Lower MN River East CWMP

60-day Formal Review Comments and Responses

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Page Number	Section	Commenter	Comment	Response
116	Chapter 4: Implementation Schedules, Table 4.1	Greg Entinger	I know that I've seen these acres total's before and believe that we talked about this. Very ambitious goals.	The reduction goals for soil health practices were determined by utilizing the HSPF SAM Model. Additionally, we had conversations amongst ST and AC members about each goal that was produced using the model to see if it was achievable. We did make some reductions for Cody, Phelps, Lemay chain of lakes, but overall, most goals for soil health practices remained the same. We believe that goal is achievable. We will be assessing our progress towards goals annually and can amend goal if necessary at 5 year amendment mark. We will not be amending the soil health goals as we discussed this thoroughly and believe goals are achievable.
General Plan Comment		Greg Entinger	What are you going to do with Towns (and landowners) that don't like to have the trash (corn trash) blown all over the area… i.e. Cleveland, and my uncle. What is the education plan for them?	Staff have not started on our education and outreach campaign yet for the partnership. The goal was to create some kind of structure for the partnership to implement education and outreach efforts. We will starting those conversation this Spring in 2024. We will add crop residue (corn trash) management to list of topics that should be included as part of our education and outreach efforts. We will not be amending the Comprehensive Watershed Management Plan to include information on how to create education and outreach efforts for residue management (corn trash). However, this will be addressed in our education and outreach campaign.
116	Chapter 4: Implementation Schedules, Table 4.1	Greg Entinger	Implement 64 BMP's for $98,500… That's $1,539 each. Some will be more, but some will be less. Seams really low dollar amount per BMP. i. BMP2 : $8,451, ii. BMP4 : $13,204, iii. BMP5 : $11,789	Costs for each BMP were discussed amongst the steering team in a few different meetings. We talked about existing programs and mentioned what the costs are in each county. We took an average amongst all partners to develop an estimated cost per BMP. We will not be amending the funds allocated for each BMP. As we know bmp costs change quite often, and can seek additionally funding sources if necessary to complete projects and practices that are needed to meet plan goals.
116	Chapter 4: Implementation Schedules, Table 4.1	Greg Entinger	2 or 3 filtration basins will take all the money. i. If the 2 or 3 basins don't reduce the tp/yr and tss/yr, we cannot do the project – limiting???	Important practice to include within activities. Would want to make sure project is providing some kind of reduction that is working towards our goals. Project ranking and scoring should come into play here. We will not be removing filtration basins from Urban BMPs. As we know bmp costs change quite often, and can seek additionally funding sources if necessary to complete projects and practices that are needed to meet plan goals.
118	Chapter 4: Implementation Schedules, Table 4.1	Greg Entinger	Lake Alum Treatments-Google, shows $280 to $700 per acre. Approx 571 acres. Clear Lake in Scott county is 142 acres. PLSLWD – Water District… What lake, or are we doing them all. Upper/Lower Prior, and Spring???	Clear lake that is mentioned is for the Clear Lake located in Le Sueur County. Which is a total of 280 acres. One other lake within the PLSLWD which is already being planned for through that organization. Find out which lake. We will update narrative in implementation table to provide context on which lakes are planned to have an alum treatment within the 10 years; Clear Lake and Other Priority Lakes.
126	Chapter 4: Implementation Schedules, Table 4.3	Greg Entinger	Smart Salting Campaign-Did a google search, MN PCA already has a whole thing on this, and it looks like training/certificates and everything… i. Road Certificaiton, ii. Liquid Deicer, and iii. Parking Lots and side walk. We shouldn't need to "Develop" anything for this. With that said, wat is the $150,000 going towards?	The $150,000 in the implementation table 4.3 is to explore options for local policy to incentivize smart salting. These funds may be used for developing the smart salting campaign (using existing materials and trainings whenever possible, but focusing on their use at a local level), implementing the campaign, developing an incentive program, and or implementing an incentive program for smart salting. An incentive program may include activities such as providing cost share or another incentive for municipalities to upgrade their equipment or salt use policies. No changes made based on this comment.
116	Chapter 4: Implementation Schedules, Table 4.1	Greg Entinger	we talk a lot about implement XXX acres…a. 405,789 in the project area, and that 52% was tillable, (211,010). With multiple BMP's stating implement acres, they add up to about 20,080, and I'm sure that more acres will be used, but not listed. As a farmer, it seams a lot, but with my other hat, is it enough.	We appreciate the feedback and insight from both the perspective of a farmer, as well as your other hat. Thank you for the comment, no change was made to the plan content.
142	Sidebar	Greg Entinger	Did you know… On the left side of the page… True! But NOT like it use to be. They are big business now, you are basically paying for the dividend in higher prices of fert/chemicals and application fees.	We will update the sidebar narrative. Mention in narrative that farmer relationships with Coops have changed over time due to them shifting to larger corporations.
36	Chapter 1: Land and Water Resources Narrative, Surface Water-Water Control	Holly Bushman	Update narrative to provide more context. This change is being suggested due to conversations Le Sueur County and SWCD staff had with the local Fisheries Supervisor. Sounds like there are numerous opportunities to partners and seed funding to restore stream habitat. Additionally, there are a few dams within this watershed that are being proposed to be fixed or removed on the DNR Dam list.	We will update the narrative to provide more context about water control structures within the watershed. Suggested Narrative: "There are no water control structures, such as dams, on the Minnesota River within the Planning Area. During low flows, the lock and dammed Mississippi River can experience backflow into the Minnesota River, creating lake-like conditions. These conditions favor the production of algae and result in low dissolved oxygen levels. While there are no water control structures on the Minnesota River, there are numerous water control structures on lakes and streams within the planning area. Partners within the planning area may explore efforts to either install or remove water control structures based off of goals (ex: remove dam to improve fish passage and habitat or implement a weir in order to reduce flooding impacts downstream)."
91	Chapter 3: Priority Resources, Targeting, Measurable Goals, Stream Prioritization, Table 3.5	Holly Bushman	Suggested Change: For consistency within Table 3.5, list sediment impairment/stressor either as Turbidity or TSS.	While both TSS and turbidity impairments/stressors are related to sediment, the standards and procedures used to evaluate turbidity and TSS are different. Historically, turbidity was the preferred sediment parameter, though now TSS is preferred. The impairments in the table will be left as is, but a footnote will be added to explain why both parameters are called out.
91	Chapter 3: Priority Resources, Targeting, Measurable Goals, Stream Prioritization, Table 3.5	Holly Bushman	In the narrative it explains that the priority streams were divided into two different Tiers (A & B) based off of pollutant impairments. Tier A streams were chosen for sediment loading to the Minnesota River. Tier B streams considered other pollutants of concern: E.coli, IBI, connectivity, etc. In the table, Le Sueur Creek and Unnamed Creek (near Henderson) do not list TSS as an impairment within the pollutants and stressors. However, this is likely due to the limited data set available. According to the WRAPS on page 31, Le Sueur Creek (823) has a suspected source of TSS as a stressor. Based on aerial reviews and site visits, we believe sediment loading is occurring, but do not know to what extent. Unnamed Creek Near Henderson (761) was not sampled in the last WRAPS process for TSS only E.coli. Gap in data. Based on aerial reviews and site visits, sediment loading is occurring, but do not know to what extent. Suggested Change: Update Table and Include TSS as potential impairment/stressor for Le Sueur Creek and Unnamed Creek (near Henderson). Provide some additional narrative about known TSS loading due to aerial reviews and site visits; extent or severity is unknown. Maybe add this in the footnote?	We will update Table 3.5 and include TSS as pollutant/ stressor for Le Sueur Creek and Unnamed Creek Near Henderson. Add to footnote below table that many of the priority streams within the watershed have some data that sediment is an issue and additionally we can see in aerials active erosion and runoff are occurring. We do not know the severity of sediment loading and need additional studies completed.
114	Chapter 4 Implementation Table, Implementation Schedules, Lead and Supporting LGU Section	Holly Bushman	Would like to mention and account for existing metro partners and efforts within the planning area. Not including all of their efforts within this comprehensive plan but should reference their plans. Additionally, reference opportunity to partner.	We will add the suggested narrative in the Lead and Supporting LGU section. Suggested Narrative: "There are existing Metro entities within the planning boundary that have their own separate Metro Comprehensive Watershed Management Plans. Priorities within Metro Comprehensive Watershed Management Plans may have similar goals and objectives as the Lower Minnesota River East Partnership, but efforts are not being duplicated. There may be opportunities for collaboration on projects, practices, and events in the future that align with priorities in numerous Comprehensive Watershed Management Plans."

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116-124	Chapter 4 Implementation Table, Table 4.1 BMP Implementation Schedule and Table 4.2 Data, Studies, and Monitoring Implementation Schedule	Holly Bushman	Additionally, need to provide narrative how Scott County and WMO funding supports Scott SWCD's implementation efforts and how it overall impacts plan's measurable outputs and goals. To reduce concern of redundancy of implementation efforts within the watershed, implementation activity goals have been reduced.	We will update the narrative in Chapter 4 Implementation Schedules in the Modeling Approach and Implementation Schedule section. Additional narrative will be added to the Modeling Approach section about the BWSR Water Erosion Pollution Reduction Estimator and how the tool was used to create reductions for the near and in channel projects. Additional narrative will be added to the implementation schedules section called Modification of Measurable Outputs and Outcomes: Goals within the comprehensive plan were modified for the following reasons: 1) In order to reduce concern of redundancy of implementation efforts within the watershed, implementation activity goals (BMPs) in Table 4.1 and 4.2 have been modified. There are numerous partners within this planning area and outside of this planning area that have their own existing watershed management plans, local water management plans, water supply plans, wellhead protection plans, groundwater protection plans, and surface water management plans that account for activities and pollutant reductions that are not included within this Plan. There are multiple efforts that are occurring to protect and improve the Lower Minnesota River Watershed. Please refer to Chapter 6 Collaboration with Other Units of Government to learn more. 2) Sediment Pollutant Modifications for Priority Streams and Streamsheds. The partnership understands that in channel and near channel erosion is leading cause for sediment loading into streams and rivers within the Watershed and to the Minnesota River. Many streams and their subwatersheds within the planning area (do not have any existing stream erosion studies and/or subwatershed analysis studies completed). These are critical in identifying areas that are at risk of erosion and also providing pollutant loads and reductions that are needed. Furthermore, the partnership went through existing efforts and took an average on how many stream and ravine projects are implemented each year. The partnership has limited capacity, staff and financial resources, to implement these projects on an annual basis. 3) Total Phosphorous Pollutant Modifications for Priority Lakes and Lakesheds. Specifically, Cody, Phelps, and Lemay TP goals were modified. This was due to limited staff capacity and landowner willingness in these lakesheds. Furthermore, the TP reduction goals needed for this chain of lakes is significant and can not be achieved within 10-year timeframe. The TP goals for Cody, Phelps, and Lemay were modified to a goal that was realistic to achieve, about 25% of the overall TP reduction needed for the lakes to achieve water quality standards. 4) Storage (Acre-Feet) Modifications for Priority Streams and Streamsheds. The partnership understands that additional storage opportunities are critical for reducing peaks flows and volumes within the watershed. Additionally, this will have major impacts to stability of streams and may help reduce erosion and runoff issues and near channel and overland sediment loading. Many streams and their subwatersheds within the planning area (do not have any existing stream erosion studies and/or subwatershed analysis studies completed). These are critical in identifying areas that are at risk of erosion and also providing pollutant loads, reductions, and storage goals that are needed. Furthermore, the partnership went through existing efforts and took an average on how many storage projects are implemented each year. The partnership has limited capacity, staff and financial resources, to implement these projects on an annual basis. Additionally, these projects are complex, expensive, and can be difficult to find willing landowners. All of these goals will be reassessed at the 5-year amendment mark (Chapter 6).
117	Chapter 6: Plan Administration and Coordination: Federal Funding	Holly Bushman	Update narrative to provide more context. This change is being suggested due to conversations Le Sueur County and SWCD staff had with local Fisheries Supervisor. Sounds like there are numerous opportunities to partners and seed funding to restore stream habitat. Additionally, there are a few dams within this watershed that are being proposed to be fixed or removed on the DNR Dam list.	We will update existing narrative with suggested narrative. Suggested Narrative: "Dam improvement programs that address habitat and connectivity concerns may involve partnering with USACE and MN DNR. There are existing federal programs that are designed to assist with improving fish passage and restoring stream habitat such as Farmers and Fishers Fund. These programs may be leveraged in the future to assist with projects and practices that address Habitat and Natural Resources Restoration Goal A."
83	Chapter 3: Surface Water Quality Goal A	Trevor Rudenick	The wording of "there implmentation" seems off. Not sure if it means three or another form of their/theyre/there	We will update the narrative to the following: "The implementation actions outlined in the Plan can be utilized to further understand internal loading issues and practices to reduce internal loading."
72	Chapter 2, Figure 2.6	Trevor Rudenick	Figure is not clear on hwere the specificed areas of concern are	We will add a leader line or star to indicate areas of concern.
93	Chapter 3, 3.2 Issue Category 2: Groundwater	Trevor Rudenick	Acronym is wrong SWSMA instead of DWSMA	We will update the acronym to DWSMA on sidebar.
105	Chapter 4: Introduction	Trevor Rudenick	sentence does not make sense. Either different wording, or seperating into two sentences is needed	We will update the narrative to the following: "In order to develop implementation schedules, multiple brainstorming sessions were held to develop and prioritize different strategies that will help the Partnership achieve our 10 year measurable goals and address our Plan priority issues. All of the different strategies were categorized into four different implementation schedules: • Best Management Practices (BMPs) • Data, Studies, and Monitoring • Policy and Regulation • Education and Outreach."
108-110	Chapter 4: Figure 4.1-4.3	Trevor Rudenick	could add a page with these ideas typed out, some notes are hard to read	We will not update the Figures 4.1-4.3. The intent of the images are to demonstrate the process.
140		Trevor Rudenick	Le Sueur county now has social media with a facebook page started	We will update Table 5.4 and mark Le Sueur County for Social Media program.
General Plan Comment		Met Council	The Council would like to see greater intention for reuse of stormwater and rainwater to offset demands on groundwater supplies. A helpful resource for this is the Minnesota Department of Health's Reuse of Stormwater and Rainwater in Minnesota white paper.	We do not have the expertise or experience with the reuse of stormwater and rainwater for groundwater recharge. The partnership feels it is an important topic to address, but would like to see how others in the state are approaching this topic. We will include this topic as something to consider during our 5 year amendment mark.
161	Chapter 6: Plan Administration and Coordination: Federal Funding	Met Council	The Plan states that members of the advisory committee will be appointed by the joint powers board and, "…will meet at least once or more often if needed." Please continue to count on the Council to be a technical resource to the joint powers board and Steering Team. Additionally, we recommend the Advisory Committee meet at least annually to effectively share new information, initiatives, and funding programs.	We will updated existing narrative, and state the following: "The AC will meet at least once annually, or more often as needed."
42-46	Chapter 1: Land and Water Resources Narrative, Impaired Streams	Minnesota Pollution Control Agency	Table 1.2: a.County ditch 10 – line up affected use and pollutant. b.Consider adding AUID numbers; could remove stream column since they are all streams.	We will remove the Water Body Type column and replace with AUID Numbers.
47	Chapter 1: Land and Water Resources Narrative, Impaired Streams	Minnesota Pollution Control Agency	Table 1.3 - Consider adding AUIDs.	We will remove the Water Body Type column and replace with AUID Numbers.
67, 69-71	Chapter 2: Issue Prioritization	Minnesota Pollution Control Agency	Figure 2.1 and 2.3: a.Consider defining what the percent represents. b.Consider referencing the appendix this information is in.	We will add a footnote at bottom of figures 2.1, 2.3, 2.4, and 2.5 to explain what percentages mean (participants). Additionally for Figure 2.3, 2.4, and 2.5 the ST will reference Appendix D.
69	Chapter 2: Issue Prioritization	Minnesota Pollution Control Agency	Figure 2.3a.Two columns are the same height but have different percentages (soil and bluff erosion and degraded soil health). In the appendix they are different heights. If they are supposed to be that, provide more details on why there is a difference.	We will change bar graphs so that each bar is proportional to the percentage. This should alleviate confusion about different weights put on items.
91-92	Chapter 3: Priority Resources, Targeting, Measurable Goals, Stream Prioritization, Table 3.5 & Figure 3.2	Minnesota Pollution Control Agency	Table 3.5 – Check on AUID numbers a.Robert Creek – 575 instead of 875? b.Upper Sand – 661 instead of 611? c.Consider adding the AUIDs to the priority stream map.	We double checked AUID numbers for Robert Creek and Upper Sand Creek. Robert Creek AUID number will be updated to 575. Upper Sand Creek AUID number will be updated to 661. Need to add AUID Number 542 tp Upper Sand Creek as well. Add AUID numbers to Figure 3.2 Priority Streams & Streamsheds?
General Plan Comment		Minnesota Pollution Control Agency	Nice summaries and inclusion of climate, environmental justice, and chloride sections	We will not make changes, comment is providing a compliment on sections of the plan.

