



LOWER MINNESOTA RIVER WATERSHED DISTRICT

Executive Summary for Action

Lower Minnesota River Watershed District Board of Managers Meeting

Wednesday, March 20, 2024

Agenda Item

Item 7. A. – Lower MN River East One Watershed One Plan

Prepared By

Linda Loomis, Administrator

Summary

At the February 21, 2024, Board of Managers meeting, Mr. Eric Evenson expressed to the Board his concerns after reviewing the Draft Lower Minnesota River East One Watershed One Plan (LMRE Plan). The Board asked Managers Amundson and Salvato to meet with LMRWD staff to develop a response/cover letter to accompany the technical review and comments for the draft LMRE Plan.

Manager Salvato prepared a letter to be sent to the LMRE Steering and Policy Committees, which was reviewed by Manager Amundson and LMRWD staff. The letter has been placed on letterhead and is attached for the Board's review and approval.

Young Environmental Consulting Group has made edits to the comments presented to the Board at the February 21, 2024, Board of Managers meeting.

Attachments

- Technical Memorandum – Lower Minnesota River East Comprehensive Watershed Management Plan – One Watershed, One Plan (1W1P) Technical Review Comments dated February 14, 2024 (Revised March 12, 2024)
- Letter to Lower Minnesota River

Recommended Action

Motion to approve technical review comments, Letter from the Board and authorize distribution.

Project website: [website](#)

Technical Memorandum



To: Holly Bushman, Environmental Resources Specialist, Le Sueur County
Anne Sawyer, Board Conservationist, BWSR

From: Della Schall Young, CPESC, PMP, CTF, Principal Scientist
Derek Beauduy, PE, Senior Water Resources Scientist

CC: Linda Loomis, Administrator
Lower Minnesota River Watershed District (LMRWD)

Date: February 14, 2024 (Revised March 12, 2024)

Re: Lower Minnesota River East Comprehensive Watershed Management Plan—One
Watershed, One Plan (1W1P) Technical Review Comments

This memo provides technical review comments on the Lower Minnesota River East Comprehensive Watershed Management Plan (Plan) on behalf of the Lower Minnesota River Watershed District (LMRWD). LMRWD Board Manager Laura Amundson was on the Policy Committee, and LMRWD Administrator Linda Loomis was on the Steering Team to develop the Plan; prioritize issues and measurable goals; and identify implementation plans, schedules, and actions. We appreciate the collaborative nature of the process and look forward to implementation actions that will lead to environmental and resource enhancements in the Lower Minnesota River East watershed over the next decade.

While the LMRWD values ongoing collaboration with the 1W1P team and stakeholders to develop strategies over the entire Planning Area, we note that the Plan generally prioritizes resources and implementation actions in areas outside of the LMRWD. The Plan does not target implementation actions toward resources that the LMRWD has identified as high value and in need of protection, such as Eagle Creek and Savage Fen. The Plan identifies Eagle Creek as a priority stream, but a local priority, indicating that the LMRWD and local jurisdictions must lead any efforts to protect and improve the creek outside of the 1W1P scope. In addition to Eagle Creek and Savage Fen, there are specific areas in the LMRWD that would benefit from targeted actions to improve watershed health and water quality (e.g., eroding bluffs, gullies, and ravines along the Minnesota River and urbanized areas where stormwater BMP implementation would provide benefit). These areas have not been included as priority or targeted areas in the Plan.

The LMRWD has a Watershed Management Plan and Rules that govern prioritization and implementation of targeted actions and projects within its jurisdiction. The LMRWD will continue to primarily rely on its Watershed Management Plan and Rules to target resources and implement actions in the district. We believe the 1W1P effort could fill a gap in identifying feasible implementation actions within the LMRWD in areas of need identified since the LMRWD Watershed Management Plan was approved in 2018 and before the scheduled 2027 comprehensive update. Although we generally support prioritizing the most impacted streams, lakes, and resources within the 1W1P Planning Area for targeted implementation, we encourage the 1W1P team to

reevaluate its prioritization strategy or include more flexible language in the Plan and implementation tables to address resources and areas outside the Plan’s defined priorities.

The following are additional comments:

Chapter 3: Priority Issues, Targeting, and Measurable Goals

Comment: As noted above, we recognize that most of the priority issues and targets focus on parts of the Planning Area outside the LMRWD. Targeting implementation actions in upstream areas of the watershed, as the Plan does, will benefit downstream water quality, and we agree that the Plan has identified appropriate issues and goals that prioritize many of the Planning Area’s most pressing needs. Although we support this larger watershed-scale approach, the LMRWD encourages the 1W1P team to revise the prioritization strategy to allow for broader consideration of priority resources for implementation.

