



Ecological and Water Resources
1200 Warner Road
St. Paul, MN 55106

May 30, 2023

Vermillion River Watershed Joint Powers Organization
Mark Zabel, Administrator
4100 220th St. W #103
Farmington, MN

Greetings Mr. Zabel,

This letter is in response to your notification soliciting input on Vermillion River Watershed Joint Powers Organization's (VRWJPO) Watershed Management Plan Update. This is an exciting time for VRWJPO as work begins on the 10-year update of the commission's Watershed Management Plan(s) (WMP). This process allows time to review and update past goals, strategies, and actions, and to think through watershed plans for the next ten years. To aid in this process, DNR has compiled this resource assessment letter to provide up-to-date information on DNR's priority issues for the watershed and useful data available through DNR that can help support watershed management organization planning, program management, and project development/design. The following narrative is divided into topics relevant to watershed resource management and included under each topic are DNR recommended actions. Continue to utilize information from State studies developed for the Watersheds including TMDLs and WRAPS to drive implementation programs and targeting.

Taylor Huinker, the DNR South Metro Area Hydrologist, will be participating on the Technical Advisory Committee for VRWJPO Watershed Management Plan preparation process. If you have questions regarding the content of this letter or would like to discuss individual topics or recommendations further, please do not hesitate to contact her (taylor.huinker@state.mn.us; 651-259-5790). The DNR looks forward to working with VRWJPO on your next generation Watershed Management Plan and on future public waters projects.

Sincerely,

A handwritten signature in blue ink that reads 'Megan JC Moore'.

Megan Moore

Central Region EWR District Manager

CC: Anne Sawyer, BWSR
Dan Lais, DNR
Jack Gleason, DNR
Taylor Huinker, DNR
John Freitag, MDH
Jeff Berg, MDA
Maureen Hoffman, Metropolitan Council
Jennifer Kostrzewski, Metropolitan Council
Jeff Risberg, MPCA
Jason Swenson, MnDOT

General Watershed Management Strategies

DNR recommends that the following general watershed management strategies be a part of your watershed management plan (WMP):

- Keep water where it falls by protecting and restoring wetlands, ensuring water courses are connected to their floodplains, and managing stormwater runoff with rate control and volume reduction standards.
- Protect and create buffers of native perennial vegetation along watercourses and water bodies.
- Reduce the flow of water volume and nutrients through drainage systems.
- Design culverts and bridges to retain floodplain functions and bank stability on natural channels and other drainage systems.
- Support land use planning and practices that protect, restore, and enhance priority ecological resources.
- Maintain and enhance perennial vegetation including protection of working forest lands.
- Use water efficiently and implement conservation measures that further reduce water demand.

Integrated Water Resource Management

As the Vermillion River Watershed Joint Powers Organization begins the WMP update process, it's important that water resource issues and goals be addressed not as independent prescriptions, but as integrated activities strategically applied toward the improvement of the entire watershed system. DNR's Watershed Health Assessment Framework approach uses a five- component framework (hydrology, biology, connectivity, geomorphology, and water quality) to address the interdependent nature of ecological systems that operate within a watershed. Placing the goals and actions identified by the Committee into this framework may help to:

- Evaluate watershed goals and actions in the context of the five aspects of watershed health.
- Identify gaps between goals and actions.
- Prioritize chosen actions effectively.
- Examine the potential for unintended consequences.

Use the [Watershed Health Assessment Framework](#) interactive online map and [downloadable data sets](#) to help refine and organize the WMP within the context of a comprehensive watershed landscape.

Additional, more specific recommendations by topical area follows:

Impact of bacteria impairments on aquatic recreation

Water quality impairments that impact aquatic recreation occur in the Vermillion River watershed and are a major concern for the DNR. Impairments are due to high levels of E. coli and/or fecal coliform bacteria from feedlots, land application of manure, and cattle in riparian areas. Leaking septic systems can also be a contributing factor. Aquatic recreation is an important part of the Vermillion River watershed and emphasizes the need to continue to address these impairments. The 2015 Vermillion River WRAPS report identified 12 river/stream bacteria impairments and also has an approved TMDL for

the impairments. The DNR encourages the JPO to continuing addressing this issue to improve recreational opportunities.

Fisheries

Fisheries staff appreciate the JPO's previous and continuing work to improve water quality and fisheries resources. Please continue to focus on minimizing the impacts of shoreline development and improving water quality. For more information and coordination on fisheries management projects, please contact TJ DeBates (timothy.debates@state.mn.us; 651-259-5770), East Metro Area Fisheries Supervisor.

Groundwater Sustainability

DNR continues to manage the state's groundwater resources to meet sustainability goals set out in statute. DNR recommends the VRWJPO's WMP contain some key objectives and actions in the plan, including:

- Increase communication about the risks of overuse and degradation of groundwater resources and promote water conservation.
- Maintain and enhance aquifer recharge
- Maintain and enhance quality of water recharging aquifers
- Increase coordination of monitoring activities between organizations with water management responsibilities, including monitoring water level trends using water level measurements from member communities.
- Increase coordination of communication activities between organizations with water management responsibilities

Stormwater Management

The VRWJPO's land use is a mix of rural and developed impervious surfaces. To reduce the resultant impact of increased runoff and pollutant loading to water bodies requires improvements to existing urban stormwater management infrastructure.

VRWJPO plays an important role in urban stormwater management and DNR encourages the VRWJPO to continue to work with its partners to:

- Monitor and protect the water quality of the VRWJPO's water resources
- Implement best management practices to reduce stormwater runoff
- Investigate new stormwater management techniques
- Promote green infrastructure
- Address storm sewer infrastructure capacity and corresponding flooding problems

One of the primary drivers of degraded water quality and habitat in rivers, streams, lakes and wetlands is nutrient and sediment-laden runoff from surrounding commercial, residential, and agricultural land uses. Minimum Impact Design Standards (MIDS) were developed by the Minnesota Pollution Control Agency to minimize stormwater runoff, minimize the amount of pollution reaching lakes, rivers, and streams, and to recharge groundwater. The development of MIDS is based on low impact development (LID), an approach to storm water management that mimics a site's natural hydrology as the landscape is developed. Continue to support the incorporation of MIDS (and the LID approach) into future development and redevelopment in the watershed.

Additionally, High Potential Zones for the federally endangered Rusty-patched Bumble Bee occur within the Vermillion River Watershed Joint Powers Organization. The Monarch Butterfly is also likely to be federally listed in the near future. Therefore, DNR encourages the use of BWSR-approved, weed-free, native seed mixes to the greatest degree possible in stormwater features and other landscaping in order to provide pollinator habitat.

Septic Systems

Consider promoting homeowner education on the proper use and maintenance of septic systems to preserve their function. The University of Minnesota's Onsite Sewage Treatment Program designed a homeowner tool that allows users to create a custom guide for their septic system. The tool can be found at <https://h2oandm.com/>

Chloride

Chloride released into local lakes and streams does not break down, and instead accumulates in the environment, potentially reaching levels that are toxic to aquatic wildlife and plants. Consider promoting local business and city applicator participation in the Smart Salting Training offered through the Minnesota Pollution Control Agency. More information and resources can be found at this website: <https://www.pca.state.mn.us/water/salt-applicators>. Many winter maintenance staff who have attended the Smart Salting training — both from cities and counties and from private companies — have used their knowledge to reduce salt use and save money for their organizations.

