



May 20, 2026

Minnesota Pollution Control Agency
c/o Nicole Kovar
714 Lake Ave, Ste 220
Detroit Lakes, MN 56501

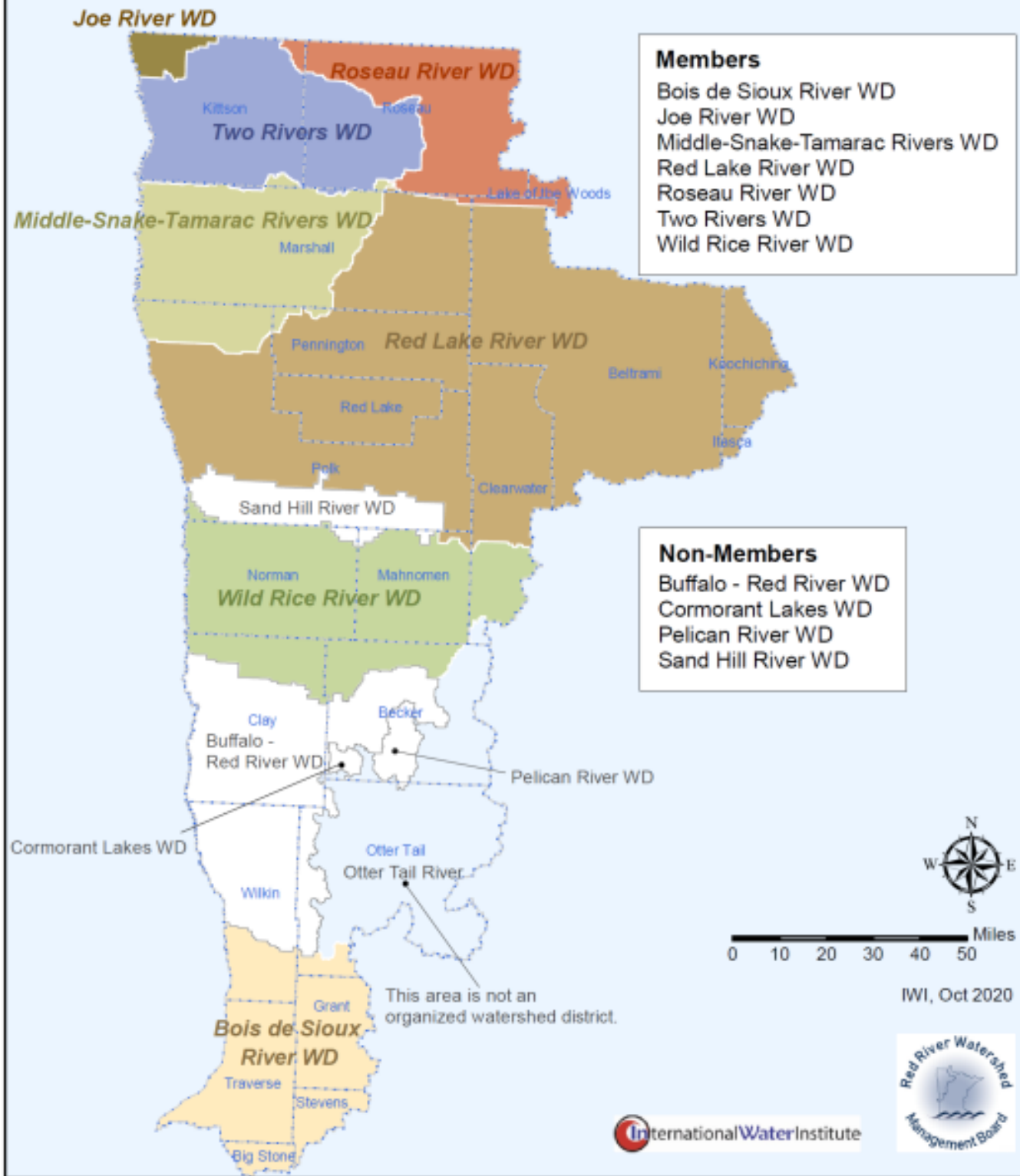
RE: Red River of the North - TMDL Report

Thank you for the opportunity to comment on the Draft Red River of the North TMDL Report. The Red River Watershed Management Board (RRWMB) is submitting these comments on behalf of our member watershed districts.