Chapter 3.1: Surface Water Quality Goal A—Reduce upland and near-channel erosion contributing sediment to priority streams by 1,886 tons per year, page 82

Comment: We recommend including more detail on sediment and erosion sources in this section, including a graphic showing the different types of near-channel sediment sources—gully, ravine, bank, and bluff erosion. Please also specify whether the Plan considers bluff erosion as a near-channel sediment source. We encourage greater description and detail on bluff erosion issues in the Plan because it is a significant source of sediment in the Minnesota River. We also recommend including a map of HUC10 subwatersheds for the subwatersheds listed in Table 3.1.

This page also notes that the BWSR Water Erosion Pollution Reduction Estimator was used to quantify the pollutant reductions for near channel sources, and that the model assumptions are included in Appendix G. There is no Appendix G in the plan. It appears that Appendix F should contain this information, but there is no discussion of model assumptions for the Water Erosion Pollution Reduction Estimator. Please update the appendix to include the model assumptions.

Table 3.5 Priority Streams, page 91

Comment: Why is the Credit River not included in Table 3.5 but Eagle Creek is included? The Eagle Creek and Credit River footnotes in the table should be integrated into the body of the document with more detail, describing why these are local priorities and not 1W1P priorities. Although local entities such as the LMRWD and the Scott County Watershed Management Organization may prioritize both Eagle Creek and the Credit River, lessening the need to prioritize them in the Plan, greater acknowledgment of this should be made in the Plan itself. We also encourage revising the Plan’s prioritization criteria to be broader, allowing for resources to be prioritized as part of the Plan, not just on the local level.

Figure 3.2: Priority Streams and Subwatersheds, page 92

Comment: No streams or subwatersheds in the LMRWD are identified as priorities in this figure, meaning there will be no 1W1P efforts to target actions toward LMRWD streams per the Figure 3.2 footnote “Efforts will be targeted to within subwatershed of priority streams.” Again, we encourage revising the Plan’s prioritization criteria to broaden the scope of resources that can be identified as

priorities.

Chapter 3.2: Groundwater, page 93

Comment: Because of the lack of groundwater quality data currently available, one of the goals should include the collection of groundwater chemistry data from wells in and around Eagle Creek and Savage Fen.

Chapter 3.3: Habitat and Natural Resources Protection and Preservation—Measurable Goal A, page 98

Comment: The LMRWD has studied and identified high-value *natural* resources within the district. We encourage the Plan to include Scott County in identification efforts and protection strategies for high-value *cultural* resources. Although we fully support identifying and protecting high-value cultural resources, the Plan should expand on what actions or protection strategies are intended for cultural resources identified through this effort.

Chapter 3.3: Restoration Goal A and Figure 3.6, page 99

Comment: Prioritizing areas for habitat restoration based on the priority streams identified in Table 3.5 leaves out streams in the LMRWD and much of Scott County that would benefit from restoration, stabilization, increased perennial cover, and improved habitat connectivity. Although implementing projects to reduce pollutants and stressors in priority streams in Table 3.5 is appropriate from a water quality standpoint, we believe restoration, riparian enhancement, and habitat connectivity goals should be more widely targeted over a broader area. Areas that could benefit from gully and ravine stabilization, riparian enhancement projects, and creek restoration projects, especially those in or near high-value resources and the Minnesota River, should be part of this goal. This includes areas and resources within the LMRWD, such as Eagle Creek and Savage Fen. Please explain why all areas in the LMRWD and much of Scott County were left out of this prioritization and why the Plan only prioritizes those creeks and subwatersheds prioritized for water quality issues as applicable for habitat restoration.

Chapter 4: Implementation Schedules

Comment: The implementation schedules and tables appear to exclude areas and resources in the LMRWD from being targeted for implementation. For example, for BMP.3 – Urban BMPs, the Priority Areas are priority streams, lakes, and groundwater priority areas identified in the Plan. Because these priority streams, lakes, and groundwater areas are generally all outside the LMRWD, no urban BMPs would be targeted in the district. This is further supported by the 17 pages of detailed implementation tables in Appendix E that identify no LMRWD subwatersheds, water resources, or areas in any of the Priority Areas columns. We read this similarly for habitat restoration-type activities; no areas or resources in the LMRWD are prioritized in the detailed implementation tables in Appendix E for grade stabilization, native plantings, stream restorations, or stream stabilization. This translates to no implementation targeted at areas or resources in the LMRWD. Why have some implementation actions such as habitat/riparian restoration projects, stabilization projects, and planting projects not been prioritized and targeted on a more watershed-wide scale?

