

Peter Nelson

Pennington SWCD

Thief River 60-Day Comments

1. With all the Federal and State land in the watershed, specifically Agassiz National Wildlife Refuge, there should be a specific action to coordinate and engage with Federal and State partners to address Water Quality affecting the City of Thief River Falls Drinking Water Supply. This action statement could be included in Section 4, page 4-7, Watershed-wide, Implementation and Education.

More specifically, if there's currently not an Advisory Committee established for the Agassiz National Wildlife Management Plan, an action could be to establish an on-going Advisory Committee including Federal, State, and Local stakeholders to address water quality downstream of Agassiz National Wildlife Refuge.

Ecological and Water Resources Division
2532 Hannah Ave NW
Bernidji MN 56601

Oct.16, 2019

Peter Nelson
Pennington SWCD
Water Plan Coordinator
201 Sherwood Avenue South
Thief River Falls, MN 56701

RE: Comments for the Draft Thief River Comprehensive Watershed Management Plan (CWMP)

Dear Mr. Nelson,

The Minnesota Department of Natural Resources (DNR) appreciates the opportunity to review the draft Thief River CWMP. We appreciate the collaborative efforts of those who participated in the development of this plan. DNR is committed to provide the necessary science to protect and improve the function and health of the watershed. We look forward to providing support as you move forward with the implementation of this plan once approved.

Please accept the following comments and concerns regarding the draft plan.

1. **Pg. 2-36, Section 2.4.1.2** Contaminants of Emerging Concern – In the 2nd paragraph, the 3rd sentence regarding AIS should be removed. AIS are addressed in the next section 2.4.1.3 Invasive Species.
2. **Pg. 2-37, Section 2.4.1.3** Invasive Species – The DNR is constantly updating the locations of invasive species and Zebra mussels have now been found in Upper Red Lake, thus potentially spreading through the Red Lake River within the watershed. This should be updated in the plan.
3. **Pgs. 3-4 and 3-5**, including table 3-2 and the map for TSS on 3-5. Mud River is identified in the table, and in the text as Nearly Impaired for TSS (yellow color), yet the map provided shows the Mud River in purple, a different category.
4. **General comment for Section 4 Targeted Implementation Schedule** – DNR and MnDNR are used interchangeably under Partner column. Select one and be consistent.
5. **Pg. 4-8, Bottom row** of Watershed Wide Activities: The DNR is listed as Lead for the action “Promote increased public use of natural features, such as streams and public lands.” This is something we already do, and I don’t see the point in listing it here unless the local authorities are looking for opportunities to collaborate.
6. **Pg. 4-9, Third action item in Action Level B.** DNR is listed as the Lead Entity for prioritizing unstable watercourses. DNR has staff available to help with prioritization; however, the DNR should not be listed as the **Lead Entity**. The DNR can partner to help with this action, but the decision to inventory all the watercourses should be led by the local governments.

7. **Pg. 4-10, Level 2 Action – 2nd and 3rd** action items. “Develop Geologic atlases...” and “Fill gaps in the groundwater...” Again, DNR should not be the Lead entity listed in a local comprehensive watershed plan. The DNR can be listed as a partner and will bring its technical expertise to assist with the actions.

The Thief River Draft Plan puts forward a series of actions to address water quality and quantity issues, habitat and riparian restoration, as well as restoration of stream function and increasing water storage through natural means. The challenge is in setting priorities to maximize benefits moving forward. The DNR and our technical staff look forward to continuing our work with the watershed to improve our water resources.

Sincerely,



Annette Drewes, Clean Water Specialist, Ecological & Water Resources
Minnesota Department of Natural Resources
2532 Hannah Ave.
Bemidji, MN 56601

CC: Nathan Kestner, DNR – EWR Division Regional Manager
Barbara Weisman, DNR Clean Water Operations, EWR Division
Matt Fischer, BWSR
Denise Oakes, PCA
Jennilyn Marchand, MDH
Margaret Wagner, MDA

Equal Opportunity Employer

I have reviewed the plan and have no comments. It looks great.

The map on the website <https://www.rlwdwatersheds.org/thiefriver1w1p> does have the Mud River labeled incorrectly as the Moose River.

