

60 DAY FORMAL REVIEW COMMENTS AND RESPONSES

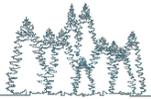
Dates of Comment Period: December 16, 2022 - February 14, 2023



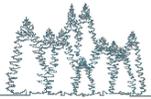
Key:

- Material:** Comments represent changes in material and content of the plan.
- Editorial:** Comments represent spelling, grammatical, clarification, or visual issues with graphics.
- Note:** Generally consist of a statement expressing a perspective.

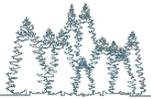
Section	Page	Paragraph	Organization	Comment	Material	Editorial	Note	Plan Change Made (Yes/No)	Comment Response / Action
2			DNR	The maps and graphics for Section 2: Land and Water Resources Narrative could be a little larger and clearer.		x		No	
Overall			DNR	The DNR appreciates seeing soil health as a goal in the plan. Soil health will provide multiple benefits within some of the other goals and strategies in the plan as well.			x	No	
Overall			DNR	Many of the implementation activities in the plan are intertwined and overlap with other benefits in the watershed. Prioritization efforts could be enhanced by drawing attention to these relationships throughout the plan and highlighting opportunities that provide multiple benefits. For example, habitat and biodiversity opportunities in riparian vegetation restorations/naturalizations on streams also incorporate strategies for floodplain connectivity and habitat; and soil health practices improve agricultural land in ways that increase soil water retention and reduce downstream peak flows.	x			No	Multiple benefits are shown in the Goals section where it links the goal with Primary and Secondary issues. Multiple benefits are shown in the implementation table with open and closed circles tying the actions to multiple plan goals. Also in the Vision Statement.



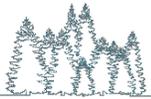
Section	Page	Paragraph	Organization	Comment	Material	Editorial	Note	Plan Change Made (Yes/No)	Comment Response / Action
Overall			DNR	Much of the plan focuses on restoration projects. Are there areas of the watershed where protection projects could be considered?			x	No	There is already a lot of public land in the watershed. There is a goal for Land Protection (SFIA and easements). Also, actions include Riparian Easements, Bacteria practices in unimpaired reaches. All practices in unimpaired reaches are protective.
Overall			DNR	There is little discussion in the plan about early coordination with local partners and state and federal agencies. Good working relationships are a must in the early planning process for many of the projects listed in the plan. Please continue to foster communication, early coordination, and collaboration with all potential partners on all projects in the plan.			x	Yes	Partners are listed in each action. Also, there is a Coordination section in Section 7. pages 112-114. Page 91: added language to the action "Review drainage system management" to say that the outcome is "Coordinated approach to better management of drainage system". This includes early coordination with landowners on projects.
1	1		DNR	Watershed Vision Statement: Should it read "Roseau River Watershed Partners" instead of "Roseau Watershed Partners"?		x		No	
3	51-52		DNR	Invasive Species: Consider adding aquatic invasive species (AIS) to the last paragraph. With Lake of the Woods so close by, AIS could become a concern, with significant boat traffic and movement of invasives.		x		Yes	
4	56		DNR	Agronomic Protection: The Long-Term Goal states that all public drainage systems will be managed to provide adequate protection of agricultural lands. Should the statement specify that "adequate" means protection from a 10-year, 24-hour storm event?		x		No	Not sure if this is possible everywhere and/or if it is adequate for future precipitation. Would like to leave it open and flexible.