We encourage VRWJPO to request that project proposers who wish to significantly increase impervious surfaces develop a chloride management plan that outlines what BMP's and strategies will be used to reduce chloride use within the project area. We also encourage cities, counties, and watershed districts to consider how they may participate in the [Statewide Chloride Management Plan](#) and provide public outreach to reduce the overuse of chloride. Please consider metrics in your plan that includes encouraging member communities to consider a sample ordinance regarding chloride use such as found here: <https://www.pca.state.mn.us/sites/default/files/p-tr1-54.pdf>.

Stream Bank Stabilization and Restoration

DNR's underlying philosophy regarding stream management is that streams are self-forming and self-maintaining systems. When they are artificially manipulated there can be negative impacts to channel stability. Alterations in pattern, dimension, or profile of a stream can lead to an increase in stream bank erosion, increased turbidity, embedded sediments, and a general reduction in biological productivity. DNR encourages the VRWJPO to consider these stream dynamics when planning stream stabilization or restoration projects.

Before attempting to stabilize streambanks, there needs to be an understanding of the underlying causes and if they are systemic or localized. If localized, then traditional stabilization techniques can be employed. DNR highly recommends using wood for toe stabilization given its habitat value. Toe-wood sod mats have been installed successfully on other rivers within the state to stabilize stream banks, protect infrastructure and provide habitat. DNR can provide site specific guidance if there is interest. If the underlying cause is systemic (e.g. altered hydrology), then additional assessment work is needed and streambank stabilization may not be appropriate for all sites due to the increased likelihood of project failure.

For more information and coordination on streambank stabilization and restoration, please contact Nick Proulx (nick.proulx@state.mn.us; 651-259-5850), DNR Clean Water Specialist.

Aquatic Invasive Species

Aquatic invasive species (AIS) pose a significant threat to Minnesota's lakes and rivers and continue to be a high priority issue for DNR. Aquatic invasive plants such as Eurasian watermilfoil and curly-leaf pondweed form thick vegetative mats on the water surface, limiting recreational opportunities and often negatively affecting water quality. Both the control of existing AIS and the prevention of new infestations are important efforts in terms of AIS management.

In most cases, eradication of invasive aquatic plants is not an option. Therefore, herbicide treatments are generally used to target abundant beds of invasive plants that may create a recreational nuisance. In most cases, the use of herbicides on lakes classified as Natural Environment (NE) lakes is not appropriate, and mechanical means (e.g. commercial aquatic plant harvester) may be a management option.

The establishment of both aquatic and terrestrial invasive species is a major threat to the ecological functions of both wetland and upland plant communities. Include plans to combat invasive species and best management practices (BMPs) in watershed project plans and designs. Promote education of the public on the control and spread of invasive species – public awareness efforts targeting riparian property owners (lakeshore owners) are needed to increase overall compliance with AIS laws. DNR will continue to support local efforts to educate the public in AIS prevention and encourage local units of government to take a leadership role. For more information on the AIS Program, contact April Londo (april.londo@state.mn.us; 651-259-5828), invasive species specialist.

Conservation Partners Legacy Grant Program

The Conservation Partners Legacy (CPL) Grant Program funds conservation projects that restore, enhance, or protect forests, wetlands, prairies and habitat for fish, game, and wildlife. The types of projects funded under this grant program include prairie restoration, river restoration, lake habitat enhancement, wildlife habitat restoration, floodplain forest restoration, bluff prairie restoration, fish barrier installation, buckthorn removal, fish passage restoration, and others.

Participate in the [Conservation Partners Legacy \(CPL\) Grant Program](#) where possible. To learn more about this grant program, contact the CPL Grant Program coordinator (LSCPLGrants.DNR@state.mn.us; 651-259-5233).

Consideration of plant communities, rare species, and special features

Information on the biology, distribution, ecology, habitat use, conservation, and management of rare species of interest is available in the [DNR's Rare Species Guide](#). The locations of state-listed species maintained in the Rare Features Database are considered sensitive information and is protected under the Minnesota Data Practices Act. This information is only available through a Natural Heritage Information System (NHIS) data request or by license agreement, and should be used for internal planning purposes only.

The NHIS is continually updated as new information becomes available and will include current records and surveys. You can visit the online [Minnesota Conservation Explorer](#) tool explore public data

available for conservation planning, to request an automated Natural Heritage Review, and, for authorized users, to access nonpublic data.

DNR recommends using assessment data of watershed characteristics and natural resource features when completing long-range watershed planning efforts. The assessment of watershed characteristics and natural resource features is valuable for evaluating landscape functions and guiding land management decisions. These assessments provide important information on a landscape's integrity and its ability to provide benefits to ecosystems. For example, assessment data can be used to examine how projects will improve or affect flora and fauna, determine the cumulative impacts of land use, make regional scale land use decisions, and to balance land use development and natural resource protection.

The presence of rare species can be an indication of the health of a watershed, and plant and animal diversity helps landscapes to maintain important watershed functions. DNR recommends that the VRWJPO's WMP include goals and policies to address how rare species and habitat will be protected.

We encourage VRWJPO to require an NHIS review as early in the planning stage of projects as possible in order to allow sufficient time for review and coordination with DNR. If the proposer waits until WCA TEP review to consider potential impacts to rare species, it is often late in the planning stages and could cause significant delays to the project.

DNR data layers have been developed that are helpful in watershed planning. These are free and available to the public from the [Minnesota Geospatial Commons](#). Some key data layers include:

- DNR managed lands such as Scientific and Natural Areas, Wildlife Management Areas, and Aquatic Management Areas
- DNR native plant communities
- Karst features
- Minnesota Biological Survey (MBS) Sites of Biodiversity Significance
- Central Region Regionally Significant Ecological Areas (CRRSEA) – The purpose of this data is to inform regional scale land use decisions, especially as it relates to balancing development and natural resource protection.
- Regionally Significant Ecological Areas and Regional Ecological Corridors – Identifies potential habitat movement corridors that may be important for wildlife connections.

DNR encourages the use of site-appropriate native plants for shoreline stabilization, buffers, and erosion control for all watershed projects. These species provide important stabilization and erosion control functions, have the greatest chance of establishment success, and contribute to biodiversity of landscape vegetation. Query the DNR's [Your Shore Native Plant Encyclopedia](#) for a list of plants tailored to specific site characteristics. DNR recommends the establishment of native grassland and herbaceous plant communities in the place of mowed turf grasses on watershed and highway projects as a means to support native insect pollinator communities. Interest in pollinators has grown since the term Colony Collapse Disorder appeared in 2006. This phrase refers to the puzzling disappearance of honey bees from their hives. While this disorder does not affect native pollinators, many of the challenges that face honey bees also affect native insects, including pesticide use, habitat loss, pathogens, parasites, climate change, and invasive species. DNR has developed a [Best Management Practices Guide](#) for restoring and enhancing native plant community habitat for native insect pollinators.

Forest Management Considerations

Importance of forested riparian areas to water resources cannot be understated. Forested riparian areas provide an array of goods and services for plant diversity, wildlife and fish habitat, nutrient, sediment, and water interception, storage, and transformation and recreational opportunities. Keeping riparian areas intact so that the functions and roles of terrestrial and aquatic ecosystems can continue to provide these services is imperative. We recommend keeping forested riparian areas forested, which does not necessarily preclude forest management activities. If riparian forests are managed in the VRWJPO's area, we highly recommend consulting and using the [Minnesota Forest Resource Council's Council's Voluntary Site-Level Forest Management Guidelines for Landowners, Loggers, and Resource Managers](#) to protect these valuable ecosystems into the future.

