



July 22, 2016

Root River One Watershed, One Plan Policy Committee
c/o Donna Rasmussen, Fillmore Soil & Water Conservation District
900 Washington Street NW, Box A
Preston, MN 55965

RE: Draft of the Ten-Year Implementation Plan for the Root River 1W1P Available for Review

Dear Root River One Watershed, One Plan Policy Committee

Thank you for the opportunity to provide comments regarding the draft Root River One Watershed, One Plan (1W1P) under Minnesota Statutes Section 103B.101, Subd. 14. We appreciate the partners' willingness to participate in development of a multi-jurisdiction, watershed-based plan.

The Root River 1W1P is expected to meet the requirements of a Priority Concerns Plan Type as per the 1W1P Plan Content Requirements for Pilot Watersheds adopted by the Board of Water and Soil Resources (BWSR) September 23, 2014. Implementation actions in the plan consider a broad range of tools, including conservation practices, capital improvements, official controls, and other tools and programs necessary to achieve the goals of the plan. This plan leverages the existing process for developing a plan based on priority concerns typically associated with current county water planning, but shifts the scope of the plan to a watershed boundary and elevates requirements for prioritizing, targeting, and measuring implementation action. BWSR has the following comments on the plan:

Comments that the plan must address to meet Plan Content Requirements:

- Include an explanation on where the Quantitative Measurable Goals from Table 4.4 came from at the beginning of Section 3.0.
- The heading for Table 4-1 needs to be clarified. These are anticipated reductions over the 10 year lifecycle of the plan and the estimated reductions to the overall loads (i.e. it will take several 10 year plan implementation cycles to fully achieve the overall reduction goals) which is not clear as the table is currently labeled.
- The heading for Table 4-7 also needs to be clarified. The table shows PTMAApp estimated reductions over the 10 year life of this plan and the percent progress towards the overall reduction goals. This table is critical to being able to understand the plan and what is intended to be accomplished on the ground.

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- A footnote for Table 4-7 must be added to explain what the blue shaded cells indicate. This is explained in the body of the plan but should also be explained here so that the table can stand on its own.
- Additional detail must be added to Section 5.4.3 on how annual work planning will take place locally. For example, what factors will be considered when local partners meet to select projects or initiatives for funding?
- The now completed Root River Watershed Restoration and Protection Strategies (WRAPS) must be specifically mentioned along with the Root River Watershed Sediment Budget as new data and information to be incorporated into the plan through the Five-Year Evaluation (Section 5.4.4.3).
- Section 5.4.5 must be revised so that the language is consistent with current statute. This includes the removal of all references to minor plan amendments and Rule 8410.0140. BWSR will follow up with the plan consultant with specific revisions to this section in order to meet current statute.
- Existing Joint Powers Boards, including the SWCD Technical Service Area 7 and Southeast Minnesota Water Resources Board, must be listed and described in Section 5.4.6 as they are pertinent to water management within the Root River watershed.
- Specific to the Crooked Creek Watershed District (WD), a summary of completed studies on active or planned projects (including financial data) is needed to fulfill WD planning requirements. This could be included in Section 5.2 or in a WD-specific addendum to the plan.
- An anticipated timeline or schedule should be added for each potential Capital Improvement Project (CIP) listed in Table 5-6, in order to meet the Plan Content Requirements.
- Additional detail is required in Section 5.5.2.12 to meet Plan Content Requirements for discussion on opportunities and potential conflicts of using land use authority comprehensive plans to achieve 1W1P goals.
- Use information gathered in the 2014 Crooked Creek WD draft plan to address the WD planning requirement for a statement on the extent that the purposes for which the Crooked Creek WD was established have been accomplished. This should be covered in Section 5.5.3. Also within Section 5.5.3, it is acknowledged that the Crooked Creek WD does not have rules or a permit program. In order to meet WD planning requirements, it should be addressed whether there will be any consideration in establishing rules and a permit program after the plan has been approved. This may involve investigating whether existing county ordinances and state law (e.g. soil loss) are sufficiently protecting the watershed above their PL566 project.

