

Thief River One Watershed One Plan

Comments and Revisions: From 60-day public comment period for public hearing

Comment #	Entity	Comment	Change Made (Y/N)	Revision
1	PN	<p>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.</p> <p>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.</p>	Y	<p>Advisory committee feedback - USFWS can not engage in an advisory committee.</p> <p>Add Action "The Policy Committee will participate in any public input processes for USFWS management strategies."</p> <p>Add Action "The Advisory Committee will participate in annual impoundment management meetings." (include interagency team as partners)</p> <p>Ensure there is an action for annual advisory meeting</p>
2	AD	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.	Y	Will be edited as described
3	AD	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.	Y	Add sentence and link to DNR site
4	AD	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.	Y	An updated map has been generated and will be included
5	AD	General comment for Section 4 Targeted Implementation Schedule - DNR and MnDNR are used interchangeably under Partner column. Select one and be consistent.	Y	DNR will be used throughout the report
6	AD	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.	N	Intend to leave the action as is. This is not to suggest that new work will be created, but rather document what is already occurring as described by the reviewer
7	AD	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.	N	It is the Planning Work Group's position that the current language is reflective of how this process has and will continue to proceed.
8	AD	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.	N	It is the Planning Work Group's position that the DNR and other State agencies can be called out for actions relative to roles that they already have as part of this planning process.
9	BH	The map on the website https://www.rldwatersheds.org/thiefriver1w1p does have the Mud River labeled incorrectly as the Moose River.	Y	Website will be revised.
10	MF	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 <u>North Township in Pennington County</u> .	Y	Will be revised as described
11	MF	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.	Y	Update will be made as described
12	MF	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 water courses/waterbodies in that statement. We recommend changing throughout the plan where this statement occurs	Y	ditches will be added to the relevant sections of the plan
13	MF	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.	Y	Update will be made as described

14	MF	Appendix references throughout the plan should be checked for accuracy. Specific issues identified include: o 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. o Section 2.2 refers to Appendix H, but should instead refer to Appendix F. o Section 4.2.1.1 says there are five PTMA related maps included in Appendix D. That is not the case.	Y	All appendix references will be double checked and revised accordingly
15	DR	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.	Y	Will be revised as described
16	DR	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.	Y	Will be revised as described
17	DR	Add managed (tile) drainage as a specific practice to maintain soil health as are cover crops a specific practice to maintain soil health.	N	Not yet approved by NRCS under design guidelines
18	JM	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 (<i>E. Coli</i> , Giardia, Cryptosporidium), to the surface water intake, resulting in a detrimental impact to the safety of drinking water."	Y	Will be revised as described
19	JM	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.	Y	A reference will be made to the monitoring goal for arsenic and a note added that some wells have shown high arsenic levels . Reduce Contamination will be future title of 3.2.1
20	JM	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 authority is 1031.005 Subd. 24. In addition, the MN Well Code rules is Chapter 4725. The statutory authority is 1031.101, subdivision 5.	Y	Will be revised as described

21 JM	<p>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.</p>	Y	Sentence of concern will be removed as the context is already established through other reports and sections of the plan.
22 JM	<p>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.”</p>	N	The issue is already addressed through the current structure of the plan
23 JM	<p>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 (<i>E. Coli</i>, <i>Giardia</i>, <i>Cryptosporidium</i>), 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.</p>	Y	Will be revised as described

24 JM	<p>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:</p> <p>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</p> <p>b.Aquatic Life and Aquatic Recreation-Reduce Bacteria Delivery and Load Goal and Issues 2.1.2 (bacteria), 5.1.4 (E.Coli), and</p> <p>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</p> <p>d.Drainage Management Systems-Erosion and Sediment Reduction Goal and Issue 2.3.1 (drainage system maintenance), and</p> <p>e.Shoreland and Riparian Areas-Improve and Increase Vegetative Cover Goal and Issue 3.2.1 (vegetation), and</p> <p>f.Habitat for Wildlife-Enhance Connectivity and Cover Goal and Issue 2.6.2 (wetlands), and</p> <p>g.Aquatic Habitat for Fish, Macroinvertebrates and Aquatic Life-Restore Connectivity and Habitat, Moderate Flow Regimes, and</p>	N	Already addressed in section 4 and described in section 3.2.2
25 JM	<p>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.</p>	Y	through comment #1
26 JM	<p>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.</p>	Y	through comment #1
27 JM	<p>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.</p>	N	through comment #1
28 JM	<p>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.</p>	Y	The Planning Work Group acknowledges that the current formatting creates confusion in this section. This will be revised so that the goals are listed at the start of section 3.2.11 so that it is more clear.

