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Rainy River Headwaters- Vermillion River Watershed, One Watershed One Plan Partnership  
 Becca Reiss  
 North St. Louis Soil & Water Conservation District  
 505 3<sup>rd</sup> St. N, Ste A  
 Virginia, MN 55792

Dear Becca,

Thank you for providing the opportunity to provide priority issues and expectations for the development of the Rainy River Vermillion River Watershed, Comprehensive Watershed Management Plan (Plan) under Minnesota Statutes section 103B.801.

The Board of Water and Soil Resources (BWSR) has the following expectations for the Plan:

**Process**

The planning process must follow the requirements outlined in the *One Watershed, One Plan Operating Procedures version 2.1*, adopted by the BWSR Board on March 24, 2021, available on the BWSR website: [Operating Procedures version 2.1](#) More specifically, the planning process must:

- Involve a broad range of stakeholders to ensure an integrated approach to watershed management. BWSR would like to see effort taken to engage tribal partners beyond regular methods. In addition, please consider reaching out to other stakeholders such as the City of Ely that may have an interest in the planning process and could provide valuable input for planning and implementation.

**Plan Content**

The Plan must meet the requirements outlined in *One Watershed, One Plan – Plan Content Requirements version 2.1*, adopted by the BWSR Board on August 29, 2019, available on the BWSR website: [Plan Content Requirements 2.1](#). 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 implementation schedule, sufficient for meeting the identified goals.
- 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.

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**BWSR has the following specific priority issues that can be addressed in this Plan:**

- **Protection of Healthy Ecosystems** – Much of the Rainy River Headwaters-Vermilion River is covered by forest/shrubland and wetlands, with a very small portion being developed or in agricultural production. These healthy ecosystems provide an important mix of benefits that protect water quality, provide wildlife habitat, contribute to economic development, and allow for many recreational opportunities. The planning efforts surrounding these large tracts of healthy woodlands, lakes and wetlands should seek to protect these resources and manage land uses to minimize any unintentional degradation of the watershed. Protection of these vast resources, comes with significant economic gains to the region from tourism. Future development and management of these healthy ecosystems should come from a point of first, doing no harm.
- **Riparian Management**- Protecting and restoring riparian areas, including adjacent floodplains, have multiple benefits by reducing soil erosion, stream channel instability, phosphorus and nitrogen loading, and restoring flood attenuations, wildlife habitat and wetland functions. The Plan should identify high priority areas for riparian erosion and sediment reduction, wetland restoration and other water storage and nutrient treatment opportunities and target implementation efforts in those areas.
- **Aquatic Species Protection** – This watershed contains exceptional species such as stream and lake sturgeon, cisco, cold-water fish species, muskies and wild rice. The partnership should discuss how to best protect these important species and the ecosystems they need to survive.
- **Stream Connectivity** – Connectivity was identified as a stressor both naturally (beaver activity) and anthropogenic (dams, undersized/perched culverts) in the Watershed Restoration and Protection Strategy reports for this planning area. Culverts and bridges that are improperly sized, installed or misaligned can contribute to stream instability, sediment impairments and habitat fragmentation. Infrastructure installations have a long lifespan and should be designed and installed with future rainfall and runoff conditions in mind. Use multidisciplinary teams early in the project design phase for stream restoration projects to bring in more diverse expertise.
- **Altered Hydrology**- The hydrologic conditions of the watersheds in this planning area have changed over time. These hydrologic changes as well as others have contributed to low dissolved oxygen levels, channel erosion, instability of natural and artificial watercourses, degradation of wetland habitats, and increased the risk of flood damages.
- **Urban Stormwater** – Inventory infrastructure and develop municipal stormwater plans that are identified during the planning process to minimize loadings to the Rainy River Headwaters and Vermillion River Watersheds, and other priority water resources. Urbanized areas are limited but can tribute to higher amounts of sediment and chloride for adjacent water resources.
- **Forage and Livestock Management** - Agricultural production is limited and mostly comprised of forage and pasture within the watershed. The watershed planning area does have locations where livestock and pastures are located near water resources. Streambank erosion, nutrient and sediment enrichment and bacteria loading can be results of livestock access to streams and rivers. The watershed partnership should explore ways to assist landowners that maintain this important land use while protecting water quality.

- **Wetlands** - Planning partners should evaluate the role of wetlands to maintain and enhance stormwater /floodwater attenuation, habitat, groundwater recharge, water quality, sediment trapping, shoreline protection and carbon storage. Water quality and quantity in lakes and rivers in inextricably linked with the wetlands present in this planning area.
- **Septic Systems** –In 2017, during Governor Dayton’s “25 x 25” town hall in Ely, septic system effects, costs, management, and operation were one of the top concerns. The geography and soils in this planning area make septic systems expensive and difficult to operate. As shoreline and rural development continues, the partnership should explore ways to assist with administering septic system programs and installation costs.
- **Lakes**—Many of the lakes in the planning area are of high quality and sensitive to phosphorus enrichment. A large number are located on public land where development is unlikely. Protecting shoreland vegetation, managing stormwater from land cover conversion and minimizing in-lake disturbance on those lakes surrounded by private land will help protect them into the future.
- **Forest Management**—Forest management of public lands should include existing best management practices to protect water quality in all cases and especially sensitive lakes and streams may need some additional measures to be implemented. To the extent possible, forest management on public lands should be coordinated among the various agencies and levels of government to minimize watershed scale impacts to particular water resources. Private forest management should be guided by the Landscape Stewardship Plan developed for this planning area. Lake water quality and forest cover are intertwined and in this watershed, achieving at least 75% forest cover will likely provide sufficient water quality to maintain quality fisheries in the area.

Again, thank you for the opportunity to provide comments. We look forward to completing the Comprehensive Watershed Management Plan for the Rainy River Headwaters-Vermillion River planning area and the successful implementation of the Plan.

Sincerely,

*Erin Loeffler*

Erin Loeffler

Board Conservationist

*Jeff Hrubes*

Jeff Hrubes

Clean Water Specialist

CC: Rainy River Headwaters-Vermillion River Watershed- Planning Work Group

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