1. **Section 3 – Watershed and Water Body Characterization:** On Page 8 or 25 (last sentence) it is stated that “More recently, installations of subsurface drainage systems have increased due to a wet climatic cycle, increased crop prices, and increasing land values for development.” The RRWMB suggests that this sentence be removed unless data is included to support this statement.
2. **Section 3.6.2 – Non-permitted Sources:** The paragraph on Page 66 or 83 states “High-tillage equipment such as plowing and disking, loosening the soil making it easier to wash away during storm events.” An alternative sentence could be “High-tillage equipment such as plowing and disking, loosens the soil, making it easier to wash away during storm events.” The use of moldboard plows is infrequent in the Red River Basin (RRB). Most farmers are using chisel plows, vertical tillage equipment, and related equipment that allows them to leave more residue. We suggest that you reach out to a farm equipment dealer to gain better insights into what type of tillage equipment is currently being used in the RRB, why it is used, and when it is used.
3. **Section 6.2.5 - RRWMB:** Please insert the map on the following page that depicts the RRWMB jurisdictional area and its member watershed districts into this Section of the document. It could be stated that the RRWMB has now funded approximately 35 water quality projects as of 2026 and the link that is provided in this Section provides financial information about projects funded and a description of each project. The RRWMB would like to see a couple of example projects highlighted in the document and below are weblinks to two of the 35 water quality projects that the RRWMB has funded:
 - [Oak Crest Coulee Project - Roseau River Watershed District](#)
 - [Lake Traverse Water Quality Improvement Project - Bois de Sioux Watershed District](#)

Red River Water Management Board

Member Watershed Districts





- 4. Section 6.5 – Funding:** Please include a reference to the Minnesota Flood Hazard Mitigation Grant Assistance Program (FHMGP) on Page 130 or 147. The FHMGP, managed through the Minnesota Department of Natural Resources is a primary funder of flood mitigation – water storage projects (impoundments), through state bond funds. Below is a weblink to more information about the FHMGP:

https://www.dnr.state.mn.us/waters/watermgmt_section/flood_damage/index.html

It should also be included that the RRWMB has a well-defined process to fund flood mitigation – water storage projects of its membership. The RRWMB has funded ~ 70 major projects since 1976 with 3 underway (see the map on next page, which also shows over 500 farmstead ring dikes). Here is a link to more information about the RRWMB process: [RRWMB Funding Procedures](#)

- 5. RRB Long-term Flood Solutions (LTFS):** A reference should be included regarding the LTFS, developed by the Red River Basin Commission. The LTFS was originally released in 2011, and an update was recently made public. The LTFS includes a 20 percent Flood Reduction Strategy for the Red River Mainstem with an original goal of 1 million acre-feet of water storage. The RRWMB and Red River Joint Water Resource District Board (RRJWRDB) in North Dakota are key local funders of flood impoundments to meet the LTFS water storage goals. Here is a link that can be included in the document:

<https://www.redriverbasincommission.org/long-term-flood-solutions>

- 6. Section 6.6 – Other Partners:**

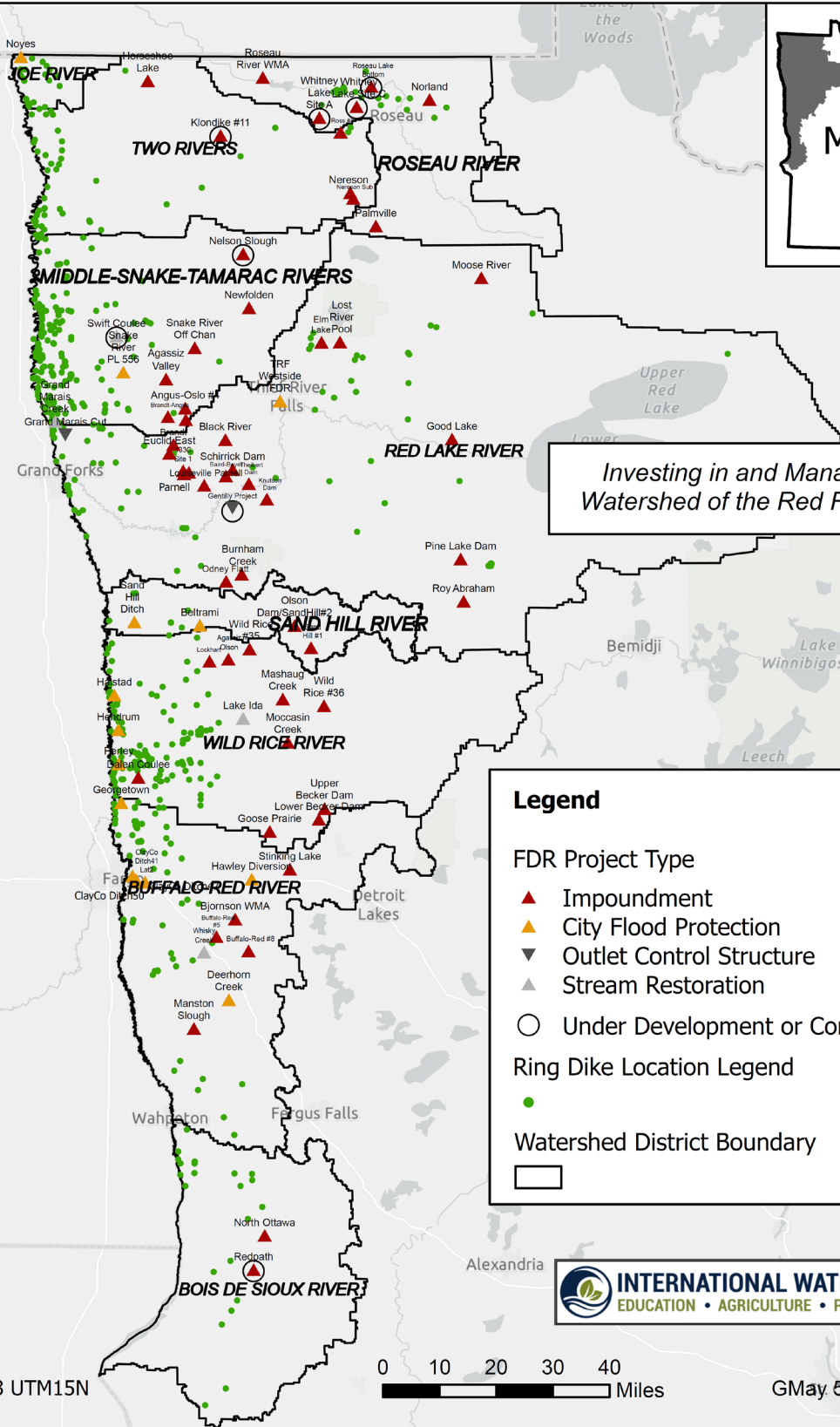
A. Red River Retention Authority (RRRA): The RRWMB and RRJWRDB each comprise one-half of the RRRA, which is a joint powers board of both organizations. The RRRA coordinates both organizations on federal funding, regulatory, and policy issues. This discussion should be included in the draft document and here is a link to the RRRA main website: [Red River Retention Authority](#)