Emerald ash borer (EAB) will continue to impact communities in the VRWJPO area within the next 10 year watershed plan cycle. Communities should be planning for EABs impacts and take action now to reduce the sudden financial burden that comes with EAB. One can find information at this [website](#). You can visit this [interactive website](#) to see the status of EAB in Minnesota. The VRWJPO area is within the "Generally Infested Area" and all of Hennepin County is within the quarantine area. To minimize pesticide exposure in the environment and to save people's money, we would not recommend applying insecticides to save ash trees until symptoms of EAB infestation are within about ¼ - ½ mile of any given location. Note that ash trees can still be saved from EAB if they are lightly infested (they must still have over 50% of their normal number of leaves that are normally sized). Ideally ash trees should be treated when they are 100% healthy and not infested at all, so there is some risk of waiting until EAB infestation symptoms are visible within a ½ mile. In natural areas, forested wetlands with ash dominant in the canopy will experience a more drastic change in plant community composition and hydrology than upland communities with a minor ash component.

The Forest Stewardship Program at the DNR provides private landowners with at least 20 acres of forested land (or land that will have trees) professional forest management advice from a qualified DNR forester or private land forestry consultant. For a fee, landowners will consult with a forester to talk about their goals for forest management. The forester will write a forest management plan and the land will be eligible for property tax relief programs and state cost-share assistance for management work. For more information on the DNR's professional forest management assistance for private landowners, please visit our [webpage](#).

Communities interested in caring for and managing their urban and community forests can find helpful information at the DNR's website on the Community Forestry webpage. Information and links about grant programs, DNR Arbor Month, and best management practices for preventing spreading invasive species and conserving wooded areas can be at this [website](#).



MN Board of Water and Soil Resources
520 Lafayette Road North
St. Paul, MN 55155

June 5, 2023

Mark Zabel, Administrator
Vermillion River Watershed Joint Powers Organization
4100 220th St. W #103
Farmington, MN 55024

RE: Vermillion River Watershed Management Plan Update

Dear Mr. Zabel,

This letter is in response to your March 31, 2023, email soliciting input for the next iteration of the Vermillion River Watershed Joint Powers Organization's (VRWJPO) Watershed Management Plan (Plan). Thank you for the opportunity to provide preliminary input. I have appreciated talking with both you and Travis Thiel about the planning process and Plan content, and I look forward to working with the VRWJPO throughout this effort.

The Board of Water and Soil Resources' (BWSR) expectations for the Plan update focus on:

- 1) Process. Provide opportunities to discuss relevant topics and affirm, align, or change direction based on initial input and issue identification.
- 2) Coordination. Good planning is collaborative from the beginning and engages with multiple units of government, partners, and the public at many different levels of the process.
- 3) Plan Contents. Plans should focus on priority issues, clearly describe actions to be taken over the next 10 years, incorporate relevant and timely data and trends, and contain short-, mid-, and long-term measurable goals based on science, local priorities, and targeted implementation plans.
- 4) Organizational Capacity. Incorporate authentic self-evaluation, accountability, and potential efficiency of implementation to create ambitious yet realistic goals.

The requirements for the planning process and Plan content are outlined in Minnesota Rule 8410 (<https://www.revisor.mn.gov/rules/8410/>) and Minnesota Statute 103B (<https://www.revisor.mn.gov/statutes/?id=103B>). Please reference these documents throughout the process.

Additional resources that may be helpful for developing implementation actions and measurable goals can be found in the *One Watershed One Plan Guidebook* (<https://bwsr.state.mn.us/one-watershed-one-plan-resources>). Note that these resources are useful for watershed planning across the region, regardless of whether the Plan is developed as part of the 1W1P process.

- *Identifying and Prioritizing Resources and Issues* (pages 7-10)
- *Setting Measurable Goals* (pages 11-14)
- *Targeting Implementation Activities* (pages 23-26)

In the VRWJPO's 2022 Performance Review and Assistance Program (PRAP) Summary Report, BWSR recognized the VRWJPO as a top performer, citing efficient and effective implementation of projects within the watershed. Commendation was also given to the VRWJPO's monitoring and tracking program as well as their capacity to forge and maintain strong, collaborative relationships with partners. I look forward to the continuation of these great efforts as part of the next Plan.

Below are a few specific comments for the VRWJPO to consider as the planning process begins.

Measurable Plan Goals (please refer to [MN Rule 8410.0080](#)):

- The Plan must include specific and measurable goals for water quantity, water quality, public drainage systems, groundwater, and wetlands, as well as other priority issues identified during the input process.
- Goals need sufficient detail to determine what will be accomplished by the end of the Plan and whether success has been achieved. BWSR recommends the following process:
 - define a strategy to prioritize the top resource concerns;
 - create specific and measurable goals for implementation activities; and
 - develop metrics to measure progress.
- The Plan should be written to ensure that highly prioritized projects are targeted, making it easier to show how the VRWJPO is addressing both resource and constituent concerns. A clearly prioritized and well-targeted plan can also help communicate the need for specific projects in terms of achieving water quality improvements.

Implementation Actions (please refer to [MN Rule 8410.0100](#)):

- The implementation program should be clear in identifying what implementation actions the VRWJPO will undertake in the next 10 years with available local funds, regardless of whether they receive new grant funding.
- Include a procedure to evaluate progress for implementation activities at a minimum of every two years.
- Define the process for evaluating implementation of local water plans.

Other comments:

- The current Plan does an excellent job describing threats to groundwater quality and quantity in the watershed and outlines numerous efforts to address groundwater issues. The VRWJPO has also worked extensively with partners on projects and planning related to groundwater over the past 10 years. In developing the next Plan, I encourage the VRWJPO to describe how they will continue this work, particularly considering recent plans and processes that did not exist during the last Plan update, such as the Dakota County Groundwater Plan, the Dakota County Agricultural Chemical Reduction Effort, and the Minnesota Groundwater Protection Rule.
- I commend the VRWJPO for addressing climate change in their current plan and look forward to greater prioritization and expanded efforts related to climate resiliency. Among other resources, the BWSR Climate Resiliency Toolbox (<https://bwsr.state.mn.us/bwsr-climate-resiliency-toolbox>) may be useful.
- Similarly, the VRWJPO should continue and expand its efforts to address chloride pollution, particularly given continued urban expansion in the region. In addition to the Twin Cities Metropolitan Area Chloride TMDL, we recommend consideration of data and strategies from the Twin Cities Chloride Management Plan (MPCA) and the Regional Assessment of Chloride in Select Twin Cities Metro Streams (Met Council).
- As the VRWJPO develops its public input process, we encourage consideration of diversity, equity, and inclusion elements to ensure robust community engagement that is representative of the changing demographics of both Scott and Dakota counties over the past 10 years¹. Tools such as [EJScreen](#):

¹ Minnesota County Profiles. Minnesota Department of Employment and Economic Development. Accessed 6/2/2023.

[Environmental Justice Screening and Mapping Tool](#)², the [Social Vulnerability Index](#)³, and the [American Community Survey](#)⁴ may be helpful.

I look forward to providing additional input and BWSR assistance as the VRWJPO works through development of the Plan. Please forward a copy of the proposed public input process once it has been developed. Please also invite me to workshops, public input events, and advisory committee meetings. My priority will be advisory committee meetings, but I will try to attend other events as time allows. If you have questions or need additional information, feel free to contact me by phone at 651-392-5064 or via email at Anne.Sawyer@state.mn.us.

