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Rum River One Watershed One Plan Partnership  
Darrick Wotachek  
Isanti County-Water Planner  
555 18<sup>th</sup> Ave SW  
Cambridge, MN 55008

Dear Darrick,

Thank you for providing the opportunity to provide priority issues and plan expectations for the development of the Rum River comprehensive watershed management plan under Minnesota Statutes section 103B.801.

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*, adopted by the BWSR Board on March 28, 2018, available on the BWSR website:

[www.bwsr.state.mn.us/planning/1W1P/index.html](http://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 *One Watershed, One Plan – Plan Content Requirements*, adopted by the BWSR Board on March 28, 2018, available on the BWSR website:

[www.bwsr.state.mn.us/planning/1W1P/index.html](http://www.bwsr.state.mn.us/planning/1W1P/index.html). More specifically, the plan must have:

- A thorough analysis of issues, using available science and data, in the selection of priority waterbodies, resource concerns, and areas.
- 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.

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- 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:**

- **Watershed Citizen Empowerment** – The key to effective watershed management is recognizing the people who live and work within the watershed are independent actors who make daily choices that will have cascading influences with unexpected water quality outcomes. Most, if not all, of those who live, work, and play within the watershed would like to see the natural environment protected or enhanced, particularly the water resources. With the understanding that governmental funding will never be able to address all of the problems within the watershed, it is critical to ensure that these individuals have the knowledge and access to resources to empower them to make wise choices that lead to desired water quality goals. As the policy committee is composed of elected and appointed officials, we encourage the policy committee members to create a sound watershed ethical framework in which government agencies recognize and empower the watershed residents to make decisions that allow for the individual and community management of locally important water resources and other features of the environment.
- **Protection of Healthy Ecosystems** – The upper portion of the Rum River Watershed is composed of large tracts of forest and substantial wetland complexes. These healthy ecosystems provide an important mix of ecosystem services that protect water quality, provide wildlife habitat, contribute to economic development (forest products), and allow for many dispersed recreational opportunities. The planning efforts surrounding these large tracts of healthy woodlands and wetlands should seek to protect these resources and manage land uses in such a way as to minimize any unintentional degradation of the upper watershed. Future development and management of these healthy ecosystems should come from a point of first, doing no harm.
- **Twin Cities Metropolitan Area Drinking Water Protection** – According to the US Forest Service, the Rum River is the second most threatened tributary for the Twin Cities metropolitan area drinking water supply, which comes from the Mississippi River. Therefore, it is critically important for the planning partnership to consider ways to at least mitigate any additional impairment, if not seek to reduce impairments, that may hinder the Twin Cities ability to affordably treat and manage their drinking water supply.
- **Local Controls** – One of the best ways for ensuring high quality water and the protection of local natural resources is to ensure these resources do not become impaired in the first place. While financial incentives and activities are useful for restoring a system after it has been degraded, local controls provide an important check on unwise land uses and development. With development and land use conversion being a significant potential risk to water resources in the central and lower portions of the watershed, effective local land use controls are an important tool in water quality protection. The Rum River planning partnership should seek to ensure that current and future land use controls are effectively implemented in such a way as to balance growth needs with water quality and natural resource protection.
- **Intergovernmental Partnerships** – There are a diverse set of landowners within the watershed. While the majority of landowners are private citizens, land is also owned by the state, by the Mille Lacs Band of

the Ojibwe, by the counties, and by municipalities within each county. During the plan development process, it will be important to be as inclusive as possible to ensure that all landowners understand the value of the Rum River One Watershed One Plan and participate as a valued entity in the planning and implementation phases of the process. In order to be fully inclusive, the planning partnership and/or consultant should consider a suite of outreach and communication strategies to maximize the ability of partners to provide input, clarify their ability to participate in watershed management, and incorporate the comprehensive watershed management plan's implementation activity into their own local governing processes. The Mille Lacs Band of the Ojibwe has used PTMApp for some of their lands and the planning partnership should work with the band to ensure the results are included in the planning process, with Band approval.