More specifically, the RRWMB and RRJWRDB entered into a Joint Powers Agreement in 2010 for the purposes of coordinating and prioritizing flood retention efforts within the Red River of the North Basin. The primary objective of the RRRA is to ensure joint, comprehensive, and strategic coordination of retention projects in the RRB. The RRRA and its members will aggressively pursue federal dollars to off-set local costs for retention projects and will serve as an advocate for local projects in the federal regulatory process. The RRRA seeks basin-wide solutions to realize effective flood protection and flood damage reduction, accomplished on a strategic project-by-project basis.

B. International Water Institute (IWI) Stewardship Program: Information should be included regarding the IWI's Stewardship Program. More information can be found at the following weblink: [Wayfindr - International Water Institute](#)

Protection of Agricultural Land and Property

Flood Mitigation Infrastructure in the Red River Basin in Minnesota



Investing in and Managing the Watershed of the Red River Basin

Legend

FDR Project Type

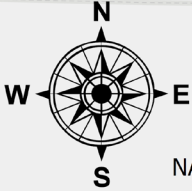
- ▲ Impoundment
- ▲ City Flood Protection
- ▼ Outlet Control Structure
- ▲ Stream Restoration
- Under Development or Construction

Ring Dike Location Legend

-

Watershed District Boundary

-



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7. RRWMB Habitat Program: The RRWMB has the RRB Riparian Habitat Program, which is currently focused on permanent RIM easements for three specific projects of our membership. Please include information about this effort, which is a collaboration between the RRWMB and its membership and the Minnesota Board of Water and Soil Resources. Below are weblinks to the Program and the three initial priority projects:

- [RRWMB - Red River Basin Riparian Habitat Program](#)
- [Swift Coulee Project - Middle Snake Tamarac Rivers Watershed District](#)
- [Doran Creek Project - Bois de Sioux Watershed District](#)
- [Lower Wild Rice Corridor Restoration Project - Wild Rice Watershed District](#)

8. General Comments:

A. 10+ Crops Grown in the RRB Annually: The following crops are consistently grown in the RRB. Flax, rye, and various types of grass for seed are also grown.

- Sugar Beets
- Corn
- Soybeans
- Wheat
- Barley
- Dry Edible Beans
- Potatoes
- Sunflowers
- Canola
- Alfalfa

B. Recognition of Past Landscape Changes: Language should be inserted that the federal government straightened many ditches, streams, and river miles decades ago. Our watershed districts and other local units of government in the RRB are working on many streambank stabilization projects to address this and to make landscape corrections.

Should you need clarity on RRWMB comments or recommendations, please contact me via email at rob.sip@rrwmb.us or at 218-474-1084 (cell). Thank you for consideration.

Sincerely,

A handwritten signature in black ink that reads "John Finney".

John Finney
RRWMB President

Sincerely

A handwritten signature in black ink that reads "Robert L. Sip".

Robert L. Sip,
RRWMB Executive Director

CC: RRWMB Managers and Membership