Commenter	Comment #	Comment Letter Page #	Comment	Plan Change Made (Y/N)	Plan Section	Comment Response and/or Action
Beth Kallestad	1	1	Early in the plan there is a note about voluntary actions being a problem however I saw very little in the plan to address this issue. There is some mention of Citizen Engagement which primarily focus on education. I would suggest giving more thought to this area of the plan and develop a more robust Citizen Engagement approach. Education is important but building relationships and trust is also important. SWCD and County staff need to have more training in how to do effective engagement. Time and resources need to be directed to actually doing that work. Social science research has shown this need to be the case in order for effective watershed management to happen.	Y	3.3 Wateshed Concerns: Socioeconomic Factors	The need for a more cohesive and coordinated citizen engagement plan was recognized and lead to the development of implementation activity 3.3.1-B-1. The plan also has goals for internal capacity (3.3.2-B) and partnership development (3.3.2-A). We will change 3.3.2-B-3 to address social capacity training and 3.3.1-B-1 will be changed to state the Education and Outreach Plan will focus on building relationships and trust in an effort to promote voluntary action.
Beth Kallestad	2	1	The plan also noted that Fox, Hunt and Cedar lakes were "very close" to meeting water quality standards. While this may be the case numerically, having been to these lakes in the summer the algae blooms on them can be very bad. I suggest changing that wording to make it clear the lakes have challenges and are not all that close to being off the impaired list.	Y	3.1 Watershed Concerns: Resources	In Section 2.2.7 and 3.1, the wording was changed to: three impaired lakes with summer eutrophication (algae bloom) problems that are closer to achieving the water quality standards (Cedar, Fox, and Hunt) than other impaired lakes.
Beth Kallestad	3	1	Lastly, I was hoping to see more specificity in the plan with regard to areas where BMPs etc would need to be implemented	N	6.4 Work Planning	The Planning Work Group assessed which tools were available at the beginning of the 1W1P Planning Process and determined no one tool met their needs. During the planning process Table 6-1 was developed to show which models and tools will be used to both target and to measure progress. Section 6.4 goes into further detail on criteria for project selection.
Cannon River Watershed Partnership (CRWP)	1	2	With the limited funding that will be allocated each year to execute the plan, CRWP is able to assist in the listed areas of drinking water protection, soil health, flooding of communities, shoreland management, subsurface sewage treatment systems, community resiliency to climate change, educating local land use decision makers, citizen engagement, planning area partnerships, and recreational value as listed in the draft plan. We think there may even be additional areas of potential partnership as well- especially, but not limited to, issues listed under the Socioeconomic Factors section of the plan.	Y	4.0 Implementation Schedule	With the assistance of CRWP, they are now listed as a potential partner on more activities than education and outreach as there are other areas that overlap with their existing or proposed work.
Circle Lake Association	1	1	The Circle Lake Association has been working on water quality projects for approximately 20 years. In 2011, the CLA board hired Steve McComas of Blue Water Science to do a lake improvement plan for the lake. That plan can be found on the Circle Lake Association Website at http://circlelake.org/wp-content/uploads/2011/05/2011_04_00__Lake_Management_Plan.pdf and has been our guide going forward.	Y	3.4 Local Priorities	During the weight of evidience approach used in prioritization, Circle Lake was not as high of a priority resource for this 10 year plannning cycle but is identified as a local priority. The local priorities section will be expanded to include amore complete list of concerns expressed in the comment letters relative to Circle Lake (Table 3-21). These local priorities can be referrenced for future grant applications for the Circle Lake Association and Lake Improvement District. Furthermore, there is a 5 year evaluation of the Plan where new issues or concern can be brought forward for consideration. CLID was added to the list of Acronyms and as a partner to a number of activities in the Targeted Implementation Schedule (under Citizen Engagement and Planning Area Partnerships).
Circle Lake Association	2	1	In the past decade our association has become recognized as one of the the most active lake association in Minnesota. Thousands of dollars have been raised and spent on exciting and creative projects to improve the water quality of our lake. Here are a few examples. 1. A large erosion control ravine project was done to prevent an estimates 110 cubic yards of sediment annually from entering the lake. 2. Settling ponds have been created. 3. Berms and log cribs have been used on farm fields to reduce the flow of water and reduce the contaminants entering the lake. 4. Radio tracking of schools of carp helped commercial fishermen find and harvest tons of these bottom feeding fish known to disrupt the lakes eco system. 197,00 pounds were located and removed in 2017 alone. 5. Grant money was found to provide our community with a workshop giving information on native plants and the beneficial impact they have on planting in Circle Lake Park. 6. The Circle Lake 5k, 10k and Half Marathon is our largest annual fundraiser. It takes many peopl to put on such an event, and our membership steps up every year to make it all possible.	N	None	We commend Circle Lake Association on their efforts and hope that we are able to coordinate and support each others efforts in the future.
Circle Lake Association	3	1	In January of 2019, the Rice County Board of Commissioners voted to approve the creation of the Circle Lake Improvement District (CLID) This happened after hundreds of man-hours were put in by the CLA board educating our membership about the benefits of establishing a Lake Improvement District, gathering the mandatory signatures, and working with the county commissioners to make it happen.	N	None	We commend the citizens of the Circle Lake Watershed for taking action to protect and improve this important resource.

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Circle Lake Association	4	2	Circle Lake clearly falls under many of your Watershed Concerns as far as Resources and Landscape Alterations. While we understand your need, and desire to protect our less impacted lakes, we feel that the Socio-Economic Factors listed as a watershed concern have not been adequately addressed. We believe this is where the (CLID) deserves a seat at the table. We have an enthusiastic lake community willing to work, and pay for water quality projects. Now that we have a Lake Improvement District we will have a steady income stream that most entities within the Targeted Implementation Table don't have. Even more important, we believe the designation will give us even more credibility with agencies and non-profits who determine where grant money goes. We believe we will have the ability to attract larger grants, and will have the resources to fulfill the matching funds requirement that generally come with these grants. If you partner with us we feel you'll get a big bang for your buck. For the reasons listed above we believe that Circle Lake deserves to be included in your Tier One Priority list.	Y	4.0 Implementation Schedule	CLID was added as a potential partner for activities in the Implementation Schedule that would likely be implemented in the contributing drainage area to Circle Lake. The planning partners would be interested in looking for collaborative grant funding in partnership with the CLID to leverage outside sources of funding for implementation (section 6.3.3). There will be stakeholder involvment with plan implementation and annual work planning, and Circle Lake Association and CLID would be invited to participate in these discussions (section 6.5.2).
Department of Natural Resources (DNR)	1	1	Rare and natural features: Rare features were covered only briefly in the draft plan yet they contribute to the overall health, habitat, diversity and environmental quality in the Cannon River watershed. Because of the sensitivity of these resources each may require extra protective consideration. These known rare and natural features also contribute directly to local economies in the form of recreation, hunting, fishing, wildlife viewing, tourism, paddling and camping. A few of the rare species in the watershed include Blanding's turtle, wood turtle, loggerhead shrike, upland sandpiper, round pigtoe mussel, milksnake, and western fox snake. The DNR has additional information available for the species of concern, along with a complete list of rare and natural features and communities found in the Cannon River Watershed. Many of the plan's proposed implementation projects would directly or indirectly protect these rare natural features, the plan could be strengthened by specifically recognizing "protection of rare and natural features" as an important, additional ecological outcome that benefits the health of the watershed. DNR staff are available to help local partners learn more about these unique features and maintain them as implementation projects are carried out.	Y	2.2 Identification of Potential Watershed Issues and Resources	The protection of rare and natural features was utilized as part of the priority area selection process primarily in Zonation, however it was not a high priority issue on its own. The 'protection of rare and nautral features' will be added in Table 2-1 for the description of Conservation Hotspots, and in Section 2.2.5, paragraph 2. Furthermore, the Zonation Memo in Appedix C describes the layers used.
Department of Natural Resources (DNR)	2	1	Aggregate and mineral resources: DNR supports effective planning efforts for local communities and governments for the development and access to natural resources as a means of sustaining affordable infrastructure maintenance and improvement opportunities across the watershed . While local planning and zoning dictates land use within each county, the Department encourages access to natural resources and sustainable development. Aggregate and mineral resources within the Cannon River Watershed play a large role in local economies. The Department wants to convey the importance of access to these natural resources, but in a way that is protective of natural and rare resources in the area as well as surface and groundwater resources. This topic is not mentioned in the plan.	N	4.4.2 North Cannon River Wtaershed Management Organization	While this issue was included in the initial planning notice letter from the DNR, this did not carry through as a priority in discussions with the public, advisory, planning or policy groups. It remains a local priority for the NCRWMO as it relates to groundwater protection (section 4.4.2).
Department of Natural Resources (DNR)	3	1	Protecting a Wild & Scenic River: The portion of the Cannon River from the northern city limits of Faribault to the confluence with the Mississippi River is designated by the state as Wild and Scenic. The designation is intended to maintain and preserve the natural and aesthetic quality of the river for public benefit. Honoring the protection of this designated riparian corridor as indicated in state statute is important to the long term protection of this unique river resource. The Department, in cooperation with Rice and Goodhue Counties, worked to designate this as a Wild and Scenic River. This is a unique feature for the watershed offering the opportunity to have a natural river corridor with limited impacts for public appreciation and potential public use. This designation should be viewed as such. The plan only mentions this designation briefly in the recreation and livability section. Strong local government support is needed to keep these areas preserved and maintained. The riparian areas designated under the Wild and Scenic designation are protected by state statute and have limited development potential in exchange for offering a large recreation, aesthetic and natural resource value.	Y	5.4 Regulation and Enforcement	The Wild and Scenic River regulations were added under section 5.4 Regulation and Enforcement. The Land and Water Resource Inventory does describe the designation and its importance.

