April 4th, 2017

Cannon One Watershed One Plan Planning Work Group / Cannon River Watershed
C/O Brian Watson/Ashley Gallagher, Dakota Soil and Water Conservation District
4100 220th Street West, Suite 102
Farmington, MN, 55024

RE: Response to request for priority issues and plan expectations (One Watershed, One Plan).

Dear Brian and Ashley,

Thank you for providing the opportunity to provide priority issues and plan expectations for the development of the Cannon River Comprehensive Watershed Management Plan under Minnesota Statutes section 103B.101, Subd. 14. We appreciate the partner’s willingness to participate in development of a watershed-based plan.

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 document, adopted by the BWSR Board on March 23, 2016 and 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.

Plan Content
- The plan must meet the requirements outlined in the One Watershed, One Plan – Plan Content Requirements document, adopted by the BWSR Board on March 23, 2016 and available on the BWSR website: www.bwsr.state.mn.us/planning/1W1P/index.html. More specifically, the plan must have:

Bemidji
403 Fourth Street NW
Suite 200
Bemidji, MN 56601
(218) 755-2600

Brainerd
1601 Minnesota Drive
Brainerd, MN 56401
(218) 828-2383

Detroit Lakes
26624 N. Tower Road
Detroit Lakes, MN 56501
(218) 846-8400

Duluth
394 S. Lake Avenue
Suite 403
Duluth, MN 55802
(218) 723-4752

Mankato
12 Civic Center Plaza
Suite 300B
Mankato, MN 56001
(507) 344-2821

Marshall
1400 East Lyon Street
Marshall, MN 56258
(507) 537-6060

New Ulm
261 Highway 15 South
New Ulm, MN 56073
(507) 359-6074

Rochester
3555 9th Street NW
Suite 350
Rochester, MN 55901
(507) 206-2889

Central Office / Metro Office
520 Lafayette Road North
Saint Paul, MN 55155
Phone: (651) 296-3767

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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.
- 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 not separate entities) and evaluation.

**BWSR has the following specific priority issues:**

**Pertaining to Vegetation Management**

- **Natural Habitat Protection/Restoration:** Protecting and restoring diverse natural habitats has multiple benefits including water quality protection for groundwater and surface water, stable plant composition to resist invasive species, protecting pollinator populations, wildlife habitat and resiliency to weather extremes. The plan should identify high priority natural habitats including wildlife and water quality complexes and corridors, and promote a combination of agricultural BMPs, buffer programs, conservation plantings, wetland projects and riparian activities that will protect, restore and link water quality and habitat corridors. Minnesota’s [Wildlife Action Plan](https://www.mnwildlife.org/wp-content/uploads/2020/01/Wildlife-Action-Plan-Report-2016.pdf) and [Prairie Conservation Plan](https://www.mnwildlife.org/wp-content/uploads/2017/03/Prairie-Conservation-Plan.pdf) are resources that can be used to aid planning efforts.

- **Protecting Pollinator Populations:** Projects should identify opportunities to benefit pollinator populations through creating areas of refuge and providing floral resources that can benefit a wide range of pollinators. BWSR’s [Pollinator Toolbox](https://www.pollinator.org/toolbox) provides guidance for projects and an Interagency Plan will be finalized in spring of 2017 that is focused on meeting pollinator goals identified in Governor Dayton’s Executive Order “[Directing Steps to Reverse Pollinator Decline and Restore Pollinator Health in Minnesota](https://www.mn.gov/governor/news_DEFINE/20160413_pollinatordecline.pdf).”

- **Invasive Species and Landscape Management:** A cooperative approach across the watershed is recommended for invasive species management to address invasive species and [noxious weeds](https://www.mnwildlife.org/topics/invasive-species) or specially regulated plants across geographic and ownership boundaries. Invasive species should be prioritized based on their risk to ecosystems, agriculture, recreation, and human health, as well as focusing on emerging weed threats such as [Palmer amaranth](https://extension.umn.edu/plants/weeds/dangerous-weeds/palmer-amaranth) that poses a significant risk to agricultural production. Adaptive management [strategies](https://www.mnwildlife.org/topics/invasive-species/adaptive-management) should be used to address invasive species and also maintain ecological functions and services within landscapes.

- **Soil Health:** The use of cover crops and perennial vegetation is recommended to promote good soil structure, organic content and microorganism populations that promote soil health and sustain productive ecological and agricultural landscapes. More vegetation more of the time increases evapotranspiration during the spring and fall seasons, reduces runoff and erosion and helps recycle nutrients. More roots more of the time increases organic matter in the soil profile, which increases infiltration and water holding capacity for plant available water, and also reduces runoff, erosion and nutrient transport.
- **Riparian Management**: Protecting and restoring riparian areas, including adjacent floodplains, have multiple benefits by reducing soil erosion, stream channel instability, phosphorus and nitrogen loading, and restoring flood attenuation, wildlife habitat and wetland functions. The Plan should identify high priority areas for riparian buffer easements, riparian erosion and sediment reduction, wetland restoration and other water storage and nutrient treatment opportunities, and target implementation efforts to those areas.

