



April 4, 2017

Ashley Gallagher
Dakota County Soil and Water Conservation District
4100 220th Street West
Farmington, MN 55021

RE: Response to Request for Priority Concerns for the Cannon River One Watershed, One Plan

Dear Ms. Gallagher:

The City is committed to improving the quality of water resources in our watershed to ensure our water resources are safe for recreation and consumption and provide healthy ecosystems. The City would like to thank the Cannon River One Watershed One Plan Work Group for the opportunity to provide input regarding the water management concerns that may help shape the direction of the Cannon River One Watershed One Plan. Please find a list of our concerns below.

1. Flood Mitigation. In recent years, increased occurrences of frequent and intense rainfall events have led to significant flooding of the Cannon and Straight Rivers – resulting in the increased risk of and substantial damage to municipal facilities and utility infrastructure. The City alone, has limited ability to begin a dialogue and implement meaningful change. The One Watershed One Plan process provides an excellent opportunity to establish a framework for and/or develop a flood mitigation strategy to help reduce the risk and impacts of flooding to life, property, and our natural environment.
2. Climate Resiliency. This planning process provides an opportunity to address potential hydrologic, hydraulic and water quality impacts stemming from and develop an adaptation strategy for future extreme weather events and scenarios. A greater understanding of possible future extreme weather event impacts are critical to successful implementation of watershed and water resource management strategies.
3. Surface Water Quality. Water quality impairments of surface water resources are numerous and prevalent across the Cannon River Watershed. This plan should identify a targeted approach for BMP implementation to address point and non-point source pollution for an array of stressors – not only focusing on sediment and nutrients, but also for bacteria, nitrate, chloride, eutrophication impairments, emerging contaminants, and management strategies to reduce runoff volumes and peak storm flows. It is recommended that the plan also explore non-traditional management strategies such as water re-use.

We also recommend that the plan support public education and outreach initiatives that help drive a change for citizens to take action or alter traditional behaviors and practices. This could include the implementation of education and outreach programs to raise awareness on: impacts of runoff on our natural environment and water resources, identify BMPs and support of programs that help citizens to implement practices (in rural and urban areas) to reduce runoff volumes, reduce erosion and sedimentation, stabilize stream banks and shorelines, and reduce pollutant loads discharging to water resources; and properly manage and dispose of wastes.

4. Strategies for Point Source Pollution. Agricultural uses dominate the Cannon River Watershed landscape. The Cannon River Watershed Restoration and Protection and Strategies Report largely focused on restoration strategies for non-point source pollution centered on nitrogen and phosphorous. The City recognizes that a majority of the watershed's impairments are driven by non-point sources. However, The City's ability to leverage outside funding sources for project implementation is directly tied to the local water and watershed management plans. If management strategies fail to identify specific implementation activities for point sources of pollution, across a diverse range of stressors, the City's ability to implement capital improvement projects to reduce pollutant loads is greatly limited.
5. Groundwater Supply and Quality. The City implements a Wellhead Protection Plan and manages its drinking water supply management area (DWSMA) and public water supply system to continue to provide a safe and adequate drinking water supply to over 23,000 residents and numerous industries. It is encouraged that the plan address protection of groundwater quality and quantity through:
 - Maintaining a water supply that achieves state and federal drinking water standards. This may also include management strategies for possible emerging contaminants and groundwater recharge opportunities.
 - Supporting the implementation of public water supplier Wellhead Protection Plans.
 - Supporting public education and outreach programs and initiatives regarding water conservation and water conservation practices, water re-use, groundwater quality, water well maintenance, well sealing, waste management and spill response and reporting, and wellhead management.
 - Supporting private well testing.
 - Supporting sealing programs for abandoned and unused wells.

The City also requests that the plan supports increased coordination amongst local regulatory authorities and partners for the protection of wellhead and DWSMA areas. Within the current framework, the City has limited ability to provide input with regards to changes in land use outside of the City's regulatory authority or when a local partner implements, or supports the implementation of structural BMPs (e.g. volume reduction) within vulnerable areas that may have the potential to adversely impact source waters.

6. Natural Resource Protection. The City's utilizes multiple planning and regulatory mechanisms to protect and restore natural features and areas within the City. It is recommended that the plan incorporate strategies and support programs for the protection and restoration of priority areas including water resources, shoreland areas, areas containing rare species and species of concern, natural resource/habitat corridors, and other high ecological value areas.
7. Recreational Value. A large portion of the Cannon River is designated as an outstanding resource value water. The many tributary creeks, streams, and rivers and lakes, trails, and parks across the watershed provide ample opportunity for recreational and physical activity. Recreation and tourism associated with these outdoor features and resources, have high economic importance to local economies. It is recommended that the plan identifies the economic value of these resources and benefits to local economies, and also supports strategies to improve and adapt the public's access to nature and mitigate stressors.
8. Coordination and Partnerships. Many local, regional, and state public and private entities have a vested interest in water resource management and the protection of our water resources and natural environment. Although the source of interest may differ, many of these entities often have overlapping or common goals. It is recommended that the plan supports increased collaboration amongst stakeholders and leveraging strategic partnerships for coordinated project, program and strategy implementation.

As previously mentioned, the City of Faribault utilizes various tools and resources to help protect and manage natural and water resources. The One Watershed One plan should have a connection to these resources or more pertinent priorities within specific local management plans, including:

- *Natural Resources Inventory and Management Plan.* This plan prioritizes local ecologically valuable areas for protection of restoration including water resources, wetlands, rare species communities, and habitat corridors/greenways,
- *Surface Water Management Plan.* This plan outlines a comprehensive strategy for surface and stormwater management with the goal of protecting the environment and preserving clean water and air, preserving scenic and environmental qualities of the Cannon and Straight Rivers and their tributaries, preserving sufficient open space to provide healthy habitats and scenic and recreational qualities, and guiding development and redevelopment in a way that protects and enhances natural resources. The plan additionally identifies priority natural resources, priority focus areas, and priority issues and areas of concern.
- *Water Supply Plan.* Public water suppliers (PWS) are required to implement this plan to develop a better understanding of and implement long-term water sustainability and conservation initiatives, and develop emergency preparedness strategies. This plan overviews the City's current groundwater demand, future demand for groundwater resources and resource sustainability, preliminary plan of water supply treatment and distribution system capital improvements, water conservation initiatives and goals, and public education and outreach activities.
- *Wellhead Protection Plan.* PWS are also required to implement this plan, to help the PWS provide adequate and safe drinking water supply to residents. The City's plan delineates the extent of wellhead protection and drinking water supply management areas, identifies vulnerable areas of the DWSMA, identifies potential contamination sources and levels of risk, identifies potential impacts from land use changes, and presents strategies and opportunities to mitigate potential adverse impacts.
- *Comprehensive Plan.* This plan is utilized to guide growth, redevelopment, and improvement of the City. It additionally builds off some strategies within the City's Natural Resources and Surface Water Management Plans with regards to the preservation of natural areas, habitat corridors, and greenways, and improving access to the natural resources and recreational opportunities. It also outlines policies with regards to the protection and enhancement of natural resources.

Additionally, the City would like to express its interest in participating on the Advisory Committee. We believe representation of and participation by the MS4 communities in the Cannon River Watershed are critical to successful local water management planning and implementation.

The City of Faribault supports the efforts of local partners and the One Watershed One Plan process. Please feel free to contact me at 507.333.0369 with any questions of if additional information is needed.

Best Regards,



Melissa King
Water Quality Specialist

Cc: Travis Block, Public Works Director (email)