- **WRAPS** - The plan should focus on protection efforts as the majority of the lakes and stream reaches in the Rum River Watershed are meeting state water quality standards. The plan should also discuss high value resources such as Mille Lacs Lake and the Rum River. The plan should address the handful of waterbodies that are impaired for aquatic recreation due to high nutrient and bacteria levels or impaired for aquatic life due to low dissolved oxygen levels, altered hydrology, and lack of habitat. For many of the waterbodies, sufficient water quality data has not been collected to determine trends and that should be acknowledged in the plan. One of the priorities of the Nonpoint Priority Funding plan (see below) is waters that are close to the impaired standard. As the Rum River is approaching the impairment standard for nutrients, the plan should identify actions to reduce nutrient loading as a way to begin moving the river away from the impaired standard.

The plan should build off of the planning efforts of the [Rum River Watershed Restoration and Protection Strategies \(WRAPS\)](#). In particular, planning partners should revisit the prioritization of areas for implementation efforts associated with nutrient and sediment loading to surface waters and that would produce multiple benefits. Also, revisiting lake prioritization efforts and implementation scenario modeling runs could prove beneficial.

- **Drinking Water** – The plan should use findings of the interagency [GRAPS](#) when completed to inform discussions of priority issues and goals related to local groundwater and drinking water.
- **Landscape Stewardship Plan** – Planning partners should consider incorporating the priority forestry protection areas into the plan as appropriate. A Landscape Stewardship Plan (LSP) is being developed for the watershed and will include prioritized, targeted and measurability parcel based data to determine where forested lands should be protected, enhanced, or reforested/restored.
- **The Nonpoint Priority Funding Plan (NPPF)** – The NPPF outlines a criteria-based process to prioritize Clean Water Fund investments. Planning partners intending to pursue Clean Water Fund dollars are strongly encouraged to consider the high-level state priorities, keys to implementation, and criteria for evaluating proposed activities in the NPPF. In particular, efforts to protect or restore surface waters that are close to the state water quality standards and efforts to protect drinking water sources should be considered a priority.
- **Drainage** - The drainage authorities within the planning boundary should be included as stakeholders in the plan development process. Additionally, the planning partners are strongly encouraged to include projects and activities consistent with multipurpose drainage criteria outlined in Minnesota Statutes §103E.011, Subd. 1a and §103E.015, Subd. 1.

- **Wetlands** – The state is embarking on a new wetland prioritization plan that will guide wetland mitigation in the future. Wetland restoration and preservation priorities in this plan may be eligible for inclusion in this statewide plan in the future. Wetlands are an important component of water storage and can serve to mitigate the extremes of heavy rainfall events. The upper part of the Rum River Watershed has a significant portion of the historic wetlands intact and in a functional condition. The plan should address efforts to protect these valuable ecosystem features to prevent either degradation or loss. In addition, the middle of the watershed may have some areas in which wetlands can be restored and these efforts can aid in improving hydrology, offering additional flood storage, and providing a variety of ecosystem services.
- **Re-Invest in Minnesota (RIM) Reserve easement program** – The 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 considers local prioritization of areas for easement enrollment.
- **Landscape Resiliency and Climate Adaption** – BWSR strongly encourages your planning partnership to consider the potential for more extreme weather events and their implications for the water and land resources of the watershed in the analysis and prioritization of issues.
- **Public Land Management** – Within the Rum River Watershed, there are fairly extensive holdings of public lands including state forests and parks, county parks, and city parks. In addition, there are many public access points to the watershed’s lakes and rivers. Balancing access and enjoyment with natural resource protection will be an important consideration as this region is likely to see ever increasing interest in recreational development. Therefore, it will be critically important to ensure there is good communication between the planning partnership and the managing entities to ensure the valuable recreational and public lands are not loved to degradation.

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 Jason Weirnerman at 320-223-7072 or [Jason.weirnerman@state.mn.us](mailto:Jason.weirnerman@state.mn.us).

Sincerely,

*Jason Weirnerman*

Jason Weirnerman

Board Conservationist

cc: Rum River 1W1P Planning Work Group (via email)  
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