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116	Chapter 4: Implementation Schedules, BMP. 4 Storage	Minnesota Department of Natural Resources	The DNR highly encourages prioritizing water storage projects that leverage natural features and demonstrate multiple benefits not only to water quantity and quality but also to aquatic and terrestrial ecosystems, fish and wildlife species, and public and private infrastructure/property. In-channel storage is listed in the draft plan as an option for water storage. Impoundments, especially on perennial streams, can contribute to water quality issues and create fish passage barriers leading to biological impairments. In-channel alterations for storage can also decrease the stream's ability to transport sediment, often causing stream stability concerns. Off-channel storage is generally a better option. Strategic culvert placement is also listed in the draft plan as an option for water storage. River networks are connected systems, draining and flowing over landscapes. Constricting the flow of water will affect sediment transport. Disruption of sediment transport and the creation of scour pools below culverts often leads to a degradation of aquatic habitat. In contrast, reconnecting the floodplain at road/river intersections has multiple benefits including maintaining natural flow in the channel and floodplain, reducing the cost of maintaining the road crossing, stabilizing sediment and water transport, and increasing biological connectivity. Individual consideration of each strategic culvert placement should be thoroughly analyzed. More information regarding culverts can be found below.	The ST will update Table 4.1 and add in Off Channel Storage in the list of options for the implementation activity ID BMP.4. Water storage section?
118	Chapter 4: Implementation	Minnesota Department of Natural Resources	The draft LMRE plan targets 16 stream restoration projects, or 3,175 linear feet of stream restoration for a reduction of 19 tons of sediment per year. The stated length may be an underestimate of the length required to move towards a	We will update the narrative in Chapter 4 Implementation Schedules in the Modeling Approach and Implementation Schedule section. Additional narrative will be added to the Modeling Approach section about the BWSR Water Erosion Pollution Reduction Estimator and how the tool was used to create
124	Chapter 4: Implementation Schedules, DSM.12 Drainage/culvert inventory	Minnesota Department of Natural Resources	The DNR appreciates that culvert inventories were included as a strategy in the implementation table. Stream crossings (including bridges, culverts, and fords) can have an impact on the individual stream reach, as well as cumulatively throughout the watershed, as crossings are abundant across the landscape. Stream connectivity benefits the health of a watershed, aquatic organisms, and floodplain access. There are many variables to consider when assessing and replacing crossings. To aid in this, the DNR has created a Culvert Inventory Application. When conducting the watershed culvert inventory, consider using the created stream crossing assessment form and entering the information into the application. The DNR can assist in the data collection and reporting of culvert inventories. In addition to using the culvert inventory, consider removing the following known barriers, as mentioned in the DNR's priority issues letter: 1) Low head dam on Le Sueur Creek between Fox Hollow Road and Lexington Road 2) Weir on Forest Prairie Creek, at the crossing with 320th Street 3) Low head dam on Forest Prairie Creek, immediately downstream of Tyrone Road. When replacing crossings, funding is available for crossings utilizing the geomorphic design approach, Culvert Replacement Incentives Program.	We understand that dams negatively impact fish passage and stream connectivity. These projects and practices are expensive and are complicated. The Partnership likely will need to seek out outside funding sources in order to fund dam removals. The ST is willing to partner with the DNR if an opportunity arises. We will add the MN DNR as a supporting entity for Activity ID# DSM.12. We will add examples of stream restorations for Activity ID# BMP.7 (Implementation Action: Implement stream restorations such as channel restorations, dam removals, dam modifications, nature-like fishway).
152	Chapter 5: Plan Implementation Programs	Minnesota Department of Natural Resources	Two-stage ditches have been shown to work well at reducing in-channel erosion and providing stable, low-maintenance side slopes. When discussing ditch maintenance, consider adding language explaining that two-stage ditches can help to minimize erosion and improve water quality and aquatic habitat.	We will add narrative to Public Drainage Systems section in Chapter 5, on page 152, that two-stage ditches can help minimize erosion and improve water quality and aquatic habitat.
11	Executive Summary	Prior Lake-Spring Lake Watershed District	Introduction – Please consider modifying the second sentence to include, "… local government units across the Watershed who choose to use it, …"	We will update the narrative to the following: " It was developed by multiple local government units across the Watershed, as well as their partners from state and federal agencies, non-profits, citizens, and other stakeholders. The Plan will be implemented by local government units who choose to adopt the plan as part of their watershed management efforts."
12	Executive Summary	Prior Lake-Spring Lake Watershed District	Under 0.2 Participating Local Governments, PLSLWD is not fully supportive of the introductory text above the bulleted list of organizations. PLSLWD suggests just listing the names of the entities that entered into the MOA below the introductory text and removing PLSLWD from the bulleted list.	We will update the narrative to remove the Prior Lake-Spring Lake Watershed District from the bulleted list.
12	Executive Summary	Prior Lake-Spring Lake Watershed District	Please modify text to clarify which entities are included in the Partnership and whether Partnership members signed the MOA. As currently written, it seems to imply that all entities signed the MOA, which is not accurate.	We will update the narrative as follows: "The local government units (LGUs) involved in managing the Planning Area resources recognized that the Minnesota Board of Water and Soil Resources (BWSR) One Watershed, One Plan (1W1P) program provided a unique opportunity to develop a management plan that unifies and accelerates the restoration of degraded resources and protection of high-quality resources. The Lower Minnesota River Watershed was divided into different planning boundaries.
14	Executive Summary	Prior Lake-Spring Lake Watershed District	Please clarify which local boards the Plan will be presented to for final approval as it implies all entities in the partnership. Alternatively, more fully define what entities comprise the partnership. If PLSLWD is considered part of the	We will update the narrative for Section 0.10 Plan Administration and Coordination. The narrative will be updated as follows: "The Policy Committee recommended the establishment of a Joint Powers Entity with the powers and authorities outlined in
105	Chapter 4: Implementation Schedules	Prior Lake-Spring Lake Watershed District	There is a typographical error in the first sentence of the introduction.	We will update the narrative in the introduction to the following: "To develop implementation schedules, brainstorming sessions were held to narrow down and condense efforts into broad categories. The Plan has several different implementation schedules, organized by the following categories: "
113	Chapter 4: Implementation Schedules	Prior Lake-Spring Lake Watershed District	PLSLWD is in the process of updating the District's website in 2024. Once updated, the QR code provided in this report will not work.	We will update the QR code to reference the main page of the District's website and reference with text what to search for to find current plan.
117-118	Chapter 4: Implementation Schedules	Prior Lake-Spring Lake Watershed District	Table 4.1: BMP Implementation Table – Under the Leads and Supporting Entities column in the table, remove all references to PLSLWD and change all "WDs" to "WD." If the intent of "WD" was PLSLWD, remove "WD." PLSLWD believes it is inappropriate to list PLSLWD as an entity that is leading or supporting efforts towards specific implementation outcomes in a plan that PLSLWD does not intend to adopt or use to guide implementation actions of PLSLWD. While page 164 of the plan states that activities within the plan are voluntary, the current draft of Table 4.1 provides misleading and incorrect information to the general public regarding PLSLWD's planned implementation actions and associated measurable outcomes. PLSLWD intends to only use the PLSLWD Water Resources Management Plan to guide District implementation actions and performance measures.	We will update Table 4.1 and change the Leads and Supporting Entities column to WD. The intent of including the PLSLWD under this column was to indicate potential partnerships in the future. However this will be added in narrative instead that the partnership will continue to communicate with the PLSLWD in our efforts and partner if opportunities exist Chapter 6.
128	Chapter 4: Implementation Schedules	Prior Lake-Spring Lake Watershed District	Table 4.4: Outreach and Education Implementation Schedule - Under the Leads and Supporting Entities column in the table, Change "WDs" to "WD."	We will update Table 4.4 and change the Leads and Supporting Entities column to WD.

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137	Chapter 5: Plan Implementation Programs	Prior Lake-Spring Lake Watershed District	PLSLWD is in the process of updating the District's website in 2024. Once updated, the QR code provided in this report will not work.	We will update the QR code to reference the main page of the District's website and reference with text what to search for to find current plan.
A-3	Appendix A: Committee Members	Prior Lake-Spring Lake Watershed District	Please add a hyphen to PLSLWD's name "Prior Lake-Spring Lake Watershed District"	We will ad a hyphen between Prior Lake and Spring Lake when referencing the organization name.
E3-E17	Appendix E: Detailed Implementation Tables	Prior Lake-Spring Lake Watershed District	Under the Leads and Supporting Entities column in the table, remove all references to PLSLWD and change all "WDs" to "WD." If the intent of "WD" was PLSLWD, remove "WD." PLSLWD believes it is inappropriate to list PLSLWD as an entity that is leading or supporting efforts towards specific implementation outcomes in a plan that PLSLWD does not intend to adopt or use to direct implementation actions of PLSLWD. While page 164 of the plan states that activities within the plan are voluntary, the current draft of Table 4.1 provides misleading and incorrect information to the general public regarding PLSLWD's planned implementation actions and associated measurable outcomes. PLSLWD intends to only use the PLSLWD Water Resources Management Plan to guide District implementation actions and performance measures.	We will update Appendix E and change the Leads and Supporting Entities column to WD.
	Chapter 3: Priority Issues, Targeting, and	Lower Minnesota River Watershed District	We recognize that most of the priority issues and targets focus on parts of the Planning Area outside the LMRWD. Targeting implementation actions in upstream areas of the watershed, as the Plan does, will benefit downstream water	The Partners will not be updating the prioritization strategy, however, local priorities or important projects or resources may be considered for plan amendments. The Partners may also partner on efforts not included in the Plan if time and resources allow.
82	Chapter 3: Priority Issues, Targeting, and	Lower Minnesota River Watershed District	We recommend including more detail on sediment and erosion sources in this section, including a graphic showing the different types of near-channel sediment sources—gully, ravine, bank, and bluff erosion. Please also specify whether the	We will add example images of the different types of near channel sediment sources. The ST will update the narrative and add bluff erosion as part of near channel sources. We will add a few photos on the sidebar to include examples of near-channel sediment source.We will add a map of the HUC 10 watersheds after Figure 3.2 on
91	Chapter 3: Priority Issues, Targeting, and Measurable Goals, Table 3.5 Priority Streams	Lower Minnesota River Watershed District	Why is the Credit River not included in Table 3.5 but Eagle Creek is included? The Eagle Creek and Credit River footnotes in the table should be integrated into the body of the document with more detail, describing why these are local priorities and not 1W1P priorities. Although local entities such as the LMRWD and the Scott County Watershed Management Organization may prioritize both Eagle Creek and the Credit River, lessening the need to prioritize them in the Plan, greater acknowledgment of this should be made in the Plan itself. We also encourage revising the Plan's prioritization criteria to be broader, allowing for resources to be prioritized as part of the Plan, not just on the local level.	We will not be updating stream priority areas in the plan. Additionally, stream priority areas were chosen based off where TSS reductions were needed the most. We will add narrative for stream prioritization: Eagle Creek and Credit River is already identified as a local priority in other metro watershed or local water management plans. In efforts to reduce redundancy, the Credit River was not include as a priority resource. Eagle Creek was called out as a local priority within the Plan due to it being considered a high value resource and trout stream. The partnership could provide implement additional projects and practices that would assist with our habitat and natural resources and groundwater goals."
92	Chapter 3: Prioriy Issues, Targeting, and Measurable Goals, Figure 3.2 Priority Streams and Subwatersheds	Lower Minnnesota River Watershed District	No streams or subwatersheds in the LMRWD are identified as priorities in this figure, meaning there will be no 1W1P efforts to target actions toward LMRWD streams per the Figure 3.2 footnote "Efforts will be targeted to within subwatershed of priority streams." Again, we encourage revising the Plan's prioritization criteria to broaden the scope of resources that can be identified as priorities.	We will not be updating stream priority areas in the plan. In an effort to reduce redundancy and not be duplicative, numerous resources were not included as top stream priorities within this Plan. However, this does not limit efforts and we can still partner and assist other partners with implementation efforts to further protect and improve other resources that are not a priority within this Plan. Additionally, stream priority areas were chosen based off where TSS reductions were needed the most."
94	Chapter 3: Prioriy Issues, Targeting, and Measurable Goals, 3.2 Issue Category 2: Groundwater	Lower Minnnesota River Watershed District	Because of the lack of groundwater quality data currently available, one of the goals should include the collection of groundwater chemistry data from wells in and around Eagle Creek and Savage Fen.	We will not be updating goals in the plan as it would require significant changes had numerous conversations and meetings about groundwater goals. However, Savage Fen and Eagle Creek are located within Groundwater Priority Areas. We will add narrative to Issue State #4: Groundwater-Knowledge, Data, and Understanding that Groundwater Chemistry data from wells in and around Eagle Creek and Savage Fen will be important in understanding changes and providing data for additional protection measures for these high value resources.
98	Chapter 3: Prioriy Issues, Targeting, and Measurable Goals, 3.3 Issue Category 3: Habitat and Natural Resources	Lower Minnnesota River Watershed District	The LMRWD has studied and identified high-value natural resources within the district. We encourage the Plan to include Scott County in identification efforts and protection strategies for high-value cultural resources. Although we fully support identifying and protecting high-value cultural resources, the Plan should expand on what actions or protection strategies are intended for cultural resources identified through this effort	Scott County and WMO expressed that they have their own High Value Natural Resources study and do not want to be included. The partnership will try to create a study that is similar to Scott County's for consistency throughout the watershed. We will not be making changes and including Scott County as part of the High-Value natural resources per their request.
99	Chapter 3: Prioriy Issues, Targeting, and Measurable Goals, Habitat and Natural Resources Protection and Preservation Figure 3.6	Lower Minnnesota River Watershed District	Prioritizing areas for habitat restoration based on the priority streams identified in Table 3.5 leaves out streams in the LMRWD and much of Scott County that would benefit from restoration, stabilization, increased perennial cover, and improved habitat connectivity. Although implementing projects to reduce pollutants and stressors in priority streams in Table 3.5 is appropriate from a water quality standpoint, we believe restoration, riparian enhancement, and habitat connectivity goals should be more widely targeted over a broader area. Areas that could benefit from gully and ravine stabilization, riparian enhancement projects, and creek restoration projects, especially those in or near high-value resources and the Minnesota River, should be part of this goal. This includes areas and resources within the LMRWD, such as Eagle Creek and Savage Fen. Please explain why all areas in the LMRWD and much of Scott County were left out of this prioritization and why the Plan only prioritizes those creeks and subwatersheds prioritized for water quality issues as applicable for habitat restoration	The LMRWD is a part of Groundwater and Habitat and Natural Resources Priority Areas. Both Eagle Creek and Savage Fen are shown in Figure 3.5 and Figure 3.6 for priority Habitat and Natural Resources Areas. During planning meetings, there was an emphasis on avoiding duplication of efforts, so local priorities for other entities (such as Eagle Creek and Savage Fen) were not identified as priority resources for this planning effort. The partnership is willing to support and partner on projects to benefit these important resources if opportunities arise.
105-129	Chapter 4: Implementation Schedules	Lower Minnnesota River Watershed District	The implementation schedules and tables appear to exclude areas and resources in the LMRWD from being targeted for implementation. For example, for BMP.3 – Urban BMPs, the Priority Areas are priority streams, lakes, and groundwater priority areas identified in the Plan. Because these priority streams, lakes, and groundwater areas are generally all outside the LMRWD, no urban BMPs would be targeted in the district. This is further supported by the 17 pages of detailed implementation tables in Appendix E that identify no LMRWD subwatersheds, water resources, or areas in any of the Priority Areas columns. We read this similarly for habitat restoration-type activities; no areas or resources in the LMRWD are prioritized in the detailed implementation tables in Appendix E for grade stabilization, native plantings, stream restorations, or stream stabilization. This translates to no implementation targeted at areas or resources in the LMRWD. Why have some implementation actions such as habitat/riparian restoration projects, stabilization projects, and planting projects not been prioritized and targeted on a more watershed-wide scale?	The LMRWD is a part of Groundwater and Habitat and Natural Resources Priority Areas. Additionally, MDH mentioned in our groundwater subcommittee meeting that Urban BMPs are a great practice to help improve groundwater contamination; especially in DWSMAS. Groundwater Priority Areas are included as a priority area for Urban BMPs. Eagle Creek and Savage Fen are shown in Figure 3.5 and Figure 3.6 for priority Habitat and Natural Resources Areas. During planning meetings, there was an emphasis on avoiding duplication of efforts, so local priorities for other entities (such as Eagle Creek and Savage Fen) were not identified as priority resources for this planning effort. The partnership is willing to support and partner on projects to benefit these important resources if opportunities arise. To keep implementation efforts focused and impactful, the partners dedicated most implementation efforts to priority resources. A note was added below table 3.5 to acknowledge that Savage Fen is also an important resource that has been identified as a local priority with efforts extending beyond the reach of this Plan.
105-129	Chapter 4: Implementation Schedules	Lower Minnnesota River Watershed District	More detail on how cost estimates were determined would be helpful to include in the Plan. Some of the cost estimates like the estimate for urban stormwater BMPs seem low, considering typical costs for design, land, construction, and ongoing operation and maintenance. Similarly, many costs for other BMPs that require design and construction, such as stabilization projects, also seem low, and the Plan would benefit from more information on how costs were determined.	We will update the narrative: "Cost estimates are presented in 2023 value and will be updated throughout the planning effort and reflected in workplan development. The costs indicated in the BMP implementation table include total project costs for land, labor, and materials to implement. The total cost estimate for BMPs was developed by averaging the costs from all partners for each BMP practice. Cost assumptions for BMP costs are included in Appendix F. Costs not outlined in the implementation table include costs incurred for outreach and education efforts or technical assistance. It was assumed that an additional 20% of costs will be incurred for technical assistance and an additional 15% of costs will be incurred for outreach and education efforts. The technical assistance and education and outreach cost estimates were developed as a total percentage of WBIF funds. Typically in other grant funds this is standard practice as staff billable rates fluctuate. The partnership wanted to make sure enough funds were set aside for not only projects and practices, but also to compensate staff time and any technical assistance that is needed to implement the plan. Best estimates based on past experience and expected total effort were also included for implementation actions in the Data, Studies, and Monitoring table as well as Policy and Regulation table. Prioritization of which projects will be funded with WBIF, will be based on estimated reductions to priority waterbodies and top priority issues among other aspects to be decided by the partners during the ranking and scoring process."

Lower MN River East CWMP 60 Day Review Formal

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Page Number	Section	Commenter	Comment	Response
135	Chapter 5: Plan Implementation Programs	Lower Minnnesota River Watershed District	Table 5.1 should include a row identifying the LMRWD's Water Resources Restoration Fund.	We will add a row to include LMRWD's Water Resources Restoration Fund and mark the LMRWD.
138-139	Chapter 5: Plan Implementation Programs	Lower Minnnesota River Watershed District	Table 5.3: The LMRWD requires entities to operate and maintain stormwater BMPs, so it seems the LMRWD should be included as having existing O & M programs for stormwater facilities and maintenance. Please explain in the Plan the difference between stormwater facility maintenance and stormwater BMP maintenance.	We will merge the stormwater facility maintenance and stormwater BMP maintenance into one row in the table as further discussion with the AC indicated that these are not separate programs.
140	Chapter 5: Plan Implementation Programs	Lower Minnnesota River Watershed District	Table 5.4: The LMRWD has a K–12 education program and a social media program. These should be reflected in the table.	We will mark the LMRWD as having a K-12 education program and social media program in Table 5.4 Existing Education and Outreach Programs.
142	Chapter 5: Plan Implementation Programs	Lower Minnnesota River Watershed District	Table 5.6: Should watershed districts and their stakeholders be included as Target Audience?	We will add WDs and WMOs to Table 5.6.
147	Chapter 5: Plan Implementation Programs	Lower Minnnesota River Watershed District	Table 5.10: The table should reflect that the LMRWD has Erosion Control and Stormwater Management regulatory programs (second row of table).	We will mark the LMRWD as having an Erosion Control & Stormwater Management Program for Table 5.10 Existing Regulatory Programs.
156	Chapter 5: Plan Implementation Programs	Lower Minnnesota River Watershed District	Table 5.12: The LMRWD provides funding to the Scott Soil and Water Conservation District to monitor Eagle Creek and Savage Fen. This could be included in a footnote or in the table itself.	We will add a circle to indicate that the Lower MN River WD is involved in stream water monitoring in table 5.12.
161	Chapter 6: Plan Administration and Coordination	Lower Minnnesota River Watershed District	Include a list of the entities making up the Joint Powers Board (LMREWJPB).	We will update narrative in Chapter 6, JPB section, to the following: "The Joint Powers Board (LMREWJPB) will be made up of one appointed representative of each participating entity that enters into the JPA. The JPA will not be finalized and formally adopted until a comprehensive watershed management plan is approved by BWSR. Partners that are anticipated to sign onto the JPA and become part of the JPB include: Le Sueur County, Rice County, Le Sueur SWCD, Rice SWCD, and Scott SWCD. Partners that may sign onto the JPA and become part of the JPB include: Lower Minnesota River Watershed District. Please refer to the finalized JPA for entities that elected to join as the document was executed. The draft JPA states that the LMREWJPB will meet twice per year or more often as deemed necessary. The LMREWJPB is responsible for approving the budget, workplan, plan amendments, cost-share policies, bylaws, as well as establishing committees as necessary to implement the Plan. The Board does not have the authority to directly hire staff but may contract for coordination or other services. Furthermore, the Board may set local dues to assist with legal fees, audits, project implementation efforts, or administration costs. The process in how dues will be set up for the partnership are explained in the JPA. The JPB is intended to streamline the decision making process and not require full board approvals from each LGU. The intent is that each member of the JPB will keep their local boards up to date with plan progress. Each JPB member will be able to make decisions on behalf of their local board, however, the JPB does not have authority over any regulatory or enforcement programs or any budgets and programs that are not directly associated with this watershed comprehensive management plan."
163	Chapter 6: Plan Administration and Coordination	Lower Minnnesota River Watershed District	Collaboration with Other Units of Government: Please include the LMRWD in the list on Page 163.	We will update the list of Collaboration with Other Units of Government and add in The Lower Minnesota River Watershed District.
E3-E17	Appendix E: Detailed Implementation Tables	Lower Minnnesota River Watershed District	See comment on chapter 4 above. The LMRWD does not have any priority streams, lakes, or areas identified in any of the detailed implementation tables in Appendix E. The LMRWD is listed as a Lead & Supporting Entity in the final table column in some tables.	The LMRWD is a part of Groundwater and Habitat and Natural Resources Priority Areas. The LMRWD is a lead or supporting entity in some activities for example: education and outreach campaign, urban bumps, habitat projects and practices, and groundwater projects and practices. The ST will double check all activities to make sure the LMWRD is included. We listed the LMRWD as lead or supporting entities in different activities due to the entity being located within priority areas or the potential to partner with the LMWRD for financial resources, technical assistance, or project expertise. We will not update the lead or supporting entity column, but instead provide additional narrative about why LMRWD is included. We will update the narrative under the Lead and Supporting Entities section to: "This field indicates the entity responsible for leading each activity and anticipated entities, organizations, or agencies expected to cooperate, review, fund, regulate, or in other ways assist
11	Executive Summary	Shakopee Mdewakanton Sioux Community	change spelling to Mdewakanton	We will fix the spelling of the name of the Tribal Government.
29	Chapter 1: Land and Water Resources Narrative, Cultural Heritage	Shakopee Mdewakanton Sioux Community	SMSC Dakota history and cultural heritage information can be found on SMSC website, https://shakopeedakota.org/culture/our-native-american-history.	We will update the link for the QR code with the link that is provided.
29	Chapter 1: Land and Water Resources Narrative, Cultural Heritage	Shakopee Mdewakanton Sioux Community	On this page, Mni Sota is translated as “cloudy waters.” I’ve seen this translation among SMSC members to be “cloud reflected waters.” Translations can be difficult and might differ between Dakota communities, so maybe include both translations.	We will update the translation of Mni Sota to include both translations.
29	Chapter 1: Land and Water Resources Narrative, Cultural Heritage	Shakopee Mdewakanton Sioux Community	Right side call out about SMSC conservation work, please reference SMSC Natural Resources Website or SMSC Native Green. https://www.smscnativegreen.org/	We will also provide a QR code or link to reference the SMSC conservation work.
31	Chapter 1: Land and Water Resources Narrative, Figure 1.4 Land Cover Class	Shakopee Mdewakanton Sioux Community	Will this be updated to the NLCD 2021 in a future draft? I notice that some of the SMSC prairie land is classified as cropland and some other areas are also outdated.	We used the most up to date version when the map was developed, and will consider reviewing and updating at the 5-year plan review and amendment timeframe as we believe the information is being updated again this year.
33	Chapter 1: Land and Water Resources Narrative, Figure 1.5 MS 4 Boundaries and Wastewater Facilities	Shakopee Mdewakanton Sioux Community	change spelling to Mdewakanton	We will fix the spelling of the name of the Tribal Government.
163	Chapter 6: Plan Administration and Coordination, Collaboration with Other Units of Government	Shakopee Mdewakanton Sioux Community	change spelling to Mdewakanton	We will fix the spelling of the name of the Tribal Government.
98	Chapter 3: Priority Resources, Targeting, and Measurable Goals, 3.3 Issue Category: Habitat and Natural Resources	Shakopee Mdewakanton Sioux Community	How will this study be conducted and how do you foresee SMSC assisting with this in Le Sueur and Rice counties?	The natural resources study is intended to identify areas of high value natural resources and assist with determining impacts from land use activities and development and provide management decisions for these resources. The study would be similar to Scott County's existing Plan. The partnership will incorporate cultural resource components as needed. Please note that after further Advisory Committee discussion, the cultural resources portion of this study was changed to as needed due to the costs associated with those studies. We will add SMSC to the supporting entities for this activity in the implementation table (DSM.14).