Bruce Hasbargen

Beltrami County Engineer

October 14, 2019

Peter Nelson
Pennington Soil and Water Conservation District
201 Sherwood Avenue South
Thief River Falls, MN 56701

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

Dear Peter,

Thank you for the opportunity to provide comments regarding the draft Thief River Comprehensive Watershed Management Plan under Minnesota Statutes Section 103B.101, Subd. 14. We appreciate the partners' willingness to participate in development of a multi-jurisdiction, watershed-based plan.

This is a Comprehensive Watershed Management Plan (CWMP), which is an all-inclusive plan to address surface and groundwater, water quality and quantity, habitat and land use as per the 1W1P Plan Content Requirements adopted by the Board of Water and Soil Resources (BWSR) on March 23, 2016. 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 mandatory and advisory comments on the plan:

Comments that must be addressed:

- Plan Content Requirement 5.B.iv.b. states that the plan should, "Describe the land use authorities within the watershed as well as potential opportunities to achieve goals through, or potential conflicts with, comprehensive land use plans." This is currently not included in the plan. At a minimum, this could be addressed by adding a row to Table 5-4 that indicates which local governments in the watershed have land use controls. Based on discussion with the planning work group, I believe that is only North Township in Pennington County.

Comments that the plan should consider addressing:

- Table 5-9 may be useful to also include in the Executive Summary. Including this information in the Executive Summary will provide readers a quick outline of the roles and responsibilities of the committees, coordinator, and fiscal agent.
- Resource Category "Surface Waters" reads, "Water resulting from excess precipitation leaving the landscape and collecting in streams, rivers, creeks, wetlands, lakes, and ponds." It seems like an oversight to not include ditches in the list of watercourses/waterbodies in that statement. We recommend changing throughout the plan where this statement occurs.

Bemidji Brainerd Detroit Lakes Duluth Mankato Marshall Rochester St. Cloud St. Paul

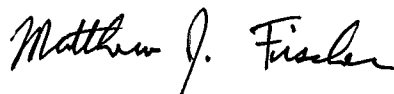
Bemidji Office 403 Fourth Street NW Suite 200 Bemidji, MN 56601 Phone: (218) 755-2600

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- Figure 3-2 should be updated to show the Mud River as Nearly Impaired so that it corresponds with the categorization in Table 3-2.
- Appendix references throughout the plan should be checked for accuracy. Specific issues identified include:
 - Section 1.3 refers to Appendix C as the Stakeholder Engagement Plan. Appendix C is no longer the Stakeholder Engagement Plan. It is now the committee membership lists.
 - Section 2.2 refers to Appendix H, but should instead refer to Appendix F.
 - Section 4.2.1.1 says there are five PTMApp related maps included in Appendix D. That is not the case.

We commend the Thief River Planning Group for your participation and collaborative effort in developing the 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 on future implementation. If you have any questions about this letter, please feel free to contact Matt Fischer at 218-755-2683.

Sincerely,



Matt Fischer
BWSR Board Conservationist

CC: Drew Kessler, Houston Engineering, Inc. (via email)
 Myron Jesme, Red Lake WD (via email)
 Corey Hanson, Red Lake WD (via email)
 Zach Gutknecht, Beltrami County (via email)
 Darren Carlson, Marshall SWCD (via email)
 Josh Johnston, Marshall County (via email)
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 Denise Oakes, MPCA (via email)
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City of Thief River Falls

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October 16, 2019

Peter Nelson
Water Planner
Pennington County SWCD
201 Sherwood Ave. South
Thief River Falls, MN 56701

RE: Thief River 1W1P Review

Dear Peter,

City Staff and I have reviewed the One Watershed One Plan and are submitting the following comments.

This plan is insufficient and does not adequately address the City of Thief River Falls drinking water quality issues that are a direct result of the TSS impairment to the Lower Thief River. This Plan is lacking goals and practices that need to occur in the Middle Thief River sub-watershed (Agassiz Wildlife Refuge) and how it impacts the Lower Thief River TSS impairment and contaminates. This directly relates to the quality of the drinking water for the City of Thief River Falls.

Water Quality needs to be the #1 priority! Without addressing the issue of the TSS impairment and contaminates in the Lower Thief River, this Plan does nothing for the City Thief River Falls.

“If you tip a gallon of milk on the table you don’t start cleaning the floor until you stand the jug back up”. We need to stand the jug up and address the issues where they originate, Agassiz Wildlife Refuge. In order for this to happen we need to get the Department of Interior involved with our efforts to assure the participation of the National Wildlife Refuge.