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Metropolitan Council	1	2	We recommend the Plan be updated to include the 2013 NCRWMO plan in an appendix, or Section 4.4.2 should be expanded to include a detailed description of the physical environment and identification of water related issues within the NCRWMO, as well as a description of the official controls implemented by local communities. An alternative would be to remove the language on page 144 allowing local government units to adopt the Plan by reference and describe the information that would need to be included in a local government unit plan to meet the requirements of 8410.0160.	Y		The NCRWMO has decided to maintain their existing Plan and not adopt the Cannon River Comprehensive Watershed Management Plan. Their intentions are to continue to participate in 1W1P and the CRWJPB. Therefore, the NCRWMO Plan will not be included as an appendix in the Plan.
Metropolitan Council	2	2	The Executive Summary should be a plain language, high level overview of the Plan that should beable to function as a standalone document. Plan elements should be explained well enough for a reader to understand their intent without referring to the rest of the document. Specifically: • Clarify the purpose of priority areas where they are first mentioned on page 2. Why are the priority areas important and how will they factor into the rest of the plan? • Rethink the flowchart starting on page 6. The multi-page format of the figure makes it unclearwhether this is actual plan content or just an example. This information is important to help a reader navigate the plan but should be rethought in another way and ideally outside of the Executive Summary.	Y	1.0 Executive Summary	Clarifying language was added to the description of the priority areas on page 2. The flow chart was created for the Executive Summary, and it remains in this section as it has been noted that others appreciated the figure in the Excutive Summary.
Metropolitan Council	3	2	Each goal of the Plan needs to be measurable, especially Tier One priority issue goals. Many goals are too high level or lack specificity. Specific Tier One priority issue goals which should be made more measurable are: 3.1.3-A, 3.1.3-B, 3.2.2-B, 3.2.2-C, 3.2.2-D, 3.2.3-A, 3.2.4-A, 3.3.1-B, 3.3.2-A, and 3.3.3-A.	N	3. Issues, Goals and Implementation Activities	There were no other comments from State Agencies related to increasing the measureability of goals and the planning partners believe the goals are measureable as written.
Metropolitan Council	4	4	Many of the measurable goals in Section 3 involve significant planning and organizational work after the completion of the One Watershed, One Plan process. This work includes completing lake management plans, manure management plans, and an education and outreach plan; setting up a monitoring program; conducting a Long-Term Flood Evaluation Study; and establishing Soil Health and Climate Change teams. The Planning Partners and proposed Cannon River Watershed Joint Powers Board should carefully evaluate their internal capacity and future coordination abilities to ensure they are able to successfully oversee and execute this work.	N	6. Plan Administration and Coordination	The Plan Administration and Coordination section addresses how the planning partners will work together to complete these tasks. The local plan partners identified these as needs, and included them as activities and identified critical partners which will help leverage staff capacity to more effectively implement the activities.
Metropolitan Council	5	4	Provide more information in Section 3.1.1-B: Impaired Lakes on why the three impaired lakes were selected for the focus as a Tier One priority. The Plan states on page 35 that there are 36 lakes impaired for recreation and/or aquatic life in the planning area. Page 28 in the Priority Area Summary indicates the three selected lakes were chosen because they are close to meeting water quality standards and have preliminary models completed. This information should be repeated and expanded in Section 3.1.1-B. Information on when the other 33 lakes will be targeted for improvement should also be included in the Plan.	Y	3.1 Watershed Concerns: Resources	The status of the lake phosphorus modeling was added to the Justification of Goals for 3.1.1-B Impaired Lakes. The Issue Statement was modified to state that not all lakes can be addressed in this 10 year plan. The following was added to the first paragraph of the Implementation Activities section: These lakes are closer to achieving the water quality standards (Cedar, Fox, and Hunt) than other impaired lakes, and also have had preliminary lake phosphorus modeling completed.
Metropolitan Council	6	4	In Section 3.2.2-A: Flooding of Communities, the initial flood reduction goal of 35,167 acre-feet per year does not seem realistic prior to the installation of a significant number of practices and the completion of the Long-Term Flood Evaluation Study. A five-year overall reduction goal might be more appropriate.	N	3.2.2-A Flooding of Communities	The goal is a ten year goal not an annual goal, and after review of MPCA comment #27 the goal has been modified to 40,154 acre-feet.
Metropolitan Council	7	4	The summary of targeting and measuring tools in Table 6-1 is confusing and appears to be incomplete. The columns under "Measuring Tool" extend pollution reduction tools down into the Flooding of Communities and Drainage System Management sections, even though those tools don't apply. There are also not tools indicated to address issues such as stormwater management, where the Minimal Impact Design Standards (MIDS) calculator might be appropriate. If the Planning Partners know they will be using a certain tool to assess progress on a goal (such as meeting a load reduction in a lake or stream) that tool should be included in the appropriate section in Chapter 3. If the Planning Partners are not sure what tool will be used, such as in the Long-Term Flood Evaluation Study, a specific model should not be specified.	N	6.4 Work Planning	These comments are inconsistent with comments from other State Agencies, in which one specific model or tool needed to be selected. The planning partners discussed and agreed upon the models and tools in Table 6-1.