Lower MN River East CWMP 60 Day Review Formal

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Page Number	Section	Commenter	Comment	Response
98	Chapter 3: Priority Resources, Targeting, and Measurable Goals, 3.3 Issue Category: Habitat and Natural Resources	Shakopee Mdewakanton Sioux Community	How will this information be shared with the public?	The study will be posted on our partnership website. Additionally, we will share the study will partners in the watershed. We could also host a workshop for the public to discuss the results of the study. We will not make any changes to the narrative about how information will be shared to public, however, we may include this information in the education and outreach campaign.
116-128	Chapter 4: Implementation Schedule	Shakopee Mdewakanton Sioux Community	Pike Lake is an impaired water in this watershed and shared management with PLSLWD. Improving this lake would benefit current lake users, surrounding homeowners and the downstream waterbodies (including the Minnesota River). This lake would be a priority water for SMSC.	At this point in the process, we will not be updating priority resources, however we will add narrative indicating that Pike Lake is a local priority for SMSC and Prior Lake-Spring Lake Watershed District and that the Partnership supports the efforts towards Pike Lake. The partners would be happy to discuss partnering on projects with SMSC and PLSPWD to improve Pike Lake, including but not limited to sharing services such as education and outreach, technical assistance, and partnering on grant applications.
116-128	Chapter 4: Implementation Schedule, Table 4.1	Shakopee Mdewakanton Sioux Community	BMP.3, BMP.6, BMP.8, BMP.9, BMP.10 - SMSC supporting entity	We will update the activities and include and list the SMSC as a supporting entity.
116-128	Chapter 4: Implementation Schedule, Table 4.2	Shakopee Mdewakanton Sioux Community	DSM.1 - SMSC supporting entity	We will update the activities and include and list the SMSC as a supporting entity.
116-128	Chapter 4: Implementation Schedule, Table 4.3	Shakopee Mdewakanton Sioux Community	PR.3 - SMSC supporting entity	We will update the activities and include and list the SMSC as a supporting entity.
116-128	Chapter 4: Implementation Schedule, Table 4.4	Shakopee Mdewakanton Sioux Community	OE.1 - SMSC supporting entity	We will update the activities and include and list the SMSC as a supporting entity.
128	Chapter 4: Implementation Schedule, Table 4.4	Shakopee Mdewakanton Sioux Community	In general, yes. Could you provide more information on what would be involved with the outreach/education campaign?	We do not need to make any changes to the Plan based off this comment. The partnership will include the SMSC when we start developing our education and outreach campaign for the watershed. Some examples of activities we would like to partner on include but not limited to: any drinking water/groundwater related items, smart salting, and urban BMPs.
General Plan Comment		Shakopee Mdewakanton Sioux Community	We will reach out when we feel ready to pursue state funding for relevant projects	We do not need to make any changes to the Plan based off this comment. The SMSC was making a statement that they will communicate with the partnership when projects arise.
General Plan Comment		Shakopee Mdewakanton Sioux Community	Staff would like to be involved with the aspects that directly impact the Shakopee Mdewakanton Sioux Community. For example, identifying culture resources of high value and monitoring in locations near SMSC lands (Pike Lake, Lake O'Dowd, PLOC and other streams).	We will continue to include SMSC on partner correspondence. SMSC is welcome to attend meetings and participate in implementation actions that they find important or relevant to their priorities.
12	Executive Summary	Scott County Watershed Management Organization	Add Scott County to the list.	We will update the narrative and add Scott County to the list.
21	Executive Summary, Table 0.4 Groundwater Knowledge, Data, and Understanding	Scott County Watershed Management Organization	Under Goal B, the action statement listed here is not consistent with the Implementation Table in section 4 Table 4.2, DSM.3. Consider changing the language in Table 0.4 from "….for the entire Planning Area." to "for Le Sueur County." Also stated that way on page 94, Issue Statement #4, B. and page 158, Table 5.9, Groundwater.	We will update Table 0.4 Goal B to state "Complete County Geologic Atlas (CGA) for Le Sueur County."
27	Chapter 1 Land and Water Resources Narrative, Planning Partners Sidebar	Scott County Watershed Management Organization	Is this accurate? Did ALL municipalities and townships participate?	We will remove "All" and just have "municipalities" listed in the sidebar.
88	Chapter 3: Priority Resources, Targeting, and Measurable Goals	Scott County Watershed Management Organization	The first sentence refers to recreational lakes classified as deep lakes. Of the three lakes chosen in the list under this section, only one (Spring) is classified as a deep lake. Cedar lake has an average depth of less than 15 feet classifying it as a shallow lake. To avoid confusion of what standard should be followed for those lakes meeting water quality standards, consider a language change in the first sentence.	We will update the narrative to the following: "Recreational value lakes were classified as both deep and shallow lakes, mostly used for boating and swimming, with at least one public access point, a public park adjacent to the lake, or a public beach for swimming."
105	Chapter 4: Implementation Schedules	Scott County Watershed Management Organization	Introduction description sentence doesn't make sense, consider revising.	We will update the narrative to the following: "The Plan prioritizes different strategies that will help the Partnership achieve our 10 year measurable goals and address our Plan priority issues. All of the different strategies were categorized into four different implementation schedules: • Best Management Practices (BMPs) • Data, Studies, and Monitoring • Policy and Regulation • Education and Outreach."
114-128	Chapter 4: Implementation Schedules	Scott County Watershed Management Organization	Check page numbering after page 114, Table 4.1-page numbering is in even numbers only.	We double checked the page numbers. For the implementation schedule tables, page numbers are located on the bottom left and bottom right corners. We will not need to make changes to the page numbers.
120	Chapter 4: Implementation Schedules, Table 4.2	Scott County Watershed Management Organization	Change Lead agency from "Counties" to "Rice County, Le Sueur County". Scott County is the lead for this action, some groundwater quality monitoring is already included in the Scott WMO current Plan and more groundwater quality monitoring will be included in the Scott County Groundwater Plan being developed.	We will update Lead and Supporting Entities columns for Table 4.2 and change "Counties" to "Le Sueur and Rice County." This will also be changed in Table 4.1, 4.2, and 4.4.
120	Chapter 4: Implementation Schedules, Table 4.2	Scott County Watershed Management Organization	Change Lead agency from "Counties" to "Rice County, Le Sueur County". Limit to nitrate water testing clinic only in Scott County/Scott SWCD as groundwater quality monitoring is already included in the Scott WMO current Plan and more groundwater quality monitoring will be included in the Scott County Groundwater Plan being developed.	We will update Lead and Supporting Entities columns for Table 4.2 and change "Counties" to "Le Sueur and Rice County." This will also be changed in Table 4.1, 4.2, and 4.4.
120	Chapter 4: Implementation Schedules, Table 4.2	Scott County Watershed Management Organization	Under Priority Area, remove priority streams that are not in Le Sueur County. Scott County will not be doing an SSTS inventory.	We will remove Middle Sand Creek and Robert's Creek, in Scott County but we will be leaving all waters that overlap with Le Sueur County.
135	Chapter 5: Plan Implementation Programs, Table 5.1 Existing Incentive/Cost Share Programs	Scott County Watershed Management Organization	The program, "Well Sealing Program" is partly funded by the Scott WMO, include WMO under the program. The programs "Ag Structural BMP Cost-Share" and "Ag Nonstructural BMP Cost Share" is not a program of Scott County but rather Scott WMO and Scott SWCD	We will update Table 5.1 and mark Scott WMO for the well sealing program. Additionally, the ST will update Table 5.1 and will mark Scott WMO for Ag Structural BMP Cost-Share and Ag Nonstructural BMP Cost-share and remove Scott County for these programs.

Lower MN River East CWMP 60 Day Review Formal

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Page Number	Section	Commenter	Comment	Response
147	Chapter 5: Plan Implementation Programs, Table 5.10 Existing Regulatory Programs	Scott County Watershed Management Organization	Under programs, "Solid Waste Program", Rice County has a Solid Waste Program	We will update the table and make sure Rice County is marked as having a Solid Waste Program in table 5.10.
148	Chapter 5: Plan Implementation Programs, Shoreland Management	Scott County Watershed Management Organization	Within the planning area, Scott County also has a shoreland management ordinance under Scott County Zoning Ordinance No. 3, Chapter 70 Shoreland District.	We will add Scott County to the Shoreland Management narrative on page 148.
148	Chapter 5: Plan Implementation Programs, Wetland and Buffer Management	Scott County Watershed Management Organization	Scott County also has a buffer management ordinance under Zoning Ordinance No. 3, Chapter 6 – Stormwater Management, Erosion Control, and Wetlands, Article D. Wetland Conservation	Based on a previous comment, narrative on page 148 indicating which entities have buffer management ordinances was removed, no narrative added or changes made to address this comment.
150	Chapter 5: Plan Implementation Programs, Waste Management and Solid Waste	Scott County Watershed Management Organization	Scott County also has a waste management program and Solid Waste Ordinance No. 2.	Scott County added to waste management program narrative on page 150 as requested.
150	Chapter 5: Plan Implementation Programs, Aquatic Invasive Species	Scott County Watershed Management Organization	Scott County also has an aquatic invasive species program	Scott County added to invasive species narrative on page 150 as requested.
152	Chapter 5: Plan Implementation Programs,Public Drainage	Scott County Watershed Management Organization	Scott County also serves as the drainage authority for public drainage systems within their boundaries	We will add Scott County to the narrative: "Le Sueur County, Rice County, and Scott County serve as the drainage authority for public drainage systems within their boundaries."
145	Chapter 5: Plan Implementation Programs,Land Use Management	Scott County Watershed Management Organization	"All JPE partners have some level of regulatory authority."True but extremely limited for most of the Scott County Planning area and this should be noted for clarity.	We will update the narrative to the following: "All Partners have some level of regulatory authority; however, this varies amongst each member. There are Government Units that are not a part of the Lower Minnesota River East Partnership that have regulatory authority within the Planning Area."
147	Chapter 5: Plan Implementation Programs, Table 5.10 Existing Regulatory Programs	Scott County Watershed Management Organization	Scott County has Bluff ordinances	We will add a row for Bluff Ordinance and mark entities that have a Bluff ordinance (Scott, Le Sueur, and Rice County).
161	Chapter 6: Plan Administration and Coordination, Joint Powers Board	Scott County Watershed Management Organization	"The PC recommended the establishment of a Joint Powers Entity (JPE) named the Lower Minnesota River East Watershed Partnership (LoMRE) with the powers and authorities outlined in the Joint Powers Agreement (JPA). The JPA for the plan implementation establishes a new entity with a governing board that operates autonomously from the members. The JPA, once finalized, is legally binding and must meet the requirements of Minnesota Statue 471.59." Clarification needed. Please provide more detail regarding the JPE's proposed authorities, such as the limitation of the underlying members, and decision on taxing or levy authority.	We will add additional narrative to clarify the JPE and the JPA: "A Memorandum of Agreement (MOA) was established by the planning partners for development of the Plan (please refer to Executive Summary). Throughout the planning process, numerous discussions occurred regarding the type of administration the Partners would like to utilize to implement the Plan. The PC recommended the establishment of a Joint Powers Entity (JPE) named the Lower Minnesota River East Watershed Partnership (LoMRE) with the powers and authorities outlined in the current draft Joint Powers Agreement (JPA). The current draft JPA for the plan implementation establishes a new entity with a governing board that operates autonomously from the members. The current draft JPA details the governing structure and defines the LMREWJPB powers, terms, vacancies, officers, openings, operations, fiscal agent, committees, compliance with open meeting laws, addition of parties, agreement and contracts, insurance, property, staff, reservation of powers, funding of operations, and budgeting and funding. The current draft JPA specifically mentions that the JPB does not have the authority to: •Levy taxes •Purchase Property, Equipment, or an Easement Right •Authority to hire staff Please refer to the final JPA for specific details on legal abilities and authorities of the JPE. Individual partners may elect to purchase equipment and hire staff through their respective entities for work completed by the JPE.
163	Chapter 6: Plan Administration and Coordination, Collaboration with Other Units of Government/With Others	Scott County Watershed Management Organization	It's off to a good start, but this section needs the most work. There are already high functioning water resource management agencies in the Planning area. How will the JPE coordinate with these existing entities to avoid duplicative activities and taxation? How, in detail, will the JPE ensure its planning and implementation activities don't hinder the efforts of the existing entities, but rather support instead? How will the JPE ensure it defers to the LGU's that are required to exist for prioritization and implementation? The Plan states early on that it will focus on filling gaps, yet coordination seems to be lacking in this Plan. Consider reading the WD/WMO Plans for good examples of coordination sections.	We will update the narrative to the following: "Collaboration with Other Units of Government The LoMRE Partnership will actively seek opportunities for early coordination and collaboration with other units of government including: • Cities • Townships • Special purpose joint powers boards • Federal agencies • Shakopee Mdewakatonan Sioux Community • Lower Minnesota River Watershed District • Prior Lake-Spring Lake Watershed District • Scott Watershed Management Organization Watershed management efforts are complex, especially, for the Lower Minnesota River Watershed, there are numerous partners within this planning area and outside of this planning area that have their own existing watershed management plans, local water management plans, water supply plans, wellhead protection plans, groundwater
164	6.2	Melissa Bokman-Ermer	Second sentence, "As time goes on, work plan development with start with a review…." Replace first "with" with "will".	We will update the narrative with the suggest changes and replace first "with" with "will".

Lower MN River East CWMP

60-day Formal Review Comments and Responses

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Lower MN River East CWMP 60 Day Review Formal