Sincerely,

Brian D. Holmer, Mayor

cc: Wayne Johnson, Water Superintendent

Darrold Rodahl
Thief River 1W1P comments
60-Day Review

Comments were summarized by Peter Nelson and forwarded to the Planning Workgroup

Comment 1: Table 4-19 on page 4-29, 2-CP, action item: "Add the word agricultural to the action statement"...enhance recreational, agricultural, and fish and wildlife habitat value. All of the same action statements in other Planning Regions would apply.

Comment 2: A-35, label on the map of the Thief River. To make it consistent with labels such as the Mud/JD11 and Moose/JD21 labels, include the SD83 label on the Thief River.

Add managed (tile) drainage as a specific practice to maintain soil health as are cover crops a specific practice to maintain soil health.



Protecting, Maintaining and Improving the Health of All Minnesotans

October 16th, 2019

Peter Nelson
Pennington SWCD
Water Plan Coordinator
201 Sherwood Ave South
Thief River Falls, MN 56701

Dear Peter,

Subject: Minnesota Department of Health Comments for the Thief River, One Watershed One Plan, 60 Day Public Plan Review

The Minnesota Department of Health (MDH) appreciates the opportunity to review the draft Thief River One Watershed One Plan (1W1P). Thank you for allowing MDH the opportunity to be part of the advisory committee and for incorporating some of our ideas and suggestions into the draft plan.

MDH comments to the draft plan include:

- 1) *2.4.1.2 Contaminants of Emerging Concern (pdf pg 65)*: Please include this sentence “upstream discharges, runoff, and scouring can introduce elevated levels of pathogens (*E. Coli*, *Giardia*, *Cryptosporidium*), to the surface water intake, resulting in a detrimental impact to the safety of drinking water.”
- 2) *3.2 Priority Issue Measurable Goal Categories (pdf page 80)*: MDH had previously commented that the Drinking Water-Reduce Nitrate Contamination measurable goal was not representative of the drinking water issues. The Environmental Protection Agency drinking water standard for nitrate is 10 ppm for public wells. There are only very low levels of nitrates detected in private wells (3ppm or less). As such, that falls under the protection-vigilance not restoration-treatment, long-term goals. Therefore, the goal is in contradiction to issue 1.1.1. Issue 1.1.1 lists other parameters (bacteria and arsenic), which states “protection of generally good quality groundwater supplies from elevated levels of nitrates, arsenic, or other contaminants, which if excessive, can result in implications to human health and treatment costs for public and private wells.” In addition, this issue was lowered from a Priority A to B (pdf pg 307) due to the “generally good groundwater quality, and no known problems with high nitrates in drinking water.” In addition, there were elevated detections of arsenic in private wells, above the recommended EPA standard of 10 ppb for public wells. This suggests arsenic, not nitrate, should be of greater concern, and identifying it as a goal would be more appropriate. In general, MDH recommends editing the goal to Drinking Water Protection. Please update the goal change language in the executive summary and throughout the draft plan.