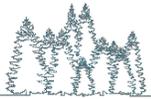
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4	58		DNR	The Long-Term Goal is to increase storage by 27,985 acre-feet based on storing 0.5 inches across the watershed. Will 0.5 inches be enough when precipitation in the Roseau River Watershed has increased more than any other watershed in the state in the last 40 years?	x			No	Probably not, but it is what is feasible based on what we know at this time.
4	59	figure 4.6	DNR	There are many ditches in the Lost River State Forest in the northeastern part of the watershed. Consider abandonment of these ditches to create storage in this part of the watershed, which might reduce the need for storage downstream. For example, ditch abandonment could be added to the strategies tables for the Lake Bottom Subwatershed Planning Region. Less water flowing out of the forest will reduce flood volumes/flows and even improve water quality. If abandonment of ditches in the Lost River State Forest is a strategy for water storage, please add the ditch systems to the map for Figure 4.6.	x			No	Lost River Peatlands restoration project is noted in the Lake Bottom Implementation Table on page 83. Ditch abandonment could be a part of a restoration project, but also may not be necessary, so it is not listed specifically.
4	64-65		DNR	The Long-Term Goal is to stabilize or restore all unstable stream reaches. Clarify what is meant by “unstable.” Have reaches been assessed to see if they are geomorphically unstable or does this just refer to areas with washed out banks? If assessments have not been conducted on streams in the watershed, it maybe a good practice to assess stream reaches and create a priority list of those unstable reaches.	x			Yes	Added action in Watershed-wide table to survey and assess stream reaches for instability. Added DNR as a partner.
4	64-66	4.12	DNR	The map shows locations to focus on for this goal. The orange lines indicate impaired streams. However, these impairments, for Index of Biological Integrity (IBI) fish and macroinvertebrates, do not necessarily mean that the streams are unstable and need restoration or bank stabilization.	x			Yes	This map was changed to local data instead of the WRAPS designations.



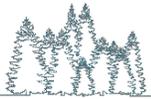
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4	69	4.16	DNR	In the map, the dark polygon near Badger stands out. Has the cause of high phosphorus there been investigated?	x			No	No, but the HSPF data was double-checked and it is correct.
4	71	4.18	DNR	The map shows only the Hay Creek subwatershed as an area in which to focus efforts. Should other subwatersheds be looked at? The Badger subwatershed is high in phosphorus, which sometimes goes hand in hand with bacteria issues. Consider focusing on bacteria reductions there as well.	x			No	Bacteria reduction projects will be targeted to Hay Creek, but there is also an action in the Watershed-wide implementation table to implement bacteria reduction projects in other areas of opportunity.
4	73	4.2	DNR	The map shows locations in which to focus efforts. Will efforts include easement opportunities? Easements do not need to be strictly conservation or habitat related. They can also be for grazing or specific farming practices, for example. We recommend adding easements to the land protection strategies for the entire watershed.	x			No	There is an action for easements and acquisitions on page 92. Also, page 95 details land retirement programs and easement options for implementation.
5	91	Add a groundwater observation well	DNR	In the Responsibility column, a local partner should be listed as the Lead, with the DNR as a secondary partner. The DNR can help, but it is not the DNR's role to request or monitor or the well.		x		Yes	Added SWCD as lead.
5	92	Connectivity enhancements	DNR	The DNR can assist with culvert replacements and dam modifications but should not be listed as a Lead partner.		x		Yes	Changed DNR to partner.
5	92	Coordinate road projects	DNR	The DNR should not be listed as a Lead partner but can assist with road projects in the capacity for culvert/bridge replacements.		x		Yes	DNR is listed as a supporting partner.
5	93	Table 5.1	DNR	Fix the table numbering (there is another "Table 5.1" on page 75).		x		Yes	
6	100-101	Aggregate Management	DNR	Add a statement that any aggregate washing over 10,000 gallons a day or 1 million gallons a year will require a DNR Water Appropriation permit.		x		Yes	