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Minnesota Department of Health (MDH)	1	1	1. Protection of public water supply drinking water sources: consider DWSMAs as priority areas within the watershed. The vulnerability of the DWSMA determines the level of risk posed by various land uses and potential sources of contamination. a. This priority concern was addressed in the following ways: i. Use of DWSMA vulnerability in assigning groundwater priority areas in Section 2.2.7, pages 19 and 21 and Table 2-2, page 22. ii. Priority Area Summary, Section 3.1.3, page 59 iii. Establishment of Goals #1-2, Section 3.1.3-A, page 60 iv. Justification for Goals, Section 3.1.3-A, page 61 v. Implementation Activities described in Section 3.1.3-A, page 62 vi. Establishment of Goals #1-3, Section 3.1.3-C, page 65	N	Multiple Sections	MDH participation in the planning process was appreciated and helpful for ensuring that MDH comments in the notification letter were addressed in the Plan.
Minnesota Department of Health (MDH)	2	1	2. Protection of drinking water sources for private wells: utilize information regarding pollution sensitivity of the upper most aquifers and wells, and nitrate and arsenic results from well testing to further target areas within the watershed for implementation activities. a.This priority concern was addressed in the following ways: i.Use of groundwater contamination sensitivity and pollution sensitivity of wellsdata layers in assigning groundwater priority areas in Section 2.2.7, pages 19and 21 and Table 2-2, page 22. ii.Priority Area Summary, Section 3.1.3, page 59 iii.Establishment of Goals #3-4, Section 3.1.3-A, page 61	N	Multiple Sections	MDH participation in the planning process was appreciated and helpful for ensuring that MDH comments in the notification letter were addressed in the Plan.
Minnesota Department of Health (MDH)	3	2	3.Prioritize sealing of unused and abandoned wells: this is a central practice in protectinggroundwater quality. However, when resource dollars are limited it is important to furtherevaluate an unsealed well by examining the risk the unused well poses to active public watersupply wells or to an aquifer used by many private wells (private well density) in an area. a.This priority concern was addressed in the following ways: i.Establishment of Goal #4, Section 3.1.3-A, page 61 ii.Implementation Activity 3.1.3-A-8 described in Section 3.1.3-A, page 62 iv.Justification for Goals, Section 3.1.3-A, page 61 v.Implementation Activities described in Section 3.1.3-A, page 62 vi.Establishment of Goals #1-3, Section 3.1.3-C, page 65	N	Multiple Sections	MDH participation in the planning process was appreciated and helpful for ensuring that MDH comments in the notification letter were addressed in the Plan.
Waseca County	1	1	Waseca County appreciates the efforts of all involved in the development of the 1W1P plan; however, after conducting a public hearing of the matter at a Water Plan Task Force Hearing, we have received feedback expressing concern that Clear Lake, Loon Lake and Goose Lake in the Straight River portion of the Cannon River Watershed was not afforded higher priority for improvement. Although the plan references Clear Lake and Loon Lake in Figure 2-3 as Surface Water Priority Areas, the remainder of the plan lists the two water bodies as only “Local Priorities”. We believe this is an oversight on the part of the plan. We believe the plan should be amended to rank and prioritize the improvement to the water quality of Clear Lake and Loon Lake higher. There is documentation to support this request. The Minnesota Pollution Control Agency, Cannon River Watershed Restoration and Protection Strategies (WRAPS) Report states the following regarding the Straight River priority catchments areas around Loon, Clear, and Goose Lakes:*The Upper Cannon priority area includes the catchment of Fish Lake. The Straight River priorityareas include: catchments aroundLoon, Clear, and Goose Lakes; a large catchment area aroundand encompassing the city ofFaribault DWSMA and moderate size area around and includingthe city of Owatonna DWSMA. Thesepriority areas can be utilized as zones to focus restorationor protection strategies during the next 10years.* Figure 38 in the WRAPS supports the higher prioritization of our waterbodies and indicates, among other things, that a reduction of phosphorous by as much as 12% should be targeted. In Figure 39 of the WRAPS document, the Waseca area lakes are shown as High Priority areas as well. Figure 40 has Clear Lake as a water body of high biological significance with Goose Lake listed as outstanding.	Y	Section 2	During the weight of evidience approach used in prioritization, Clear Lake and Loon Lake were not as high of a priority resource for this 10 year plannning cycle but are identified as a local priority. The local priorities section was expanded to include a more complete list of concerns expressed in the comment letters relative to Clear Lake and Loon Lake (Table 3-21). These local priorities can be referrenced for future grant applications. Furthermore, there is a 5 year evaluation of the Plan where new issues or concern can be brought forward for consideration. Addressed in table 2-2 and in the priority area descriptions, for Large Communities, added "surface water" to the existing description (page 18). Changed "Stormwater Ordinance" sub-issue under Development to "Stormwater Management" and added a goal and implementation activity for stormwater retrofits to address existing water quality issues in developed drainage areas to local priority lakes.

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Waseca County Economic Development Authority	1	2	The above amenities drive are a strong driver tourism, not only for the City of Waseca, but for much of the south central part of the state. The water quality of this water resource is critical to Waseca County and the City of Waseca. For this reason, the Waseca County Economic Development Authority voted unanimously to urge the Cannon River Watershed Task Force to increas the priority of our lakes to protect these critical assets.	Y	Section 2	See response to previous comment from Waseca County.
Waseca Lakes Association	1	1	The Waseca Lakes Association strongly supports this comprehensive watershed management program, but wishes to convey support to place Clear Lake and Loon Lakes at a higher priority in the 1W1P document. Clear and Loon Lakes are listed as surface water priorities in the 1R1W document. The large amount of information on the call out box for Waseca in figure 2.3 illustrates the need for its' lakes to receive a higher priority. The Waseca Lakes Association has helped to implement shoreline restoration projects, annual cleanup days, and has worked with local and state agencies towards our goal of improved water quality, but asks for your help to make this a higher priority.	Y	Section 2	See response to previous comment from Waseca County.
Minnesota Pollution Control Agency (MPCA)	1	1	Priority Concern: Nitrate-nitrogen reduction. *Nitrate contamination of surface and groundwater is a long-standing issue in southeastern Minnesota. "Moving the needle" on nitrates will be a challenge going forward; one that should be addressed in the CRWI WIP.* The plan outlines good strategies for nitrate-nitrogen reduction and calls out some important priority areas for implementation. 1. Table 2-2 identifies groundwater as a Tier 1 priority issue and notes that priority areas are those with sensitivity to groundwater pollution. 2. Two of the streams identified in Table 2-2 as targeted implementation areas are cold water streams with very high [>10 milligrams per liter (mg/l)] base flow nitrate concentrations: Trout Brook and Little Cannon River. 3. Table 2-2 notes that communities with moderate or high vulnerabilities to groundwater pollution are a targeted implementation area; this comports with the "layering" approach put forward in MPCA's priority concerns letter. 4. Table 2-2 also describes agricultural runoff and leaching loss a Tier 1 priority issue; specifying the main transport mechanism for nitrate (leaching loss to tiles and/or groundwater) is an important part ofthe plan's language. 5. The discussion of impaired streams includes (page 40) a very good and clear paragraph regarding "lag time" with respect to nitrogen management at the land surface and response in groundwater-dominated trout streams.	N	3.1.3 Groundwater and 3.2.1 Agriculture	MPCA participation in the planning process was appreciated and helpful for ensuring good strategies for nitrate-nitrogen reduction were developed.
			Priority Concern: Improve and protect the watershed's lakes. *The CRWI WIP should forward efforts to better understand the nutrient budgets (i.e. watershed vs internal loads) of specific lakes, while more generally working to reduce phosphorus loading in the lakes region. Five assessed lakes in the watershed arefully supporting recreational use: Kelly, Dudley, Fish, Roehmildts, and Beaver. The CRWI WIP should solidify strategies (e.g. preserving perennial cover in the watersheds via easements or ordinance) to keep the quality of these lakes intact.* The plan identifies priorities (protection lakes and lakes near thresholds) that comport with the WRAPS, stakeholders input and state directives. Further emphasizing these lake watersheds as the top priorities (relative to the "lakes region") would improve the plan's focus. 1. Table 2-2 identifies lakes as a Tier 1 priority issue it specifically lists the protection lakes as identified in the WRAPS, and three of the four lakes that the WRAPS identifies as near threshold . The watersheds of these eight lakes are subsequently referenced in Table 2-2 (and greater in the document body) as targeted implementation areas for nonpoint source pollution reduction. However, 2.2.7 Priority Areas for Implementation identifies three large areas that account for the majority of the CRW acres as "surface water priority areas." The plan should discuss the relationship between the smaller priority areas (e.g. the priority lake watersheds) and the larger polygons depicted in figures 2-3 and 2-4. For example, does the plan mean to indicate that the lakes region is a general priority area, and within it, the eight priority lakes are the main focus for this implementation cycle? This relationship is asserted in item #2 in the shadow box on page 25; it should be stated earlier and/or more frequently.			Section 2.2.7 was updated with an explanation of how the targeted implementation areas are related to the broader priority areas.