Comment: More detail on how cost estimates were determined would be helpful to include in the Plan. Some of the cost estimates like the estimate for urban stormwater BMPs seem low, considering typical costs for design, land, construction, and ongoing operation and maintenance. Similarly, many costs for other BMPs that require design and construction, such as stabilization projects, also seem low, and the Plan would benefit from more information on how costs were determined.

Chapter 5: Plan Implementation Programs

Comments: Table 5.1 should include a row identifying the LMRWD's Water Resources Restoration Fund.

Table 5.3: The LMRWD requires entities to operate and maintain stormwater BMPs, so it seems the LMRWD should be included as having existing O & M programs for stormwater facilities and maintenance. Please explain in the Plan the difference between stormwater facility maintenance and stormwater BMP maintenance.

Table 5.4: The LMRWD has a K–12 education program and a social media program. These should be reflected in the table.

Table 5.6: Should watershed districts and their stakeholders be included as Target Audience?

Table 5.10: The table should reflect that the LMRWD has Erosion Control and Stormwater Management regulatory programs (second row of table).

Table 5.12: The LMRWD provides funding to the Scott Soil and Water Conservation District to monitor Eagle Creek and Savage Fen. This could be included in a footnote or in the table itself.

Chapter 6: Plan Administration and Coordination

Comments: It is important to see and understand the LMRWD's involvement in the administration and coordination of this Plan. Please provide specific information.

Page 161: Include a list of the entities making up the Joint Powers Board (LMREWJPB).

Page 163: Collaboration with Other Units of Government: Please include the LMRWD in the list on Page 163.

Appendix E: Detailed Implementation Tables

Comment: See comment on chapter 4 above. The LMRWD does not have any priority streams, lakes, or areas identified in any of the detailed implementation tables in Appendix E. The LMRWD *is* listed as a Lead & Supporting Entity in the final table column in some tables.

In addition to the comments above, Young Environmental will provide a PDF markup of the Plan that includes suggested grammatical edits or areas of clarification.



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To the Lower Minnesota River East Steering Committee:

The Lower Minnesota River Watershed District (LMRWD) Board of Managers and Staff appreciate the opportunity to provide comments on the Lower Minnesota River (LMR) East Comprehensive Watershed Management Plan (herein called "Plan") and for being a part of the development of Plan to date. In addition to the LMRWD technical review comments, please consider our broader comments below about the Plan's importance and potential to make significant impacts both to LMR east watershed as well as downstream.

The LMRWD was founded in 1960 initially to serve as a local sponsor for the U.S. Army Corps of Engineer's dredging and maintenance of the 9-foot navigation channel in the navigable portions of the Minnesota River. The LMRWD's (herein called the "District") responsibilities have expanded substantially since then to include surface and groundwater quality and management; floodplain and flood management; erosion and sediment control; and public education and outreach. The boundaries of the LMRWD do not conform to a watershed but instead span bluff to bluff. As a result, the District is challenged by upstream land management and associated runoff that reaches the main stem of the LMR. According to the Collaborative for Sediment Source Reduction Report, one third of the discharge and two thirds of the sediment in Lake Pepin is delivered from the Minnesota River (Wilcock et al., 2016). More sediment in the channel has increased dredging responsibilities, all of which are funded by taxpayers. Climate change impacts, including increasing discharge and precipitation have further exacerbated the District's ability to manage and protect its natural resources.

The District's Board wants to commend the partnership and expertise that came together to develop the Plan. The development of the Plan is the first step, and we recognize the significant role of working with landowners to install best management practices. The counties and soil and water conservation districts are uniquely positioned to provide that technical assistance and knowledge of the local landscape. While we recognize this is an initial effort to set measurable goals to improve water quality, the District Board strongly encourages that as the implementation of this Plan is underway, that routine updates be made to both adaptively manage, continuously learn, and ultimately set more ambitious goals to improve and protect surface and groundwater resources.

The success of this Plan goes beyond the boundaries of the LMR watershed east. The Plan has the potential to improve water resources locally and improve the quality of life for residents, businesses, and everyone in between. More importantly, meeting the milestones laid out in this Plan can reduce downstream impacts including reducing the sedimentation that is filling in Lake Pepin, and all the way down to the Gulf of Mexico Hypoxic Dead Zone. As a headwater state, it is imperative that we do our fair share to reduce downstream impacts.

Thank you for considering the comments in this letter. Please feel free to reach out to Laura Amundson (Treasurer) at jlamu107@gmail.com or Lauren Salvato (Secretary) at laurensalvato@gmail.com with any questions.

Sincerely,

The Lower Minnesota River Watershed District Board of Managers