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Page Number	Section	Commenter	Comment	Response
168	Chapter 6: Plan Administration and Coordination, 6.5 Funding	Scott County Watershed Management Organization	It's always good to see innovative thinking when exploring unique funding alternatives, however, this budget seems very high for a limited applicable portion of the Planning Area. The JPE does not have taxing or levy authority over most of the planning area within Scott County. Please provide additional detail to clarify the planning area where this is achievable and/or how this would be achieved. In Addition, Scott County and SWMO have communicated that there is no support for duplicative taxing or levies for water resource activities where existing entities already occur. Scott County is not interested in approving these types of additional taxes or levies.	We will add additional narrative to clarify the JPE and the JPA: "A Memorandum of Agreement (MOA) was established by the planning partners for development of the Plan (please refer to Executive Summary). Throughout the planning process, numerous discussions occurred regarding the type of administration the Partners would like to utilize to implement the Plan. The PC recommended the establishment of a Joint Powers Entity (JPE) named the Lower Minnesota River East Watershed Partnership (LoMRE) with the powers and authorities outlined in the current draft Joint Powers Agreement (JPA). The current draft JPA for the plan implementation establishes a new entity with a governing board that operates autonomously from the members. The current draft JPA details the governing structure and defines the LMREWJPB powers, terms, vacancies, officers, openings, operations, fiscal agent, committees, compliance with open meeting laws, addition of parties, agreement and contracts, insurance, property, staff, reservation of powers, funding of operations, and budgeting and funding. The current draft JPA specifically mentions that the JPB does not have the authority to: •Levy taxes •Purchase Property, Equipment, or an Easement Right •Authority to hire staff Please refer to the final JPA for specific details on legal abilities and authorities of the JPE. Individual partners may elect to purchase equipment and hire staff through their respective entities for work completed by the JPE.
173-174	Chapter 6: Plan Administration and Coordiantion, Table 6.4 Potential Grant Funding Sources	Scott County Watershed Management Organization	This is a good comprehensive list of grants. A bit of clarification is needed. Please include a column of eligible recipients for these grants as there are some grants listed the JPE is not eligible to apply for directly or receive within the Planning area.	The intent of Table 6.4 is simply to list potential grant funding sources. We understand that the JPE is not eligible to apply for all opportunities listed, however, these opportunities may apply to partners of the JPE or to individual entities within the JPE. We will not be adding an additional column to the table.
General Plan Comment		Scott County Watershed Management Organization	Final overall plan implementation comment, for any activity under the implementation schedule where Scott County or Scott SWCD may lead, Scott County Natural Resources/Scott Watershed Management Organization must approve and be involved in coordination prior to workplan approval to avoid duplication and ensure efforts are filling gaps and not duplicative of Scott County or Scott WMO Plans. This coordination can occur through the Scott SWCD and Scott County/Scott WMO staff	Scott County and WMO will have access to all of our annual progress reports we are making towards the comprehensive watershed management plan and make sure projects are not duplicative. However, the JPE does not need approval from Scott County and WMO to implement projects and practices that are funded through this WBIF funding stream. We will not be making changes as approval from Scott County and WMO is not required to implement projects with this WBIF funding source.
19	Executive Summary, QR code	Minnesota Department of Health	Link does not work.	We will update the link.
48-49	Chapter 1: Land and Water Resources Narrative, Groundwater	Minnesota Department of Health	The content around groundwater provinces is accurate, but as noted during the December 12, 2023 Advisory Committee meeting, groundwater provinces are not meant to be used at this scale as they are statewide generalizations. An alternative could be to discuss how the availability of water varies throughout the watershed. The northern portion of the watershed generally has access to bedrock aquifers while the southern portion tends to use surficial and buried sand aquifers. Karst features are present along the Minnesota River Valley and are a concern for groundwater quality issues.	We will remove existing Province narrative and bulleted list, and replace with suggested narrative: "The northern portion of the watershed generally has access to bedrock aquifers while the southern portion tends to use surficial and buried sand aquifers. Karst features are present along the Minnesota River Valley and are a concern for groundwater quality issues."
50	Chapter 1: Land and Water Resources Narrative, Groundwater	Minnesota Department of Health	While pollution sensitivity is indeed an example of information provided in a Part B county geologic atlas, this is not the (sole) source for the data shown in Figure 1.19, since Le Sueur County does not have a geologic atlas. Instead, this statewide layer comes from the Minnesota Hydrogeology Atlas Series HG-02, which "builds on the... maps and data initially published [in county geologic atlases], it updates the previous coverage, and provides new information in areas without existing atlases" (from report that can be found here: https://www.dnr.state.mn.us/waters/groundwater_section/mapping/mn-hydro-atlas.html). Ensure data used is properly cited and referred to.	We will update the narrative to the following: "Part B is produced by the DNR once Part A is complete and includes more detailed information on groundwater and hydrogeologic properties, including maps and reports on groundwater flow direction, water chemistry, and pollution sensitivity. Scott County's hydrogeologic information is provided as a supplement to Part A, instead of its own Part B (DNR, 2023). Pollution sensitivity of near surface materials for the watershed are shown in Figure 1.19, the dataset for which is from the Minnesota Hydrogeology Atlas - a collection of statewide layers that build on the maps and data initially published in county geologic atlases and provide new information in areas without existing atlases, such as Le Sueur County (CITATION)." Citation: Adams, R., 2016, Pollution sensitivity of near-surface materials: St. Paul, Minnesota Department of Natural Resources, Minnesota Hydrogeology Atlas Series HG-02, report and plate, accessible at https://www.dnr.state.mn.us/waters/groundwater_section/mapping/mn-hydro-atlas.html. • OR DNR, 2018: https://gisdata.mn.gov/dataset/geos-hydrogeology-atlas-hg02
50	Chapter 1: Land and Water Resources Narrative, Groundwater	Minnesota Department of Health	The last sentence is an incomplete description of MDA Groundwater Protection Rule. It is important to ensure this is complete both for accuracy and to provide sufficient context when discussing the Shakopee Level 2 DWSMA later in the plan. It is important to understand that not all "high" areas are restricted, even outside of their listed exceptions, because it is based on the percentage of vulnerable land in the quarter-section. Suggested change: "In their Groundwater Protection Rule, the MDA defined vulnerable groundwater areas as areas with coarse textured soils, shallow bedrock, or karst geology. The rule restricts nitrogen fertilizer application on cropland in the fall (after September 1) or on frozen soils in quarter-sections of land where 50% or more of the land is in a vulnerable groundwater area. This rule helps to protect drinking water from nitrate contamination, as nitrate from nitrogen fertilizers can move easily through soil and into groundwater in areas with vulnerable groundwater. The rule also applies to Drinking Water Supply Management Areas (DWSMAs) that have nitrate-nitrogen concentrations of 5.4 mg/L or higher, with the exception of some portions of the DWSMAs that have low vulnerability." Refer to Figure 1.18 and your reference. With this additional content, suggest changing or adding reference to https://www.mda.state.mn.us/nfr.	We update the narrative with MDH's suggested narrative change: "In their Groundwater Protection Rule, the MDA defined vulnerable groundwater areas as areas with coarse textured soils, shallow bedrock, or karst geology. The rule restricts nitrogen fertilizer application on cropland in the fall (after September 1) or on frozen soils in quarter-sections of land where 50% or more of the land is in a vulnerable groundwater area. This rule helps to protect drinking water from nitrate contamination, as nitrate from nitrogen fertilizers can move easily through soil and into groundwater in areas with vulnerable groundwater. The rule also applies to Drinking Water Supply Management Areas (DWSMAs) that have nitrate-nitrogen concentrations of 5.4 mg/L or higher, with the exception of some portions of the DWSMAs that have low vulnerability." Added in text citations as requested.
76-77	Chapter 2: Issue Prioritization, 2.2 Priority Issues and Issue Statements and Table 2.3 Issue Statements	Minnesota Department of Health	Page 76 states that groundwater became groundwater quality and groundwater knowledge, data and understanding, but table 2.3 still says groundwater quality. Change text in Table 2.3 to list final issue statement categories.	We will update Table 2.3 (Page 77) so that the Issue Statement Groundwater Knowledge, Data, and Understanding is listed in the Category Column instead of Groundwater Quantity.
86	Chapter 3: Priority Resources, Targeting, and Measurable Goals, Surface Water Hydrology Goal A	Minnesota Department of Health	While it is true that water storage projects are also known to assist with groundwater recharge, urban BMPs should take into account the aquifer sensitivity and, where an infiltration BMP is desired, a thorough analysis of the aquifer conditions and nearby drinking water sources should be completed to ensure infiltration does not introduce additional contamination. Recommend including these important considerations either here or somewhere else in the Plan. Note that the reference cited in the sidebar on page 99 includes some guidance and recommendations on this topic. MDH Source Water Protection is available available for technical assistance. This comment is also relevant for other places where infiltration or similar BMPs is said to benefit groundwater such as items in Tables 4.1 and 5.5. See additional comments for suggested changes to these tables.	We will update narrative, on page 86, For Surface Water Hydrology Goal A. The sentence: "Water storage projects are also known to assist with groundwater recharge." will be removed from this section. Narrative will be added to the introductory paragraph for 3.2 Issue Category 2: Groundwater on page 93. We will add the following narrative: "Implementation actions that promote groundwater recharge, for example water storage projects, will be preferred over similar practices that do not promote recharge. Aquifer sensitivity and potential impacts to groundwater will be reviewed and taking into consideration for infiltration practice to reduce the risk of introducing new contamination to groundwater."
93	Chapter 3: Priority Resources, Targeting, and Measurable Goals, 3.2 Issue Category: Groundwater	Minnesota Department of Health	Consider whether the goal of no net increase in groundwater well nitrate is feasible throughout the watershed. While Shakopee's nitrate levels should decrease over time, in other areas of the watershed, particularly in less developed areas, it is likely that levels will continue to rise due to the buildup of nitrates in the soil and groundwater.	We will not be updating the groundwater nitrate goal. We had numerous conversations about this goal at ST and AC meetings. We discussed that maintaining nitrates levels would be reasonable. There was additional discussion at the groundwater subcommittee meeting about this topic. We will consider amending the goal at the 5 yr amendment mark and will include in Chapter 6.
93	Chapter 3: Priority Resources, Targeting, and Measurable Goals, 3.2 Issue Category: Groundwater	Minnesota Department of Health	Text references Figure 3.5 when it appears it should reference Figure 3.4.	We will update narrative to reference Figure 3.4 instead of Figure 3.5.

Lower MN River East CWMP 60 Day Review Formal

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Page Number	Section	Commenter	Comment	Response
96	Chapter 3: Priority Resources, Targeting, and Mesaurable Goals, Groundwater Priority Areas	Minnesota Department of Health	While other areas of the Plan (ex: page 48 and 77) correctly state that groundwater is the *primary* source of drinking water for the Planning Area, this page says that 100% of residential drinking water is supplied by groundwater, which is not the case. Approximately half of the City of Savage's primary water supply is purchased from the City of Burnsville, who blends surface water and groundwater together for their finished water. Correct this statement.	We will update the narrative to state that the following: "Groundwater is a crucial resource, as residential drinking water within the Planning Area is primarily supplied from groundwater resources."
96	Chapter 3: Priority Resources, Targeting, and Mesaurable Goals, Groundwater Priority Areas	Minnesota Department of Health	The first two sentences say the same thing twice. Revisit the wording here.	We will remove the last sentence in the introductory paragraph to reduce redundancy.
96	Chapter 3: Priority Resources, Targeting, and Mesaurable Goals, Groundwater Priority Areas	Minnesota Department of Health	Contamination of high vulnerability [rating] aquifers would impact both public and private wells. Recommend changing text to "... accessed through private and public wells...".	We will change the narrative to state the following: " Contamination of the high vulnerability ranking aquifers would primarily impact drinking water accessed through public and private wells, leading to an increased need for infrastructure to provide treatment for the groundwater or to access another source of drinking water."
96	Chapter 3: Priority Resources, Targeting, and Mesaurable Goals, Groundwater Priority Areas	Minnesota Department of Health	This section remains inaccurate. Only one of the two criteria mentioned here is from the Township Testing Program. The nitrate point data that show "wells at or above the 10 mg/L standard" and "exceeding the halfway point of 5 mg/L" is not Township Testing data. This may be from the Minnesota Well Index, but please look at the data you used for Figure 3.4 and properly refer to and cite this data source. Ensure the wording of this whole section and its title are accurately describing the data you are using. Recommend previously suggested rewording: "Two datasets were used as targeting criteria related to nitrate levels in the watershed. The first was the Township Testing Program Initial Results, showing the percentage of wells in the township that met or exceeded the drinking water standard of 10 mg/L. Townships with 10% or more wells at or above 10 mg/L are priority areas for plan implementation. The only township that meets this criteria in the planning area is Ottawa Township in Le Sueur County. The second dataset used was [insert source of data]. Areas with wells at or above the 10 mg/L standard, as well as wells exceeding the halfway point of 5 mg/L, are priority areas for plan implementation. Wells with nitrate levels greater than 5 mg/L are at a higher risk of exceeding the 10 mg/L standard compared to wells with nitrate levels less than 5 mg/L."	We will update the narrative for Groundwater Priority Areas under the Township Testing Program to the following: "Two datasets were used as targeting criteria related to nitrate levels in the watershed. The first was the Township Testing Program Initial Results, showing the percentage of wells in the township that met or exceeded the drinking water standard of 10 mg/L. Townships with 10% or more wells at or above 10 mg/L are priority areas for plan implementation. The only township that meets this criteria in the planning area is Ottawa Township in Le Sueur County. The second dataset used was the County Well Index. Areas with wells at or above the 10 mg/L standard, as well as wells exceeding the halfway point of 5 mg/L, are priority areas for plan implementation. Wells with nitrate levels greater than 5 mg/L are at a higher risk of exceeding the 10 mg/L standard compared to wells with nitrate levels less than 5 mg/L."
96	Chapter 3: Priority Resources, Targeting, and Mesaurable Goals, Groundwater Priority Areas	Minnesota Department of Health	The second paragraph should be reworded to more clearly explain the context of including this information to the reader. Suggested rewording: "The Township Testing Program also produced a Final Results dataset in which some of the data points from the Intial Results dataset were removed, which lowered the number of wells in Ottawa Township to <20 wells. This is because the Final Results dataset was intended to only include private drinking water wells potentially impacted by applied commercial fertilizer. Therefore, wells with nitrate over 5 mg/L were removed if a potential non-fertilizer source or well problem was identified, there was insufficient information on the construction or condition of the well, etc. For this reason, the Intial Results are being used for targeting criteria, but this information may be useful when addressing nitrate contamination in Ottawa Township during plan implementation and determining what action to take." While this information was given during informal review to assist the partnership in implementation, this paragraph could alternatively be removed instead of rewording, but it is confusing as-is.	We will update the narrative in the second paragraph with the suggested narrative by MDH: "The Township Testing Program also produced a Final Results dataset in which some of the data points from the Initial Results dataset were removed, which lowered the number of wells in Ottawa Township to <20 wells. This is because the Final Results dataset was intended to only include private drinking water wells potentially impacted by applied commercial fertilizer. Therefore, wells with nitrate over 5 mg/L were removed if a potential non-fertilizer source or well problem was identified, there was insufficient information on the construction or condition of the well, etc. For this reason, the Initial Results are being used for targeting criteria, but this information may be useful when addressing nitrate contamination in Ottawa Township during plan implementation and determining what action to take."
96	Chapter 3: Priority Resources, Targeting, and Mesaurable Goals, Groundwater Priority Areas	Minnesota Department of Health	Either rename this section to something more encompassing of the data (like "nitrate targeting criteria") or separate these two data sources with separate headers. If doing the latter, ensure the second paragraph stays with the Township Testing information and just pull out the second criteria that is not Township Testing data (nitrate point data).	We will update the Header and replace Township Testing Program with Nitrate Targeting Criteria.
96-97	Chapter 3: Priority Resources, Targeting, and Mesaurable Goals, Groundwater Priority Areas and Figure 3.4 Groundwater Priority Areas	Minnesota Department of Health	Datasets and information shown in Figure 3.4 and discussed on page 96 are not cited within the plan or included in References. This includes DWSMAs information, Part 2 of the Groundwater Protection Rule, Township Testing Program Initial Results, and nitrate point data (as previously mentioned). The water table aquifer vulnerability information is OK as it is cited earlier in the plan.	We will update the narrative and Figure to make sure sources are cited correctly.
97	Chapter 3: Priority Resources, Targeting, and Mesaurable Goals, Figure 3.4 Groundwater Priority Areas	Minnesota Department of Health	This figure is very busy and it is difficult to see everything, especially the DWSMAs. Consider separating out the data shown in this figure into two figures so everything can be seen clearly or modifying the symbology (maybe outlining the DWSMAs would help?).	We will not change map. We feel the map is clearly showing all the priority areas.
99	Chapter 3: Priority Resources, Targeting and Measurable Goals, Sidebar-DWSMA	Minnesota Department of Health	Not sure why the definition for DWSMA is in the Habitat section - suggest relocating to a more appropriate location.	We will relocate the sidebar either on Page 93, 94, or 96.
111	Chapter 4: Implementation Schedules, Targeting	Minnesota Department of Health	The last bullet point includes the same inaccuracies as addressed in previous comments. To reflect the targeting criteria described in Chapter 3 with accurate interpretations of the data, reword this bullet point or separate into 2 bullets (recommended, in order to not conflate nitrate point data with Township Testing program data). Suggested reword: "Townships with 10% or more of wells at or above the 10 mg/L standard, as determined by the MDA Township Testing Inital Results and [or new bullet starting here] areas with wells at or above the 10 mg/L nitrate standard, as well as wells exceeding the halfway point of 5 mg/L".	We will update the bullet point list (last bullet point) and separate into two different bullet points. We will use the suggested narrative by MDH: "1. Townships with 10% or more of wells at or above the 10 mg/L standard, as determined by the MDA Township Testing Initial Results. 2. Areas with wells at or above the 10 mg/L nitrate standard, as well as wells exceeding the halfway point of 5 mg/L."

Lower MN River East CWMP

60-day Formal Review Comments and Responses

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Lower MN River East CWMP 60 Day Review Formal

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111	Chapter 4: Implementation Schedules, Targeting	Minnesota Department of Health	Text references Figure 3.5 when it appears it should reference Figure 3.4.	We will updated the narrative and reference Figure 3.4 instead of Figure 3.5.
111	Chapter 4: Implementation Schedules, Targeting	Minnesota Department of Health	Consider adding a note that well sealing efforts will be watershed wide.	Well sealings are marked as watershed-wide efforts in Table 4.1. We will not be adding a note about well sealing efforts being watershed-wide.
116-129	Chapter 4: Implementation Schedules	Minnesota Department of Health	Groundwater knowledge Goal C - Arsenic is not included in the implementation table. Add in this goal and indicate which strategies will support this goal (looks like these would be DSM.1, DSM.2, maybe DSM.3, and OE.1).	The Groundwater Knowledge, Data, and Understanding Goal C-Arsenic Campaign will be added to Table 4.1, Table 4.2, Table 4.3, and Table 4.4 (pages 116-128). Additionally Strategies DSM.1, DSM.2, and OE.1 will be marked with achieving this goal.
116-129	Chapter 4: Implementation Schedules	Minnesota Department of Health	As an overall comment for the implementation table, ensure that listing groundwater priority areas as a priority area for a strategy matches up with markers in the groundwater column(s) throughout.	We will make sure all groundwater priority areas listed for each strategy have a corresponding goal(s) for groundwater being accounted for.
117	Chapter 4: Implementation Schedules, Table 4.1	Minnesota Department of Health	For BMP.2, if the priority area for Agricultral BMPs is going to include groundwater priority areas, indicate which groundwater goal(s) are being supported through this work.	We will update the BMP the implementation schedule to mark that both groundwater quality goals are being met.
117	Chapter 4: Implementation Schedules, Table 4.1	Minnesota Department of Health	Suggest removing groundwater priority areas from the priority area for strategy BMP.3 - Urban BMPs. As explained in a comment above, while these types of BMPs benefit groundwater quantitiy, they do not typically benefit groundwater quality and actually can create or exacerbate water quality concerns, particularly in vulnerable areas.	We will remove groundwater priority areas from the priority area for BMP.3.
117	Chapter 4: Implementation Schedules, Table 4.1	Minnesota Department of Health	Suggest removing groundwater priority areas from the priority area for strategy BMP.4 - Storage. Examples of water storage projects listed earlier in the plan included things like infiltration and as explained in comments above, while these types of BMPs benefit groundwater quantitiy, they do not typically benefit groundwater quality and actually can create or exacerbate water quality concerns, particularly in vulnerable areas.	We will remove groundwater priority areas from the priority area for BMP.4 activity and under groundwater goals.
127	Chapter 4: Implementation Schedules, Table 4.3	Minnesota Department of Health	Consider acknowledging the potential impacts to groundwater quality of stormwater BMPs by indicating GW Protection-Source Contamination as a supported goal with strategy PR.4	We will update Table 4.3 Policy and Regulation Implementation Schedule and mark Groundwater Protection-Source Contamination for PR.4
128-129, 141	Chapter 4: Implementation Schedules, Table 4.4 and Chapter 5: Plan Implementation Programs, Table 5.5: Education and Outreach Campaign Topics	Minnesota Department of Health	Developing and implementing a groundwater contamination and management education and outreach campaign and an arsenic awareness and exposure prevention campaign are identified as specific 10-year goals of the plan, but they are not called out specifically in either Table 4.4 or 5.5. While outreach and education will be important for each issue and set of goals, since these are specific goals of the plan, they should be emphasized in some way. At minimum, these two topics and goals should be listed in Table 5.5 and ideally given a High priority level.	We will add both of the requested campaign topics to table 5.5, listing both as high priority with Groundwater Knowledge, Data, and Understanding as the associated goal.
141	Chapter 5: Plan Implementation Programs, Table 5.5: Education and Outreach Campaign Topics	Minnesota Department of Health	For Infiltration BMPs, remove Groundwater Quality - Groundwater Protection as an associated goal. As noted in above comments, while infiltration BMPs can be beneficial for groundwater recharge/groundwater *quantity* , they do not typically benefit groundwater quality and actually can create or exacerbate water quality concerns.	We will update Table 5.5 and remove groundwater quality goal for infiltration bmps.
155	Chapter 5: Plan Implementation Programs, Table 5.11: Current Monitoring	Minnesota Department of Health	Typo in the first item under groundwater - change one instance of "quality" to "quantity".	We will fix the type to change one instance of quality to quantity.
173	Chapter 6: Plan Administration and Coordiantion, Table 6.4 Potential Grant Funding Sources	Minnesota Department of Health	While the partnership has expressed that there are some existing relationships with public water suppliers who have applied for these grant funds and they could provide opportunities for muncipalities to partner with other LGUs to increase capacity and resources, please note that only public water suppliers are eligible for Source Water Protection Grants. An additional MDH grant that the partnership may be interested in is the Groundwater Protection Initiative Accelarated Implementation Grant. No action is required, but could add the additional grant to the table to keep this funding source in mind.	Add the Groundwater Protection Initiative Accelerated Implementation Grant to Table 6.4. This is a grant provided by MDH to provide financial assistance. The grant would assist with Monitoring, Data, Acquisition, and Studies and Education & Outreach. We will update Table 6.4 to include these grants. Additionally we will update Table 6.4 and add an asterisk and footnote to indicate which grants would not be eligible for JPE members, but may be eligible for other partners or landowners within the watershed. (Source Water Protection Grants, Stream Gaging Network, State Revolving Fund, Sustainable Forest Incentive Act, Forest Stewardship Program).
173	Chapter 6: Plan Administration and Coordiantion, Table 6.4 Potential Grant Funding Sources	Minnesota Department of Health	Note that MDH only monitors for nitrate in public water supply wells. MDA and/or MPCA may have a more useful monitoring program for the partnership.	MPCA monitoring efforts are included. MDA does not offer cost share programs for monitoring efforts. Does not appear that MDA has any funding available for monitoring efforts. We will not make any amendments to Table 6.4.
177-179	Chapter 7: References	Minnesota Department of Health	Broken, incomplete, or incorrect links: MDA (2022), MDH (September 2021), DNR (2023), DNR (2021) [groundwater provinces], MPCA (2021).	We will update links and make sure are working correctly.
E15	Appendix E: Detailed Implementation Tables	Minnesota Department of Health	This priority area does not match the implementation table in Chapter 4. If refining from watershed wide, outreach and education should not be targeted in priority groundwater areas. As the text that has been added to page 93 states, unsealed wells are a particular concern when the well is in an area of *low* vulnerability and when the well is constructed in a confined aquifer, which would otherwise be protected from surface contamination. Good areas to target could be areas with "low" pollution sensitivity of near surface materials and sections where the primary aquifer used is an aquifer other than surficial sand and gravel (these aren't always confined, but a good starting point). Targeting could also take place in areas of higher private well density as noted in MDH's initial comment letter. These three datasets are available through the watershed health assessment framework (https://gisdata.mn.gov/dataset/whaf).	We discussed this in length at multiple meetings and we feel that watershed wide targeting for well sealing is important in protecting groundwater resources. We will not be making any changes to the narrative for Groundwater Quality Goal B or in Appendix E. We will update t Appendix E on page E15, seal unused wells activity under the priority areas to the following: "Outreach and Education will target areas that are at the highest risk of contamination to drinking water."