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<tr><th>Commenter</th><th>Comment #</th><th>Comment Letter Page #</th><th>Comment</th><th>Plan Change Made (Y/N)</th><th>Plan Section</th><th>Comment Response and/or Action</th></tr>
<tr><td>Minnesota Pollution Control Agency (MPCA)</td><td>2</td><td>1 & 2</td><td>2. The document notes that the loading information for the protection lakes and waters near thresholds were taken from the WRAPS and Total Maximum Daily Load (TMDLs) respectively, but the numbers for the existing loads in Tables 3-2 and 3-5 do not match those found in Table 17 of the WRAPS (even after adjusting the units to match). This discrepancy should be examined and corrected or clarified in the document if there was a deliberate rationale for deviating from the WRAPS numbers. It does not appear that a uniform adjustment was made to the WRAPS numbers, as Table 3-2 includes existing loads for individual lakes that are both greater than and less than respective loads in WRAPS Table 17. The table below compares the two numbers.

<table><tr><th></th><th colspan="2">Existing loading (lbs/year)</th><th colspan="2">Reduction needed (lb/year)</th></tr><tr><th>Lake</th><th>1W1P</th><th>WRAPS/TMDL</th><th>1W1P</th><th>WRAPS/TMDL</th></tr><tr><td>Beaver</td><td>72</td><td>41.89</td><td>8.6</td><td>4.1</td></tr><tr><td>Dudley</td><td>116*</td><td>321.87</td><td>13.9*</td><td>39.68</td></tr><tr><td>Kelly</td><td>116*</td><td>401.24</td><td>13.9*</td><td>48.51</td></tr><tr><td>Roemhildts</td><td>53</td><td>701.07</td><td>6.4</td><td>83.78</td></tr><tr><td>Fish</td><td>105</td><td>46.3</td><td>12.6</td><td>6.62</td></tr><tr><td>Cedar</td><td>1116</td><td>2473.58</td><td>603</td><td>929.64</td></tr><tr><td>Fox</td><td>2144</td><td>2594.84</td><td>901</td><td>962.06</td></tr><tr><td>Hunt</td><td>137</td><td>899.55</td><td>25</td><td>739.49</td></tr></table>
3. The implementation activities for the lake watersheds agree with the mainnonpoint source strategies put forward in the WRAPS.
4. The plan includes a recommendation to complete lake management plans for each of the priority lakes; this will address the need to further understand the details of the phosphorus budgets; thereby, allowing for a better approach to management. To support this planning the MPCA has contracted with the Science Museum of Minnesota to study phosphorus dynamics and budgets in 16 ofthe CRW lakes. The plan should make clear that some active management in the priority lake watersheds will be beneficial regardless of the findings of future lake management plans. For example, inspecting feedlots and septic systems (and addressing pollution hazards) in each of the eight lake watersheds would be beneficial to the lakes and also provide useful data resources in lake management plans. The implementation table indicates a budget of $5000 for each lake management plan; this estimate could be too low.
5. The MPCA's priority concerns letter noted that "Two lakes (Clear and Loon) and one reservoir (Byllesby) include permitted Municipal Separate Storm Sewer System (MS4} areas in their watersheds; the 1 WIP should work with state and local MS4 staff to consider strategies for these urban areas, particularly in the cases of Clear and Loon Lake which include 40% and 93% MS4 area in their drainages (respectively}." The plan does not address (or underscore the need for others to address) phosphorus loading from MS4s to these waters.</td><td>Y</td><td>3.1.1 Lakes, Streams and Rivers</td><td>The existing lake loads in Tables 3-2 and 3-5 were changed to match with Table 17 in the Cannon River WRAPS.

The following was added to the implementation activity discussion for Protection and Impaired Lakes: Active watershed management in the Tier One Lake watersheds will be beneficial regardless of the findings of future lake management plans.

The scale of prioritization, with highest priority on targeted implementation areas, then broader priority areas, followed by watershed wide will be added to the list of criteria for application ranking described in section 6.4 Work Planning.

The average cost of a lake TMDL is $5,000 per lake, which includes source assessments, load reductions and high level BMP identification. It is assumed that the Planning Partners will lead civic engagement efforts as part of a lake management plan.

See response to previous comment from Waseca County.</td></tr>
<tr><td>Minnesota Pollution Control</td><td>3</td><td>2</td><td>Priority Concern: Further study and address habitat issues in streams. Degraded and/or insufficient stream habitat is a prevalent stressor of biota (i.e. 'iish and bugs") in southeast Minnesota and in the CRW (see WRAPS Appendix I for list of 22 streams for which habitat is a conclusive stressor). The CRW1W1P should consider the best strategies for addressing habitat issues in various settings and at various scales. The plan identifies non-pollutant stream stressors (of which lack of habitat and degraded habitat are the two most common in the CRW) as a Tier two priority issue, indicating they "are most likely to be addressed in the next 10-year plan."</td><td>N</td><td>3.1.1 Lakes, Streams</td><td></td></tr>
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Commenter	Comment #	Comment Letter Page #	Comment	Plan Change Made (Y/N)	Plan Section	Comment Response and/or Action
Agency (MPCA)			1. The MPCA agrees that given limited money and staff time, focusing on the priority lakes and pollutant-impaired streams is a reasonable approach for the first watershed plan. The planning partners should look ahead to the next iteration of the document and consider what further understanding would support a meaningful examination and prioritization of habitat issues in the CRW. Page 28 notes that regarding non-pollutant stream stressors: "Future plan revisions may include a prioritized approach for addressing these impairments."		Streams and Rivers	No change needed. There are opportunities for assessment and evaluation annually, in which the group may begin to look ahead.
Minnesota Pollution Control Agency (MPCA)	4	3 & 4	Protection of baseflow especially in Lower Cannon Trout Streams. *A focus of protection work should be preserving the base/low of streams via focused monitoring and careful consideration of future water appropriations.* The plan identifies "other groundwater dependent natural resources" as a Tier two priority issue, indicating they "are most likely to be addressed in the next 10-year plan." The plan should in the interim further discuss (or at a minimum acknowledge) the potential impacts of groundwater appropriations. 1. Page 59 describes these resources, including trout streams, as distributed throughout the planning area. 3.1.3-D on page 65 outlines a good desired future condition: All groundwater-dependent resources, including trout streams, groundwater dependent lakes, and calcareous fens, located in the Cannon River Planning Area will have adequate supply of high quality groundwater. This concern is important enough to merit some discussion in the plan regarding what measures are in place now to provide sufficient protection of groundwater dependent resources, particularly trout streams (e.g. what measures and protocols are in place at DNR?). The text does not mention groundwater appropriations as a potential issue (searching for the word "appropriation" shows one instance in Appendix A). The lower CRW is largely defined by baseflow to trout stream systems; preserving this quantity of water is foundationally as important as efforts to improve water quality in the systems.	Y	3.1.3 Groundwater	Expanded upon the description in Table 2-3 for 'other GW dependant Natural Resources' to address these concerns. Tier 2 issues have and Issue Statement, Desired Future Condition and Goals, but are not further developed in this Plan. Added text to Tier 2 description on page 59 and to Issue Statement for 3.1.3-D to address needs to maintan baseflow to GDNRs (e.g. GW appropriations).
Minnesota Pollution Control Agency (MPCA)	5	4	Priority Concern: Increase perennial land acreage. *More living cover on the land reduces pollutant loads and provides wildlife habitat. This is a multiple-benefits "parent" strategy from which various specific strategies could be shaped.* A key targeted implementation activity put forward by the plan is to "convert vulnerable cropland to perennial cropland or perennial vegetation." This agrees with the Minnesota Nutrient Reduction Strategy and the WRAPS in that it should be an implementation focus; part of a suite of practices that will provide multiple benefits. Implementation table 4-3 budgets $9,261,000 over the 10-year life of the plan to "convert 10% of vulnerable cropland to perennial cropland or perennial vegetation in all Tier One lake and stream drainage areas."	N	Multiple Sections	No change needed.
Minnesota Pollution Control Agency (MPCA)	6	4	Continue work to reduce pathogens in surface waters. *The presence of fecal pathogens in surface water is a regional problem in southeast Minnesota. The CRWI WIP should support continued work to better understand E. coli indicator presence (see TMDLs document for research needs) and reduce pathogen loading to surface waters.* E.coli is not directly addressed in the plan. This generally aligns with the WRAPS, which acknowledges the regional nature of the problem and the difficulty in prioritizing based on E.coli data/impairments. The plan could include an acknowledgement that many of the best management practices (BMPs) described in the document will reduce E.coli loading to surface and groundwater. The plan could also acknowledge regional work like the feedlot and small community wastewater projects that have been underway for years, both of which provided project funding in the CRW.	Y	Multiple Sections	The issue statement for Pollutant Impaired Streams (3.1.1-C) was modified to address the regional nature of the *E. coli* laoding to surface and groundwater. Addiitonally, the statement mentions how implementation activities (included in the Targeted Implementation Schedule) and regional programs are addressing this issue in the Planning Area.
Minnesota Pollution Control Agency (MPCA)	7	4	1. A review of the entire document is needed to address grammar, spelling, punctuation, and use of acronyms errors. When documents, such as this, have significant errors it reduces the credibility of the information contained within the document.	Y	General Comment	Edits were made.
Minnesota Pollution Control Agency (MPCA)	8	4	2. On page 27, the second paragraph should read "In 2016, there were 36 lakes and 4-e-59 stream reaches that were impaired for recreation and/or aquatic life..." The number "59" should also replace "46" in the first paragraph on page 40.	Y	Section 3	Change was made as suggested.