Sincerely,

Anne Sawyer

Anne Sawyer
BWSR Board Conservationist

CC: Melissa Bokman-Ermer (VRWJPO Co-administrator, via email)
Marcey Westrick (Central Region Manager, BWSR, via email)
State Review Agencies (via email)
Megan Moore (DNR)
Mark Wettlaufer (MDH)
Jeffrey Berg (MDA)
Maureen Hoffman (METC)
Jeff Risberg (MPCA)
Jason Swenson (MNDOT)

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² US Environmental Protection Agency, accessed 6/2/2023

³ Agency for Toxic Substances and Disease Registry, US Centers for Disease Control, accessed 6/2/2023

⁴ US Census Bureau, accessed 6/2/2023



June 2, 2023

Mark Zabel, Administrator
Vermillion River Watershed Joint Powers Organization
4100 220th Street West, #103
Farmington, Minnesota 55337

Re: Comprehensive Watershed Management Plan Update for the Vermillion River Watershed Joint Powers Organization

Mark,

This letter is in response to your request for information that can be considered as you begin developing your 4th generation comprehensive watershed management plan (Plan). We appreciate the partnership our organizations have shared over the past many years.

Initial priority issues of our organization will be to 1.) identify those water bodies that are “nearly or barely” impaired and focus on keeping them from being impaired or work toward getting them delisted; 2.) reducing peak flow and volume of surface water runoff within sub-watersheds that have experienced flooding or excessive soil loss and 3.) Seek implementation activities that provide multiple benefits to water resources such as groundwater or surface water quality, fish or wildlife habitat and public recreation opportunities.

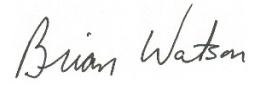
As you know, the State of Minnesota has placed a stronger emphasis on the use of Prioritized, Targeted and Measurable (PTM) criteria for the development of goals and objectives within both watershed plans and soil and water conservation district plans under Minnesota Statute 103b and 103c. A stated goal of the Dakota County Soil and Water Conservation District (SWCD) Board is to decrease the amount of time and cost involved with planning efforts and the overall number of plans developed. The SWCD would like to work through local watershed plans to incorporate our resource priorities.

As our two organizations along with state, regional agencies and other local stakeholders begin discussing updates to the Plan, we would ask that the VRWJPO consider how SWCD priorities under the PTM criteria could be adopted into the VRWJPO implementation table. We believe this effort could align priorities and pool resources for both organizations. Potential collaboration ideas for inclusion into an implementation plan include:

- Administrating and implementing grants
- Education and outreach
- Sub-watershed assessments or feasibility studies
- Technical assistance and project implementation
- Water monitoring

Again, thank you for your partnership and we look forward to implementing our shared vision of protecting and managing soil and water resources.

Sincerely,

A handwritten signature in cursive script that reads "Brian Watson".

Brian Watson, District Manager

Cc: Melissa Bookman, Co-VRWJPO Administrator
Anne Sawyer, BWSR Board Conservationist
Dakota SWCD Board



May 26, 2023

Mark Zabel
Administrator
Vermillion River Watershed Joint Powers Organization
4100 220th St. W #103
Farmington, MN 55024

RE: Vermillion River Watershed Management Plan Update Request for Information

Dear Mr. Zabel:

Thank you for the opportunity to submit our priority concerns for inclusion in the Vermillion River Watershed Joint Powers Organization's (VRWJPO) updated Watershed Management Plan (Plan), as well as the Metropolitan Council's (Council) expectations for the Plan outcomes. I have included a list of Council resources that may be of use in the Plan preparation.

Council Expectations and Priorities for Plan Preparation and Review

Council staff will review the plan through the lens of the Council's *Thrive MSP 2040* document which is the Regional Development Framework for the seven county Twin Cities Metropolitan Area and the *2040 Water Resources Policy Plan*, both of which can be found on the Council's web page (www.metrocouncil.org).

In particular, the *2040 Water Resources Policy Plan* (Policy Plan) includes policies and strategies to achieve the following goal:

To protect, conserve, and utilize the region's groundwater and surface water in ways that protect public health, support economic growth and development, maintain habitat and ecosystem health, and provide for recreational opportunities, which are essential to our region's quality of life.

The Policy Plan takes an integrated approach to water supply, water quality, and wastewater issues. This approach moves beyond managing wastewater and stormwater only to meet regulatory requirements by viewing wastewater and stormwater as resources, with the goal of protecting the quantity and quality of water our region's needs now and for future generations.

The Policy Plan includes policies and strategies to:

- Maximize regional benefits from regional investments in the areas of wastewater, water supply and surface water management and protection.
- Pursue reuse of wastewater and stormwater to offset demands on groundwater supplies.
- Promote greater collaboration, financial support, and technical support in working with partners to address wastewater, water quality, water quantity and water supply issues.
- Promote the concept of sustainable water resources through collaboration and cooperation, with the region taking steps to manage its water resources in a sustainable way with goals of:

- Providing an adequate water supply for the region
- Promoting and implementing best management practices aimed at protecting the quality and quantity of our resources
- Providing efficient and cost-effective wastewater services to the region
- Efficiently addressing nonpoint and point sources pollution issues and solutions, and,
- Assessment and monitoring of lakes, rivers, and streams to direct adequate management, protection, and restoration of the region's valued water resources.

The updated watershed management plan should include policies related to the protection of area water resources with these strategies in mind, with the end goal of water sustainability.

In addition to being consistent with the Council's policy plan, the Plan also should include quantifiable and measurable goals and policies that address water quantity, water quality, recreation, fish and wildlife, enhancement of public participation, groundwater, wetlands, and erosion issues.

Council staff will be looking for the Plan to address the issues and problems in the watershed and to include projects or actions and funding to address them. At a minimum the Plan should address:

1. Any problems with lake and stream water quality and quantity, including information on impaired waters in the watershed and the Organization's role in addressing the impairments,
2. Flooding issues in the watershed,
3. Climate and resilience planning,
4. Information on emerging contaminants within the watershed, outlining watershed district and partners' roles.
5. Stormwater rate control issues in the watershed,
6. Impacts of water management on the recreation opportunities,
7. Impact of soil erosion problems on water quantity and quality,
8. The general impact of land use practices on water quantity and quality,
9. Policies and strategies related to monitoring of area water resources,
10. Policies and strategies related to use of best management practices,
11. Issues concerning the interaction of surface water and groundwater in the watershed,
12. Erosion and sediment control standards and requirements,
13. Volume reduction goals at least as restrictive as requirements in the NPDES construction general permit, and,
14. Capital improvement plan with itemized list of actions, estimated costs, and timeline.
15. Specifics on long-term maintenance of projects identified in the capital improvement plan, including identification of entities responsible for funding and conducting maintenance, as well as how long-term maintenance will be documented,
16. Specify to what degree the Plan may be adopted by reference by a local government unit for all or part of its local water plan. Additionally, please include information in the Plan on what information local municipalities must include in their local water management plans to receive approval from VRWJPO.

The Council also encourages the plan to leverage partnership opportunities where possible and to state them clearly within the Plan. The Council believes that to achieve productive and effective water governance within Minnesota we must all work together, this includes partnering with the cities and townships within the watershed.

Specific Priority Issues

Based on Council policies, the following issues are specific to the Vermillion River watershed and are viewed as priorities by the Council for inclusion in the Plan:

- Lebanon Hills, Spring Lake Park Reserve, and Whitetail Woods Regional Parks are located in the watershed. The Council has made a substantial investment in the regional park system through its park implementing powers. Improvement of water quality in the watershed would likely have a positive impact on the park, through improving fisheries and wildlife and/or by reducing risks to public health. The Plan needs to address any issues, problems, capital projects, or land use changes related to the regional park.
- The Council has updated its Priority Waters list, formerly known as the Priority Lakes list, which now includes rivers and streams. It will provide a key lens for developing policies and activities to include in the 2050 Water Resources Policy Plan. It will inform how the Council can align with the priorities of local and state partners, like VRWJPO, and provide value for the region.

