

February 1, 2023

Tracy Halstensgard
Administrator, Roseau River WD
714 6th St SW
Roseau, MN 56751

RE: Response to submittal of draft Roseau River Comprehensive Watershed Management Plan 60-day review

Dear Roseau River Watershed Partner LGUs,

Thank you for the opportunity to provide comments regarding the draft Roseau River Comprehensive Watershed Management Plan developed under the Board of Water and Soil Resources (BWSR) One Watershed One Plan (1W1P) program as prescribed under Minnesota Statutes Section 103B.101, Subdivision 14. We appreciate the partners' willingness to participate in development of a multi-jurisdictional, watershed-based plan.

As a comprehensive watershed management plan, this is an all-inclusive plan to address surface and groundwater, water quality and quantity, habitat, and land use per the 1W1P Plan Content Requirements adopted by the BWSR on August 29, 2019. Implementation actions in the plan consider a broad range of tools and programs necessary to achieve the goals of the plan. BWSR has the following comments on the plan:

Assessment of the inclusion of BWSR's initial priority issues submitted November 16, 2021:

- BWSR submitted initial comments for priority issues to include in the plan. After review of the plan, we commend the group for discussing all the submitted priorities during the planning process and incorporating them into the plan.

Items that must be addressed to meet Plan Content Requirements

- 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:
 - 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.

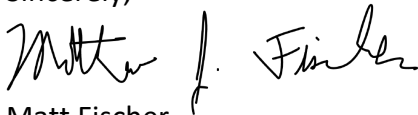
- List fish passage and connectivity as a secondary issue addressed through progress towards the Stream Stabilization and Restoration goal (Figure 4.11) and the Ditch Bank Stabilization goal (Figure 4.1) in Section 4 of the Plan.

Other items for consideration that may provide additional benefit

- Figure 4.6 - This map includes the FEMA 100-year event floodplain. The caption suggests that these are the areas where work will be done. Suggest editing the map caption to read, “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”.
- 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.

The work of Roseau River planning group provides a great example of the type of collaborative effort needed to develop a comprehensive watershed management plan through the 1W1P program. The state’s main water management agencies have committed to the 1W1P approach, and we look forward to continuing to work with you as this plan is implemented. If you have any questions about this letter, please feel free to contact Matt Fischer at 218-766-6496.

Sincerely,



Matt Fischer

BWSR Board Conservationist

CC via email:

Janine Lovold, Roseau SWCD

Moriya Rufer, HEI