- 3) *Section 3.2.1 Drinking Water-Reduce Nitrate Contamination (pdf page 80)*: MDH had previously commented that the Wellhead Protection Area should be abbreviated (WHPA) and MN Rules, should be Chapter 4720, Parts 4720.5100-5590. The statutory authority is 103I.005 Subd. 24. In addition, the MN Well Code rules is Chapter 4725. The statutory authority is 103I.101, subdivision 5.
- 4) *Section 3.2.1 Drinking Water-Reduce Nitrate Contamination (pdf page 80)*: MDH has concerns regarding this statement “because there are federal and state regulatory programs to protect public drinking water systems, only private drinking water systems are addressed in this plan.” Please edit or remove this statement. While MDH does regulate public water supply systems, there are actions regarding land use that can be taken to protect public water supply systems that are primarily addressed under Healthy Rural Landscapes and other goals in the plan. This statement is also concerning in regards to strategies that can be taken to protect the Thief River Falls surface water intake. Many actions have multiple benefits and are addressed comments 6 and 7 below.
- 5) *Section 3.2.2 Aquatic Life and Aquatic Recreation-Reduce Sediment and Phosphorus Delivery and Load (pdf pg 82)*: It is unfortunate that Issue 2.5.2 (pg 41) “Water Quality: Protect surface water intakes, the inner-emergency response area, and outer source water management area from potential contaminants and sediment to protect the source and quality of drinking water” was voted as a Priority C and therefore, not assigned a measureable goal to address it. As previously suggested, consider moving surface drinking water protection under the Drinking Water Goal instead of categorized under other goals and issues, such as Aquatic Life and Recreation through Issue 2.5.1 Water Quality, “Elevated concentrations of sediment, and organic matter have a detrimental impact on drinking water quality.”
- 6) *Section 3.2.2 Aquatic Life and Aquatic Recreation-Reduce Sediment and Phosphorus Delivery and Load (pdf pg 82)*: Please include the following sentences to address surface drinking water quality: Upstream discharges, runoff, and scouring can introduce elevated levels of pathogens (*E. Coli*, *Giardia*, *Cryptosporidium*), as well as sediment, organic matter, and total suspended solids (TSS) to the Thief River Falls Intake. This places an operational and financial burden on the Thief River Falls public water system, making it difficult to manage the drinking water system to avoid adverse public health outcomes. Therefore, the TSS impairment on the Lower Thief River Falls River can result in detrimental impacts to the safety of the City of Thief River Fall’s drinking water.
- 7) *Section 3.2.2 Aquatic Life and Aquatic Recreation-Reduce Sediment and Phosphorus Delivery and Load (pdf pg 81, 82)*: It would be useful to insert a paragraph referencing the goals and issues that address surface drinking water quality and achieving multiple benefits. Specific examples related to goals and issues in this plan could include:
 - a. Aquatic Life and Aquatic Recreation-Reduce Sediment and Phosphorus Delivery and Load Goal and issues 2.5.1 (water quality), 2.1.7 (stream stability), 2.1.1 (aquatic life impairments), 2.4.1 (erosion and sedimentation), 2.6.1 (sediment deposition), 5.1.1 (stormwater run-off), and
 - b. Aquatic Life and Aquatic Recreation-Reduce Bacteria Delivery and Load Goal and Issues 2.1.2 (bacteria), 5.1.4 (*E.Coli*), and

- c. Surface Runoff and Flooding-Reduce Damages from Peak Flows and Overland Flooding Goal and Issues 2.2.1 (water storage), 2.2.2 (peak and low flow), 2.2.3 (flooding), and
 - d. Drainage Management Systems-Erosion and Sediment Reduction Goal and Issue 2.3.1 (drainage system maintenance), and
 - e. Shoreland and Riparian Areas-Improve and Increase Vegetative Cover Goal and Issue 3.2.1 (vegetation), and
 - f. Habitat for Wildlife-Enhance Connectivity and Cover Goal and Issue 2.6.2 (wetlands), and
 - g. Aquatic Habitat for Fish, Macroinvertebrates and Aquatic Life-Restore Connectivity and Habitat, Moderate Flow Regimes, and Promote Vegetated Banks and Buffers Goal and Issues 3.1.1 (hydrologic connectivity), and 3.1.3 (aquatic habitat degradation), and
 - h. Healthy Rural Landscapes- Reduce Surface and Groundwater contamination Goal, and issues 5.2.1 (soil health), 5.2.2 (erosion), 5.2.3 (septics), and 5.2.4 (feedlots).
- 8) *Section 3.2.2 Aquatic Life and Aquatic Recreation-Reduce Sediment and Phosphorus Delivery and Load (pdf pgs 82, 83)*: This section details sedimentation sources and issues upstream, within, and downstream of the USFWS Refuge's Agassiz Pool. However, the plan does not include any strategies to address sedimentation within the refuge. This is especially significant due to Agassiz Refuge managing a large portion of land within the watershed and Refuge operations having a significant impact on downstream waters, especially drinking water for Thief River Falls and East Grand Forks.
- 9) MDH recommends that Agassiz Refuge be consulted to identify sediment reduction (such as Judicial Ditch 11 excavation, scouring and flushing) and flow regime activities within the refuge that can be identified in the plan and implemented.
- 10) *Section 3.2.1 Public Knowledge of and Behavior Related to Water Resources- Increase Stakeholder Participation (pdf pg 91)*. This may be an appropriate section to add an issue or strategy to improve communication and collaboration with Agassiz Refuge as this was not identified as an issue during the public input and ranking process. Unfortunately, the closest issue to this, Issue 2.4.2 (pg 41) "Need for increased coordination for management of waters released from impoundments and reservoirs needed to balance interests of natural resources management, agricultural productivity, and flood damage reduction" was voted as a Priority C and therefore was not assigned a measurable goal to address it. MDH recommends that the plan address activities to improve communication and collaboration with Agassiz Refuge.
- 11) *Section 3.2.11.7 Tile Drainage (pdf pg 93)*. The short and long-term goals under Tile Drainage should only be listed if they are relevant to Tile Drainage. Consider moving the short and long-term goals for altered hydrology, groundwater quantity and quality (arsenic, nitrate, bacteria) under each appropriate sub-section for Data Collection Section 3.2.11, instead of all under Tile Drainage.
- 12) *Section 3.2.11.7 Tile Drainage (pdf pg 93)*. In order to establish a baseline data set, it is important to monitor different wells every year, rather than the same wells for 10 years. In addition, the 32 wells per year data point was in reference to the number of wells that would need to be sampled every year for 10 years, that were known to exist at that point in time of plan development. There are many unknown wells, and new wells will