Lower MN River East CWMP

60-day Formal Review Comments and Responses

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Lower MN River East CWMP 60 Day Review Formal

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19	Executive Summary, 0.8 Priority Issue Statements and Measurable Goals	Minnesota River Collaborative	Will the goals associated with these categories be met with this 1W1P? The lack of detail in the implementation approach does not give confidence they will be met any time soon.	The goals developed through the planning process are intended to challenge the partners to increase implementation efforts while still being reasonable to achieve within the 10-year time frame. Numerous factors contribute to the success of the partners in achieving their goals, including but not limited to: landowner willingness to implement, funding, new data and information, and staff capacity. Goals will be reviewed and adjusted as needed during the 5-year plan review period. We will not be making any changes to the measurable goals at this time.
19	Executive Summary, 0.8 Priority Issue Statements and Measurable Goals	Minnesota River Collaborative	Missing information. The BWSR Water Erosion Pollution Reduction Estimator was used for bank erosion BMPs and a custom tool (Widget) was used for the remaining BMPs. Add this information here and explain Widget in Appendix F23.	We will update the narrative in Chapter 4 Implementation Schedules in the Modeling Approach and Implementation Schedule section and in Appendix F. Additional narrative will be added to the Modeling Approach section about the BWSR Water Erosion Pollution Reduction Estimator and how the tool was used to create reductions for the near and in channel projects.
19	Executive Summary, 0.8 Priority Issue Statements and Measurable Goals	Minnesota River Collaborative	The HSPF model is good for evaluating surface water quality while the BWSR model is good for streambank erosion. What about groundwater and habitat? What approach was used for those statement categories?	We will add in additional narrative to Chapter 4 to the following: "We didn't utilize any models to determine groundwater and habitat goals. Currently there is a lack of groundwater knowledge and data within the planning area to fully identify risk and sensitivity of groundwater and drinking water resources. Additionally, a more robust effort of water testing data and monitoring is needed in order to address these gaps. Habitat goals were determined off of existing efforts, programs, and best professional judgement. Habitat areas were also chosen due to the existing habitat corridors".
20	Executive Summary, Table 0.1-0.7	Minnesota River Collaborative	Tables need references to quantitative goals and costs, either referring to other parts of the plan, or referring to external documents.	Added a note on page 19 under the Goals section that implementation actions for achieving the goals are located in Tables 4.1-4.4.
20	Executive Summary, Table 0.1 Surface Water Quality	Minnesota River Collaborative	There is no mention of excessive nutrients in the streams. This sub-watershed of the Minnesota River is a major contributor to excessive nutrients to the Mississippi and the hypoxic "dead zone" in the gulf and the table should have the overall State nutrient reduction goals in the table.	Our primary focus for pollutant reductions in streams is sediment. However, we will still include reductions in excessive nutrients when reporting measurable goals and progress to BWSR. Refer to Appendix E. We will not be including any TP or TN reductions as part of the goals for streams and their subwatersheds however any TP and TN reductions will still be reported.
20	Executive Summary, Table 0.2 Surface Water Hydrology	Minnesota River Collaborative	Reduce annual runoff by 0.09-inches through implementation of 3,165 acre-feet of storage in priority stream subwatersheds in an attempt to stabilize streams through reduced peak flowrates." Is this surface runoff or total streamflow? Please clarify.	We will update Surface Water Hydrology Goal A to state: "Reduce annual surface runoff by 0.09-inches through implementation of 3,165 acre-feet of storage in priority stream subwatersheds in an attempt to stabilize streams through reduced peak flowrates". This will be updated throughout the entire plan for Goal A.
20	Executive Summary, Table 0.2 Surface	Minnesota River Collaborative	Reduce annual runoff by 0.09-inches through implementation of 3,165 acre-feet of storage in priority stream subwatersheds in an attempt to stabilize streams through reduced peak flowrates." target total flow reduction of	We will update the narrative in Chapter 4 Implementation Schedules in the Modeling Approach and Implementation Schedule section. Additional narrative will be added to the Modeling Approach section about the BWSR Water Erosion Pollution Reduction Estimator and how the tool was used to create
20	Executive Summary, Table 0.2 Surface Water Hydrology	Minnesota River Collaborative	Reduce annual runoff by 0.09-inches through implementation of 3,165 acre-feet of storage in priority stream subwatersheds in an attempt to stabilize streams through reduced peak flowrates." There is no target for baseflow reduction. Baseflow in the entire Minnesota River near Jordan MN has also increased similarly over the same period. Since baseflow is ~70% of the flow in the Minnesota River, a target reduction of baseflow of 0.7" would be meaningful.	The Partners agree that addressing baseflow concerns is important, however this was not identified as a priority issue for the partnership during issue prioritization and therefore was not selected as focus for the 10-year plan. The partnership opted to focus on annual volume and peak flow reductions. This is consistent with other local planning efforts. The goals are simple enough for the partners to easily track progress towards the goal through models as well as measure progress through monitoring efforts completed through the watershed.
20	Executive Summary, Table 0.2 Surface Water Hydrology	Minnesota River Collaborative	No goal related to channel forming flows. Both increased flows and duration are aggravating streambank erosion. Need a goal for reducing the frequency and duration of channel forming flows as discussed in the Minnesota River TSS TMDL.	The Partners agree that channel forming flows are important, however, this was not identified as a priority issue for the partnership during issue prioritization and therefore was not selected as focus for the 10-year plan. The partnership opted to focus on annual volume, peak flow reductions, and sediment reductions. This is consistent with other local planning efforts. The goals are simple enough for the partners to easily track progress towards the goal through models as well as measure progress through monitoring efforts completed through the watershed.
20	Executive Summary, Table 0.3 Groundwater Quality	Minnesota River Collaborative	"Reduce nitrate inputs to achieve a no net increase in groundwater well nitrate concentrations or trends in priority." The target should be 10 mg/L NO3 as required by the National Groundwater Rule. How does this plan even begin to address this human health issue?	Testing clinics, SSTS upgrades, and overall improvements to water quality through implementation actions presented in Tables 4.1-4.4 will all work towards addressing human health concerns. No change made to plan content.
41	Chapter 1: Land and Water Resources Narrative, Water Quality	Minnesota River Collaborative	"In total, there are 96 impairments listed from 28 streams and 19 lakes." How many of these impairments will be removed by this plan and by when?	The process of delisting water resources takes a considerable amount of time and resources. Many streams and lakes within the planning boundary are extremely impaired and will take decades before we see any improvements. For the restoration lakes that are close to meeting water quality standards, there is a potential of delisting those resources. At this point in time, the partnership does not have a timeline on when this will occur. If this does occur within the lifespan of the 10 year plan, the plan will be updated during the 5 year amendment mark. We will not be making any changes to include water resources and goals for delisting.
48	Chapter 1: Land and Water Resources Narrative, Water Quality, Aquatic Life impairements	Minnesota River Collaborative	Table 1.4 lists identified stressors for the 28 reaches with aquatic life impairments.How many of these impairments will be removed by this plan and by when?	The process of delisting water resources takes a considerable amount of time and resources. At this point in time, the partnership does not have a timeline on when this will occur. If this does occur within the lifespan of the 10 year plan, the plan will be updated during the 5 year amendment mark. We will not be making any changes to include water resources and goals for delisting.
48	Chapter 1: Land and Water Resources Narrative, Groundwater	Minnesota River Collaborative	"Groundwater is the primary source of drinking water for the Planning Area." Needs a map of nitrates showing areas > 10 mg/L nitrates	We provided a map with nitrate concentrations (Figure 3.4). We will not be adding an additional priority map to show >10mg/L for nitrates.
55	Chapter 1: Land and Water Resources Narrative, Topography, Soils, and Geology	Minnesota River Collaborative	Map legend is poor. Needs more distinctive blue and green colors.	Due to limited color in GIS and number of soil classifications we will not be updating the map. We recommend using Web Soil Survey to review specific areas where you would like to see further distinction.
56	Chapter 1: Land and Water Resources Narrative, Climate	Minnesota River Collaborative	No discussion of temperature increases and the resultant increase in evapotranspiration, which can have a large effect on the overall watershed water budget and total flow.	The Climate section in Chapter 1 does reference temperature increases across the watershed. We do not feel it is necessary to add additional narrative about evapotranspiration. The increase and temperature and precipitation in Chapter 1 is sufficient in telling the story of a changing climate and we are trying to keep this section brief. We will not be updating the narrative.
65	Chapter 2: Issue Prioritization	Minnesota River Collaborative	There is no mention of loads in this chapter at all. Loads are typically key considerations in watershed planning in the characterization, solutions, and implementation components. This section needs to make present loading information available even if it is a repeat of prior reports.	Table 2.3 lists the relevance of the issue statement to the planning area. Impairments are listed as part of the relevance. The term loading is not used, but impairments implies there is pollutant loading occurring. We will not be making changes to the narrative in this section as impairments clearly defines there is a resource concern and issue.
82	Chapter 3: Priority Resources, Targeting, and Measurable Goals, 3.1 Issue Category: Surface Water	Minnesota River Collaborative	See previous comments in the Goals section. They are also relevant in this section.	Our primary focus for pollutant reductions in streams is sediment. However, we will still include reductions in excessive nutrients when reporting measurable goals and progress to BWSR. Refer to Appendix E. We will not be including any TP or TN reductions as part of the goals for streams and their subwatersheds.
82	Chapter 3: Priority Resources, Targeting, and Measurable Goals, 3.1 Issue Category: Surface Water	Minnesota River Collaborative	All reductions should be expressed as a percentage of the total watershed loads. Reductions should be in the 50% range to have a meaningful impact.	We will not be including the reductions as a percentage because there are many existing efforts within the planning area and outside the planning area to address pollutants and stressors that are not being accounted for in this plan. Including a percentage of progress towards the overall goal is not representative of progress towards the entire Lower Minnesota River Watershed. We will not be updating and including percentage of progress towards overall goal.
111	Chapter 4: Implementation Schedules, Cost Estimates	Minnesota River Collaborative	Does "technical assistance" mean design. If so, the 20% charge for technical assistance seems low. It should be 25-35%.	Technical assistance can mean design, engineer work, consultant work, or staff time. Technical assistance costs were determined where there was a balanced approach to implement projects and practices and as well as cover costs for staff to implement the plan. Limited WBIF funds right now. May increase TA if additional funds come in. We will not adjust TA cost estimate as we have had numerous conversations about what this amount should be in order to implement efforts and we took an average of TA costs.
116-119	Chapter 4: Implementation Schedules	Minnesota River Collaborative	For quantifiable BMPs, this table should include a column for percent of total problem addressed after 10 years. That way the BMP effectiveness can be evaluated against the total 10-year cost.	We will not be including the reductions as a percentage because there are many existing efforts within the planning area and outside the planning area to address pollutants and stressors that are not being accounted for in this plan. Including a percentage of progress towards the overall goal is not representative of progress towards the entire Lower Minnesota River Watershed. We will not be updating and including percentage of progress towards overall goal.

Lower MN River East CWMP

60-day Formal Review Comments and Responses

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Lower MN River East CWMP 60 Day Review Formal

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116-119	Chapter 4: Implementation Schedules	Minnesota River Collaborative	There is no evidence that a drainage system would improve water quality. Review of planned drainage systems typically excludes any water quality analysis. So the drainage systems cannot claim a benefit if there is no water quality review of the design.	The watershed has numerous ditch systems. We have had experience working on ditch systems and implementing projects and practices that reduce pollutants and provide storage benefits. There is additional narrative in the plan that explains this. We will not be updating the implementation schedule section since we know that there are existing practices on ditch systems that can improve and benefit water quality.
135	Chapter 5: Plan Implementation Programs,	Minnesota River Collaborative	Include Federal Funding sources for agricultural conservation practices. The United States Department of Agriculture (USDA) via the Natural Resources Conservation Service (NRCS) and Farm Service Agency (FSA) have the Agricultural Conservation Easement Program, Conservation Reserve Program, Conservation Stewardship Program, Environmental Quality Incentives Program, and the Regional Conservation Partnership Program (RCPP). The United States Department of Environmental Protection (US EPA) sponsors the Wetland Program Development Grant program. There might be more.	Table 5.1 is for existing programs that partners have. The Agricultural Conservation Easement program would fall under federal easements. We will add a program line item for NRCS/FSA programs (CRP, CSP, EQIP, and RCPP), and mark all SWCDs.
138	Chapter 5: Plan Implementation Programs, , 5.3 Operation and Maintenance Plans	Minnesota River Collaborative	"Inspections should be conducted on a regular basis and after significant weather events throughout the life of the practice to confirm that the O&M plan is being followed and that the practice is still performing as designed" Need a plan to ensure this happens. Maybe hold back full payment capital funding until maintenance is done?	Inspections and operation and maintenance are typically requirements when signing up for cost-share. Cost-share contracts explicitly state these requirements and penalties if they are not followed. Additionally, operation and maintenance plans are developed for most cost-share projects and practices and are implemented by staff. This information is already listed within 5.3 Operation and Maintenance. We will not be updating/making changes to this section.
144	Chapter 5: Plan Implementation Programs, Monitoring Program, 5.4 Outreach and Education Program Framework	Minnesota River Collaborative	Why is this campaign #1. On a watershed scale, it is low impact/concern. Put surface and groundwater issues like sediments and nutrients first.	The campaigns listed are just examples and are not chronologically in order for importance of the issue. We will update the narrative and add a sentence at the end of the paragraph: "These examples are not intended to dictate or restrict program development based on assessed needs. Additionally, the campaigns listed are examples are not listed in order of importance or preference."
153	Chapter 5: Plan Implementation Programs, Monitoring Program	Minnesota River Collaborative	There needs to be a monitoring station at the outlet of the watershed design to track how well the watershed is doing. Target monitoring would include instantaneous flow, and two-weekly (max) flow-weighted composites of nutrients and sediment. This is the realistic only way to see how the watershed is doing over time compared to the proposed Plan.	The MPCA does have river/stream sites that are located near the outlet of the 8-HUC watershed scale; Lower Minnesota River Watershed. Other entities within the watershed have monitoring programs as well. Data from these monitoring efforts, in addition to modeled reductions from implemented BMPs, will be used to track progress towards meeting plan goals. No change made to plan content.
161	Chapter 6: Plan Administration and Coordination	Minnesota River Collaborative	"the establishment of a Joint Powers Entity (JPE) named the Lower Minnesota River East Watershed Partnership (LoMRE) with the powers and authorities outlined in the Joint Powers Agreement (JPA)." The JPE should have some regulatory teeth for enhance compliance with the Plan goals of the 10-year planning horizon.	Please refer to Chapter 6, Section 6.2 Workplan Development (page 166), the narrative references that the partnership will hold their selves accountable to make sure we are making progress towards our goals. Additionally, it mentioned some of the tools and resources we will use to do this. The JPA does not have an regulatory authority over other partners. Regulatory programs are discussed in Chapter 6. We will not be updating narrative in the plan, as it is already included in Chapter 6.
168	Chapter 6: Plan Administration and Coordination, Table 6.1	Minnesota River Collaborative	What's the source of funding for "Other"?	A brief list of other potential funding sources was added to table 6.1. Additional detail regarding other funding sources can be found on Page 172 of the plan (Other Funding Sources heading).
177	Chapter 7: References	Minnesota River Collaborative	The last two references are not alphabetical.	We will update references so they are in alphabetical order.
C3	Appendix C: Data Aggregation Summary	Minnesota River Collaborative	Some formatting issues - overlaid text	We will update Appendix C to fix overlaid text.
E3	Appendix E: Detailed Implementation Tables	Minnesota River Collaborative	Include measurable benefit column	We will not be including a measurable benefit column. We have included measurable outputs in Appendix E.
E3	Appendix E: Detailed Implementation Tables	Minnesota River Collaborative	Some formatting issues – missing outlines	We will update the formatting issues and fix the missing outlines.
F3	Appendix F: Modeling	Minnesota River Collaborative	This brief appendix needs a lot more explanation because the whole planning process depends on the approach and assumptions here. This entire topic needs to be expanded about 2-3x.	We will update the narrative in Chapter 4 Implementation Schedules in the Modeling Approach and Implementation Schedule section and in Appendix F. Additional narrative will be added to the Modeling Approach section about the BWSR Water Erosion Pollution Reduction Estimator and how the tool was used to create reductions for the near and in channel projects.
F4	Appendix F: Modeling	Minnesota River Collaborative	"BMPs were placed in subwatersheds that overlap with priority areas for each practice. The BMPs were placed into each subwatershed equally based on the suitable acres within each subwatershed. Further refinement on priority placement of BMPs at field scale will be completed during work planning and can utilize other tools to further prioritization such as PTMApp, ACPF, and HSPF-SAM subwatershed loading rates." How did you determine the suitable acres? Was it a desktop analysis like ACPF? Is a subsequent field assessment needed to verify there is enough suitable area available to do the planned BMPs?	We will update the narrative in Chapter 4 Implementation Schedules in the Modeling Approach and Implementation Schedule section and in Appendix F. Additional narrative will be added to the Modeling Approach section about the BWSR Water Erosion Pollution Reduction Estimator and how the tool was used to create reductions for the near and in channel projects.
F4	Appendix F: Modeling	Minnesota River Collaborative	Give a direct link the BMP Database not a general link to the SAM page.	The database is included in Appendix F (Figure 3). It has been updated to the database for HSPF-SAM V2.
F5	Appendix F: Modeling	Minnesota River Collaborative	"HSPF – SAM does not model near channel erosion (ravine, bank, or bluff). The BWSR Water Erosion Pollution Reduction Estimator was used to quantify reduction numbers for near channel and in-channel projects such as ravine stabilization and stream restoration." This is a very important point, and it is glossed over in the Plan. Most of the soil erosion in the Minnesota River is from channel erosion. So flow increases, especially that affecting the frequency and duration of channel forming flows are crucial for targeting sediment reductions in the Plan. For example, see comment on p20 (Table 0.2 Surface Water Hydrology).	We will update the narrative in Chapter 4 Implementation Schedules in the Modeling Approach and Implementation Schedule section and in Appendix F. Additional narrative will be added to the Modeling Approach section about the BWSR Water Erosion Pollution Reduction Estimator and how the tool was used to create reductions for the near and in channel projects.
F5	Appendix F: Modeling	Minnesota River Collaborative	"HSPF – SAM does not model near channel erosion (ravine, bank, or bluff). The BWSR Water Erosion Pollution Reduction Estimator was used to quantify reduction numbers for near channel and in-channel projects such as ravine stabilization and stream restoration." A more detailed explanation of the BWSR Water Erosion Pollution Reduction Estimator is needed to show how it was used use to determine stream restoration BMP reductions in the Plan.	We will update the narrative in Chapter 4 Implementation Schedules in the Modeling Approach and Implementation Schedule section and in Appendix F. Additional narrative will be added to the Modeling Approach section about the BWSR Water Erosion Pollution Reduction Estimator and how the tool was used to create reductions for the near and in channel projects.
F6	Appendix F: Modeling	Minnesota River Collaborative	Ambiguous reference to a Widget. What's a Widget and what does it do?	We will update Appendix F to clarify what a widget means.
F7	Appendix F: Modeling	Minnesota River Collaborative	How did you assign drainage to practice area ratios? Was that based on literature values or just BPJ?	There are default values that are assigned in HSPF - SAM based on literature review. This was reviewed during AC meeting and partners provided feedback on adjustments to better reflect work completed in the region and by partners to reflect scale of project they would anticipate. The treated acres assumptions are included in the modeling appendix.
General Plan Comment		Friends of the Minnesota Valley	The plan fails to meet its legislative requirements. Minnesota Statute 103B.801 lays out the purposes of the comprehensive watershed management plan program (One Watershed One Plan). Each of the legislatively mandated purposes of the Lower Minnesota River East Plan are listed below, with a short explanation why the plan fails to meet, or only partially meets, the criteria.	BWSR has stated that our plan is meeting plan content requirements. We do not need to make any changes to address this comment.

