic approach to identifying solutions, including removal of watershed disturbances that are causing the instability. Recognizing and prioritizing this issue and specific stream reaches in the plan would help ensure that projects protecting and restoring natural watercourses are part of the partnership’s long-term plan.
- **Flood Damage** – Flood damage has been a priority issue in the planning area for a long time. The Red River Watershed Management Board and the 1998 Mediation Agreement have established flood damage reduction as a primary goal in the Red River Basin. Recognizing flood damage as a priority issue in the planning area will help ensure that the plan includes goals and recommends practices consistent with Technical and Scientific Advisory Committee technical papers, particularly Technical Paper 11. The planning partners are also encouraged to identify and prioritize specific infrastructure and areas of the watershed impacted by this issue. This plan should recognize and build on past work to reduce flood damages to increase the resiliency of watershed resources to increasing precipitation trends and resulting flooding.
- **Altered hydrology** – The hydrologic conditions of the planning area have changed over time. In recent decades more precipitation, more runoff, and more runoff per unit of precipitation has been observed, as well as more frequent periods of extremely low flow in some watercourses. These hydrologic changes, as well as other factors, have contributed to instability of natural and artificial watercourses, degradation of wetland habitats, loss of agricultural productivity, and increased risk of flood damages.

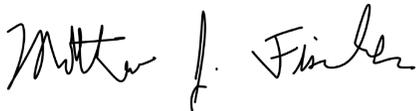
Recognizing altered hydrology as a priority issue in the plan would help ensure that a driving factor behind many related issues is directly addressed in the plan.

- **Productivity of agricultural land** – Productive agricultural land is a highly valuable resource and an economic driver of the planning area. Identifying and prioritizing productive agricultural lands, setting goals, and implementing practices for protection and improvement of agricultural land productivity (soil health, drainage water management, field windbreaks, etc.) can be a strength of this plan, especially when these practices are applied in areas that provide benefits to multiple priority issues in the plan.
- **Loss and degradation of wetland and upland habitat** – The planning area provides many opportunities to restore drained wetland basins, which will augment base flows, attenuate peak flows, improve water quality, and restore habitat. A variety of data and tools are available to help identify and prioritize restorations to achieve watershed management goals. Over the next five years, nearly 18,000 acres of CRP are scheduled to expire within Roseau County (not all in planning area). These expiring contracts have the potential to impact many of the priority issues listed above. The plan should recognize this issue, its potential impacts, and develop implementation strategies that the partnership may use to work with producers to manage those acres to achieve the goals of the plan.

BWSR encourages the local partnership to prioritize actions in the implementation section of the plan that address multiple resource concerns and provide multi-purpose benefits. Many implementation actions will provide multiple benefits and contribute to achieving multiple goals. The comprehensive watershed management planning process should recognize opportunities to achieve multiple goals in priority areas and target actions in these areas. This approach should ensure implementation of comprehensive projects and help partners secure funding from a variety of sources.

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 me at matt.fischer@state.mn.us, or 218-766-6496.

Sincerely,



Matt Fischer

Board Conservationist

EC: Janine Lovold (Roseau SWCD), Moriya Rufer (HEI), Ryan Hughes (BWSR), Henry Van Offelen (BWSR), Julie Westerlund (BWSR), Margaret Wagner (MDA), Carrie Raber (MDH), Dan Disrud (MDH), Stephanie Klamm (DNR), Nathan Kestner (DNR), Barbara Weisman (DNR), Cary Hernandez (MPCA), Jeff Risberg (MPCA)

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