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Minnesota Pollution Control Agency (MPCA)	9	5	3. Within the implementation activities on page 31 there appears to be inconsistencies in the number of acres available for activities . Activity 3.2.1-A-3 indicates there is 7,290 acres of cultivated cropland in the Tier One Protection Lakes drainage area (based on implementation on 10% of the acres for 729 acres). However, activity 3.2.1-B-2 indicates there is only 280 acres of corn and soybeans which seems significantly low. Please review and correct the inconsistencies.	Y	Section 3	The total cultivated cropland for Protection Lakes was 729 acres, with 10% at 73 acres. This was corrected in Activity 3.2.1-A-3. All other acreages were checked and are accurate.
Minnesota Pollution Control Agency (MPCA)	10	5	4. Activity 3.2.1 -B-3 on page 32 (along with several other locations) describes short season crops as corn silage, small grains, peas, sweet corn, potatoes, dry edible beans, and sugar beets. The MPCA would recommend removing the crops of potatoes, dry edible beans, and sugar beets as these are not crops that are normally grown on agricultural lands within this watershed.	Y	Section 3	Potatoes, dry edible beans, and sugar beets were removed as examples of short-season crops in the CWMP.
Minnesota Pollution Control Agency (MPCA)	11	5	5. Activity 3.2.1-B-3 on page 32 indicates this practice would occur on 0.5 acre totals. Please verify if this is the correct amount of acres. If the 0.5 acre is correct the MPCA recommends removal of this activity in Tier One Protection Lakes drainage area as this would result in an insignificant improvement and resources could be better utilized elsewhere.	Y	Section 3	Cover crops on short-season crops was combined with cover crops on corn/soy for the Protection Lakes due to the small acres of short-season crops in the Protection Lake targeted implementation areas.
Minnesota Pollution Control Agency (MPCA)	12	5	6. Figure 3-1 on page 33 and Figure 3-2 on page 34, the narratives below the figures indicate the Targeted Implementation Areas are shown in blue shading. However, it appears the lakes are blue and not the targeted lake watersheds. For clarity, it is recommended to either change the color of the Targeted Implementation Areas or change the blue shading highlighting the bigger "Lakes Area", as this may confuse readers into thinking that the larger Lakes Area is the targeted area.	Y	Section 3	These figures were revised to be easier to understand.
Minnesota Pollution Control Agency (MPCA)	13	5	7. In the Justification for the Goals section on page 36, the MPCA recommends replacing the following sentences "Hunt has from ~60-80% of the P budget unaccounted for. Hunt is deep enough to stratify but has a very large littoral area, which when combined with abundant carp could allow for excessive internal loading. 11 The following sentences better describe the "unaccounted for" P and corrects some errors: "Hunt has 64% of the P unaccounted for when utilizing this estimation method. Heiskary and Martin determined that if external loads were calculated with a high degree of confidence, it would be reasonable to assign the "unaccounted for" portion of the estimated P budget to internal recycling. Hunt is deep enough to stratify but has a very large littoral area which is subject to bottom disturbance from wind and wave action which could allow for this excessive internal loading." It should also be noted that the Heiskary and Martin paper inadvertently identified Hunt Lake as having abundant carp which is incorrect. The statement regarding carp in Hunt Lake on page 37 should also be removed.	Y	Section 3	Change was made as suggested.
Minnesota Pollution Control Agency (MPCA)	14	5	8. On page 37, review the activities acres (similar to the issue in the protection lake section) as there appears to be significant inconsistencies between total crop acres and corn/soybean acres.	Y	Section 3	The total cultivated cropland for Protection Lakes was 729 acres, with 10% at 73 acres. This was corrected in Activity 3.2.1-A-3. All other acreages were checked and are accurate.
Minnesota Pollution Control Agency (MPCA)	15	5	9. In the third paragraph of the Issue Statement on page 40; the goals identified in the 1WIP do not fully "restore" the impaired streams, so to prevent confusion to the readers, the MPCA recommends changing the following language "The impaired streams to be restored targeted as part of the first 10-year plan..."	Y	Section 3	Change was made as suggested.
Minnesota Pollution Control Agency (MPCA)	16	5	10. Figure 3-4 on page 42 misidentifies Trout Brook creek as impaired for aquatic consumption. Trout Brook should be identified as impaired for drinking water standards (nitrates) as aquatic consumption refers to mercury in fish tissue.	Y	Section 3	Change was made as suggested.