Comments that the plan should consider addressing:

- To avoid confusion, ensure that the Crooked Creek WD is referred to using their full name. “District” is missing in a few instances.
- The status of the WRAPS should be specifically mentioned within the Executive Summary. The fact that the Minnesota Nutrient Reduction Strategy (NRS) was used as a surrogate for the water quality reduction goals is included as a footnote for Table ES-2 but should be discussed both in the Executive Summary as well as the beginning of Section 3.0, along with further discussion on how the plan will be updated with information from the recently completed WRAPS as well as the completed Root River Watershed Sediment Budget in the future.

- A reference in the plan was made to adding \$1 million for staffing in Table ES-4. It is recommended that the information from the pivot table that was developed by the plan consultant be included which shows how current dollars are spent by each of the planning entities and allocated back to each entity by planning area.
- The table title for Table ES-5 should be updated once the Joint Powers Agreement is officially approved by the Policy Committee.
- Since the “C” level priority resource concerns will not be directly addressed in the life of this plan, Figures 2-12 through 2-18 could be moved to the Appendix.
- Figure 2-13 is somewhat difficult to look at with so many data points displayed. If all Macroinvertebrate Sites and Fish Sites are found at the same location, consider combining them into one data point to reduce the clutter.
- Section 3.1 includes a number of definitions. It is suggested that all definitions be located at the front of the plan and then referenced when needed.
- Section 3.2 does a good job of defining the resource concerns related to restoration and protection status. However, more discussion is needed to tie this information to future implementation for this watershed. For example, which of these subcategories are a higher priority over the life of this plan? This discussion should tie in with the State Nonpoint Priority Funding Plan (NPPF) which sets Restoration: Low Restoration Effort and Protection: Threatened Impairment Risk as high-level state priorities. If planning partners are intending to pursue the Clean Water Fund as a source of funding, partners are strongly encouraged to consider the high-level state priorities, keys to implementation, and criteria for evaluating proposed activities outlined in the NPPF.
- Although Section 4.2 is important for explaining how PTMApp works, it is recommended to be moved into the plan appendix. This would allow the reader to get into the implementation tables quicker and allow those who are interested in the details on PTMApp to access that information at the end.
- It is highly recommended that an explanation be included on how the additional one million dollars discussed in the second paragraph on page 4-45 was estimated. The pivot table developed by the plan consultant on staff dollars, programs, and allocations should be utilized here to show how this number was calculated. The pivot table should also be added to Section 5.3.1 to provide information on the existing investments on local programs, funding allocations, and staffing.
- It is recommended to include discussion on shared services that are currently taking place between local partners as well as potential shared services in the future in Section 5.4.1. Shared staffing for the administration of the Wetland Conservation Act has been discussed recently, for example.
- Consider removing “Native Buffer Grant Program” from BWSR grants in Table 5-8. This grant program has not been available since 2010. Instead, consider adding the “SWCD Local Capacity” grant which could be used to fund all of the initiatives in this table.
- Section 5.4.4.2 (Biennial Evaluation) is likely not needed since you have chosen to complete an Annual Workplan as well as an Annual Evaluation. Instead, you could move the text from this section to Section 5.4.3.2 as it would be more appropriate there.
- It is recommended to complete a final spelling and grammar check, look for word omissions and punctuation errors that software will not catch, and table and page breaks.

We commend the Root River Watershed partners for your participation as a pilot in developing the 1W1P program and for your collaborative effort in bringing this together. The partners should be specifically acknowledged for the public engagement campaign that was implemented throughout the planning process. This campaign will serve as a model for future 1W1Ps throughout the state. The state's main water management agencies have committed to the 1W1P approach and we look forward to continue working with you on future implementation. If you have any questions about this letter, please feel free to contact Adam Beilke at 507-206-2892, or David Johnson at 651-296-6068.

Sincerely,



Adam Beilke
Board Conservationist



David Johnson
Clean Water Specialist

cc: Ed Lenz, BWSR (via email)
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