Lower MN River East CWMP 60 Day Review Formal

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General Plan Comment		Friends of the Minnesota Valley	103B.801, subd.2 (1): "Align local water planning purposes and procedures under this chapter and chapters 103C and 103D on watershed boundaries to create a systematic, watershed-wide, science-based approach to watershed management." For planning purposes, the Lower Minnesota River Watershed was divided into two planning units Lower Minnesota West and Lower Minnesota East. In itself, this abrogates the concept of a One Watershed One Plan. While it can be argued, for political or funding purposes, this approach may be reasonable as long as the plans' implementation structures, priorities, and programs are coordinated and complementary. However, neither of the plans addresses coordination with each other or, for that matter, with other plan in the Minnesota River watershed, in any reasonable level of specificity. Even if this was acceptable, the Lower Minnesota River East Plan also omits the parts of the watershed in Carver County, Hennepin County, and Dakota County. It is simply not possible to manage the Minnesota River watershed by considering only a small part of its drainage area.	BWSR has stated that our plan is meeting plan content requirements. Throughout the entire planning process we have involved local and state government units within the planning area. We are adding additional narrative in the executive summary that will further describe these conversations. Additionally, we have included information and additional narrative in Chapter 6 in how we will work with Other Units of Government and Other Entities to build off of existing efforts that are being implemented within the watershed. We do not need to make any changes to address this comment.
General Plan Comment		Friends of the Minnesota Valley	103B.801, subd.2 (1): "Align local water planning purposes and procedures under this chapter and chapters 103C and 103D on watershed boundaries to create a systematic, watershed-wide, science-based approach to watershed management. " Furthermore, the plan falsely states in its Executive Summary that it "was developed by, and will be implemented by, local government units across the Watershed, as well as their partners from state and federal agencies, non-profits, citizens, and other stakeholders." This is untrue. First off, plan developers were unwilling or unable to engage cities, or townships in the planning process, the Lower Minnesota River and Prior Lake Watershed Districts have not yet agreed to participate in the plan's implementation, and it is unclear what will be done to compel cities, townships, or watershed districts, Native nations, federal agencies, non-profits, and others to implement the plan.	BWSR has stated that our plan is meeting plan content requirements. Municipalities, Tribal Nations, and Watershed Districts/Management Organizations were invited to participate in the planning process through participation in the planning committees or in subcommittee meetings that were held on specific topics. Subcommittee meetings were held for the sole purpose of gathering input from municipalities. The language in the executive summary has been updated to state that the Plan will be implemented by local government units who choose to adopt the plan as part of their watershed management efforts. Other local government units may opt not to adopt this Plan, but the Partnership remains open to opportunities to partner with those entities and work together toward shared goals and the betterment of the watershed's resources.
General Plan Comment		Friends of the Minnesota Valley	103B.801, subd.2 (2): Acknowledge and build off existing local government structure, water plan services, and local capacity:The plan does not provide sufficient detail to evaluate how it will build off "existing local government structure, water plan services, and local capacity." For example, most large cities have water resource management plans, open space plans, parks plans, and have the ability to use their zoning and regulatory framework to implement their plans. It is unclear to what extent these plans were used in the development of the Lower Minnesota River Watershed East Plan or the specifics of how their authorities will be used to implement the Plan. It is also unclear how the Plan will build off USFWS plans and programs in the planning area.	BWSR has stated that our plan is meeting plan content requirements. We have included information and additional narrative in Chapter 6 in how we will work with Other Units of Government and Other Entities to build off of existing efforts that are being implemented within the watershed. We do not need to make any changes to address this comment.
General Plan Comment		Friends of the Minnesota Valley	103B.801, subd.2 (2): Acknowledge and build off existing local government structure, water plan services, and local capacity. While the term "local capacity" is vague, it generally relates to local authorities, funding, and staffing. While the Plan does say additional staff will be needed, it does not say what the ongoing costs will be to local taxing authorities (counties, cities, watershed districts, townships). It is unlikely the state will pay 100% of the cost of hiring and retaining additional staff (cost of an employees can easily exceed 1.5 of their base rate).	BWSR has stated that our plan is meeting plan content requirements. We address in the Executive Summary and Chapter 6 about costs to implement the plan. We do mention additional staff are needed in order to help implement the plan, but the JPB does not have the authority to hire staff and that will be up to each local entity. We have set aside funds to assist with technical assistance, education/outreach, and administrative costs. We do not need to make any changes to address this comment.
General Plan Comment		Friends of the Minnesota Valley	103B.801, subd.2 (2): Acknowledge and build off existing local government structure, water plan services, and local capacity. Scott County, the Lower Minnesota Watershed District, and larger cities in the planning area have approved water management plans. It is unclear how these plans will be incorporated in the Lower Minnesota River East Plan's priorities, programs, and implementation strategy. If they are not included in their entirety, the Plan needs to specify what elements and costs are included.	BWSR has stated that our plan is meeting plan content requirements. We have included information and additional narrative in Chapter 6 in how we will work with Other Units of Government and Other Entities to build off of existing efforts that are being implemented within the watershed. We do not need to make any changes to address this comment.
General Plan Comment		Friends of the Minnesota Valley	103B.801, subd.2 (3): Incorporate and make use of data and information, including watershed restoration and protection strategies under section 114D.26, which may serve to fulfill all or some of the requirements under chapter 114D. While the Plan may meet the minimum requirement of the statute, the planning process was not very robust. Only 78 people attended the in-person and virtual planning meetings. Of these, it is unclear how many were agency and planning staff. With a population of over 175,000 in the planning area, this is not a statically valid sample size. With today's technology, it is disappointing how little effort was put into soliciting input from residents, property owners, organizations, and others in the watershed. There are many neighborhood Facebook and discussion sites, city websites, non-profit organization websites, planning software, and other opportunities that should have been used to get meaningful feedback for the Plan. As it is, it is reasonable for anyone to feel marginalized from the planning process.	BWSR has stated that our plan is meeting plan content requirements. We have included numerous opportunities for the public as well as local, state, and federal agency staff to provide comments and feedback on plan goals, priorities, and implementation activities. The partnership posted on our local websites and local newspapers about the public kickoff meeting. Additionally, we have a stakeholder list that included about 100 individuals who represent local, state, and federal government agencies, nonprofits, coops, businesses, environmental groups, lake associations, and so forth. These individuals were invited to the public kickoff meeting. If they could not attend the meeting in person, there was the option for them to participate in a virtual open house. We do not need to make any changes to address this comment.
General Plan Comment		Friends of the Minnesota Valley	103B.801, subd.2 (3): Incorporate and make use of data and information, including watershed restoration and protection strategies under section 114D.26, which may serve to fulfill all or some of the requirements under chapter 114D. The Plan states the planning process "involved the review of all existing water and natural resource plans, studies, and related documents within the Planning Area and compiling priorities and key takeaways from each document." It is unclear how accurate this statement is – it is highly unlikely "all" of the existing data was reviewed. The Minnesota River Data Center contains thousands of documents, some dating back over 100 years, that could provide meaningful insight into past planning and watershed management efforts, community concerns and desires, as well as important provide historical, scientific, and land use issues. Of the thousands of document available, the Plan references 39 of them, most of which are state agency publications dating from 2019-2022. No local water plans, city watershed management plans, county and city land use plans, etc. are listed in the references. It is also difficult to determine what information was used from these documents since the plan is not footnoted.	BWSR has stated that our plan is meeting plan content requirements. The language in the executive summary has been changed from "all" to "numerous existing water and natural resource plans.... ".
20	Executive Summary, Table 0.1 Surface	Friends of the Minnesota Valley	Goals will have little positive effect on the Minnesota River. Surface Water Quality, Goal A under Sediment/Erosion is to "Reduce upland and near channel erosion contributing sediment to priority streams by 1,885 tons per year." The Plan	We will update the narrative in Chapter 4 Implementation Schedules in the Modeling Approach and Implementation Schedule section. Additional narrative will be added to the Modeling Approach section about the BWSR Water Erosion Pollution Reduction Estimator and how the tool was used to create
20	Executive Summary, Table 0.1 Surface Water Quality	Friends of the Minnesota Valley	Goals will have little positive effect on the Minnesota River. Surface Water Quality, Goal B under Nutrients in Impaired Lakes is to "Reduce total phosphorus (TP) loading to priority impaired lakes by 87 pounds per year." The Minnesota Storm water manual estimates phosphorous runoff from farmland is between 1.8-3.4 lb/ac/year. A goal of 87 lbs per is extremely low and will likely be met as ag-land to be converted to residential land. According to the US Census, in 2022 there were 624 farms in Scott County. That would mean each farmer would only be asked to reduce phosphorus load by .15/lb for their entire farm. Phosphorous fertilizer costs about $2.50/lb, so the goal is only keeping $218.75 worth of fertilizer out of the watershed. The phosphorous removal goal needs to be significantly increased.	All of the TP reductions were developed using HSPF SAM Model. Many of the priority lakes that are listed in Table 3.2 are nearly barely impaired and only need small reductions to meet water quality standards. Scott County has done a lot of work to get these lakes to this point. Additionally, there are four lakes that are meeting water quality standards and are considered protection lakes. Clear Lake and Cody/Phelps/Lemay chain of lakes need significant reductions in total phosphorus loads; however, there is limited staff capacity and landowner willingness to increase load reductions at this time. In Chapter 4 we will be including additional information about why goals were altered: "Total Phosphorous Pollutant Modifications for Priority Lakes and Lakesheds. Specifically, Cody, Phelps, and Lemay TP goals were modified. This was due to limited staff capacity and landowner willingness in these lakesheds. Furthermore, the TP reduction goals needed for this chain of lakes is significant and can not be achieved within 10-year timeframe. The TP goals for Cody, Phelps, and Lemay were modified to a goal that was realistic to achieve, about 25% of the overall TP reduction needed for the lakes to achieve water quality standards." We will not be amending TP reduction goals for priority lakes. We will reassess storage goals at the 5 year amendment mark and they may be amended at that time.
20	Executive Summary, Table 0.1 Surface Water Quality	Friends of the Minnesota Valley	Goals will have little positive effect on the Minneosta River. Surface Water Quality, Goal E under "Ecoli" and Goal B under Groundwater Protection – Source Contamination is to "Complete 10 SSTS improvements/replacements." Currently, there is about 140 properties with a SSTS for sale in Scott County alone. At the time of sale most properties will likely be inspected and SSTS and wells will be brought into conformance with state code. Furthermore, most home rebuilds or expansions will trigger SSTS inspections and repairs/replacements. Ten SSTS improvements/replacements over a 10 year period is extremely low. Even 10/year would be low given that most will be replaced or upgraded if the property changes ownership.	The SSTS improvements and replacement goals do not include Scott County. This was requested by Scott County and WMO. SSTS compliance varies by County. SSTS upgrades that are accounted will only include Le Sueur and Rice County. We may adjust at 5 year amendment mark if needed. We will not be updating the goal.

Lower MN River East CWMP 60 Day Review Formal

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General Plan Comment		Friends of the Minnesota Valley	Goals will have little positive effect on the Minnesota River. Dredge testing and placement – the Plan does not address the public cost of dredging or the testing and disposal of dredge materials.	Dredging is not a focus or activity that the partnership will implement within the plan. There is narrative in Chapter 1, under navigation, that describes briefly dredging activities. One of the primary goals of the plan is to address sediment which will have a positive impact on the reduction of costs associated with dredging activities. We will not be updating narrative within the plan to expand on dredging activities as it is not a priority or focus for this partnership.
General Plan Comment		Friends of the Minnesota Valley	Goals will have little positive effect on the Minnesota River. Impact to the Minnesota River and downstream communities – the plan does not address public costs and impacts from the planning area (or other upstream areas) on the main stem of the Minnesota River or downstream communities (e.g. what is the cost/benefit associated with upstream land uses on downstream communities).	The partnership understands that any projects implemented in the upper watershed will have positive impacts to downstream communities. We will not be including any economic impacts in the narrative of the plan.
20	Executive Summary, Table 0.2 Surface Water Hydrology, Goal A	Friends of the Minnesota Valley	Goals will have little positive effect on the Minnesota River. Goal A Surface Water Hydrology, Altered Hydrology/Storage is to "Reduce annual runoff by 0.09-inches through implementation of 3,165 acre-feet of storage in priority stream sub-watersheds in an attempt to stabilize streams through reduced peak flowrates." Again, this number seems low. Below is a figure from the Plan showing streamflow in the Minnesota River at Jordan. Even after considering increased precipitation, the rate of flow has increased dramatically over the past 20 years. In the late 1980's and early 1990's several changes were made to state wetland and surface water law and $100's of millions of dollars federal, state, and local taxes have been spent to improve water quality and control flow in the Minnesota River. Rather than reducing the flow, the tread lines have become steeper. What will this plan do to reverse this trend? Upland storage goals need to be increased significantly to reduce this trend.	We reached out to the Scott County engineer to determine a reasonable goal for the partnership. Furthermore we took into consideration that these projects are complex and expensive. Additionally, it is difficult to find willing landowners. Please note that there are other watershed partnerships located within the Minnesota River Basin that are addressing storage goals as well. We will update the narrative in Chapter 4 Implementation Schedules in the Modeling Approach and Implementation Schedule section. Additional narrative will be added to the Modeling Approach section about the BWSR Water Erosion Pollution Reduction Estimator and how the tool was used to create reductions for the near and in channel projects. Additional narrative will be added to the implementation schedules section called Modification of Measurable Outputs and Outcomes: Goals within the comprehensive plan were modified for the following reasons: 1) In order to reduce concern of redundancy of implementation efforts within the watershed, implementation activity goals (BMPs) in Table 4.1 and 4.2 have been modified. There are numerous partners within this planning area and outside of this planning area that have their own existing watershed management plans, local water management plans, water supply plans, wellhead protection plans, groundwater protection plans, and surface water management plans that account for activities and pollutant reductions that are not included within this Plan. There are multiple efforts that are occurring to protect and improve the Lower Minnesota River Watershed. Please refer to Chapter 6 Collaboration with Other Units of Government to learn more. 2) Sediment Pollutant Modifications for Priority Streams and Streamsheds. The partnership understands that in channel and near channel erosion is leading cause for sediment loading into streams and rivers within the Watershed and to the Minnesota River. Many streams and their subwatersheds within the planning area (do not have any existing stream erosion studies and/or subwatershed analysis studies completed). These are critical in identifying areas that are at risk of erosion and also providing pollutant loads and reductions that are needed. Furthermore, the partnership went through existing efforts and took an average on how many stream and ravine projects are implemented each year. The partnership has limited capacity, staff and financial resources, to implement these projects on an annual basis. 3) Total Phosphorous Pollutant Modifications for Priority Lakes and Lakesheds. Specifically, Cody, Phelps, and LemayTP goals were modified. This was due to limited staff capacity and landowner willingness in these lakesheds. Furthermore, the TP reduction goals needed for this chain of lakes is significant and can not be achieved within 10-year timeframe. The TP goals for Cody, Phelps, and Lemay were modified to a goal that was realistic to achieve, about 25% of the overall TP reduction needed for the lakes to achieve water quality standards. 4) Storage (Acre-Feet) Modifications for Priority Streams and Streamsheds. The partnership understands that additional storage opportunities are critical for reducing peaks flows and volumes within the watershed. Additionally, this will have major impacts to stability of streams and may help reduce erosion and runoff issues and near channel and overland sediment loading. Many streams and their subwatersheds within the planning area (do not have any existing stream erosion studies and/or subwatershed analysis studies completed). These are critical in identifying areas that are at risk of erosion and also providing pollutant loads, reductions, and storage goals that are needed. Furthermore, the partnership went through existing efforts and took an average on how many storage projects are implemented each year. The partnership has limited capacity, staff and financial resources, to implement these projects on an annual basis. Additionally, these projects are complex,
21	Executive Summary, Table 0.5, Habitat and Natural Resource Restoration	Friends of the Minnesota Valley	Goals will have little positive effect on the Minnesota River. Goal A Habitat and Natural Area Restoration, Riparian Restoration is "Within priority stream subwatersheds, increase perennial cover by 300 acres or 50 miles within a half mile wide corridor on rivers and streams." This is not enough. The planning area is just over 400,000 acres. The proposal to in 10 years to increase perennial cover by 300 acres (this can be hay crops or or other agricultural uses) or 50 mile along stream corridors is low. How much of this has already been done by the state buffer law? Regardless, the goal is less than 1% of the land in the planning area and will be met without spending public money as farmland is converted to residential use.	We had numerous discussions on realistic acres that can be implemented within a 10 year time frame. These goals are intended to address habitat corridors. We will not be updating the Restoration goal. This goal may be amended at the 5 year amendment mark if needed.
21	Executive Summary, Table 0.6, Habitat and Natural Resource Portection and Preservation	Friends of the Minnesota Valley	Goals will have little positive effect on the Minnesota River. Goal A, Habitat and Natural Resources Protection and Preservation, "Identify High Value Natural and Cultural Resources by completing "study(s) to identify high value natural and cultural resources, determine sensitive habitat areas, and establish strategies for protection." It is not clear how much of this has already been done. The Minnesota River Data center has several studies and plans that identify habitat and natural area protection areas. The Lower Minnestoa East 1W1P planners should review these plans to determine areas that were identified in the past and, if they are no longer being considered, specify why.	Please refer to Chapter 3, Section 3.3 Issue Category: Habitat and Natural Resources. There is narrative provided on why a study is being completed and why it is needed. We will update the narrative of Section 3.3 to the following: "During several committee meetings, the Partners determined that there were various gaps that needed to be addressed within the Planning Area regarding identifying and prioritizing areas of high value natural resources. Scott County already has a high value natural resources study. However, Le Sueur and Rice County do not. The study would include working with communities to identify natural of high value. AC discussion considered topics that may be included in the study such as classifications of wild rice lakes, unidentified fens, high value community resources, and high value cultural resources inclusive of the Shakopee Mdewakanton Sioux Community. Priority areas identified through the study will be added as priority areas for protection and preservation. The study may also include specific actions for the protection and enhancement of fish and wildlife habitat and water recreational facilities as components of key habitat projects. The Partners will evaluate cultural resources as needed." The Minnesota River Basin Data Center will be used as a source of data for this work.
20-21	Executive Summary, Table 0.1- 0.6	Friends of the Minnesota Valley	Goals will have little positive effect on the Minnesota River. Biotic and Aquatic Life Impairments. While the Plan contains considerable information aquatic life impairments in waterbodies throughout the planning area, it does not contain any measurable goals identifying what are the target species, species abundance/diversity, or locations of habitat improvement.	We understand that there are considerable biotic and aquatic life impairments throughout the watershed. However, they are not the partnership's primary goals when improving water resources within watershed; they are viewed more as secondary benefits to installing a practice. The partnership does have some habitat and natural resource goals that will likely address some of the biotic and aquatic life impairments. We will not be adding additional goals for biotic and aquatic life impairments.
General Plan Comment		Friends of the Minnesota Valley	Goals will have little positive effect on the Minnesota River. The Lower Minnesota River East Plan should specify how it fits with other One-watershed - One-plans, WMO plans, watershed district plans, and other water management plans. It must be part of a strategy that defines specific goals and implementation strategies for storage, sediment reduction, water quality, ecological improvement, etc. for the Minnesota River watershed.	We will update the narrative to the following: "Collaboration with Other Units of Government The LoMRE Partnership will actively seek opportunities for early coordination and collaboration with other units of government including: • Cities • Townships • Special purpose joint powers boards • Federal agencies • Shakopee Mdwekatonan Sioux Community • Lower Minnesota River Watershed District • Prior Lake-Spring Lake Watershed District • Scott Watershed Management Organization Watershed management efforts are complex, especially, for the Lower Minnesota River Watershed, there are numerous partners within this planning area and outside of this planning area that have their own existing watershed management plans, local water management plans, water supply plans, wellhead protection plans, groundwater protection plans, and surface water management plans that account for activities and pollutant reductions that are not included within this Plan. The partnership will ensure that there are communications efforts amongst partners in order to prevent duplicative efforts within the watershed. There may be opportunities for