continue to be drilled on a regular basis during plan development and implementation. As such, it is recommended to change the strategy to consult with MDH and other appropriate state agencies to obtain up-to-date information and develop a monitoring plan, or at least consult with state agencies prior to the baseline monitoring occurring. In addition, baseline well sampling changes are needed in the Implementation Table, pdf pg 105.

- 13) *Section 4, Table 4-35, Mud River/JD 11 Capital Projects Implementation Schedule (pdf pg 147)*: MDH recognizes Implementation Action “Restore flow to approximately 5 miles of the historical Mud River/JD 121 Channel in the Agassiz NWR.” MDH would like to see more strategies like this for the Middle Thief River Planning Region.
- 14) *Section 4.5 Planning Region Implementation Profiles (pdf pg 154)*: This section includes a statement regarding best management practices in the Middle Thief River Planning Region and the need for Agassiz Refuge to be a “significant partner in implementing conservation practices in and around the refuge.” These efforts should be grouped with comments 8, 9, 10, and 13 above.
- 15) *Section 5.1.4.1 Operations and Maintenance (pdf pg 182)*: This section includes a statement recognizing a need for “a coordinated effort between the RLWD and the USFWS is needed to manage flow impoundments under their jurisdiction” to increase dissolved oxygen concentrations. This coordination of efforts should be grouped with comments 8, 9, 10, and 13 above.
- 16) *Appendix H (pdf pg 325, 326)*. Recommend updating Planning Region Prioritization Table comments to reflect if concerns were addressed for Issue 2.1.2.

As our comments are listed in chronological order, to assist in prioritizing our plan comments Issues 1, 2, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 15 relating to drinking water and Agassiz Refuge are all high priority. Issue 11 related to short and long term goals is a medium priority. Issues 3 and 16 related to MDH statutes and Appendix H Planning Region Prioritization Table are low priority.

We appreciate the planning team’s contributions in plan development. If you have any questions please contact me at (218) 308-2153 or via email at Jenilynn.Marchand@state.mn.us.

Sincerely,



Jenilynn Marchand, Principal Planner, North Supervisor
Minnesota Department of Health
Source Water Protection Unit
705 5th St NW, Suite A
Bemidji, MN 56601

Attachments

CC: Steve Robertson, Unit Supervisor, MDH Source Water Protection Unit

Trent Farnum, MDH Source Water Protection Unit
Carrie Raber, MDH Source Water Protection Unit
Chris Elvrum, MDH Well Management Section
Matt Fischer, BWSR Board Conservationist
Henry Van Offelen, BWSR Clean Water Specialist
Annette Drewes, DNR
Denise Oakes, MPCA
Margaret Wagner, MDA

October 16, 2019

Peter Nelson
Water Planner
Pennington County SWCD
201 Sherwood Avenue South
Thief River Falls, MN 56701-3407

RE: Thief River One Water One Plan 60-Day Review Period

Dear Peter Nelson:

The Minnesota Pollution Control Agency (MPCA) has reviewed your draft Thief River One Watershed One Plan (Plan) dated August 12, 2019, and we are providing the following comments as part of the official 60-Day review and comment period. The MPCA appreciates the opportunity to have provided input throughout your Plan development process.