- **Wetland Management**: Protection and restoration of wetlands provides benefits for water quality, peak flow reduction, habitat and wildlife. The plan should support the continued implementation of the Wetland Conservation Act and look for opportunities to improve coordination across jurisdictional boundaries. The plan should also identify high priority areas for wetland restoration and strategically target restoration projects to those areas. The **Restorable Wetland Prioritization Tool** is one resource that can be used to help identify areas for wetland restoration.

**Pertaining to Groundwater**

- **Groundwater Coordination and Prioritization**: Work with BWSR staff and agency partners (MDH, DNR, MDA, MPCA) to outline any groundwater – related priority issues for the planning area. Take into account any Groundwater Management Areas, areas of groundwater concern, wellhead protection areas, and Drinking Water Supply Management Areas that have been identified. Address specific concerns about groundwater contamination and overuse that have been identified. Be sure to make use of existing groundwater data and publications. These include maps, data layers, and publications available from the Minnesota Geological Survey (MGS), DNR, MDH, US Geological Survey (USGS), and other sources.

**Pertaining to Drainage Management (103E):**

- **Involve Drainage Authorities**: Chapter 103E drainage authorities should be fully engaged from the early stages of the planning process. Use Section 103E.015 CONSIDERATIONS BEFORE DRAINAGE WORK IS DONE to capture both the extent and the limitations of drainage authority responsibility and authority for participating in the planning and implementation of conservation practices involving public drainage systems and their associated drainage areas.

- **Multipurpose Drainage Management (MDM)**: Include multipurpose drainage management in the approach for targeting best management practices (BMPs) within the drainage area of Chapter 103E drainage systems.

  - Prioritization of the watershed include landscapes and identification of Chapter 103E drainage systems and their drainage areas.
  - Measurable outcomes for erosion and sediment reduction, nutrient reduction, improved instream biology, and detention storage to assist those outcomes, should include correlation to Chapter 103E drainage systems.

- **Coordinate Implementation**: Lay out a coordinated approach for how implementation of multipurpose drainage management practices identified in the plan can be coordinated with,
and/or integrated early into 103E processes and proceedings. When projecting funding needs for BMP implementation on, or within the drainage area of, public drainage systems, incorporate use of Sections 103.011, Subdivision 5. Use of external sources of funding, and 103E.015, Subdivision 1a. Investigating potential use of external sources of funding and technical assistance.

Drainage authorities should consider the permissive authority to incrementally implement permanent buffer strips of perennial vegetation or side inlet controls to control erosion and sedimentation, improve water quality, or maintain efficiency of the drainage system allowed in 103E.201 subd. 6. In addition, a drainage authority shall order a 16-1/2 feet strip of perennial vegetation for any proceeding to establish, construct, improve or do any work affecting a public drainage system under any law that appoints viewers to assess benefits and damages pursuit to 103E.021 subd. 1.

**Pertaining to Wetlands**

- **Wetland Prioritization:** The state is embarking on a wetland prioritization plan that will guide wetland mitigation in the future. Wetland restoration and preservation priorities identified in this plan may be eligible for inclusion in this statewide plan in the future.

**Pertaining to Easements**

- **Re-Invest in Minnesota (RIM):** The State’s Re-Invest in Minnesota (RIM) Reserve easement program considers several site specific and landscape scale factors when funding applications. Though it is dependent on specific program terms, the State does consider local prioritization of areas for easement enrollment.

**General Comments**

- **Review of the Nonpoint Priority Funding Plan:** The state’s Nonpoint Priority Funding Plan (NFPF) outlines a criteria-based process to prioritize Clean Water Fund investments—if planning partners are intending to pursue Clean Water Fund as a future source of funding, partners are strongly encouraged to consider the high-level state priorities, keys to implementation, and criteria for evaluating proposed activities in the NFPF.

- **Ordinance Review:** A review of local ordinances and regulations across the watershed should be considered with the purpose of identifying commonalities and significant differences and opportunities for coordination.

- **Climate Change Review:** Please review the document entitled: “Climate Change Trends and Action Report-Updated December 13, 2016” and incorporate climate change information within your planning effort. This document includes information related to mitigation and adaptation.

  [http://www.bwsr.state.mn.us/native_vegetation/BWSR_Climate_Change.pdf](http://www.bwsr.state.mn.us/native_vegetation/BWSR_Climate_Change.pdf)
- **Cannon River WRAPS**: The Cannon River Watershed Restoration and Protection Strategies approved October 20th, 2016 contains information related to existing watershed conditions, pollutant sources and TMDL information, and management strategies pertaining to restoration and protection. This information should be reviewed and incorporated within this planning efforts.

- **Altered Hydrology/Flooding/Water Quantity**: Counties within the Cannon River Watershed have experienced increases in disaster declarations, and damaging flood events. There are several causes for the increased flooding. BWSR believes the watershed plan should examine these causes and potential mitigation and implementation efforts that would assist in the reduction of peak flow, flooding, streambank/riparian erosion and sedimentation. Artificial drainage and potential wetland restoration should also be considered.

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 Jennifer Mocol-Johnson at 507-344-2820.

Sincerely,

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