Lower MN River East CWMP

60-day Formal Review Comments and Responses

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Lower MN River East CWMP 60 Day Review Formal

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Page Number	Section	Commenter	Comment	Response
40	Chapter 1: Land And Water Resources Narrative, Water Quantity and Water Quality	Friends of the Minnesota Valley	Goals will have little positive effect on the Minnesota River. The Plan states, "altered hydrology has been identified as one of the primary stressors of biotic impairments in the Planning Area. Due to the complexity and connection of altered hydrology to other issues within the Planning Area, this topic will be discussed in detail throughout the Plan document." The Plan also states. "due to the location of the Planning Area, partial contribution to the Minnesota River, and complexity of modeling the Minnesota River, the partners focused the measurable goal on sediment delivery to the Minnesota River from each of the major subwatersheds." Granted, developing a single plan for the Minnesota River watershed is complex; however, it is doable and necessary. To address altered hydrology and sediment delivery in the Minnesota River by setting goals for each of the "subwatersheds" makes it sounds like there is a target goal for the Minnesota River, otherwise the subwatershed goals make no sense. What is the target goal for the Minnesota River?	We had numerous discussions at our ST, AC, and PC meetings about whether the Minnesota River needs separate goals for reductions. We came to the conclusion that in order to improve the Minnesota River, pollutant reductions and reduce peak flows/volumes need to occur within the resources and subwatersheds that directly outlet to the Minnesota River. Additionally, there are many other watershed partnerships that are protecting and improving other subwatersheds to improve the overall health of the Minnesota River. We will not be creating a separate goal for the Minnesota River.
36-38	Chapter 1: Land And Water Resources Narrative, Surface Water	Friends of the Minnesota Valley	Goals will have little positive effect on the Minnesota River. The Plan seems to have a bias in favor of agricultural drainage and needs to better identify impact from tiling and private drainage. The Plan states, "public and private drainage is present in the Planning Area, mostly in the southern portion of the Planning Area where the need for artificial drainage is necessary to allow for productive agricultural lands. There are 46 public drainage systems, including approximately 150 miles of open ditch and 23 miles of public drainage tile." The statement, "the need for artificial drainage is necessary to allow for productive agricultural lands." Is a generalization, certainly, productive agricultural land can exist without artificial drainage. A more correct statement would be "artificial drainage is necessary to improve the economic value of land used for agriculture."	Tile is not regulated and the partners have no authority for enforcement. The only time that there may be restrictions for private ditches and tile is if a landowner is enrolled in a local, state, or federal program. We will update the narrative in the Drainage Systems section to state the following: "Public and private drainage is present in the Planning Area, mostly in the southern portion of the Planning Area where artificial drainage is a common practice utilized in agricultural lands. There are 46 public drainage systems, including approximately 150 miles of open ditch and 23 miles of public drainage tile. Private drainage systems and tiles are not accounted for in these figures. A significant amount of water resources within the watershed have been ditched or straightened for agricultural drainage; approximately 63.2% for the entered Lower Minnesota River Watershed. The altering of watercourses leads to an increase of the speed at which water leaves the landscape, creating more near channel erosion. Private drainage and tile creates a complexity in watershed hydrology, and varies greatly due to six factors: type of drainage, scale of impacts, precipitation patterns, field conditions, the rest of the watershed, and system design and landscape details (MPCA, Lower Minnesota River WRAPs 2020). More research needs to be done in order to develop a comprehensive understanding of private drainage and tile impacts to watersheds."
40	Chapter 1: Land And Water Resources Narrative, Surface Water	Friends of the Minnesota Valley	Goals will have little positive effect on the Minnesota River. The plan says the flow in the Minnesota River at Jordan has increased 80% as compared to historic records that date back to 1935. While some of this is the result of the development of rural cities, most of this flow is from agricultural drainage. Runoff from new urban developments is regulated, new private agricultural drainage or drainage improvements is not. The plan needs to better address the impact from tiling and agricultural drainage. The plan also needs to address the economic benefits of agricultural drainage versus the public and private costs of downstream communities and property owners.	Tile is not regulated and the partners have no authority for enforcement. The only time that there may be restrictions for private ditches and tile is if a landowner is enrolled in a local, state, or federal program. The Partners intend to work with drainage authorities in the Planning Area to incorporate water quality and storage projects into drainage projects when feasible. Drainage law requires the drainage authority to complete a cost-benefit analysis of drainage projects, and drainage law allows drainage projects to proceed. The Partners have decided that it will be the best use of time and resources to focus on partnering with these entities. By partnering with drainage authorities, drainage law will guide those projects and the Partners will work within their authority to incorporate water quality and storage components to minimize negative and encourage positive impacts to downstream communities and property owners. Partnering with drainage authorities will also allow the partners to address the impact of tiling and agricultural drainage more effectively.
56	Chapter 1: Land and Water Resources Narrative	Friends of the Minnesota Valley	Goals will have little positive effect on the Minnesota River. Climate resiliency. The Plan claims to have "a focus on resiliency throughout the various impacts that may develop from the unknown components of emerging issues and climate change." If this is an accurate statement, the Plan should specify what climate resiliency actions it is recommending, measurable goals related to climate resiliency, and how it fits within the state's climate resiliency goals.	Please refer to Chapter 2, Emerging Concerns and Major Environmental Issues. We will provide additional narrative in this section: "This Plan is based on existing knowledge and evaluation of existing concerns. A shift in focus may be required, or plan priorities and actions may be influenced by the need to address issues of emerging concern. There were five general categories of emerging issues that were identified in the aggregated data: • Climate Change Adaption and Building Resilience • Contaminants of Emerging Concern • Land Development and Changes • Pesticide and Fertilizer Impacts • Other Emerging Issues Many of these issues have limited data, making it difficult to fully understand the extent and nature of the problem. Some of the emerging issues are also beyond the authorities or resources of the Partnership and require implementation efforts at a much larger scale than the watershed boundary. As such, the Partnership did not elevate emerging issues as a priority issue for the Plan. However, many of the activities that the partnership is proposing to implement in the Plan will help with addressing some of these emerging concerns and major environmental issues. For example, surface water hydrology, an issue greatly impacted by climate change, has been identified as a priority issue in the Plan. To address the concerns associated with surface water hydrology, the Partnership integrated actions such as implementing water storage projects and urban BMPs that aim to alleviate impacts of climate change. These are described in more detail in Chapter 5. Due to the importance of emerging issues and climate change, the Partnership committed to developing their Plan with a focus on resiliency throughout the various impacts that may develop from the unknown components of emerging issues and climate change. As such the Partnership will continue to monitor emerging issues throughout the implementation period, especially during the five year review period, to ensure the implementation actions incorporate and address emerging issues when possible. Updates to the Plan will be made as deemed necessary to continue conservation work in a resilient capacity." The ST will not be adding goals for climate resiliency as the Partnership feels climate resiliency is being address in other goals mentioned in the plan.
161	Chapter 6: Plan Administration and Coordination	Friends of the Minnesota Valley	The implementation strategy is non-inclusive and appears to assert authority over counties, cities, watershed districts, and others. The Plan calls for the establishment of a Joint Powers Entity (JPE) called the Lower Minnesota River East Watershed Partnership (LoMRE) with the powers and authorities outlined in the Joint Powers Agreement (JPA). The JPA for the plan implementation establishes a new entity with a governing board that operates autonomously from the members. The Plan also calls for a "Joint Powers Board referred to as the "LMREWJPB" made of one representative from "participating entities." The Plan needs to better define the relationship between these two entities.	We will add narrative to the Plan in Chapter 6 clarifying that the Lower Minnesota River East Watershed Parternship (LoMRE) consists of the partners working to implement the Plan and the Lower Minnesota River East Watershed Joint Powers Board (LMREWJPB) consists of one official from each partner entity appointed to the Board to make policy related decisions for the partnership.
161	Chapter 6: Plan Administration and Coordination	Friends of the Minnesota Valley	The implementation strategy is non-inclusive and appears to assert authority over counties, cities, watershed districts, and others. If the LoMRE or the LMREWJPB operates autonomously from the members, will they have authority over them?	We will update the JPB section narrative to describe the following information: The Joint Powers Board (LMREWJPB) will be made up of one appointed representative of each participating entity that enters into the JPA. The JPA will not be finalized and formally adopted until a comprehensive watershed management plan is approved by BWSR. Partners that are anticipated to sign onto the JPA and become part of the JPB include: Le Sueur County, Rice County, Le Sueur SWCD, Rice SWCD, and Scott SWCD. Partners that may sign onto the JPA and become part of the JPB include: Lower Minnesota River Watershed District. The draft JPA states that the LMREWJPB will meet twice per year or more often as deemed necessary. The LMREWJPB is responsible for approving the budget, workplan, plan amendments, cost-share policies, bylaws, as well as establishing committees as necessary to implement the Plan. The Board does not have the authority to directly hire staff but may contract for coordination or other services. Furthermore, the Board may set local dues to assist with legal fees, audits, project implementation efforts, or administration costs. The process in how dues will be set up for the partnership are explained in the JPA. The JPB is intended to streamline the decision making process and not require full board approvals from each LGU. The intent is that each member of the JPB will keep their local boards up to date with plan progress. Each JPB member will be able to make decisions on behalf of their local board, however, the JPB does not have authority over any regulatory or enforcement programs or any budgets and programs that are not directly associated with this watershed comprehensive management plan.
161	Chapter 6: Plan Administration and Coordination	Friends of the Minnesota Valley	The implementation strategy is non-inclusive and appears to assert authority over counties, cities, watershed districts, and others. Has a JPA been developed? If so, it should be included in this Plan. Without knowing, what authorities the JPA will contain, the goals, strategies, and programs recommended in the plan may be nothing more than wishful thinking.	A JPA has been developed and is in draft mode. We will not be including a copy with the plan as likely the JPA and final plan approval will be occurring simultaneously. This will slow down the plan approval process. All LGUs that have indicated they would like to sign the JPA have a clear understanding of how the partnership will impact them. We will not be making any changes and including the JPA in the plan. We will post the final JPA on our watershed website once adopted by all partners.
161	Chapter 6: Plan Administration and Coordination	Friends of the Minnesota Valley	The implementation strategy is non-inclusive and appears to assert authority over counties, cities, watershed districts, and others. It is unknown who will be part of the JPA. It is unclear why a LGU would approve the Plan without first understanding how it will impact them.	All LGUs that have indicated they would like to sign the JPA have a clear understanding of how the partnership will impact them. If additional parties would like to be added onto the JPA, they will be informed of the existing agreement and brought up to speed. Entities joining the JPA will be listed on the partnership website. The JPA will not have authority over other entities, and will follow the appropriate statutory guidelines for operation.

Lower MN River East CWMP

60-day Formal Review Comments and Responses

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Lower MN River East CWMP 60 Day Review Formal

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Page Number	Section	Commenter	Comment	Response
E3-E17	Appendix E: Detailed Implementation Tables	Friends of the Minnesota Valley	The implementation strategy is non-inclusive and appears to assert authority over counties, cities, watershed districts, and others. Appendix E "Detailed Implementation Tables" shows programs and funding requirements and lists the Prior Lake Watershed, Lower Minnesota River Watershed, cities, and others as lead or supporting agencies. Have all of these entities been involved in the planning process and have they agreed to serve as leads? As a lead, what will there responsibly entail, e.g. funding, staffing, enforcement, etc.	The implementation schedule is required to have a column that indicates the Lead and Supporting Entities as identified in BWSR's Plan Content Requirements Version 3.0. We have had discussions during our Advisory Committee meetings to determine who is serving as lead and supporting roles. Additionally, if amendments for this column are suggested during the 60 Day comment we will be updating the column as suggested. We only will make changes to the Lead and Supporting Entity columns if entities suggest changes are needed. Those changes have been identified in other comments from that specific entity who has made the request.
105-128	Chapter 4: Implementation Schedules	Friends of the Minnesota Valley	The cost of plan implementation to counties, cities, watershed districts and others is not clear. Most of the local entities listed as members are already implementing many of the activities listed in the Plan. Are the costs to local government listed in Appendix E what local government is currently spending or is it additional funding needed from LGU's to implement the plan? The Implementation schedule lists Estimated Costs with the following statement indicating a foot note, "*Outside funding not needed." Yet, there is no footnote. Does this mean the watershed districts, counties, and cities will be responsible to fund these activities?	This footnote will be removed to eliminate confusion. Please refer to the funding sources column in the implementation tables in Chapter 4 for information on where WBIF and other funding sources will be utilized.
161-174	Chapter 6: Plan Administration and Coordination	Friends of the Minnesota Valley	The cost of plan implementation to counties, cities, watershed districts and others is not clear. The plan states the cost to implement the over ten years $22,678,272. Of this, $1,491,630 are expected to come from local sources. Are local funds supplemental or is if funding LGU's currently budget?	We have included information within Chapter 6 that describes what Local Funding Sources may include. This information can be found on Page 169 and Page 170 of the plan (Local Funding Sources). We will not be updating language within the plan, local funding sources has already been defined.
161-174	Chapter 6: Plan Administration and Coordination	Friends of the Minnesota Valley	The cost of plan implementation to counties, cities, watershed districts and others is not clear. The Plan indicates new "staff" may be needed. Do any of the costs listed include the ongoing costs of staffing? If so, the costs are dramatically understated. If no new staff is required, how do the recommended program implementation affect existing staff workloads?	The costs currently included in Chapter 4 and Chapter 6, does consider some new staff that will be needed in order to carry out education outreach efforts, promote soil health practices, coordinate plan efforts, and track progress towards plan goals. However, the plan does not include any additional new staff that may be added later. We will not be updating language within the plan, as examples of financial resources that will cover new staff is mentioned in Chapter 6.
161-174	Chapter 6: Plan Administration and Coordination	Friends of the Minnesota Valley	The cost of plan implementation to counties, cities, watershed districts and others is not clear. Is the state money guaranteed? If not, will the state agree to pay costs associated with employee termination, e.g. unemployment benefits, re-assignment training, etc.	We have included information within Chapter 6 that describes all the funding sources that are needed in order to implement the Comprehensive Watershed Management Plan. The sources of funding includes, local, state, WBIF, and other. Additionally, there are descriptions within this section that describe in more detail the types of funding sources that can be utilized to implement the plan. Some funding sources are a part of State Statue (ex: AIS Prevention Aid and Riparian Aid). Most of our funding sources are not guaranteed due to competitive processes and landowner willingness to provide local match. The WBIF funds are intended to help reduce the competitive process for government units to "guarantee funding" within a watershed boundary. Government Units rely heavily on the Clean Water Funds which is set to expire in 2034. We will not be amending the funding section to clarify specific grants and programs that will cover which projects and practices. This will allow additional flexibility when trying to obtain additional financial resources.
161-174	Chapter 6: Plan Administration and Coordination	Friends of the Minnesota Valley	The cost of plan implementation to counties, cities, watershed districts and others is not clear. The plan indicates $205,000 is estimated to be spent on policy and regulation. If the plan anticipates the development of new land use controls, changes to landuse and water plans, or efforts to better enforce existing regulations, this number seems unrealistically low.	The Joint Powers Board and Partnership have no authority to require partners to implement regulatory changes. These workshops are for developing *recommended* regulatory changes that each LGU will be asked to review and consider implementing, though the decision to proceed with these changes will remain in the jurisdiction of each local board. Should changes be adopted and additional funding needed to continue working on the Policy and Regulatory items outlined in the plan, we will address changes to the estimated costs through the plan amendment process. We appreciate the feedback on the estimated costs for the implementation of these items.
General Plan Comment		BWSR	The Lower Minnesota River East Comprehensive Watershed Management Plan meets BWSR's One Watershed, One Plan Plan Content Requirements (Version 2.1).	BWSR has stated that our plan is meeting plan content requirements. We do not need to make any changes to address this specific comment.
General Plan Comment		BWSR	The Plan is well-organized, easy to understand, and visually pleasing with nice photos and graphics. The maps and charts are particularly well done and help convey information effectively.	BWSR provided a compliment on the format and organization of the plan. We do not need to make any changes to address this comment.
General Plan Comment		BWSR	Thank you for reaching out to the Shakopee Mdewakanton Sioux Community, neighboring watershed entities, and municipalities during the process of developing this watershed plan.	BWSR provided a compliment on the effort the partnership put in to include the SMSC and municipalities. We do not need to make any changes to address this comment.
General Plan Comment		BWSR	Advisory Committee meetings were well-facilitated, allowing each agency and local entity staff to provide meaningful feedback during the development of this Plan based on the data and their expertise.	BWSR provided a compliment on the effort of the AC and including their expertise. We do not need to make any changes to address this comment.
General Plan Comment		BWSR	Appreciate that Partners recognized the importance of groundwater in this Plan by having goals and strategies that address important issues such as nitrate and arsenic, which can have human health impacts.	BWSR provided a compliment about the Plan prioritizing groundwater. We do not need to make any changes to address this comment.
General Plan Comment		BWSR	We appreciate that the Plan includes goals and strategies that address altered hydrology and storage, erosion, and riparian restoration. Collaborative work on these issues is vital to restoring and protecting the health of streams and the Minnesota River.	BWSR provided a compliment about the Plan prioritizing alerted hydrology, storage, erosion, and riparian restoration. We do not need to make any changes to address this comment.
General Plan Comment		BWSR	The Implementation Table strategy that focuses on working with landowners to adopt soil health practices is of paramount importance to improving water quality in this watershed over the next 10 years. We appreciate that the Partners included multiple activity options to provide flexibility in achieving their sediment and phosphorus reduction goals.	BWSR provided a compliment about the Plan prioritizing soil health practices and included multiple different types of activities to address TP and TSS goals. We do not need to make any changes to address this comment.
General Plan Comment		BWSR	Please ask Shakopee Mdewakanton Sioux Community how they want to be represented in this Plan, their interest in being involved in implementation activities (e.g., OE.1, page 98) and for their review of the cultural heritage section. Note that they may not want to be referred to as a "stakeholder" since they are a Tribal Nation.	The SMSC did provide feedback from the 60 day comment period on how they want to be included within the Plan. The SMSC stated that any opportunities where the SMSC can partner, they would like to be listed as a supporting entity within the implementation tables. We will update the implementation tables within the Plan to include SMSC as a supporting entity.
General Plan Comment		BWSR	Recommend including an actual section/paragraph in Chapter 5 or 6 (page 166 could be a good place) that concisely captures all of your thoughts on topics that may be addressed during the 5-year plan assessment. Consider the following: storage goal (see page 19), emerging concerns (page 78), sediment goals (page 82), E. coli (page 86), groundwater recharge (page 93), and monitoring (page 158). This could make it easier for the Partnership to find these topics in the Plan and discuss them during the assessment process.	We will update the narrative on page 166 to include a header called 5 year Plan Amendment. Additionally, there will be a bulleted list of all the goals and issues that will be reassessed during the 5 year amendment mark. The bulleted list of goals and issues that will be reassessed during the 5 year amendment mark include: TSS Goals, TP Goals, Storage Goals, E.coli Goals, Groundwater Nitrate Goals, Reuse of Stormwater and Rainwater and how it impacts groundwater recharge, climate change adaptation and resiliency, contaminant of emerging concern (ex: PFAS), land development and changes, pesticide and fertilizer impacts, and delisting of resources.
	Acknowledgements	BWSR	Met Council is not a state agency. Please revise the heading to say "agencies". Lower MN WD should be listed as a "partner" with the counties and SWCDs. Consider calling these "planning partners". Please check with PLSLWD to see if they want to be listed on this page.	We will update the heading of the acknowledgments page to state "Agencies" instead of "State Agencies". We will update the heading of the acknowledgments page to state "Lower Minnesota River East Watershed Planning Partners" instead of "Lower Minnesota River East Watershed One Watershed, One Plan Partners". We will update the planning partners list to include LMRWD and Scott WMO. We will check with PLSLWD to confirm whether they would like to be included on this page.
	Executive Summary	BWSR	Recommend including a paragraph that summarizes your high level activities and outcomes for the 10 years of the Plan, e.g. "Over the 10 years of this Plan, the Partnership hopes to implement conservation activities such as agricultural and urban BMPs to reduce TP by X lbs/yr, sediment by X tons/yr, and increase water storage by X." It doesn't have to include everything, but can give both staff and JPE members talking points.	We will update the narrative in the Goals Section (very last paragraph) of Section 0.8 Priority Issue Statements and Measurable Goals to: "Over the 10 years of this Plan, the Partnership hopes to implement conservation strategies such as agricultural and urban BMPs to reduce TP by 87 lbs./yr., sediment by 1,885 tons/yr., increase water storage by 3,165 acre-feet, increase perennial cover by 300 acres or 50 miles, increase permanent protection of land by 800 acres, seal 40 wells, and host 10 well testing clinics."
11	Executive Summary	BWSR	Figure 01. displays…of local governmental units. (Language change is inclusive of tribal representation shown on the map).	We will update the narrative in Section 0.1 Planning Area Overview to the following: "Figure 0.1 displays the Planning Area with jurisdictional boundaries of local governmental units and one tribal government."
12	Executive Summary	BWSR	Please check with PLSLWD to see if they want to be listed on this page. Also note there are no spaces before or after the dash in "Prior Lake-Spring Lake Watershed District"; this should be checked and corrected throughout the Plan.	PLSLWD had a similar comment. We will update the narrative as follows: "The local government units (LGUs) involved in managing the Planning Area resources recognized that the Minnesota Board of Water and Soil Resources (BWSR) One Watershed, One Plan (1W1P) program provided a unique opportunity to develop a
17	Figure 0.3	BWSR	This is a great figure. It's simple yet descriptive and easy to follow. Well done!	BWSR is providing a compliment on the Figure. We do not need to make any changes based off this comment.
20	Table 0.1	BWSR	Sediment goal of 1,885 doesn't match table 3.1 (p. 83) of 1,886.	We will update the goal in Table 0.1 and Table 3.1 to match.

