



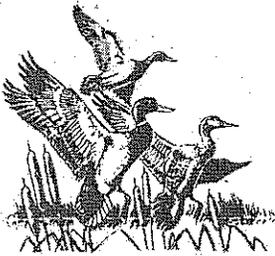
**Executive Order 12-04:
Supporting and Strengthening Implementation of the State's Wetland Policy**

Comments Received on the Draft Report.

Additional Comments

December 7, 2012

1. Minnesota Waterfowl Association
2. Minnesota Department of Transportation
3. Northern Counties Land Use Coordinating Board



Minnesota Waterfowl Association, INC

907 First Street North, Hopkins, MN 55343 • 952-767-0320 • FAX 952-767-0324

November 28, 2012

Mr. David Weirens
Minnesota Board of Water and Soil Resources
520 Lafayette Avenue North
St. Paul, MN 55155

RE: Draft Report on Governor Dayton's Executive Order 12-04

Dear Mr. Weirens:

Minnesota Waterfowl Association welcomes the opportunity to share its comments on the draft report on Governor Dayton's Executive Order 12-04, *Supporting and Strengthening Implementation of the State's Wetland Policy*. We appreciate the time and effort BWSR invested in this process. We especially appreciate that the opinion and input of the various stakeholders was sought and given consideration.

On behalf of MWA's members and Board of Directors, we offer the following comments and recommendations along with our continued support for BWSR and other groups to improve Minnesota's wetland policy.

Minnesota Waterfowl Association strongly supports the overall *No Net Loss of Wetlands* policy for Minnesota. MWA (for over 45 years) along with many other partners and organizations has worked tirelessly to increase and protect wetlands, their restoration, enhancement and management so the needs of waterfowl and other wetland dependent wildlife in Minnesota are sustained. However, we do not have a good process to measure the current status of *no net loss of wetlands*. MWA supports both the time and effort it will take to get a reliable process developed and implemented.

Further, and more importantly, wetland goals and objectives for conservation plans at the national, regional and state level require a *net increase in prairie wetlands* to meet the needs of waterfowl, other wildlife and water quantity and quality concerns. In MWA's opinion, the North American Waterfowl Management Plan, Prairie Pothole All Bird Joint Venture Plan, Upper Mississippi River/Great Lakes All Bird Joint Venture Plan, Minnesota's Prairie Conservation Plan and Long Range Duck Plan, and other state plans call for greater investment in **adding** wetlands to the landscape, especially in the prairie pothole region. Losses in this region have been extensive. MWA strongly supports both the protection and restoration of healthy wetland landscapes for the benefit of the environmental, economic and social needs of our citizens. From a *Minnesota duck perspective*, it is of vital importance that we **increase** the quantity and quality of our prairie wetlands which in turn will increase our duck population.

Wetlands have an environmental, economic and social impact on our citizens. Wetlands support robust waterfowl, fish and other wildlife populations enjoyed by Minnesota hunters and anglers. Wetlands also offer improved water quality, flood retention, and clean drinking water. The economic benefits derived from over a million hunters and anglers is huge and is not limited to just the dollars spent by hunters and anglers. The jobs and services springing from the sports of hunting and fishing is enormous. *It is a force to be reckoned with*. Socially, wetlands ensure our landscapes are healthy, and thus, benefit our citizens.

Mr. David Weirens
November 28, 2012
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In regards to the specific areas identified in the Draft Report, MWA offers the following thoughts:

De minimus exemptions – It is important that de minimus exemptions be tracked and reported so we can evaluate NNL. We believe the proposal by Minnesota Center for Environmental Advocacy (their Table 2) is a good place to start the process.

Alignment of Pre-Settlement Zones – We support the draft plan's option ii, with an effort to maximize efficiency of watershed and political boundaries.

Consistent Review, Approval and Implementation – This is one of the biggest areas of need. The state assumption of the 404 program should be strongly considered.

Adequacy of Wetland Bank Program – We support the draft report's recommendation i, and recommend BWSR ensure the program's long term costs come from non-public sources involved in the bank program.

Costs/Benefits of Wetland Mitigation – MWA supports the *avoid, minimize and mitigate* sequencing established by federal agencies. We also support the pursuit of an *in lieu fee program* to assist with difficult mitigation issues.

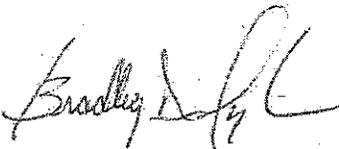
Strategic Use of Funding Resources to Achieve Continued Restoration of Drained Wetlands – MWA supports all draft plan recommendations in this category.

Other Issues – No Net Loss – MWA agrees with recommendation I and ii, but again strongly supports the *avoid, minimize and mitigate* concept throughout the state.

MWA also supports further discussion and development of recommendations relating to agriculture drainage including review and revision of state drainage law as it relates to insuring adequate wetlands.

In closing, thank you for the opportunity to share our thoughts. MWA's mission makes it imperative that we always stand ready to *preserve, protect and enhance Minnesota's wetlands, related waterfowl habitat and our hunting heritage*. We are ready to work with BWSR and other groups to ensure a healthy and productive Minnesota landscape.

Sincerely,



Bradley D. Nylín
Executive Director



John Wolf
President – Board of Directors



Minnesota Department of Transportation

Environmental Stewardship Office
395 John Ireland Boulevard
Saint Paul, MN 55155

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Bd. of Water & Soil Resources
St. Paul

November 30, 2012

Mr. John Jaschke
Executive Director
Board of Water and Soil Resources
520 Lafayette Road
St. Paul, MN 55155

RE: Executive Order 12-04

Dear Mr. Jaschke:

Thank you for BWSR's efforts in organizing and conducting the stakeholder process for Executive Order 12-04: Supporting and Strengthening Implementation of the State's Wetland Policy. MnDOT supported this effort by participating in several forums and reviewing the various iterations of the report.

We hope that future activities developed through this process will be consistent with and support recommendations in MnDOT's legislative directive "Report on Water Permitting Processes For Transportation Projects". This report is near completion. It identifies streamlining practices that have already been implemented, and suggests new initiatives and technologies to further streamline the water permitting processes in Minnesota. The resulting improvements will benefit the development of Minnesota's transportation system through a more efficient review and approval process while maintaining environmental protections.

We look forward to continuing to work with you in our ongoing efforts to improve interagency cooperation.

Sincerely,

Lynn Clarkowski, P.E.
Chief Environmental Officer

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December 5, 2012

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

Dear Members of the BWSR Board:

A joint meeting of the Northern Counties Land Use Coordinating Board and the Consolidated Conservation Natural Resources Joint Powers Board was held on December 4, 2012. These two boards represent twelve counties in northern Minnesota that hold the vast majority of wetlands in the State of Minnesota.

Both bodies at the December 4 meeting unanimously passed resolutions in support of the final draft of the Wetland Report prepared by BWSR to be presented to Governor Dayton on December 15, 2012. This draft as prepared represents fairness and balance for all of Minnesota.

Thank you for the opportunity to comment.

Yours sincerely,

Brian McBride, Chair
Northern Counties Land Use Coordinating Board

Cc: Representative David Dill
Senator Thomas Bakk

Member Counties:

Aitkin County

Cook County

Koochiching County

Lake County

Lake of the Woods

Pennington County

Roseau County

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