



# Minnesota Pollution Control Agency

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July 15, 2016

Ms. Kerry Netzke  
Executive Director, Area II  
Minnesota River Basin Projects, Inc.  
1424 East College Drive, Suite 300  
Marshall, MN 56258

RE: Minnesota Pollution Control Agency Comments for the Yellow Medicine One Watershed-One Plan

Dear Ms. Netzke:

The Minnesota Pollution Control Agency (MPCA) appreciates the opportunity to review and comment on the draft Yellow Medicine One Watershed-One Plan (Plan). As one of five pilot project partners across the state, the MPCA applauds the hard work, time commitment, and dedication the local plan partners put in to address the water quality issues affecting southwest Minnesota.

The following are the MPCA comments for the Plan:

- The Plan identifies information from the Yellow Medicine Watershed Restoration and Protection Strategies (WRAPS) Report. The MPCA appreciates the fact that the work done for the WRAPS Report is taken into consideration and was utilized for the development of the Plan. The MPCA strongly supports the primary concerns identified by the Yellow Medicine Plan Advisory Committee. These concerns are consistent with those identified in the Yellow Medicine WRAPS.
- On page 2, paragraph two, in the first sentence, Executive Summary, the MPCA recommends adding the link <https://www.pca.state.mn.us/water/watersheds/minnesota-river-yellow-medicine-river> after “WRAPS report.”
- On page 31, the top paragraph states:

“These goals were reviewed, revised, and approved by the Policy Committee for adoption into the YM1W1P for the first 10-year cycle. If met, the goals summarized in Table 3-1 would restore all of the waterbodies in the watershed to a state that meets water quality standards for aquatic recreation and habitat.”

The MPCA feels this is incorrect, and recommends replacing part of the last sentence to read:

“...that meets the 10-year target goals...” instead of “...that meets water quality standards...”

- On page 31, the top paragraph states that, “The current monitoring plan is discussed in Section 5.7.2.” It should read, “The current monitoring plan is discussed in Section 5.8.2 and Table 5-10.”

- On page 36, Table 4-1, 4-2, the MPCA could be listed as a source of funding for our administration of Section 319 funds.
- On page 42, the MPCA is listed as a source of funding for subsurface sewage treatment system (SSTS) upgrades, but is not listed in the table of acronyms at the top of Table 4-2.
- On page 46, the Minnesota Department of Agriculture (MDA) is listed in Table 4-3 but not included in the acronym table. The MDA is missing from Section 6.4, Tables 4-1 and 4-2 as well. While the MDA may not have responsibility in the strictest sense or be a source of funding, their participation as a partner will be extremely important to achieving the goals of this Plan, something that is not evident in these tables.
- The MPCA commends the approach described for review of ditch improvement projects to mitigate hydrologic alterations as well as the call for regular coordination/communication by the drainage authorities.
- The MPCA also appreciates the relatively high goal of 20% adoption of cover crops to improve soil health and reduce exposed soil.
- On page 62, Table 5-6, “Potential Capital-Improvement Project Components,” the Plan symbols in the table identify two levels of effectiveness: High or Low/Medium. The MPCA would like to see some clarification added the narrative as to how the effectiveness parameters were derived.
- On page 76, 5.7.3.5 Point-Source Pollution Regulations states:

“The MPCA implements this program, which includes municipal sewage-treatment plants, industrial discharges, concentrated animal feeding operations (CAFOs), and stormwater at the state level. Minnesota has general permits that govern activities such as confined animal feedlots, and the standards are outlined in state rule.”

The MPCA suggests changing the wording to:

- “The MPCA implements NPDES permits, such as stormwater (construction, industrial, and MS4), concentrated animal feeding operations (CAFOs), and municipal and industrial wastewater discharges. Specific information on NPDES permits and process can be found at <https://www.pca.state.mn.us/water/water-permits-and-forms>.”
- On page 81, Table 5-10, the MPCA recommends taking the “Stream Flow Monitoring” title from the table and replacing it with “Watershed Pollution Load Monitoring Network.”
  - On page 86-87, Section 5.9.7 Formal Education Programs, the MPCA appreciates that the list includes the mention of Volunteer Monitoring Programs, and also identifies middle and high school students for water quality issues. The Plan could also provide a link to the MPCA’s web site for these programs: <https://www.pca.state.mn.us/water/citizen-water-monitoring>.
  - Lastly, on page 100, for the last entry in Table 6-5, the MPCA recommends changing the “State Revolving Fund” to “Section 319,” and “loan” to “grant.”

Ms. Kerry Netzke

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Thank you, and please let us know if we may be of further assistance.

Sincerely,

*Wayne Cords*

*This document has been electronically signed.*

Wayne Cords

Manager, Southeast Region

Watershed Division

WC/SM:cz

cc: Rebecca Flood, MPCA  
Michael Weckwerth, MPCA