The list has the following waters in the VRWJPO: Empire Lake, Marion Lake, and Lake Rebecca; in addition to the Mississippi River, Vermillion River, and the South Branch of the Vermillion River.

While the list was developed after the adoption of the 2040 Policy Plan and is a foundational dataset for the 2050 Policy Plan, it would be appreciated if the VRWJPO could include these water designations in the Land and Water Resources Inventory.

Available Council Resources

The Council has collected monitoring data for numerous water bodies within Vermillion River watershed from 2013-2022.

Waterbody Type	Site	Monitoring Program [†]	Years of data
Lake	Alimagnet lake	CAMP	2013-2022
Lake	Birger Pond	CAMP	2022
Lake	Cobblestone Lake	CAMP	2013-2021
Lake	East Lake	CAMP	2013-2022
Lake	Empire Lake	MCES	2022
Lake	Farquar Lake	CAMP	2013-2022
Lake	Long Lake	CAMP	2013-2022
Lake	Marion Lake	CAMP	2013-2022
Lake	Lake Rebecca	CAMP	2015-2022
Lake	Scout Lake	CAMP	2013-2022
Lake	Spring Lake	MCES	2016
Lake	Valley Lake	CAMP	2013-2022
River	Mississippi River, Mile 815.6	River Program	2013-2022
River	Vermillion River, Mile 20.6	River Program	2013-2017
River	Vermillion River, Mile 15.6	River Program	2013-2019
River	Vermillion River, Mile 2.7	River Program	2013-2017
River	Vermillion River, Mile 2.0	WOMP	2013-2022

[†]CAMP = Citizen Assisted Monitoring Program; MCES = Environmental Services Lake Monitoring Program; WOMP = Watershed Outlet Monitoring Program

River, stream, and lake data can be downloaded by visiting the Council's EIMS website:

<https://eims.metc.state.mn.us/>.

- **Local Planning Handbook:** The Council provides information about the cities and townships within your watershed boundaries, including community designations, forecasted population counts, generalized land uses, and other information that might be useful in your planning efforts.

[Local Planning Handbook – Metropolitan Council \(metro council.org\)](https://metro council.org)

- **Place-based equity research dataset:** The Council has published a new dataset, “Equity Considerations for Place-Based Advocacy and Decisions in the Twin Cities Region,” that provides equity-relevant characteristics for each of the 704 census tracts in the Twin Cities region. Formerly known as the Areas of Concentrated Poverty dataset, it has been expanded to provide a much more nuanced portrait of neighborhoods and their residents.

[Place-based Equity Research - Metropolitan Council \(metro council.org\)](https://metro council.org)

- **Climate vulnerability assessment (CVA):** The CVA is a tool that can assist in Council and community planning efforts in preparing and adapting to climate change because the CVA can reveal system vulnerabilities to currently occurring and, to some extent, expected climatic changes. Tools and resources currently include an extreme heat map tool and localized flood map screening tool.

[Climate Vulnerability Assessment - Metropolitan Council \(metro council.org\)](https://metro council.org)

- **Growing shade, tree canopy enhancement and preservation tool:** Growing Shade combines local stories and an interactive mapping tool to inform tree canopy enhancement and preservation. The tool, designed in partnership with The Nature Conservancy and Tree Trust, allows users to generate reports based on various presets like climate change, conservation, environmental justice, and public health at a range of scales from city-township to census block groups. By combining different variables of your choosing, you can generate data to meet your specific needs, whether you want to set canopy goals for a community or produce supporting data for grant applications.

[Tree Canopy - Metropolitan Council \(metro council.org\)](https://metro council.org)

I will be happy to direct you to load spreadsheets and any other Environmental Services’ data and analyses, as well as any spatial data. I will also be the Council representative to participate in your Plan’s TAC. Feel free to me call on 651-602-1078 or email me at Jennifer.kostrzewski@metc.state.mn.us with questions about my comments or for any assistance during the plan preparation.

Sincerely,



Jennifer (Jen) Kostrzewski
Environmental Analyst
Water Resources Planning
Metropolitan Council Environmental Services

cc: Anne Sawyer, Board of Soil and Water Resources
Water Resources Reviews, Metropolitan Council

May 30, 2023

Mark Zabel
Administrator
Vermillion River Watershed JPO
4100 220th St W, #103
Farmington, MN 55024

RE: Vermillion River Watershed JPO request for MPCA Priority Issues to include in Local Water Plan (2026-2036)

Dear Mark Zabel:

The Minnesota Pollution Control Agency (MPCA) appreciates the opportunity to provide input at the outset of the Local Water Plan Process to the Vermillion River Watershed Joint Powers Organization (JPO). The MPCA has developed technical information, reports, total maximum daily load (TMDL) studies, tools, and potential strategies for the protection and restoration of waterbodies that may be useful for inclusion in a local water plan.

We recommend:

- Incorporating and implementing strategies and goals from completed TMDL's and implementation plans
- Determine quantitative accounting of efforts and reductions you hope/intend to accomplish over the 10-year plan cycle relative to water quality targets
- Identify geographic priority areas and implementation to match those prioritized waters

Priority issues:

The MPCA has identified several strategic goals including:

- Assist local partners to accelerate targeted reductions for identified priority impaired waters
- Assist to develop strategies to protect priority waters that are meeting water quality goals
- Reduce chloride to surface and ground water
- Incorporate environmental justice into planning
- Increase community and environmental resilience to climate change

Links to reports and pertinent information can be found at:

- Mississippi River – Lake Pepin Watershed TMDL page with Monitoring reports, TMDL's, and Implementation reports
 - [Mississippi River - Lake Pepin | Minnesota Pollution Control Agency \(state.mn.us\)](#)
 - There are sections related to the Vermillion River
- Data access
 - [Water Quality Assessments Data Viewer](#)
 - [MPCA Surface Water Data](#)
- Point Source Phosphorus Mapping Tool: Summaries of annual phosphorus loads and flow volumes discharged from National Pollutant Discharge Elimination System (NPDES)/State Disposal System (SDS) permitted facilities since 2005

- [Background information on phosphorus in wastewater](#)
- [Phosphorus Loads by NPDES Wastewater Facility \(arcgis.com\)](#)
- Minnesota Nutrient Reduction Strategy
 - [MPCA Nutrient Reduction Strategy](#)
- Minnesota Stormwater Manual
 - [MPCA Stormwater Manual](#)
- MPCA funding options
 - [Watershed project funding | Minnesota Pollution Control Agency \(state.mn.us\)](#)

Background information:

Table 1 through 3 summarize the status of waters within the Vermillion River JPO boundary:

- 26 streams and lakes have 60 impairments as identified in the 2022 U.S. Environmental Protection Agency (EPA) approved 303(d) impaired waters list (Table 1)
 - 30 have approved TMDL plans
 - At this time, the MPCA does not require TMDLs for aluminum, PCBs, or PFOS
- 1 new impairment is being proposed in the 2024 submittal to the EPA
- 1 lake is meeting or close to meeting standards

Chloride Reduction

Currently, there are no chloride impairments in the Vermillion JPO's area, but with more growth in the watershed, it is good to be aware of strategies to reduce the impact of chloride.

