

February 10, 2023

Tracy Halstengard, Administrator
Roseau River Watershed District
714 6th St SW
Roseau, MN 56751
Via rrwd@mncable.net

Matt Fischer, Board Conservationist
Board of Water and Soil Resources
403 4th St NW, Room 200
Bemidji, MN 56601
Via matt.fischer@state.mn.us

Subject: Minnesota Department of Health Comments for the Roseau River Comprehensive Watershed Management Plan (RRCWMP)(1W1P) 60-Day Review

The Minnesota Department of Health (MDH) Source Water Protection Unit appreciates the opportunity to review the draft Roseau River Comprehensive Watershed Management Plan. MDH commends the plan partners for including drinking water as a priority concern. Thank you for the opportunity to participate in the plan's Advisory Committee and for including our considerations.

MDH comments on the draft plan include an assessment of priority concerns addressed from our initial comment letter dated November 16, 2021.

1. Prioritize drinking water protection: Consider Drinking Water Supply Management Areas (DWSMAs) as priority areas for protection activities. The vulnerability of DWSMAs determines the level of risk posed by various land uses and potential sources of contamination.

This priority concern was addressed in the following ways:

- a. *Recognizing the potential for drinking water shortages as a future challenge associated with climate and precipitation changes in the Land and Water Resource Narrative (page 37).*
- b. *Identifying the DWSMAs delineated in the planning area for the communities of Roseau, Cedar Bend Park, Lakewood Park and Sales, Oak Manor Mobile Home Park, and Timberline Mobile Home Park as groundwater resources needing protection in the Land and Resource Narrative (page 38 and Figure 2.27).*
- c. *Assigning the protection of drinking water quality as a Priority B Issue in Priority Issues (page 46).*
- d. *Assigning the protection of drinking water quantity as a Priority B Issue in Priority Issues (page 46).*
- e. *Including drinking water Contaminants of Emerging Concern and associated public health impacts as an Emerging Issue in Priority Issues (page 51)*
- f. *Identifying the protection of drinking water quality and quantity as Primary Issues in Measurable Goals (page 66).*
- g. *Including the participation in Wellhead Protection Plan development and implementation as a watershed-wide action in Targeted Implementation Schedule (page 92).*

- h. *Acknowledging MDH’s administration of the Wellhead Protection Rule and Well Code as Regulatory Programs that benefit water resource management in Implementation Programs (page 104).*
 - i. *Providing Wellhead Protection planning as an example of collaboration with other units of government in Plan Administration (page 112).*
 - j. *Identifying MDH’s Source Water Protection Grant Program as a resource for projects & practices, data collection & monitoring, and education & outreach in Plan Administration (page 125).*

- 2. Prioritize sealing abandoned wells: This is a central practice in protecting groundwater quality. When resources are limited, it is important to further evaluate an unsealed well by examining the risk it poses to active Public Water Systems or to an aquifer used by many private wells in an area.

This priority concern was addressed in the following ways:

 - a. *Identifying abandoned wells as a contamination risk to drinking water resources in Priority Issues (page 46).*
 - b. *Assigning the sealing of four wells per year as a short-term and watershed-wide goal in Measurable Goals (page 66) and Targeted Implementation (page 92).*
 - c. *Assigning the sealing of all unused wells in the planning area as a long-term goal in Measurable Goals (page 66).*
 - d. *Including well sealings as an example of Cost Share Programs used to achieve plan goals in Implementation Programs (page 95).*

- 3. Prioritize protection of private wells: Many residents rely on a private well for the water they drink. Local governments can assist with protecting private wells through land use management, making water testing accessible, controlling sources of contamination, and providing best practices information.

This priority concern was addressed in the following ways:

 - a. *Assigning the providing of one private well screening clinic per year as a short-term goal in Measurable Goals (page 66) and watershed-wide activity in Targeted Implementation (page 91).*
 - b. *Assigning the distribution of water test kits at SWCD offices as a watershed-wide activity in Targeted Implementation (page 91).*
 - c. *Including the continued building of private well water testing clinics as an Education and Outreach activity in Implementation Programs (page 107).*

- 4. Prioritize protection of Noncommunity Public Water Systems: Noncommunity public water suppliers provide drinking water to people at their places of work or play (which may also serve as a gathering location for routine worship). The plan should consider impacts of land use and management activities to drinking water resources used by employees, volunteers and visitors of Hayes Lakes State Park, Bemis Hill/Clear River State Campground , Intercept Industries, Riverfront Station, North Country Convenience Store, Pine Grove Lutheran Church, Concordia Lutheran Church, Riverside Lutheran Church, First Lutheran Church of Salol, Immanuel Baptist Church, Bethesda Lutheran Church, Bethel Lutheran Church of Stafford, Spruce Free Lutheran Church, Rose Free Lutheran Church, St. Phillip’s Catholic Church of Falun, Roseau Free Lutheran Church, and New Life Assembly of God. This priority concern was addressed in the following way:

Including private businesses and civic groups as entities for additional collaboration during the implementation of the plan in Plan Administration (page 114).

5. Support the development of County Geologic Atlases: Compiling advanced information on the extent of aquifers and aquitards will help decision making when groundwater resource issues need to be addressed.

This priority concern was addressed in the following ways:

- a. *Assigning the completion of a Geologic Atlas for the enhanced understanding of groundwater variation as a long-term goal in Measurable Goals (page 66).*
- b. *Including the construction of one groundwater observation well as a short-term goal in Measurable Goals (page 66) and a watershed-wide action in Targeted Implementation (page 91).*

Although groundwater was the primary focus of our drinking water protection input and review, we recognize the surface water protection benefits in the plan which continue to be experienced downstream by communities that rely on managed international flow as a drinking water resource.

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. If you have any questions, please contact me at (218) 332-5195 or via email at dan.disrud@state.mn.us.

Sincerely,



Daniel L. Disrud, REHS, Principal Planner
Source Water Protection Unit
Drinking Water Protection Section
Environmental Health Division
Health Protection Bureau
2312 College Way
Fergus Falls, MN 56537

cc: Carrie Raber, MDH GRAPS Coordinator
Trent Farnum, MDH Source Water Protection Research Scientist
Luke Pickman, MDH Source Water Protection Hydrologist
Jenilynn Marchand, MDH Source Water Protection Planner Supervisor
Steve Robertson, MDH Source Water Protection Unit Supervisor
Henry Van Offelen, BWSR Clean Water Specialist
Ryan Hughes, BWSR Northern Region Manager
Julie Westerlund, BWSR 1W1P Coordinator
Stephanie Klamm, DNR Area Hydrologist
Nathan Kestner, DNR Northwest Region Manager Ecological and Water Resources Division
Barbara Weisman, DNR Clean Water Operations Consultant
Cary Hernandez, MPCA Watershed Project Manager
Jeff Risberg, MPCA Watershed Unit Coordinator
Margaret Wagner, MDA Pesticides and Fertilizer Management Section Manager