While the Plan prioritizes goals and practices for the sub-watersheds up-stream of the Middle Thief River sub-watershed reasonably well, the Plan lacks significant goals and practices in the Middle Thief River sub-watershed, as it relates to the Agassiz National Wildlife Refuge (Refuge) and impacts to the Lower Thief River Total Suspended Solids (TSS) impairment, and drinking water quality for the city of Thief River Falls (City).

During the planning process, there appeared to be a lack of willingness and cooperation from some Advisory Committee members in addressing the impacts that Refuge operations have on downstream water quality in the Lower Thief River, and how those water quality impacts negatively affect the surface water quality for the City's drinking water supply. MPCA staff realize that this is a local water plan and the Refuge is managed at the Federal level, by the United States Fish and Wildlife Service. However, Agassiz National Wildlife Refuge occupies a very large portion of land within the Thief River Watershed and Refuge operations have a significant water quality impact on downstream waters, including the Red Lake River outside of the Thief River Watershed.

Refuge staff inconsistently participated in monthly Advisory Committee meetings, even after accepting appointment to the committee, and continually stated that wildlife was their first and only priority. However, the City representative to the Advisory Committee continued to identify Refuge operations as a drinking water quality issue for the City water supply, but to no avail. No detailed discussions regarding this issue occurred during the Advisory Committee meetings that MPCA staff attended (MPCA staff only missed two Advisory Committee meetings). As a result, the Plan does not adequately address the Lower Thief River TSS impairment or the City's drinking water quality issues. MPCA staff believe that this is the largest water quality issue within the Thief River Watershed.

Peter Nelson
Page 2
October 16, 2019

While MPCA staff are not in a position to suggest short and long term Plan goals for Refuge operations within the Middle Thief River Watershed, staff are committed to participate in discussions to develop those needed Plan goals for improved downstream surface water quality.

Again, thank you for the opportunity to review and comment on the draft Plan. If we may be of further assistance, please contact Denise Oakes at 218-846-8119 at the MPCA's Detroit Lakes Regional Office.

Sincerely,

Nicole Blasing

This document has been electronically signed

Nicole Blasing
Manager
Northwest & Central Section
Watershed Division

NB/DAO:gd:db

cc: Drew Kessler, Houston Engineering, Inc. (via email)
Myron Jesme, Red Lake Watershed District (via email)
Corey Hanson, Red Lake Watershed District (via email)
Matt Fischer, BWSR Board Conservationist (via email)
Henry Van Offelen, BWSR Clean Water Specialist (via email)
Annette Drewes, DNR Basin Planner (via email)
Jennilynn Marchand, MDH Source Water Protection North Supervisor (via email)
Wayne Johnson, City of Thief River Falls, Water Systems Superintendent (via email)
Glenn Skuta, MPCA Watershed Division Director (via email)



MISSION, PRINCIPAL OBJECTIVE AND SUPPORTING OBJECTIVES

RRWMB Mission: To institute, coordinate, and finance projects and programs to alleviate flooding and assure the beneficial use of water in the watershed of the Red River of the North and its tributaries.

Contact Information:

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www.rrwmb.org

FEBRUARY 2019

Principal Objective:

The principal objective of the RRWMB is to assist member Watershed Districts with the implementation of water related projects and programs. The purpose of these projects and programs is:

- The reduction of local and mainstem flood damages.
- To enhance environmental and water resource management.

Projects and programs must be of benefit to the Red River Basin and its member watershed districts in order to qualify for RRWMB funding.

The principal objective of the RRWMB, as stated above, is derived from legislation passed in 1976 and 1991. This objective is also in direct support of the RRWMB's Mission Statement. In addition to the RRWMB's principle objective, the Board has adopted several supporting objectives listed in this factsheet. Taken as a whole, the principal and supporting objectives form an overall policy for the RRWMB.

RRWMB Supporting Objectives:

1. Coordination - It is a supporting objective of the RRWMB to provide leadership for the coordination of projects and programs related to water management. The RRWMB accepts this leadership role as a matter of policy.

2. Financial Support - It is a supporting objective of the RRWMB to participate in funding initiatives which include projects and related programs that encourage consideration of mainstem benefits and enhance environmental and water resources. It is current policy of the RRWMB to participate in funding of projects initiated by a member watershed district-initiated projects meeting RRWMB established criteria for financial support and other initiatives beneficial to the basin.