Chloride reduction at the source is key since there are currently no known economically feasible remediation strategies to remove chloride once it enters the environment. Major sources of chloride include application of chloride-based salts for winter maintenance, residential, and commercial water softening, and agricultural inputs.

- The MPCA maintains technical, educational, and financial resources
 - [MPCA Statewide Chloride Resources](#)

Environmental Justice

The MPCA has resources to assist in identifying areas with environmental justice concerns:

- [Understanding environmental justice in Minnesota \(arcgis.com\)](#)
- [MPCA and environmental justice | Minnesota Pollution Control Agency \(state.mn.us\)](#)

EPA tools:

- [EJScreen \(epa.gov\)](#)
- [Environmental Justice | US EPA](#)

Climate Change

Planning should incorporate changing weather patterns to help our communities be prepared for extreme weather events

- [Climate adaptation resources | Minnesota Pollution Control Agency \(state.mn.us\)](#)
- [Climate Resilient Communities | MPCA](#)

Table 1. Impaired Lakes and Streams in Vermillion River Watershed JPO boundary

AUID	Water body name	Water body type	Year added to List	Affected designated use	Pollutant or stressor	EPA category	Year TMDL plan approved	TMDL ID
07040001-504	Vermillion River	Stream	1998	Aquatic Consumption	Mercury in fish tissue	4A	2007	PRJ07770-001
-			1998	Aquatic Consumption	PCBs in fish tissue	5		
-			1994	Aquatic Life	Turbidity	4A	2009	PRJ05736-001
07040001-507	Vermillion River	Stream	2012	Aquatic Consumption	Mercury in fish tissue	4A	2013	PRJ07770-001
-			2022	Aquatic Life	Aluminum	5		
-			2012	Aquatic Life	Benthic macroinvertebrates bioassessments	5		
-			2012	Aquatic Life	Fish bioassessments	5		
-			2022	Aquatic Life	Total suspended solids (TSS)	5		
-			1994	Aquatic Recreation	Fecal coliform	4A	2006	PRJ07742-001
07040001-516	Vermillion River	Stream	2012	Aquatic Consumption	Mercury in fish tissue	4A	2013	PRJ07770-001
-			2022	Aquatic Life	Total suspended solids (TSS)	5		
-			2012	Aquatic Recreation	Escherichia coli (E. coli)	4A	2015	PRJ07701-001
07040001-517	Vermillion River	Stream	2012	Aquatic Consumption	Mercury in fish tissue	4A	2013	PRJ07770-001
-			2012	Aquatic Life	Benthic macroinvertebrates bioassessments	5		
-			2010	Aquatic Life	Dissolved oxygen	5		
-			2012	Aquatic Life	Fish bioassessments	5		
-			2008	Aquatic Life	Turbidity	4A	2015	PRJ07701-001
-			2008	Aquatic Recreation	Fecal coliform	4A	2015	PRJ07701-001
07040001-527	Unnamed creek	Stream	2020	Aquatic Life	Benthic macroinvertebrates bioassessments	5		
-			2022	Aquatic Life	Dissolved oxygen	5		
-			2020	Aquatic Life	Fish bioassessments	5		
-			2022	Aquatic Life	Total suspended solids (TSS)	5		
-			2008	Aquatic Recreation	Fecal coliform	4A	2015	PRJ07701-001
07040001-542	Unnamed creek	Stream	2008	Aquatic Recreation	Fecal coliform	4A	2015	PRJ07701-001
07040001-545	Unnamed creek (Vermillion River Tributary)	Stream	2010	Aquatic Life	Dissolved oxygen	5		
-			2022	Aquatic Life	Total suspended solids (TSS)	5		

AUID	Water body name	Water body type	Year added to List	Affected designated use	Pollutant or stressor	EPA category	Year TMDL plan approved	TMDL ID
-	-	-	2008	Aquatic Recreation	Fecal coliform	4A	2015	PRJ07701-001
07040001-546	Unnamed creek	Stream	2010	Aquatic Recreation	Escherichia coli (E. coli)	4A	2015	PRJ07701-001
07040001-548	Unnamed creek	Stream	2010	Aquatic Recreation	Escherichia coli (E. coli)	4A	2015	PRJ07701-001
07040001-668	Unnamed creek (Vermillion River Tributary)	Stream	2008	Aquatic Recreation	Fecal coliform	4A	2015	PRJ07701-001
07040001-670	Unnamed creek (Vermillion River Tributary)	Stream	2022	Aquatic Life	Fish bioassessments	5		
-	-	-	2010	Aquatic Recreation	Escherichia coli (E. coli)	4A	2015	PRJ07701-001
07040001-671	Unnamed creek (Vermillion River Tributary)	Stream	2020	Aquatic Life	Benthic macroinvertebrates bioassessments	5		
-	-	-	2020	Aquatic Life	Dissolved oxygen	5		
-	-	-	2020	Aquatic Life	Fish bioassessments	5		
-	-	-	2022	Aquatic Life	Total suspended solids (TSS)	5		
-	-	-	2008	Aquatic Recreation	Fecal coliform	4A	2015	PRJ07701-001
07040001-691	Vermillion River	Stream	2012	Aquatic Consumption	Mercury in fish tissue	4A	2013	PRJ07770-001
07040001-692	Vermillion River	Stream	2012	Aquatic Consumption	Mercury in fish tissue	4A	2013	PRJ07770-001
-	-	-	2012	Aquatic Life	Fish bioassessments	5		
-	-	-	2022	Aquatic Life	Total suspended solids (TSS)	5		
-	-	-	1996	Aquatic Recreation	Fecal coliform	4A	2006	PRJ07742-001
07040001-697	Unnamed creek	Stream	2020	Aquatic Life	Benthic macroinvertebrates bioassessments	5		
-	-	-	2020	Aquatic Life	Fish bioassessments	5		
07040001-706	Vermillion River, South Branch	Stream	2008	Aquatic Recreation	Fecal coliform	4A	2015	PRJ07701-001
07040001-707	Vermillion River, South Branch	Stream	2022	Aquatic Life	Benthic macroinvertebrates bioassessments	5		
-	-	-	2022	Aquatic Life	Fish bioassessments	5		
-	-	-	2022	Aquatic Life	Total suspended solids (TSS)	5		
-	-	-	2008	Aquatic Recreation	Fecal coliform	4A	2015	PRJ07701-001
07040001-721	Unnamed creek (Vermillion River Tributary)	Stream	2020	Aquatic Life	Benthic macroinvertebrates bioassessments	5		
-	-	-	2020	Aquatic Life	Fish bioassessments	5		

AUID	Water body name	Water body type	Year added to List	Affected designated use	Pollutant or stressor	EPA category	Year TMDL plan approved	TMDL ID
19-0003-00	Rebecca	Lake	1998	Aquatic Consumption	Mercury in fish tissue	4A	2008	PRJ07770-001
			2022	Aquatic Consumption	Perfluorooctane sulfonate (PFOS) in fish tissue	5		
19-0021-00	Alimagnet	Lake	2002	Aquatic Recreation	Nutrients	4A	2015	PRJ07701-001
19-0022-00	Long	Lake	2002	Aquatic Recreation	Nutrients	4A	2009	PRJ07738-001
19-0023-00	Farquar	Lake	2002	Aquatic Recreation	Nutrients	4A	2009	PRJ07738-001
19-0026-01	MARION (EAST BAY)	Lake	1998	Aquatic Consumption	Mercury in fish tissue	4A	2007	PRJ07770-001
19-0026-02	MARION (MIDDLE BAY)	Lake	1998	Aquatic Consumption	Mercury in fish tissue	4A	2007	PRJ07770-001
19-0026-03	MARION (WEST BAY)	Lake	1998	Aquatic Consumption	Mercury in fish tissue	4A	2007	PRJ07770-001
19-0349-00	Unnamed	Lake	2012	Aquatic Recreation	Nutrients	4A	2015	PRJ07701-001

Table 2. New Impairments proposed for 2024 303(d) impaired waters list

WATERBODY NAME	WATERBODY TYPE	AUID	NEW IMPAIRMENTS
Rebecca	Lake	19-0003-00	Nutrients

Table 3. Meeting or close to meeting standards

Water body name	Water body type	AUID
Unnamed (Valley)	Lake	19-0348-00

We look forward to partnering with the Vermillion River Watershed JPO in the continued development of your local water plan. The MPCA is aware of the many efforts underway in the watershed, and we hope to continue to work in cooperation with local governments in the watershed. If we may be of further assistance, please contact me, Amy Timm, at 651-757-2632.

