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394 South Lake Avenue, Room 403
Duluth, MN 55802

June 26th, 2020
St. Louis River Watershed One Watershed One Plan Partnership
Kate Kubiak,
215 North 1st. Ave. East
Duluth, MN 55802

Dear Kate,

Thank you for providing the opportunity to provide priority issues and plan expectations for the development of the St. Louis River Watershed 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 version 2.1*, adopted by the BWSR Board on August 29, 2019, available on the BWSR website: https://bwsr.state.mn.us/sites/default/files/2019-08/1W1P_Operating_Procedures.pdf. 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 version 2.1*, adopted by the BWSR Board on August 29, 2019, available on the BWSR website: https://bwsr.state.mn.us/sites/default/files/2019-12/1w1p_plan_content_requirements_2.1_0.pdf. 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.

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- A targeted and comprehensive 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.

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

- **Protection of Healthy Ecosystems** – Much of the St. Louis River Watershed is composed of forest, lakes, rivers and substantial wetland complexes. 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 in such a way as to minimize any unintentional degradation of the watershed. Future development and management of these healthy ecosystems should come from a point of first, doing no harm. Consider using information from the Value of Nature’s Benefits in the St. Louis River Watershed report, commissioned by the Fond du Lac Band of Lake Superior Chippewa.
- **Available Data** - The plan should use the information from the multiple WRAPS reports (St. Louis River, Duluth Urban, South Lake Superior, Cloquet River), the Fond du Lac Reservation Office of Water Protection Tribal Report under Section 305(b), Clean Water Act any 1854 Treaty Authority Natural Resource Management reports and other studies and reports to guide discussions on lake, river, and stream protection and restoration efforts for the St. Louis River Watershed. Additionally, the plan should recognize the largest gaps in water monitoring data and describe how these gaps will be addressed these gaps in the next 10 years
- **Drinking Water** – Most individuals within the St. Louis River Watershed use groundwater for their drinking water source although several communities within the watershed use surface water sources and the City of Duluth gets its drinking water from Lake Superior which may be affected by the St. Louis River. The protection of drinking water is critical to ensuring the long-term health of the residents and visitors to the watershed. The plan should include a component related to the management of groundwater as a drinking water resource that includes a discussion on both maintaining the quantity of groundwater available for drinking and the quality of that water to ensure safe domestic use. The plan should use findings of the interagency Groundwater Restoration and Protection Strategies Report that will be developed for the St. Louis River Watershed along with the USGS tribal sponsored, Simulation of the Regional Groundwater-Flow System in the St. Louis River Basin, Minnesota report to help identify priority areas and potential issues and strategies for protecting drinking water sources.
- **Landscape Stewardship Plan** – Planning partners should consider incorporating the goals developed in the St. Louis River Watershed Landscape Stewardship Plan (when completed) as actions to address forest management in the St. Louis River Watershed Comprehensive Management Plans. Coordinated forest management among owners of public lands can maintain watershed protection benefits and support economic uses.
- **Stormwater** – Inventory infrastructure and develop municipal stormwater plans that are identified during the planning process to minimize loadings to the St. Louis River, Lake Superior and other priority water resources.

- **Stream Connectivity** - Culverts and bridges that are improperly sized, installed or aligned 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.
- **Wetlands** - Planning partners should evaluate the role of headwaters wetlands in preserving and restoring ecological functions in the headwater and transfer reaches of the watershed adjacent to urban areas to maintain and enhance stormwater /floodwater attenuation, habitat, groundwater recharge, water quality, sediment trapping, shoreline protection and carbon storage.
- **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.
- **Lakes** - The watershed planning area contains over 500 lakes greater than 10 acres in size. Information from WRAPS, citizen monitoring and other sources should be evaluated for water quality and habitat risks, trends, protection opportunities and restoration options in order to protect water quality, habitat, recreation opportunities and economic benefits.
- **Forage and Livestock Management**- Row crop production within the watershed is somewhat limited and primarily for on-farm use. 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 side effects of livestock access to streams and rivers. The watershed partnership should explore ways to assist landowners in ways that maintain this important land use while protecting water quality.

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 Erin Loeffler at 218-850-1141

Sincerely,

Erin Loeffler
Board Conservationist

Jeff Arubes
Clean Water Specialist.

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