Lower MN River East CWMP

60-day Formal Review Comments and Responses

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Lower MN River East CWMP 60 Day Review Formal

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20	Table 0.2	BWSR	Surface water hydrology goal AND table 3.3 (p. 84) are incorrect; there's a math error in table 3.1. It should be 3,166, not 3,165.	We will update the surface water hydrology goal and table 0.2, 3.1, and 3.3 to match and be consistent.
21	Table 0.6	BWSR	Goal A in Chapter 3 (p. 98) says "... establish strategies for protection in Le Sueur and Rice counties.", but Table 0.6 Goal A doesn't include Le Sueur and Rice counties.	We will update Table 0.6 Goal A, page 98, and throughout the rest of the plan to amend the goal to the following: "Complete a study(s) to identify high value natural resources, determine sensitive habitat areas, and establish strategies for protection in Le Sueur and Rice Counties." We will provide additional narrative in Chapter 3 Goal A, that Scott County already has an existing studies that assist with developing a natural area corridor overlay for development purposes and updated the MLCCS coverage to understand what areas had high value natural resources when developing the overlay. The partnership would like to complete a study for the rest of the planning area that will be similar to what Scott County has completed. "
21	Table 0.6	BWSR	Change Goal B to "...protection in priority areas through..." to ensure consistency with Chapter 3.	We will update Goal B for Habitat and Natural Resources Protection and Preservation to: "Increase the amount of land in permanent protection in priority areas through conservation easements by 800 acres." This goal will be updated throughout the Plan.
21 & 99	Table 0.5	BWSR	Goal A says "priority stream subwatersheds" but on P. 99 says "priority stream watersheds".	We will update Goal A for Habitat and Natural Resources Restoration on Page 21 and 99 to state: "Within priority stream subwatersheds.." This goal will be updated throughout the Plan.
22	Executive Summary	BWSR	Please delete "cite/103B.315" from sidebar. Links are okay.	We will delete "cite/103B.315" and leave link in sidebar.
22	Executive summary	BWSR	Please add administrative costs to the table or explain how these are already incorporated in the other categories	We will add narrative in the Executive summary and Chapter 6 about the administrative costs that will be required for planning efforts. Administrative costs for implementing the Plan include: fiscal, coordinator, project coordinator, and legal counsel roles. Initial conversations with the partnership will set aside roughly 10% of the total WBIF funds received to pay for administrative costs. Additionally, any education and outreach roles were estimated at 15% of the WBIF funds. Lastly, Technical Assistance (design, engineer, consultant, or staff time) is included as part of the 20% of the total WBIF funds. Administrative, Education & Outreach, and Technical Assistance costs estimates and may change over time.
27	land and water	BWSR	Delete or revise this page so it only includes the Planning Partners that signed the MOA. Recommend deleting the sidebar.	We will only include Logos and Names of those that participated within planning efforts as a planning partner on the PC level. We will remove all other entities. Additionally, we will delete the sidebar. We will delete the text that states stakeholders within the planning area and replace with planning partners.
29	Chapter 1: Land and Water Resources Narrative, Cultural Heritage	BWSR	Thank you for adding text to the narrative about indigenous people living in the region prior to European settlement. However, it's equally important to also reflect this history in the figure. Suggest utilizing a "break" in the timeline to visually acknowledge thousands of years of land stewardship by the Dakota people and lessen the "Eurocentric" focus of the graphic.	We will update the timeline to include within the timeline of the Dakota People Land Stewardship Pre Settlement and pre 1600's.
25 & 57	Chapter 1: Land and Water Resources Narrative	BWSR	Delete these cities or include all municipalities in the watershed. Note all municipalities are also already listed on page 57 of your Plan.	We will not be removing the list of cities on page 25. We will leave the cities in both sections due to different context that we are referring to in each section. One section is talking about the planning area and one section is talking about socioeconomics.
38	Chapter 1: Land and Water Resources Narrative, Wetlands	BWSR	Please add additional detail regarding control structures in the watershed including, but not limited to, the structures referred to in the DNR early input letter. Also, please consider whether you want to include any dam removal projects in the Implementation Table, and if so, would they fall under BMP.7 or be added as another strategy. Also consider whether you may want to do dam removal studies, and if so, consider where in the Implementation Table they would fit. You could change language to broaden existing activities, e.g. stream erosion or restoration in DSM.6 or SWA or similar studies for DSM.7.	We will updated existing narrative with suggest narrative. Suggested Narrative on page 36: "There are no water control structures, such as dams, on the Minnesota River within the Planning Area. During low flows, the lock and dammed Mississippi River can experience backflow into the Minnesota River, creating lake-like conditions. These conditions favor the production of algae and result in low dissolved oxygen levels. While there are no water control structures on the Minnesota River, there are numerous water control structures on lakes and streams within the planning area. Partners within the planning area may explore efforts to either install or remove water control structures based off of goals (ex: remove dam to improve fish passage and habitat)." We will update the implementation table BMP 7 to include dam improvement programs that address habitat and connectivity concerns may involve partnering with USACE and MN DNR. There are existing state and federal programs that are designed to assist with improving fish passage and restoring stream habitat such as Farmers and Fishers Fund. These programs may be leveraged in the future to assist with projects and practices that address Habitat and Natural Resources Restoration Goal A. The Partnership will add narrative on Page 98-99: The Partnership understands that dams negatively impact fish passage and stream connectivity. These projects and practices are expensive and are complicated. The Partnership likely will need to seek out outside funding sources in order to fund dam removals. The Partnership is willing to partner with the DNR if an opportunity arises. The Partnership will add the MN DNR as a supporting entity for Activity ID# DSM.12. The Partnership will add examples of stream restorations for Activity ID# BMP.7 (Implementation Action: Implement stream restorations such as channel restorations, dam removals, dam modifications, nature-like fishway).
41	Chapter 1: Land and Water Resources Narrative, Water Quality	BWSR	Please add a brief statement in the narrative explaining why this plan does not address mercury.	We will add addition narrative to the footnote below Table 1.1 . The footnote will be updated to the following: "Does not include mercury impairments. Mercury Impairments are not the primary focus of pollutant and stressor reductions within the Planning Area due to other pollutants and stressors such as Phosphorus and Sediment that are a higher priority and concern within the watershed"

Lower MN River East CWMP

60-day Formal Review Comments and Responses

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Lower MN River East CWMP 60 Day Review Formal

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Page Number	Section	Commenter	Comment	Response
59	Chapter 1: Land and Water Resources Narrative, Environmental Justice	BWSR	Thank you for mentioning environmental justice in the Plan. Is there any other place where environmental justice could be a component of implementation beyond a "potential criteria" for incentive programs (p. 133)? Could any more detail be added about where and how environmental justice can inform implementation activities?	We will update the narrative to the following: "The partnership will utilize the MPCA Environmental Justice Priority Areas to help target landowners, especially when it comes to the groundwater protection goals as well as the outreach and education campaign goals."
77	Chapter 2: Issue Prioritization, Table 2.3	BWSR	Please change "Groundwater Quantity" to "Groundwater Knowledge, Data, and Understanding".	We will update the Groundwater Quantity goal in Table 2.3 to Groundwater Knowledge, Data, and Understanding.
83	Chapter 3: Priority Resources, Targeting, and Measurable Goals, Table 3.1	BWSR	Math errors. Sum of Near Channel Sediment is 1189. Total Sediment Delivery to Sand Creek is 664. Total Sediment Delivery at Belle Plain is 74.	We will update Table 3.1 to make sure Sand Creek total sediment delivery is 664 and the City of Belle Plain total sediment delivery is 74. Additionally, we will update the sum of near channel sediment delivery will need to be updated to 1189.
79 and E1	Chapter 3: Priority Resources and Appendix E	BWSR	Thank you for taking the time during planning to develop these subwatershed goals. These efforts should make implementation more efficient and effective because of this targeting.	BWSR provided a compliment on how the partnership explained how we further developed subwatershed goals for this comprehensive watershed management plan. We do not need to make any changes based off this comment.
E1 or G1?	Appendix	BWSR	Please include a map of the HUC 10 subwatersheds that are refenced (note if you add this on page 83, then you can just reference it in the Appendix).	We will include the HUC 10 Subwatershed Map as a part of Appendix E or include in the Plan after the Surface Water Hydrology Goal A Pg. 83.
166	Chapter 6: Plan Administration and Coordination	BWSR	Table 3.2 - Please revisit TP reduction numbers for lakes in the 5-year review.	We will update the narrative on page 166 to include a header called 5 year Plan Amendment. Additionally, there will be a bulleted list of all the goals and issues that will be reassessed during the 5 year amendment mark. The bulleted list of goals and issues that will be reassessed during the 5 year amendment mark include: TSS Goals, TP Goals, Storage Goals, E.Coli Goals, Groundwater Nitrate Goals, Reuse of Stormwater and Rainwater and how it impacts groundwater recharge, climate change adaptation and resiliency, contaminant of emerging concern (ex: PFAS), land development and changes, pesticide and fertilizer impacts, and delisting of resources.
166	Chapter 6: Plan Administration and Coordination	BWSR	Please revisit your Surface Water - Hydrology Goal A during the 5-year assessment as it might be too low.	We will update the narrative on page 166 to include a header called 5 year Plan Amendment. Additionally, there will be a bulleted list of all the goals and issues that will be reassessed during the 5 year amendment mark. The bulleted list of goals and issues that will be reassessed during the 5 year amendment mark include: TSS Goals, TP Goals, Storage Goals, E.coli Goals, Groundwater Nitrate Goals, Reuse of Stormwater and Rainwater and how it impacts groundwater recharge, climate change adaptation and resiliency, contaminant of emerging concern (ex: PFAS), land development and changes, pesticide and fertilizer impacts, and delisting of resources.
86	gaol A	BWSR	...through implementation of 3,165 3,166 acre-feet of storage..."	We will update the surface water hydrology goal and table 0.2, 3.1, and 3.3 to match and be consistent.
86	table 3.3	BWSR	Math error. Sum of annual discharge reduction is 3,166.	We will update the goal in Table 0.1 and Table 3.1 to match.
88	Chapter 3: Priority	BWSR	Thank you for explaining how recreational value was defined and used by the Partnership for prioritizing lakes.	BWSR provided a compliment on how the partnership explained how we defined and used recreational value for prioritizing lakes. We do not need to make any changes based off this comment.
139	Chapter 5: Plan Implementation Programs, 5.4 Outreach and Education Program Framework	BWSR	The education and outreach approach is excellent overall, providing great example strategies while allowing for flexibility. The tables are also a great addition. However, the text is hard to follow in places and is somewhat repetitive throughout the section. Because this is such an important aspect of the Plan, we suggest a concise rewrite of the content on page 139 to summarize the concept and introduce the content on the pages that follow. Remove everything after the first paragraph (ending with "... actions identified within the Plan.") and replace it with: "As a starting point to address outreach needs throughout the watershed, the Partners compiled a list of their existing outreach and education programs (Table 5.4) from which to build on. The resulting outreach campaign framework consists of two primary components, both of which are meant to provide examples and are not intended to restrict activities. The first is a "menu-style" approach that the Partners can utilize to identify appropriate tactics for success in a variety of circumstances, and the second is a series of modified implementation tables that identify potential campaign topic priorities and associated measurable goals (Table 5.5), give examples of target audiences (Table 5.6) and partners (Table 5.7), and provide cost estimates (Table 5.8). " In this way, you'd provide a great overview of the framework and the rest of the section flows seamlessly.	We will update the education and outreach narrative to the suggested narrative from BWSR and removed the text after the first paragraph and replace with the following: "As a starting point to address outreach needs throughout the watershed, the Partners compiled a list of their existing outreach and education programs (Table 5.4) from which to build on. The resulting outreach campaign framework consists of two primary components, both of which are meant to provide examples and are not intended to restrict activities. The first is a "menu-style" approach that the Partners can utilize to identify appropriate tactics for success in a variety of circumstances, and the second is a series of modified implementation tables that identify potential campaign topic priorities and associated measurable goals (Table 5.5), give examples of target audiences (Table 5.6) and partners (Table 5.7), and provide cost estimates (Table 5.8). "
162	Chapter 6: Plan Administration and Coordination	BWSR	Good examples of opportunities to share services in the watershed between local entities.	BWSR provided a compliment on how the partnership will share services amongst the watershed. We do not need to make any changes based off this comment.
165	Chapter 6: Plan Administration and Coordination	BWSR	Recommend deleting the first sentence and the 8 bullet points that follow it. These may fall under a "minor" plan amendment.	We will remove bulleted list and narrative of minor plan amendments.
166	Chapter 6: Plan Administration and Coordination	BWSR	Recommend including a reference to BWSR's "Performance Review and Assistance Program (PRAP)" on this page and in the partnership assessment since that will be used for the 5-year plan evaluation and partnership assessment: https://bwsr.state.mn.us/prap.	We will add in narrative in 5 year amendment section that PRAP will be included as part of process: "As part of the 5 year amendment process the partnership will use the Performance Review and Assistance Program (PRAP) process to complete watershed-based assements. This assessment will review and evaluate plan progress on plan implementation and analyzes partners working relationships."
116-129	Chapter 4: Implementation Schedules	BWSR	The Implementation Table layout clearly demonstrates the multiple benefits from a variety of conservation strategies.	BWSR was providing a compliment that the partnership included a variety of strategies to address water quality issues. We will not need to make any changes based off of this comment.
116-129	Chapter 4: Implementation Schedules	BWSR	Missing groundwater knowledge Goal C (arsenic) in the Table.	We will add Groundwater Protection-Arsenic Campaign (Goal C) to the Groundwater Quality Goals for each implementation schedule. Additionally, we will mark the following activities that help achieve that goal: BMP. 10, DSM.1 , DSM. 2, and OE. 1.

Lower MN River East CWMP 60 Day Review Formal

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147-153	Chapter 5: Plan Implementation Programs, Table 5.10 Existing Regulatory Programs	BWSR	Please confirm Rice County ordinances in Table 5.10. Also note that the lists of LGUs as having authorities in Buffers, Waste Management, Invasive Species, etc. on pages 148-153 does not match Table 5.10. Recommend removing lists of LGUs in those narrative sections (e.g. "... Le Sueur and Rice counties have shoreland management ordinances.") and letting Table 5.10 speak for itself. An added bonus of removing the narrative lists is that it'll be easier to update at the 5-year mark, if need be.	We will double check Table 5.10 to see which programs need to be checked or added. We will mark Feedlot Ordinance, Septic Ordinance, Shoreland Ordinance, Zoning Ordinance, Solid Waste Program, Aquatic Invasive Species Program, and Subsurface Sewage Treatment System Program for Rice County for Table 5.10. We will remove LGUs listed in all of the regulatory programs as the tables demonstrate who implements these programs.
E3-E17	Appendix E: Detailed Implementation Tables	BWSR	If the Partners want to utilize the detailed Implementation Table in Appendix E for tracking, please ensure that the data match the Chapter 4 tables prior to initiating the evaluation. Example: When summed, the "measurable output" column in Appendix E for nutrient management (1060 ac), cover crops (11725 ac), perennial cover/buffers (890 ac), and tillage (4295 ac) adds to 17,970 acres. The "Soil Health" (BMP.1) activity has 18,870 acres.	We will double check the measurable outputs and costs are consistent with the implementation tables in Chapter 4. We will update any inaccuracies mentioned in Appendix E.