Thank you again for the opportunity to provide our comments toward the development of your local water plan.

Sincerely,



This document has been electronically signed.

Amy Timm
Environmental Specialist
Watershed Division

AT:jdf

June 21, 2023

Vermillion River Watershed Joint Powers Organization
4100 220th Street W #103
Farmington, MN 55024

Re: Comments for Future Watershed Plan Review

Dear Mr. Zabel:

In response to your request for comments on issues that we might want to be addressed in the upcoming update of the VRWJPO watershed plan, the City of Rosemount would like to request the VRWJPO formally consider and advise the City if they have the option of approving a temporary or permanent outlet directing stormwater overflows from within the City South to the Vermillion River. In 2016, the City and VRWJPO engaged in a cost share agreement to add additional detail to the VRWJPO XP-SWMM Model within the City of Rosemount and re-establish existing conditions intercommunity discharge limits. This analysis stopped at the establishment of the existing discharge limits and did not answer critical questions of what the process would be to provide necessary flood protection for hundreds of homes within the City.

A trunk storm sewer line is currently being constructed through the City as development occurs along its alignment. The proposed trunk storm sewer will eventually provide an outlet to the Mississippi River. However, there are segments of the Mississippi River trunk storm sewer line that may not be constructed for quite some time depending on future development timelines, or that face land acquisition challenges or other hurdles, keeping the majority of the City landlocked until the trunk line can be completed. In order to provide resiliency to the City's stormwater system, the City requests VRWJPO's consideration of modification to the established intercommunity flow rates to allow for an alternative temporary or permanent outlet option for the City of Rosemount south to the Vermillion River.

In addition, if this option does exist, 1) would there be restrictions or conditions associated with the use of this outlet and if so, what would those restrictions or conditions include? 2) How would the VRWJPO be able to assist the City with financing or the construction of outlets to the Vermillion River, and in particular, those that would need to be installed outside the Cities Municipal boundary?

SPIRIT OF PRIDE AND PROGRESS

Rosemount City Hall • 2875 145th Street West • Rosemount, MN 55068-4997
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www.ci.rosemount.mn.us

The City would also be interested in reviewing alternative strategies to provide flood storage or capacity within or outside the city limits along with potential grant funding opportunities to support infrastructure projects focused on building resiliency and flood control.

Thank you for your consideration in this matter. If you have any questions or need any additional information, please don't hesitate to contact me at 651-322-2025.

Sincerely,



Brian L. Erickson, P.E.

City Engineer

City of Rosemount

From: [Behan, Michael](#)
To: [Moore-Kutz, Brita](#)
Cc: [Thiel, Travis](#); [Zabel, Mark](#)
Subject: RE: Notice: Vermillion River Watershed Plan Update
Date: Monday, April 3, 2023 12:17:54 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.gif](#)
[image005.jpg](#)
[image006.jpg](#)
[image007.jpg](#)
[image008.jpg](#)
[image009.jpg](#)

Brita – thanks for the notice. I don't have a ton to add but I think as someone that tracks Dakota County's (transportation-related) storm sewer system permit, I think studies or assistance in targeting the Vermillion River TSS and bacterial impairments for project prioritization would be useful. For instance, could the VRWJPO lead a study that identifies the largest TSS contributors via municipal storm sewer systems and recommend specific projects that can be implemented by City or County public works departments in conjunction with highway reconstruction projects? Or, if specific structural BMPs are not recommended to address the problem, then perhaps some assistance in identifying enhanced street sweeping areas that can be prioritized for TSS reduction benefits. The specific impairment I am referring to is TSS for the Vermillion River Mainstem which I believe applies upstream of the City of Farmington.

Thanks,
Mike

Mike Behan, CPESC
Projects Supervisor – Water Resources
Byllesby Dam Operations



Environmental Resources Department

P 952-891-7539
W www.dakotacounty.us
A 14955 Galaxie Avenue, Apple Valley, MN 55124



From: Moore-Kutz, Brita <Brita.Moore-Kutz@CO.DAKOTA.MN.US>
Sent: Monday, April 03, 2023 10:09 AM
Cc: Zabel, Mark <Mark.Zabel@CO.DAKOTA.MN.US>; Bokman, Melissa <MBokman@co.scott.mn.us>
Subject: Notice: Vermillion River Watershed Plan Update

Interested parties,

The Vermillion River Watershed Joint Powers Organization (VRWJPO) has initiated the process of

From: [Neppl, Valerie](#)
To: [Moore-Kutz, Brita](#); [Zabel, Mark](#)
Cc: [Stewart, Nikki](#); [Becker, Brad](#)
Subject: RE: Notice: Vermillion River Watershed Plan Update
Date: Tuesday, June 6, 2023 12:04:15 PM
Attachments: [image004.png](#)
[image005.jpg](#)
[image006.jpg](#)
[image007.jpg](#)
[image008.jpg](#)
[image009.jpg](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)

Mark, Brita,

Please see below comments:

Dakota County recently adopted the [2020-2023 Dakota County Groundwater Plan](#), and subsequently the [Agricultural Chemical Reduction Effort \(ACRE\) Plan](#). The Groundwater Plan and ACRE Plan state the goals and priorities for groundwater protection in the county over the next 10-years. When updating the Vermillion River Watershed Joint Powers Organization (VRWJPO) Plan, County staff recommend the VRWJPO staff review the Groundwater Plan to ensure consistency with the stated goals, strategies and tactics. A highlight of information can be found below:

- 1) Priority issues and expectations for VRWJPO involvement in these issues.