<table>
<tr><th>Commenter</th><th>Comment #</th><th>Comment Letter Page #</th><th>Comment</th><th>Plan Change Made (Y/N)</th><th>Plan Section</th><th>Comment Response and/or Action</th></tr>
<tr><td>Minnesota Pollution Control Agency (MPCA)</td><td>17</td><td>6</td><td>11. Page 46; The MPCA strongly cautions the 1W1P writers in the interchanging of total phosphorus (TP) and total suspended solids (TSS) and the use of the oversimplified general statement of "lib of phosphorus corresponds to approximately 1 ton of sediment/ TSS" . Even though TP and TSS share some similar pathways, other things like the sources, the effectiveness of BMPs and reduction needs can vary greatly. For instance, nutrient management BMPs which are highly effective BMPs for TP will have zero effect on TSS. In other examples, cover crops reduce sediment delivery with an efficiency that is 2.5 times greater than the efficiency for TP (i.e. cover crops are much more effective at reducing sediment than phosphorus). In contrast, a buffer strip reduces sediment and phosphorus delivery with roughly the same efficiency (an 80% reduction in sediment versus a 70% reduction in TP). The difference in reductions needed is also significant as there is a 12% overall reduction of TP called for in the WRAPS, but a 50% overall reduction needed for TSS to achieve downstream water quality goals. The MPCA recommends not using the P BMP spreadsheet for TSS loading and reductions, but instead use a different model specific to TSS to predict loading and BMP effectiveness. The table below is a comparison of the loading developed using the P BMP tool and Hydrological Simulation Program Fortran (HSPF) modeling.
<table>
<tr><th>Stream</th><th>1W1P (tons/yr) Existing Load</th><th>HSPF (tons/yr) Existing Load</th></tr>
<tr><td>Lower Vermillion</td><td>3,746</td><td>NA</td></tr>
<tr><td>Belle Creek</td><td>16,825</td><td>34,704</td></tr>
<tr><td>Little Cannon River</td><td>17,538</td><td>32,577</td></tr>
<tr><td>Trout Brook</td><td>446</td><td>2,377</td></tr>
<tr><td>Prairie Creek</td><td>17,564</td><td>8,427</td></tr>
<tr><td>Rush Creek</td><td>5,153</td><td>1,939</td></tr>
<tr><td>Medford Creek</td><td>5,111</td><td>2,005</td></tr>
</table></td><td>N</td><td>Section 3</td><td>We compared the HSPF TP and TSS yields for the Cannon River Watershed by subbasin and they were, on average, 1 lb of TP for every 1 ton of TSS. We are keeping the goals established using the P and N BMP spreadsheets. However, we recognize that BMPs differ in their effectiveness at removing TP versus TSS. The BMPs implemented will be input into the HSPF model to track progress of TP and TSS reductions achieved acrossing the Planning Area through implementation of the CWMP over the 10-year timeframe of the Plan.</td></tr>
<tr><td>Minnesota Pollution Control Agency (MPCA)</td><td>18</td><td>6</td><td>12. The 10-year measurable goals on page 46 and 47 include a table for nitrate loads; the text indicates that these were adapted from WRAPS BMP spreadsheet scenarios. This is a good approach that makes use of work completed by the (Local Government Units) LGUs during the WRAPS process. However, there should be some explanation regarding the derivation of the numbers: given the differing specificity from WRAPS to 1W1P. If the spreadsheet tools were applied to recreate and adjust what was done in WRAPS process this could be further described (maybe in an Appendix).</td><td>Y</td><td>Section 3</td><td>More clear references were added to the fact that the load reductions are adapted from the P and N BMP spreadsheets, not taken directly from the 2016 Cannon River WRAPS scenarios.</td></tr>
<tr><td>Minnesota Pollution Control Agency (MPCA)</td><td>19</td><td>6</td><td>13. Goal 3 on page 47 appears to be missing several key words which creates a confusing sentence. Please review and edit.</td><td>Y</td><td>Section 3</td><td>The first sentence of the goal was modified as follows: Develop 5 manure, 5 feedlot runoff, and 5 rotational grazing management plans to address sources of bacteria to Tier One Impaired Streams with a bacteria impairment.</td></tr>
<tr><td>Minnesota Pollution Control Agency (MPCA)</td><td>20</td><td>6</td><td>14. Activity 3.1.1-C-4 on page 48, the MPCA recommends increasing the animal unit (AU) to less than 300 AU as facilities under 300 AU are also not required to have a manure management plan. This may allow you to better target facilities that generate a significant amount of manure, but may not have a manure management plan. The MPCA would also recommend that as part of the plan development that calibration of the manure application equipment occur at the facility.</td><td>Y</td><td>Section 3</td><td>Changed to 300 AU, 3.1.1-C-4 modified to specify development in shoreland areas of the Tier One stream drainage areas.</td></tr>
<tr><td>Minnesota Pollution Control Agency (MPCA)</td><td>21</td><td>6</td><td>15. Activity 3.1.1-C-5 on page 48, the MPCA recommends further targeting the feedlot runoff control projects to either facilities with Open Lot Agreements or are locations in shoreland of the Tier One stream drainage areas.</td><td>Y</td><td>Section 3</td><td>3.1.1-C-5 modified to specify development in shoreland areas of the Tier One stream drainage areas.</td></tr>
</table>

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Minnesota Pollution Control Agency (MPCA)	22	7	16. Desired Future Conditions on page 51, The MPCA recommends changing the sentence to say: "Fish and macroinvertebrate IBl scores that indicate that all stream reaches are supporting of aquatic life."	Y	Section 3	Change was made as suggested.
Minnesota Pollution Control Agency (MPCA)	23	7	17. Goal 1 on page 53 indicates wetland restoration will occur in the Upper Cannon Hydro logic Unit Code (HUC) -10 and in the Chub Creek HUC -10. However, in the priority area summary on the previous page it indicates the priority area will be in the Straight River Tributary Priority Area. Please clarify why wetland restoration work will occur in the non-priority area of Chub Creek.	Y	Section 3	The Justification for Goals was modified to include: During the 2016 Cannon River WRAPS development process, the local partners decided on the most appropriate places for wetland restoration (Chub Creek HUC10 and Upper Cannon HUC10) and a feasible level of implementation (10%)
Minnesota Pollution Control Agency (MPCA)	24	7	18. On page 54, the WRAPS nitrogen reduction scenario calls for a 30% increase in restored wetlands in the Chub Creek HUC-10 so, request a change in the sentence: " ...the WRAPS nitrogen reduction scenario for these HUC10s {10% increase in the Upper Cannon HUC10 and W% 30% increase in the Chub Creek HUC10 based on the Nitrogen BMP Spreadsheet tool)..."	Y	Section 3	The Upper Cannon HUC10 percent reduction was used for both HUC10s. The Justiifcation for Goals section was revised to clarify this.
Minnesota Pollution Control Agency (MPCA)	25	7	19. On page 69, the MPCA recommends only using feedlot data for feedlots that are required to register when reporting feedlot data to ensure consistency across all the counties. Feedlots that are required to register include those feedlots 10 AU and higher in shoreland and those 50 AU and higher outside of shoreland. The MPCA and local county feedlot officers recently updated feedlot registration and current feedlot numbers. In the CRW there are: 657 registered feedlots of which, 49 are Concentrated Animal Feedlot Operations (CAFO). There are 114 facilities that have Open Lot Agreements (OLA) of which, 24 are located in shoreland. A total of 100 facilities are located within shoreland in CRW.	Y	Section 3	Data was updated as suggested.
Minnesota Pollution Control Agency (MPCA)	26	7	20. On page 79, the "**" notation below table 3-16 appears to be a duplication of the"*" notation.	Y	Section 3	Duplicate notation deleted.
Minnesota Pollution Control Agency (MPCA)	27	7	21. In the flood reduction discussion on page 83, the flow reduction of 35,167 acre-feet is incorrectly calculated if the goal is to retain 0.5 inches of precipitation on the landscape. If 0.5 inches of precipitation was retained on the 963,717 acres of the Planning Area the flow reduction would equal 40,154 acre-feet (963,717 acres x (0.5/12)feet). When future flow reductions are determined for flood reductions, the MPCA encourages local decision makers to also give consideration to how increase flows effect pollutant delivery to surface waters. A flow reduction that addresses both flooding issues and pollutant delivery is desirable. To evaluate long term changes in flow in the watershed, the MPCA recommends review of the Minnesota Department of Natural Resources (MNDNR) report - Upper Cannon River Watershed Geomorphology and Hydrology: A Report to MNDNR Fisheries (2014).	Y	Section 3	Changed to 40,154 ac-ft.
Minnesota Pollution Control Agency (MPCA)	28	7	22. The MPCA is pleased in how the plan overall referenced the goals, priorities and strategies of the WRAPS. The group is to be commended on the efforts to prioritize and target actions. However, with having 20 Tier One Priority Issues covering four Surface Water Priority Areas, two Groundwater Priority Areas and over 20 Targeted Implementation Areas, the group may find that the modest goals that were developed and that are spread out over many targeted areas may not achieve water quality improvements that were hoped for. To ensure success, the annual work planning must focus on achieving 100% of the goals in the identified Tier one lakes and streams if significant water quality improvements are to be realized.	N	Multiple Sections	Section 6.0 addresses annual work planning.

