



July 12, 2016

Yellow Medicine River Planning Work Group  
c/o Kerry Netzke, Area II Minnesota River Basin Projects  
1424 East College Drive, Suite 300  
Marshall, MN 56258

**RE: Response to request for Yellow Medicine One Watershed, One Plan Comments**

Dear Yellow Medicine River Watershed Planning Work Group,

Thank you for providing the opportunity to provide comments regarding the draft Yellow Medicine 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 Yellow Medicine 1W1P is a Comprehensive Watershed Management Plan, which is an all-inclusive plan to address surface and groundwater, water quality and quantity, and land use 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:**

- The Scenario Application Manager (SAM) Tool pollution reduction estimates for implementing practices identified in Priority Concern 1 and Priority Concern 2 and buffers throughout the plan boundary, measures sediment output in tons/year and phosphorus and nitrogen in lbs./yr. The plan provides tons/year for all of these outputs. The units need to be changed in the plan for consistency with the outputs of the tool. This comment has also been communicated to RESPEC Consulting and Services.
- The partner Memorandum of Understanding (MOU) provided in Appendix D of the Plan is the original MOU and must be replaced with the current MOU adopted by the partner organizations.

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- For Implementation Tables 4.1 to 4.7 in chapter 4, plan needs to better describe the timeframe for the outcomes of annually established activities. Activities that require re-establishment annually need clarification if the results of the action are intended to be measured on an annual basis or something more. Example Language:
  - Original: Increase reduced tillage practices in 10% of the cropland by treating 2,856 acres.
  - New: Increase reduced tillage practices in 10% of the cropland in this sub-watershed by treating 2,856 acres on an annual basis.
- The plan must provide language in regards to measurement standard of 1,000 acre feet of storage based on conversations the planning work group discussed. Example language:
  - *“Measuring progress towards the YM 1W1P goal of creating an additional 1,000 acre-feet of storage in the watershed, will be based on the following criteria:*
    1. *Additional temporary storage capacity engineered into a project that is above the permanent/normal pooling elevation created by a water control structure and below the emergency spillway elevation, where the overall drawdown time for the structure is greater than 48 hours for a 10-yr. summer rainfall event.*
    2. *For dry dams, 100% percent of the storage capacity up to the emergency spillway elevation, where the overall draw down time is greater than 48 hours for a 10-yr. summer rainfall event.”*
- The plan must describe an annual commitment to collaboratively review and submit to BWSR statutory and policy requirements as provided in Level 1 Performance Review and Assistance Program (PRAP). The last paragraph in 6.7.1 must include language to meet statutory and policy requirements submitted to the Board of Water and Soil Resources (BWSR). Example Language:
  - *Additionally each local government is committed to submitting the required statutory and policy, plans and reports, as identified in Level 1 PRAP.*
- Plan organization may have changed so all references should be checked. Specifically:
  - Table 4-4 references section 5.5 for operation and maintenance descriptions and additional information. Section 5.5 addresses previous capital improvement projects. The correct reference appears to be 5.6.
  - Table 4-5 references section 5.6 for Existing Regulatory Controls descriptions and additional information. Section 5.6 addresses operation and maintenance programs. The correct reference appears to be 5.7.
  - Table 4-6 references section 5.8 for education and outreach descriptions and additional information. Section 5.8 addresses potential research, studies, data acquisition, and data management. The correct reference appears to be 5.9.
  - Table 4-7 references section 5.7.2 for resource monitoring descriptions and additional information. Section 5.7.2 addresses influencing State Policy. The correct reference appears to be 5.8.2.
- The Plan must describe the rules and associated permit programs of the watershed district(s) in the watershed. Section 5.7.3 provides a description of existing regulatory controls and table 5-9 provides a summary of the current local regulatory controls including YMRWD. The Yellow Medicine River Watershed District (YMRWD) authorities are explained in section 5.7.3.

Appendix I provides a link to the YMRWD Plan which incorporated regulatory program. A link to the YMRWD rules must be provided in section 5.7.3.

**Comments that the plan should consider addressing:**

- Describe opportunities for permanent land protection necessary to meet the resource needs and achieve the goals for the watershed. Example language:
  - *“A Minnesota Conservation Reserve and Enhancement Program (CREP) initiative is expected to provide significant federal and state funding over a 5 year period. This program can fund many of the practices and projects contained within this plan. The Yellow Medicine Watershed Plan Area is included in the targeted program area and has the added priority factors of being designated in the high priority area for the Minnesota Nutrient Reduction Strategy, as well as containing serval prairie corridors that are listed in Minnesota Prairie Conservation Plan.”*
- The Plan should consider describing and spatially providing a sampling of specific BMPs found in each of the 4 Zones for implementation.
- The plan should consider a statement on how the MSU Terrain Analysis will be part of the biennial summit and how it will be used to target field scale implementation projects. See example schematic attached.
- The Plan should consider providing a narrative regarding how the new monitoring plan will be implemented along with a link to the appendices, in addition to the existing monitoring effort.
- 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 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. The NPPF and prioritization consideration should be referenced in 6.9.4 State Funding section of the plan.
- Global plan comments for consideration include: Spell & grammar check, technical editor, work omissions, punctuation errors that software will not catch, and tables and page breaks.

We commend the Yellow Medicine River Watershed partners for your participation as a pilot in developing the 1W1P program and for your collaborative effort in bringing this together. This plan is well written and at a level that makes it “available” to all readers. The state’s main water management agencies have committed to the One Watershed One Plan approach and we look forward to continue to work with you on future implementation. If you have any questions about this letter, please feel free to contact Mark Hiles at 507-359-6077, or Matt Drewitz at 507-359-6076.

Sincerely,



Mark Hiles



Matt Drewitz

Board Conservationist

Clean Water Specialist

Enclosure

cc: Jeff Nielsen, BWSR (via email)  
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