Ecological & Water Resources
Region 4 (South Region)
21371 Highway 15 South
New Ulm, MN 56073

January 12, 2026

Renville County Drainage Authority
Government Services Center
105 South 5th Street, Suite 319
Olivia, MN 56277

Re: DNR Advisory Report - Preliminary Engineer's Report for Improvement of County Ditch No. 59 Branch B, 203 & 194, Renville County.

Dear Renville County Drainage Authority,

We appreciate the opportunity to evaluate the preliminary engineer's report (PER) for the proposed Renville County Ditch 59 Branch B, 203 & 194 (CD59) improvement project. This Advisory Report, prepared on behalf of the Commissioner of the Minnesota Department of Natural Resources (DNR), aims to provide expert insights and recommendations in accordance with the guidelines outlined in Minnesota Statutes 103E.255. The comments in this advisory report are based on review of the CD 59 Branches B, 203, and 394 Improvement Preliminary Engineer's Report, dated December 8, 2025.

Overview

The CD59 branches represented in this report serve a watershed of approximately 1856 acres within Sections 1 and 2 in Troy Township and Sections 24, 25, 26, 27, 34, 35, and 36 in Winfield Township in Renville County and consist solely of subsurface drainage tile. Branches B, 203, and 194 outlet into the CD 59 mainstem open ditch in Sections 34 and 35 of Winfield Township, which then flows generally westward to outlet into the CD 37 main stem in Section 2 of Emmet Township. The CD 59/37 open ditch flows generally south-southeast, ultimately discharging into West Branch of Beaver Creek, a designated public water at the north line of Section 18 of Troy Township. A petition was submitted to the Renville County Board of Commissioners, acting as the drainage authority for CD 59, requesting improvements to the above noted branches of the CD 59 drainage system.

Hydrologic Impacts and adequacy of the outlet

- The report does not provide an analysis of changes in flow duration. This is a critical omission, as changes in flow duration can negatively impact stream channel stability, aquatic ecosystems, and habitats, even during low-flow conditions. An assessment of duration changes is necessary to determine how flow timing and extent differ from existing conditions. Furthermore, additional survey data is required, including flow volume, velocity, and hydrographs for various storm events.

- The PER indicates that “The change in peak flow for the proposed condition without storage increases from the existing condition by one cubic foot per second for all events except for the two year, where it increases by five cubic feet per second”, (Page 16, first paragraph). Impacts of these increased volumes cannot be evaluated without the more specific calculations that have been requested here.
- Wetland restoration is discussed in the PER as a project alternative but dismissed due to cost based on the assumed dimensions. We note that with a greater design depth, the footprint could be substantially reduced as well as the corresponding land cost.
    - It is positive to see this improvement request utilizing wetland restoration, in collaboration with BWSR, to reduce low-flow impacts and provide a pollutant sink prior to discharge into CD 37 and Beaver Creek. Wetland restorations can take a variety of forms, and it is unclear why 140 acres wetland, with a 1.5 ft storage depth, is the only option provided. 280 acres of land would not necessarily be needed for a wetland restoration that could provide multiple benefits, and partial or smaller wetland restorations could be used in combination with other storage options rather than an all-or-nothing consideration. Restricting the analysis to these assumptions artificially inflates the acreage required for wetland restoration, consequently driving up land acquisition costs. This generalized approach does not appear to reflect a site-specific design and may prematurely dismiss wetland restoration as a viable alternative. We suggest that alternative design elements be included in this analysis to provide options in comparison to a single basin restoration proposal.
- The proximity of the evaluation point compared to the location of the improvements needs additional clarification. According to the PER (Page 15, Section VII.B.), “This location was chosen due to the existing improvements and impoundments within the CD 59 system that have created additional storage up to County Road 59.” While it is understood that this project is part of the larger improvements to the CD 59 system, it is difficult to review the potential impacts of this project alone using data at this location due to the influence of many other branches between the respective outlets of these branches and the evaluation point. An evaluation point closer to the branches' outlets would be more effective for assessing the changes in discharge and duration that may result from the proposed improvement of these branches alone.
- What specific improvements and impoundments are being considered as part of the additional storage?

Compatibility of the Project with Local Land Use Plans

The Final Engineer’s Report should address how the project aligns with the Hawk Creek – Middle Minnesota River Watershed Comprehensive Watershed Management Plan (approved in 2022). CD59 is part of the Beaver Creek subwatershed, a Tier 1 High Priority Area. Priority issues in the subwatershed include:

1. Impaired Lakes and Streams (pg. 68)
    a. CD 59, and Beaver Creek,
    b. Measurable Short-Term Goal: Achieve a 7% reduction in TSS loads at the downstream end of Beaver Creek.
2. Altered Hydrology (pg. 76)
    a. Measurable Short-Term Goal: Reduce average annual runoff by 0.25 inches (2,642 ac-ft)
3. Agricultural Practices, Soil Erosion and Runoff Management (pg. 82)

a. Measurable Short-Term Goal: Implement components of Multipurpose Drainage Management through the use of practices to reduce erosion, increase storage, improve water quality, and reduce maintenance.

The CWMP project goals aim to mitigate the hydrologic effects of altered hydrology through strategies such as improved soil health (e.g., cover crops, conservation tillage) and additional storage features such as conservation cover and wetland storage. This is especially important since CD 59 has been designated as a priority drainage system for drainage water management and a high-priority area for addressing runoff management and altered hydrology—both of which are Tier 1 priority issues.

Public Waters Impacts & Permitting Requirements

The outlet of CD 59 is located approximately two miles from the termination of CD 37 into the West Fork Beaver Creek, a designated public water. While a permit may not be required for this project, the final determination will depend on responses to the questions and concerns outlined above and on the submission of requested data for further evaluation.

Thank you for the consideration of these comments. Please send the response to this letter, the meeting minutes, the Finding of Fact, the Viewer's Report, and any Order issued by the Drainage Authority regarding this proposed improvement to the DNR when they become available. Please submit these documents to Region4Drainage.dnr@state.mn.us.

Regards,

Ethan Jenzen Digitally signed by Ethan Jenzen
Date: 2026.01.12 20:15:36 -06'00'

Ethan Jenzen, DNR, EWR Northern District Manager

EC:
Haley Byron, DNR, Regional Environmental Assessment Ecologist
Emily Wolf, DNR, Area Hydrologist
Seth Sparks, Renville County, Drainage Systems Manager
Shaun Luker, Bolton & Menk, Project Engineer
Heather Weis, Renville County, Auditor-Treasurer
Holly Hatlewick, Renville County SWCD, District Manager

Equal Opportunity Employer