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Minnesota Department of Agriculture (MDA)	1	1	The plan is laid out in a user friendly way and it is helpful to have the "Example illustrating how to navigate the Plan". We appreciate the consistent formatting that allows a reader to move between the different issue statements and measurable goals. The implementation tables are also well laid out and summarize a large amount of information found elsewhere in the plan. Overall the plan has a lot of good information, however, it contains a lot of detail for an average reader. It would be helpful to have an executive summary or short factsheet that is used to communicate with community members moving forward.	N	General Comment	A factsheet has been developed.
Minnesota Department of Agriculture (MDA)	2	1	The Minnesota Nitrogen Fertilizer Management Plan (PDF) is the state's blueprint for preventing or minimizing impacts of nitrogen fertilizer on groundwater. The primary goal of the Nitrogen Fertilizer Management Plan (NFMP) is to involve the agricultural community in problem solving at the local level; to work together to respond to and address localized concerns about unsafe levels of nitrate in groundwater. The MDA Township Testing Program (TTP) provides nitrate testing to private well owners identified in targeted townships. The results of the TTP determines the actions (as is identified in the NFMP) that MDA will take in cooperation with local partners in the township(s). Township testing has been done in several areas of the Cannon River watershed and this information can be incorporated in the plan. Statewide map of TTP results: https://www.mda.state.mn.us/sites/default/files/2019- 02/combinedttmapfsht.pdf) Some of this watershed is irrigated, therefore irrigation water management BMPs (for water and nitrogen management) may be of interest. See: https://www.mda.state.mn.us/node/1313	N	Section 3	MDA TTP results were reviewed as part of the initial document review and were valuable in determining groundwater priority areas.
Minnesota Department of Agriculture (MDA)	3	2	Based upon the MDA's areas of interest noted above, there are opportunities to include MDA as a partner in the plan. Please let us know if you would like us to provide addition background narrative for any of these items. Pollutant Impaired Streams - 3.1.1-C-2 – depending upon the goal of researching nitrogen transport and groundwater-surface water monitoring, you may wish to include MDA as a partner. The MDA may be considering groundwater monitoring for nitrate in some targeted areas of the watershed. Drinking Water Protection – The MDA could be included on most of these items except; 3.1.3-A-3, 3.1.3-A-6, 3.1.3-A-7, & 3.1.3-A-8 The NFMP outlines the various actions items applicable here such as private well testing, working with farmers to implement nitrogen fertilizer BMP and other conservation practices, and education and outreach. Monitoring Data - 3.1.4-A-1 – Similar to Pollutant Impaired Streams - 3.1.1-C-2, depending on the type of monitoring, the MDA could be a partner here.	Y	Section 4	Added MDA as a partner.
Minnesota Department of	4	2	The MDA supports technical assistance and on-farm demonstrations to ensure that current and accurate scientific information is made available and used to address local water quality concerns in agricultural areas of Minnesota. This includes activities to evaluate the effective of best management practices. The MDA works with many partners including farmers, crops advisers, university researchers, private industry, soil and water conservation districts, and other state agencies. Agricultural Runoff and Leaching Loss 3.2.1-A-1, 3.2.1-A-2, 3.2.1-A-3 Using some existing programs (and developing new partnerships and programs in the future), MDA works with farmers to promote and implement nitrogen fertilizer BMPs, and in implementation of alternative crops and cropping systems that are protective of water quality. The MDA is an existing partner with Discovery Farms and support this program. However, you may not want to limit yourself to only Discovery Farms. We suggest using text that includes Discovery Farms and other on-farm demonstration programs.	Y	Section 4	Added as a partner. Added MDA as a partner and added other on-farm research.

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Agriculture (MDA)			Related to: .2.1-A-2 Monitor BMPs to demonstrate economic benefits (to farmers) of locally implemented conservation practices. Consider referencing the following programs: • The AGRI Sustainable Agriculture Demonstration Grant supports innovative on-farm research and demonstrations. It funds projects that explore sustainable agriculture practices and systems that could make farming more profitable, resource efficient, and personally satisfying. Findings are published in the MDA's annual Greenbook. More information is available at www.mda.state.mn.us/sustagdemogrant. • Nutrient Management Initiative: designed to help farmers and crop advisers evaluate management decisions using the farmer's actual field conditions. On-farm trials allow farmers to compare different practices and evaluate their outcomes. This program is a great way to support discussions with farmers and crop advisers about BMPs. More information is available at https://www.mda.state.mn.us/protecting/cleanwaterfund/onfarmprojects/nmi	Y		No change made to address this comment as the Planning Partners recognize that programs change over time. The group feels these are covered broadly under the State Funding section of the Plan.
Minnesota Department of Agriculture (MDA)	5	3	Thank you for noting the MAWQCP on page 152 (and page 179) – since SWCD may already be partners with this program, the plan may want to include MAWQCP in table 5-1, and include as an implementation activity (and/or include MDA as a partner) in table 4-1. (Ex. Implementation activity(s) for Priority concerns; Pollutant Impaired Stream, Drinking Water Protection, Agricultural Runoff and Leaching Loss, and/or Soil Health).	Y	Section 5	This was added to Table 5-1 which is now located in Appendix H of the Plan.
Board of Water and Soil Resources (BWSR)	1	1	Tables utilizing WRAPs data do not match information found within the Table 17 of the WRAPS document. This discrepancy must be examined and corrected or explained/clarified within the document. Table with data from the WRAPS are inconsistent with WRAPS content.	Y	General Comment	See response to MPCA Comment #2.
Board of Water and Soil Resources (BWSR)	2	1	The entirety of this plan needs to be reviewed for editorial inconsistencies (spelling and grammatical errors, use of acronyms inconsistently, tables that are missing numbers, lack of citations, narrative and tables that contradict, etc.). It is very difficult to focus on content with significant editorial issues.	Y	General Comment	Edits were made.
Board of Water and Soil Resources (BWSR)	3	1	There are ten counties within the planning area and the Plan must consistently state this (example found Page 1, Section 1).	Y	General Comment	Changed throughout the Plan.
Board of Water and Soil Resources (BWSR)	4	1	Water quality reduction goals are modest and within statistical error in some instances, which will make it difficult to track progress towards plan goals.	Y	General Comment	The planning partners created goals that will be targeted and acheivable within 10 years. It is recognized that water quality monitoring may not always show results and the planning partners intend to use models and tools to measure progress as well. It is recognized, and was added to work planning project selection crieteria, that work will be prioritized in targeted drainage areas and that if there is momentum in a targeted drainage area, efforts should be made to maximize implementation.
Board of Water and Soil Resources (BWSR)	5	1	Provide a list of appendices in the Table of Contents.	Y	General Comment	List of appendices was added.
Board of Water and Soil Resources (BWSR)	6	1	Multiple areas of the Plan include this statement: "the priority areas are where planning partners will measure progress towards goals, but implementation activities may be implemented upstream of the priority area". This comment effectively makes the priority areas ambiguous and inconsistent with Plan Content Requirements. Remove or reword.	Y	General Comment	The two instances of this sentence have been removed.
Board of Water and Soil Resources (BWSR)	7	2	Place the Clean Water Land and Legacy Amendment Logo on the front page of the document. This is required when using Clean Water Funds.	N	Document Cover	Logo is on page 1 of the Plan.
Board of Water and Soil Resources (BWSR)	8	2	Figure 1-1 references the Cannon lobes and then references Figure 1-2; but the lobes are not shown in the map referenced (making it difficult to discern location).	Y	Section 1	A new Lobe map was added to the Executive Summary.
Board of Water and Soil Resources (BWSR)	9	2	Regarding Page 6, the Priority Area Identification for the Lakes Area is 263,055 acres; however, the Specific Sites reference provides the same acreage. Needs to be corrected. Same page, "goals" is spelled incorrectly. Pages 6-9, clarify if this is a figure.	Y	Section 1	Flow chart has been corrected as suggested.