29	JM	<p>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.</p>	Y	clarify differently and that MDH will be involved in planning
30	JM	<p>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.</p>	Y	Investigate opportunities for sed. Reducitons in middle thief under data gap acitons.
31	JM	<p>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.</p>	Y	Through comment #1
32	JM	<p>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.</p>	Y	Through comment #1
33	JM	<p>Appendix H (pdf pg 325, 326). Recommend updating Planning Region Prioritization Table comments to reflect if concerns were addressed for Issue 2.1.2.</p>	Y	Revise the appendix. Based on impaired or nearly impaired reaches
34	DO	<p>Abbreviated 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).</p>	Y	Through comment #1
35	RS	<p>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=2018-0418-101814-467</p>	N	These are already addressed in the plan
36	RS	<p>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.</p>	N	These are already addressed in the plan
37	RS	<p>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.</p>	Y	Will be added to local funding portion

38 RS	<p>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.</p>	N	These are already addressed in the plan
39 RS	<p>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</p>	N	These are already addressed in the plan
40 JG	<p>The first is a statement in Section 5.1.4.1 (pg 5-10) Operations and Maintenance that states....</p> <p>"The MnDNR also owns and operates a small dam within the Agassiz NWR."</p> <p>I would guess that this might be the Farnes 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 Farnes Pool is located both on Agassiz Refuge and MN DNR land. The refuge operates the water control structure.</p> <p>The statement, as it reads now is a bit confusing. I think it would be more accurate if it were stated that the Farnes Pool impoundment is a co-managed pool between the USFWS, MnDNR and RLWD.</p>	Y	Will be revised as described
41 JG	<p>The second statement that needs to be reviewed is found in Section 2 Land Use Land Cover & Development (pg A-4).</p> <p>It states that the primary goal for the refuge is waterfowl production and maintenance (MPCA, 2014).</p> <p>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.</p>	Y	Will be revised as described
42 JG	<p>Page A-J4. - .5 Impoundment</p> <p>The report states that the refuge "has adopted a strategy of incremental excavation topromote scouring and.flushing of sediment in the old JD! 1 channel within the pool lo address the sedimentation. Although necessary for 1'11ate1fowl management, adverse water quality effects have occurred with this strategy." It should be noted that our objectives for cleaning out JD 11 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 JD I I to protect the pool, in addition to sediment removal. Also, the word old preceding JD I I should be removed. This is still an operating ditch and calling it old may give the impression that it's defunct or unnecessary .</p>	Y	Will be revised as described
43 JG	<p>Page A-57, 9.1.2 Aquatic Habitat</p> <p>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.</p>	N	Taken from another report. However, the paragraph will be deleted as the topic is already covered prior in the document.

44	JG	<p>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.</p>	N	Given that the mentioned members were the designated members for the majority of the plan, the Planning work group recommends leaving them for reference purposes.
45	JB	<p>Page A-23 Notable Studies Assessment of Nutrients and Suspended Sediment Conditions in and near the Agassiz National Wildlife Refuge, Northwest Minnesota, 2008-20010. https://pubs.ugus.gov/sir/2012/5112/</p>	Y	Reference will be added if time allows.
46	BH	<p>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.</p> <p>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.</p> <p>“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.</p> <p>Sincerely,</p> <p>Brian D. Holmer, Mayor</p> <p>cc: Wayne Johnson, Water Superintendent</p>	Y	through comment #1
47	MF	Appendix J labeled wrong	Y	All appendix labels will be revised as needed.
48	PWG	The MDH will be a lead on an action in Plan Section 4 to Update the Source Water Assessment Plan and to Investigate doing a Surface Source Water Assessment	Y	Will be revised as described
49	PWG	An action will be added to Plan Section 4 that states, Work with local, regional, national US Fish and Wildlife Service staff to address water quality leaving Agassiz Pool to address downstream impacts on drinking water supplies and water quality impairments.	Y	Will be revised as described
50	PWG	A statement will be added to section 3.12 that states, “See the WRAPS study for additional details of the water quality impacts within the planning region.”	Y	Will be revised as described
51	PWG	An action will be added to Plan Section 4 that states, “Develop a factsheet to summarize and share information about the causes of water quality problems in the Thief River that are affecting drinking water in the city of Thief River Falls.”	Y	Will be revised as described
52	PWG	An action will be added to Plan Section 4 that states, “Investigate Strategies in the Agassiz National Wildlife Refuge to address sediment issues”	Y	Will be revised as described
53	PWG	Table 4-3 will be revised to provide better context on the purpose of the table on connect the goals listed to issues already prioritized in the plan	Y	Will be revised as described
54	PWG	Table 4-7 – there are areas where additional measurable goals should be delineated as being addressed by an action with an X.	Y	Will be revised as described