A list of all strategies with identified priority can be found in Chapter 2 (Plan Implementation) of the Groundwater Plan. High priority issues/strategies the County anticipates VRWJPO partnership and support include the following:

Goal	Strategy	Expected VRWJPO Involvement
Goal 1 – Water Quality	1A3 – Assist private well owners in having their drinking water tested, understanding results, and using appropriate water treatment	Consider if there are opportunities to partner with Dakota County for private well owner education and outreach within the watershed.
Goal 1 – Water Quality	1B1 – Reduce agricultural chemical contamination Also see ACRE	Dakota County has developed several strategies to address agricultural contamination in Dakota County, with a focus in high nitrate areas of the County. The Vermillion River Watershed has been identified as one of the priority target areas of ACRE due to the elevated nitrate in both groundwater and surface water, and the presence of pesticides, impacting both private and public wells. Consider goals and strategies that will support ACRE and increase voluntary adoption

		of agricultural best management practices and alternate management tools; to include cost-share funding.
Goal 1 – Water Quality	1B4 – Prevent groundwater contamination from chloride	Consider development of a local chloride reduction plan and policy in accordance with the MPCA Statewide Chloride Management Plan and Twin Cities Metropolitan Area Chloride Management Plan.
Goal 2 – Water Quantity	2A2 - Promote Water Conservation	Consider participation in a County-wide water supply/conservation initiative; promotion or cost-share of water conservation projects; or partnering with the County on water conservation programs and projects. This may include law/turf management and irrigation efficiency projects; conservation audits; and replacement of appliances with water/energy efficient versions (e.g., WaterSense toilets, irrigation controllers, etc.)
Goal 2 – Water Quantity	2A3 – Support alternative water supplies	Considering promotion or cost-share of water reuse projects; or partnering with the County on water reuse projects.
Goal 2 – Water Quantity	2B2 - Protect, preserve, and restore resources that support groundwater-dependent ecosystems such as wetlands, fens, and trout streams	Consider any updates to wetland protection and management plans, as needed. Consider partnering with the County for wetland retention and restoration activities as well as partnerships to improve groundwater quality that may impact wetlands, fens, or trout streams.
Goal 3 – Education	3A – Inform and educate general public 3B – Provide training and education to targeted audiences	Consider partnering with the County to expand groundwater conservation and pollution prevention education and outreach efforts. This may include education to the general public or targeted audiences. Consider partnering on “Smart Salt” training and certification efforts.

2) Pertinent water resource information.

Available County-wide groundwater information can be found in Chapter 5 (Groundwater Issues: Quality and Drinking Water Health), and Chapter 6 (Groundwater Quantity Issues: Use, Drawdown, and Recharge) in the Groundwater Plan. In addition, the County recently completed a 20-year ambient groundwater quality study, and a study of per- and polyfluoroalkyl substances (PFAS) in private wells. All groundwater studies can be found on the [Drinking Water Studies](#) website.

PFAS: PFAS was not found in private wells above the current Minnesota Department of Health

(MDH) guidelines; however, eight wells did have PFOS or PFOA above the recently proposed EPA guidelines of 4 ng/L – all but one was located within the Vermillion River Watershed. Recommend the VRWJPO determine if testing of PFAS in the Vermillion River should be considered.

3) Official controls and programs (as applicable).

Recommended changes to official controls are identified in Chapter 4 (Groundwater Management Roles, Responsibilities, and Official Controls), Section E. This includes:

- To implement Water Quality Goal, Strategy 1B1, “Reduce agricultural chemical contamination,” changes to WMO plans, standards or policies may be needed to support implementation of the Agricultural Chemical Reduction Effort and any associated County Ordinances.
- To implement Water Quality Goal, Strategy 1B3, “Prevent groundwater pollution from stormwater,” changes to WMO plans, standards or policies may be needed that include topsoil organic matter requirements for new developments to reduce compaction, promote soil health, and reduce runoff and potential impacts to groundwater.
- To implement Water Quality Goal, Strategy 1C4, “Prevent pollution by minimizing impacts of aggregate mining on groundwater quality,” changes to WMO plans, standards or policies may be needed to align with the updated County’s model Mining Ordinance and ensure adequate protection from mining operations.
- To implement Water Quantity Goal, Strategy 2A3, “Support alternative water supplies,” changes to WMO plans, standards or policies may be needed to support the development and implementation of water reuse projects

Valerie Neppl, P.E.
Groundwater Protection Unit Supervisor



Environmental Resources

P 952-891-7019
C 210-823-5398
W www.dakotacounty.us
A 14955 Galaxie Avenue, Apple Valley, MN 55124



From: Moore-Kutz, Brita <Brita.Moore-Kutz@CO.DAKOTA.MN.US>
Sent: Monday, April 3, 2023 10:09 AM
Cc: Zabel, Mark <Mark.Zabel@CO.DAKOTA.MN.US>; Bokman, Melissa <MBokman@co.scott.mn.us>
Subject: Notice: Vermillion River Watershed Plan Update

Interested parties,

The Vermillion River Watershed Joint Powers Organization (VRWJPO) has initiated the process of updating its Watershed Management Plan. Please see the attached letter for details about the Plan

From: [Samantha Berger](#)
To: [Moore-Kutz, Brita](#); [Zabel, Mark](#)
Cc: [Thiel, Travis](#)
Subject: FW: Notice: Vermillion River Watershed Plan Update
Date: Tuesday, June 6, 2023 7:18:26 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image006.png](#)

WARNING: External email. Please verify sender before opening attachments or clicking on links.

Good Morning,

I am a day late with my comment, my apologies, I was out sick yesterday.

General Comment for Consideration:

Watershed should consider whether it would be worthwhile to adopt 100-year regulatory floodplain elevations for riparian areas. As part of the Surface Water Management Plans process, many municipalities created Hydraulic and Hyrdologic models to look at water elevations based on Atlas 14 precipitation values for 100-year events. However, many municipalities likely do not have regulatory floodplain elevations outside those identified by FEMA. FEMA models are not as detailed as local model data; therefore, areas could be at risk of flooding during extreme events, but are not aware that they are within flood risk areas.

The City will look forward to being involved in the planning process as it progresses.

Thanks,

Sam

Samantha Berger

City of Apple Valley | Water Resource Specialist
952.953.2462 | samantha.berger@applevalleymn.gov

From: Moore-Kutz, Brita <Brita.Moore-Kutz@CO.DAKOTA.MN.US>
Sent: Monday, April 3, 2023 10:09 AM
Cc: Zabel, Mark <Mark.Zabel@CO.DAKOTA.MN.US>; Bokman, Melissa <MBokman@co.scott.mn.us>
Subject: Notice: Vermillion River Watershed Plan Update

From: [Zabel, Mark](#)
To: [Moore-Kutz, Brita](#); [Thiel, Travis](#)
Subject: FW: VRWJPO Comments from City of Empire
Date: Wednesday, May 10, 2023 12:23:52 PM
Attachments: [Vermillion Watershed Request.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)

FYI.

Mark Zabel | Administrator
Vermillion River Watershed Joint Powers Organization

Dakota County Extension & Conservation Center
4100 220th St W #103
Farmington, MN 55024
952.891.7011
mark.zabel@co.dakota.mn.us
vermillionriverwatershed.org



From: admin@ci.empire.mn.us <admin@ci.empire.mn.us>
Sent: Wednesday, May 10, 2023 12:16 PM
To: Zabel, Mark <Mark.Zabel@CO.DAKOTA.MN.US>
Cc: Jenni Faulkner <jenni.faulkner@bolton-menk.com>
Subject: VRWJPO Comments from City of Empire

WARNING: External email. Please verify sender before opening attachments or clicking on links.

Dear Mark,

The City of Empire received your letter dated March 31, 2023, requesting comments on the 2026-2035 Watershed Plan.

The Empire Planning Commission and City Council reviewed the request and have the following comments:

- The need for infiltration on sandy soils.
- We want to make sure there are not changes to the recommended setbacks for new home construction.
- We want to make sure that there are no recommended changes to Ag/Farming practices in the new plan.

We would like the ability to review and comment on the draft 2026-2035.

Please let me know if you have any questions or concerns.

Sincerely,

Charles Seipel - Teng
Clerk – Administrator

City of Empire
3385 197th Street
Farmington, MN 55024
651-463-4494
www.ci.empire.mn.us

Hours: Mon-Thur 8AM-4:30PM, Fri 8AM-11AM