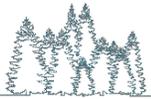
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6		Public Waters	DNR	Add a section/paragraph about 103G Public Waters regulations.		x		Yes	
4	70	Bacteria Reduction Goal	MPCA	Section 4. Measurable Goals – Bacteria Reduction Long-term Goal. The Plan identifies the long-term bacteria reduction goal as, “A 23% reduction in the concentration of E. coli in Hay Creek based on the TMDL.” The 2020 Roseau River Watershed Total Maximum Daily Load (TMDL) identifies the Hay Creek E. coli reduction goals as 18% under low-flow conditions and 21% under very-low-flow conditions. The MPCA recommends citing the same goals in the Plan as identified in the TMDL.	x			Yes	
5 & 6			City of Roseau	Include the a West Side Stormwater system upgrade to alleviate localized flooding along the TH 89 corridor including are-as around Polaris Industries and the West Side Trailer Court. This project was recently developed to address stormwater deficiencies resulting from more frequent and intense rainfall events in the city of Roseau. This storm water project would not only alleviate flooding issues at Polaris and the West Side Trailer Court, but also address flooding along the TH 89 corridor which currently restrict MnDOT from being able to make requested roadway safety improvements.	x			Yes	Added to Capital Improvement Projects list, and then upped the number of stormwater projects in the Stafford Planning Region Implementation Table from 2 to 3.
4	59	Figure 4.6	BWSR	This is a map of FEMA 100 year event. The caption suggests to me that these are the areas where work will be done. Suggest reword map caption. “Areas with most frequent flood damages. Water storage efforts will be directed to areas of the watershed that reduce the volume of runoff to these areas most at risk of damage from floods”.		x		Yes	Changed to say these are areas where flood damage risks are, not storage projects.



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3			BWSR	<p>There is one priority issue from Section 3, fish passage and connectivity (Priority B), that is not identified as a primary or secondary issue addressed by any of the goals in Section 4 of the draft Plan. BWSR Plan Content Requirements Version 2.1 states, "Each priority issue must have associated measurable goals for addressing the issue." Below are two alternatives that could address this item: 1) Edit the insufficient instream habitat issue to read, "Instream habitat can be affected by channelization, sedimentation from erosion, barriers to fish passage, land use changes, low base flow, flashiness, etc. The removal of woody debris also impacts flow regimes and fish and wildlife habitat and life stages." Then the fish passage and connectivity issue could be removed as a separate issue in the plan.</p> <p>2) List fish passage and connectivity as a secondary issue addressed through progress towards the Stream Stabilization and Restoration goal (Figure 4.11) and the Ditch Bank Stabilization goal (Figure 4.1) in Section 4 of the Plan.</p>	x			Yes	Option 1 was used.
4	65	4.12	BWSR	<p>Figure 4.12 – The Stream Restoration/Protection Priority layer from the WRAPS is good to include in the Plan, but this is a water quality-based restoration/protection categorization and not directly representative of stream reaches needing stabilization or restoration. Suggest to instead use the Stream Restoration layers from the Targeting Maps in Section 5 in Figure 4.12, and the WRAPS Restoration/Protection layer could be used in Figures 4.8, 4.16, and 4.18.</p>	x			Yes	



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Overall			MDH	Our priority concerns have been adequately addressed in the draft plan. MDH looks forward to providing continued support and technical assistance with the implementation of the plan. We commend the planning team for their work in developing the plan.			x	No	
4	73	Figure 4.20	LOW SWCD	It seems that the mapped portion in Lake of the Woods (LOW) County has the federal and state lands cut off by the hydrologic boundary and not by the Watershed district boundary. Could you fix this map to include the state and federal land ownership data for the planning boundary?		x		Yes	
4	73	Figure 4.20	LOW SWCD	In addition, should there be any privately owned forest parcels > 20 acres identified on this map in Lake of the Woods County? It seems like there should be, if there was another screening process for greater than 20 acre forestry parcels that removed some of these sites, that process should be explained on the map. It seems like there are not that many privately owned forest parcels in the entire map, but there are none identified in LOW County. I believe that there are some in Lake of the Woods County. This may also be attributed to not all of the data layers being included for the entire planning boundary if they were truncated by the hydrologic boundary.	x			No	There were no additional privately owned parcels >20 acres in size.
4	90	Figure 5.9	LOW SWCD	It seems that the mapped portion in LOW County has the federal and state lands cut off by the hydrologic boundary and not by the Watershed district boundary. Could you fix this map to include the state and federal land ownership data for the planning boundary?		x		Yes	



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4	66		RSWCD	Please add within the Groundwater Protection Long-Term Goals: Eliminate the demolition landfill groundwater contamination. (There could be some work done towards this in the next 10 years.)	x			Yes	Added to the Emerging Issues section in the plan.