3. Basin Planning - The RRWMB assists private, local, state, interstate, federal, or international water management and natural resource activities within the Red River Basin, through coordination and assistance with implementation. The RRWMB assists planning efforts at all levels within the Red River Basin and is committed to supporting basin planning efforts as a matter of Board policy.

4. Water Quantity - The RRWMB supports projects and programs for the alleviation of damage by floodwater, with an additional emphasis on maintaining low flow conditions for the aquatic environment and providing water supply for public use. It is Board policy to support flood control and water conservation projects.

Continued on Other Side →

RRWMB Supporting Objectives Continued:

5. Water Quality - It is a supporting objective of the RRWMB to provide assistance for studies, programs, initiatives and projects to improve water quality. It is a policy of the RRWMB to support ongoing studies, initiatives, and programs for the improvement of water quality.

6. Erosion and Sedimentation - It is a supporting objective of the RRWMB to provide assistance for studies, programs, and initiatives, including cooperative efforts with other agencies, to reduce soil erosion and sedimentation. It is a policy of the RRWMB to support studies, programs, and initiatives conducted by federal, state and local agencies for the reduction of soil erosion.

7. Education - It is a supporting objective of the RRWMB to support development of informational and educational programs related to water and natural resource management concerns. It is a policy of the RRWMB to utilize education as a tool to inform the public on issues related to the conservation of water, soil, and the preservation and enhancement of natural resources in the basin.

8. Research - It is a supporting objective of the RRWMB to provide assistance for basic and applied research related to natural resources management within the Red River Basin. It is a policy of the RRWMB to commit to an administrative and financial role in supporting and sponsoring relevant research related to water and natural resource management within the Red River Basin.

9. Public Information - It is a supporting objective of the RRWMB to inform the public of water management activities and concerns. It is a policy of the RRWMB to promote a strong public information program to educate the public regarding its operations and initiatives.

10. Conflict Resolution - The RRWMB shall work toward the resolution of conflicts regarding water management. The RRWMB is committed to the resolution of conflicts and methods to reduce conflict include, but are not limited to negotiation, mediation, arbitration, or legal action. It is a policy of the RRWMB to commit itself to the speedy and efficient resolution of any conflicts related to managing the basin's water resources.

11. Policies, Rules, and Regulations of Other Entities - The RRWMB will comply with the policies and regulations of other governmental entities. Where inconsistencies in policies and regulations exist, the RRWMB will cooperate with the appropriate governmental entities in resolving the inconsistencies. It is a policy of the RRWMB to adopt policies and regulations which are consistent with policies and regulations of other governmental entities, and to comply with the regulatory programs of these agencies.

Peter,

The RRWMB is providing the following comments regarding the Thief River 1W1P:

1. **Red River Basin Comprehensive Watershed Plan** – The recently finalized and approved Red River Basin Comprehensive Watershed Plan is available for review and consideration as the Thief River 1W1P is finalized. This document could be included as a reference in relation to other reports and studies. Here is the weblink to the plan:
https://www.mvp.usace.army.mil/Portals/57/docs/Civil%20Works/Projects/Red%20River/00_MainRpt_CWMP_Jan2018_final_reduced.pdf?ver=2018-04-18-101814-467
2. **20 Percent Flow Reduction Strategy** – The RRWMB assumes references have been made to the 20 percent flow reduction strategy in the draft Thief River 1W1P. If not, the RRWMB recommends that a reference or discussion be included in the plan.
3. **RRWMB Mission and Objectives** – You are aware that the RRWMB has included \$3 million for water quality projects in the 2020 budget. The RRWMB is currently developing process, procedure, criteria, and guidance for this allocation of funds for its member watershed districts. The RRWMB recommends that the plan consider alignment with the RRWMBs mission, principle objective, and supporting objectives and attached is a factsheet highlighting these items.
4. **Natural Resources Enhancements (NREs)** – The RRWMB recommends that the plan indicate or illustrate where NREs are needed by location, type, and amount of NRE needed by planning region or area to meet specific habitat and water quality goals and according to current land-use. You may need to work with the MN Department of Natural Resources and USFWS to make this determination to gain insights into specific NRE needs. By identifying NRE needs, the plan may moves toward further alignment with goals, objectives, and action items of state, federal, regional, and international plans. The projects being implemented through this plan can be instrumental in meeting water quality and habitat goals of these types of plans. The RRWMB realizes that this could be a major effort to address this issue and that the current timeframe may not allow for this activity.
5. **Drainage Guidance** – Several guidance documents are included at the RRWMB website related to surface and subsurface drainage. The RRWMB recommends that these documents be reviewed and included as references as related to you draft plan goals and priorities. These guidance documents can be found at this weblink:
<http://rrwmb.org/Drainage%20Guidance.html>

