



MINNESOTA DEPARTMENT OF NATURAL RESOURCES

SOUTHERN REGION

21371 STATE HWY 15 SOUTH

NEW ULM, MN 56073

507-359-6000

Date: 7/21/2016

Yellow Medicine River One Watershed One Plan Planning and Policy Committees
C/O Kerry Netzke
1424 East College Drive, Suite 300
Marshall, MN 56258

Dear Ms. Netzke:

Thank you for the opportunity to comment on the One Watershed One Plan for the Yellow Medicine River Watershed. The Department of Natural Resources (DNR) appreciates the efforts of all those who have been involved in this process. We will continue to provide support through the implementation of the plan.

Generally, the Yellow Medicine One Watershed One Plan addresses each of DNR's concerns from our April 17th letter. We strongly support the ongoing education and engagement efforts of the watershed.

We offer the following observations:

- We encourage you to place a higher priority on protection efforts. Limited areas remain in the watershed that provide natural benefits for the watershed. Areas of wetlands, floodplains and perennial vegetation can store water and help limit peak flows. Drainage systems within the watershed and downstream will function better. Protection efforts will help limit channel erosion and bank failure. Added benefits like water infiltrating to groundwater or saving natural habitats can also result from protection efforts. Protection efforts are a better solution than needing to recreate these critical features and their functions. Rare, threatened, and high quality resources should continue to be considered in targeting protection.
- As restoration and protection actions are considered, priority should be given to the actions that provide multiple benefits. While a bioreactor and wetland may both treat nutrients, even a created wetland provides greater multiple benefits such as flood storage, pollinator habitat, sediment storage and wildlife habitat.
- We recommend more emphasis being placed on multiple benefit best management practices in the agricultural landscape instead of capital improvement projects.
- The plan has a fairly limited discussion of lakes. We recommend expanding the focus on lakes including adding priorities and action items for lakes and their watersheds.

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- The plan identified transport of bacteria to surface waters as a priority concern; however, no parallel identified issue or measurable goal has been developed.
- We encourage you to reference other plans and teams that may be directly related to your plan. Specifically, the Minnesota Prairie Conservation Plan Upper Minnesota Valley Prairie Core Area and the Minnesota River Valley Local Technical Team should be considered as they may have shared goals. Combining of resources may result in better outcomes for all cooperators.
- Table 5-6 in the plan seems to assign more benefits to dams than other options. DNR generally finds that the cost of creating dams often outweighs the benefits with many unintended negative consequences. The plan does prioritize implementing a comprehensive suite of best management practices across the watershed, including natural flood storage options, such as floodplain, grassland and wetland restorations.
- Consider replacing the key in Figure 2-7 with permit locations, not Minnesota Department of Health (MDH) located/unlocated well locations.
- We recommend a more balanced approach to removal of debris from watercourses (Table 4-4). Woody material often provides streambank protection while producing habitat for fish and other aquatic life. Projects aimed at removing woody debris may result in large bank failures. DNR supports removal of woody material when it is impeding flow or may float downstream restricting water flow through culverts or bridges. The balance is to avoid the unintended consequences of making the banks more susceptible to erosion or degrading habitat.
- Since bank stabilization projects were not given priority in the implementation schedule, remove the last sentence in 3.3.4 that states, "Inventorying all existing bank failures and then prioritizing them based on the greatest benefit per dollar invested is recommended".

Finally, please consider the following tools and approaches as you move forward:

- Development of a Decision Support System using Agricultural Conservation Planning Framework, PTMApp or other tools as they become available to target practices and inform design criteria.
- Use Undisturbed Lands GIS Layer to develop protection priorities for perennial vegetative cover.
- Develop and use historical non-contributing watershed analysis to document and prioritize areas of the landscape that could provide multiple benefits (i.e. flood reduction, water quality, fish and wildlife habitat, ground water recharge) if protected or restored.

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- The HSPF-SAM model utilized in the development of the plan appears to underestimate the importance and benefit of perennial vegetation, wetland restoration and temporary and long-term storage of water on the landscape in addressing altered hydrology. We recommend:
 - Verifying that the model includes an upland vegetated component for wetland restorations.
 - Verifying starting water conditions for the model.
 - Investigating additional models or tools to review the water storage goal.
- CRP, RIM, buffers and other set-a-side programs help manage both the quality and quantity of the water in the watershed. However, these efforts will only touch a limited number of acres. As the use of cover crop expands and the benefits to soil health and water quality are realized, we believe this may be an additional tool that can serve the watershed well.

Thank you for consideration of these points. Overall, the plan builds upon your long history of water planning. We are encouraged by this continued broad focus on watersheds and watershed health. We commend you for the work you have done, and are eager to be a partner with you in implementing this plan.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Frederickson". The signature is written in a cursive, flowing style.

Dennis Frederickson
Southern Regional Director

Ec: Lucas Youngsma, DNR Area Hydrologist
Mike Weckwerth, MPCA Project Manager
Jason Beckler, BWSR Board Conservationist
Mark Hiles, BWSR Board Conservationist
Amanda Strommer, MDH Drinking Water Protection Planner
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