Robert L. Sip
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United States Department of the Interior



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Agassiz National Wildlife Refuge
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October 4, 2019

Pennington SWCD, Water Plan Coordinator
Attn: Peter Nelson
201 Sherwood Ave South
Thief River Falls, MN 56701

BWSR, Board Conservationist
Attn: Matt Fischer
403 4th St NW, Suite 200
Bemidji, MN 56601

Subject U.S. Fish and Wildlife Service Comments on the Thief River One Watershed, One Plan

Dear Mr. Nelson and Mr. Fischer

The following comments are in review of the draft 1W1P.

Page A-23 Notable Studies

[Assessment of Nutrients and Suspended Sediment Conditions in and near the Agassiz National Wildlife Refuge, Northwest Minnesota, 2008–2010. https://pubs.usgs.gov/sir/2012/5112/](https://pubs.usgs.gov/sir/2012/5112/)

Page A-34, 5.5 Impoundments

The report states that the refuge *"has adopted a strategy of incremental excavation to promote scouring and flushing of sediment in the old JD11 channel within the pool to address the sedimentation. Although necessary for waterfowl management, adverse water quality effects have occurred with this strategy."* It should be noted that our objectives for cleaning out JD11 include consolidation of sediments through drying, improved water conveyance for more effective drawdowns and bypassing of sediment laden flood flows, and recreation of sediment trapping capacity of JD11 to protect the pool, in addition to sediment removal. Also, the word *old* preceding JD11 should be removed. This is still an operating ditch and calling it old may give the impression that it's defunct or unnecessary.

Page A-57, 9.1.2 Aquatic Habitat

The report states that *"fish IBI scores appear to be negatively affected upstream of the dams that create the pools..."* Since this is a reasonable statement of the effects of a water control structure, it should also be stated that these same structures would offer the same effect on the upstream spread of aquatic invasive species.

Page 2, Advisory Committee Members

Both FWS representatives; Craig Mowry and Laurie Fairchild have transferred and retired, respectively. Do you need an active FWS person listed? The Agassiz Project Leader position is currently vacant, I'll be acting in this capacity until the position is filled. If you need to use me as a contact you can do so.

Thank you for the opportunity to comment. If you have any questions please let me know.

A handwritten signature in black ink, appearing to read "Jim F. Graham". The signature is fluid and cursive, with the first name "Jim" and last name "Graham" clearly legible, and "F." as a middle initial.

Jim Graham
Acting Refuge Manager

Matt, Peter -

In reviewing the Thief River 1W1P I came across 2 statements regarding the refuge that need to be changed.....

The first is a statement in Section 5.1.4.1 (pg 5-10) Operations and Maintenance that states....

"The MnDNR also owns and operates a small dam within the Agassiz NWR."

I would guess that this might be the Farmes Pool WCS and dike? If that is correct, the WCS is located on DNR land - outside the refuge and the dike that impounds the water of Farmes Pool is located both on Agassiz Refuge and MN DNR land. The refuge operates the water control structure.

The statement, as it reads now is a bit confusing. I think it would be more accurate if it were stated that the Farmes Pool impoundment is a co-managed pool between the USFWS, MnDNR and RLWD.

The second statement that needs to be reviewed is found in Section 2 Land Use Land Cover & Development (pg A-4).

It states that the primary goal for the refuge is waterfowl production and maintenance (MPCA, 2014).

The waterfowl production part is correct but maintenance is not a goal. The purpose for which the refuge was established was to be "a refuge and breeding ground for migratory birds and other wildlife." The maintenance of the infrastructure would be an objective to meeting our goal.

I think just taking out the word maintenance would solve this issue.

Let me know how these 2 items will be addressed and if you need anything else from me.

Thanks

Jim

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