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Board of Water and Soil Resources (BWSR)	10	2	Targeted Implementation Schedule, Page 8, “gained water quality reductions for lake management plans” needs to be removed.	Y	Section 1	Flow chart has been corrected as suggested.
Board of Water and Soil Resources (BWSR)	11	2	Numeric values are missing for 2.1-B-2: and 2.1-B-3 (see below) indicated currently with “X”.	Y	Section 1	Tables and implementation activities in flow chart are updated with current plan information.
Board of Water and Soil Resources (BWSR)	12	3	On Page 9, remove the final paragraph and replace it with a bullet that simply states, “landowner willingness to participate”, which reflects the potential tools and methodologies listed rather than identifying barriers to targeting.	Y	Section 1	Change was made as suggested.
Board of Water and Soil Resources (BWSR)	13	3	Page 11, 2.1. Definitions – Hotspot appears to be used interchangeably with priority issue throughout this document. May want to elaborate and/or explain that hotspot may address more than one issue.	Y	Section 2	The hotspot definition has been changed to: an area where a number of restoration and protection issues are concentrated.
Board of Water and Soil Resources (BWSR)	14	3	Page 14, 2.2.3. Planning Work Group and Advisory Committee definitions. The Planning Work Group is a subset of the Advisory Committee. The role of the Advisory Committee, per Operating Procedures v1, is: “to make recommendations on the plan contents and plan implementation to the Policy Committee.” The specific role of the Planning Work Group (per Operating Procedures v1) is: “for the purposes of logistical (not policy) and process decision-making in the plan development process and in formulating recommendations for consideration by the Advisory Committee.” Change wording in Plan to reflect these roles.	Y	Section 2	This section has been modified.
Board of Water and Soil Resources (BWSR)	15	3	Page 15, 2.2.5. Comprehensive Watershed Priority Scheme – Zonation is referenced as a model and tool throughout the document. Correct for consistency and reference as appropriate.	Y	Section 2	Changed to "Conservation prioritization software"
Board of Water and Soil Resources (BWSR)	16	3	Page 16 – The purpose of Table 2-1 is unclear between the narrative, table title and table contents. Is the description column related to the first or second column?	Y	Section 2	Changed to "Supporting Method/Tool" and "Method/Tool Outputs"
Board of Water and Soil Resources (BWSR)	17	3	Page 18, bullet 4 – Clarify approach for third tier.	Y	Section 2	Tier Three added to list in bullet 4 of Tier One and Tier Two. Same approach.
Board of Water and Soil Resources (BWSR)	18	3	Page 30, 3.1.1.-A: Protection Lakes, Table 3-2 – Clarify whether the intent is Total Phosphorus or Phosphorus throughout this section. Regarding the 10-year progress towards measurable goal, is this progress towards the long-term goal or towards the 10-year goal (ex. Percentage towards the long-term or overall load)? Additional information is needed.	Y	Section 3	Clarified as TP, here and elsewhere
Board of Water and Soil Resources (BWSR)	19	3	Page 33-34, Figure 3-1 and Figure 3-2 – The legends are incorrect. The gray polygon appears to denote drainage area to Protection Lake; however, the legends state they denote the lakes themselves.	Y	Section 3	Legends revised.
Board of Water and Soil Resources (BWSR)	20	3	Page 38 Table 3-6 – The first column is titled “Impaired Lakes” when this is within the Protection Lakes description, and the protection lakes are listed.	Y	Section 3	Corrected.
Board of Water and Soil Resources (BWSR)	21	3	Pages 32, 37 and 38, 3.2.1-A-3, Table 3-3 and Table 3-6 – Verify the reduction values associated with Nutrient Management BMPs are accurate.	Y	Section 3	These are correct and equate to approximately 0.1 lb/ac reduction in phosphorus based on nutrient management BMPs. The P BMP spreadsheet is cited in the Plan.
Board of Water and Soil Resources (BWSR)	22	4	Page 36 and 37, Justification for Goals and Implementation Activities, last two sentences – Provide citation reference regarding the abundant carp issue in Hunt Lake.	Y	Section 3	MPCA noted that carp are not abundant in Hunt Lake. Reference removed.

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Board of Water and Soil Resources (BWSR)	23	4	Page 40, 3.1.1-C, Pollutant Impaired Streams. Cite source of sentence that describes Rice Creek conditions. Also, citation needed for statement that begins "There are some completed assessments…. These assessments show…." Is this in reference to MPCA assessments? Clarify.	Y	Section 3	Section modified to reflect comment.
Board of Water and Soil Resources (BWSR)	24	4	Page 42, Figure 3-4 – Verify the aquatic consumption impairment on Trout Brook. Also, Aquatic Life is listed on the legend but nothing on the map is labeled for Aquatic Life (Figure 3-5, Figure 3-6 also included on legend). Update Figures.	Y	Section 3	Figures updated.
Board of Water and Soil Resources (BWSR)	25	4	Page 46, Goal 1, Table 3-8 – For consistency, choose Sediment or TSS for the Goals and Table.	Y	Section 3	Changed to TSS.
Board of Water and Soil Resources (BWSR)	26	4	Page 51, 3.1.1-D: Non-Pollutant Stream Stressors – The Desired Future Condition states: "Fish and macroinvertebrate IBI scores that meet water quality standards…." There is not an IBI score that meets Water Quality Standards. IBI scores only indicate whether the fish/bug communities are reaching their potential. Reword.	Y	Section 3	DFC modified to: Fish and macroinvertebrate IBI scores that indicate that all stream reaches are supporting of aquatic life.
Board of Water and Soil Resources (BWSR)	27	4	Page 53, 3.1.2-A: Wetland Restoration, Goal 1 – The goal statement contradicts the "Priority Area Summary" (in the plan) since it states that the Straight River and Lakes Area will be priority areas until a flood study can be completed. Upper Cannon HUC10 covers the Lakes Area, but Chub is not in the Straight. Table 3-11 – The goal statement of increasing wetland area does not match the justification of nitrate reductions. Make a better connection of how measuring nitrate reductions will indicate whether the goal to have a net gain of 10% wetland acres is being met. Justification for Goals 'Upper Cannon HUC10 and the Chub Creek HUC10' contradicts Priority Area Summary language.	Y	Section 3	Corrected priority area references. Goal justification was modified to include: The increase in wetland area in the Upper Cannon HUC10 and Chub Creek HUC10 will also achieve nitrate reductions (Table 3 11).
Board of Water and Soil Resources (BWSR)	27	4	Page 54, 3.1.2-A-1 – Please clarify what "elsewhere in the subwatershed as needed" references. Also, what are the "other tools"?	Y	Section 3	The phrase "elesewhere in the sub-watershed as needed" was removed. The activity was modified to reference Table 6-1 and SWMM was added to Table 6-1 as a targeting tool for wetlands.
Board of Water and Soil Resources (BWSR)	28	4	Page 61, Justification for Goals, first paragraph – Is the intent to expand upon the area or assist in "public water suppliers meet the education and outreach requirements of their Source Water Protection Plans and the Safe Drinking Water Act"? Explain.	N	Section 3	The planning partners intend to work within existing DWSMAs and support existing Source Water Protection Plans. This is evident as the plan states that the planning partners "could support their efforts" and there is no mention of expanding the areas.
Board of Water and Soil Resources (BWSR)	29	4	Page 63, 3.1.3-B: GW Dependent Natural Resources - Protection Lakes – Issue statement should state somewhere that land-altering activities "have" impacted. This statement references that they may.	N	Section 3	The variety of potential impacts are described later on in the same paragraph, hence why the statement reads "have the potential to impact" and no change was made.
Board of Water and Soil Resources (BWSR)	30	4	Page 67, 3.1.4-A: Monitoring Data, first paragraph – Please review the first paragraph as it first states that monitoring gaps exist, but subsequent narrative describes that there may be gaps. Be consistent.	N	Section 3	The two references to gaps are different. The first describes gaps in baseline data needed to established goals and second is any future gaps that may occur when assessing progress towards goals established in the Plan.
Board of Water and Soil Resources (BWSR)	31	4	Page 67, 3.1.4-A: Monitoring Data, Desired Future Condition – The Issue Statement narrative describes GW however it is not included in the Desired Future Condition.	Y	Section 3	GW was added to the DFC.
Board of Water and Soil Resources (BWSR)	32	4	Page 68, 3.1.4-A-1 – The first item states "continue to collect" baseline data for…… Clarify as it was stated that baseline GW info was a need, not something already occurring (referenced link on page 165 does not work).	Y	Section 3	There is existing monitoring, however planning partners want to support existing and potentially expand. The monitoring plan will determine the appropriate monitoring levels in more detail, therefore no change is needed in the Plan. The link on page 165 has been updated.
Board of Water and Soil Resources (BWSR)	33	4	Page 68, 3.1.4-A-2 and 3.1.4-A-3; Pace of Progress, as well 4.1.1 Resource Targeted Implementation Table Page 119; Reference is given in the narrative and Pace of Progress that annual monitoring and data collection activities will initiate in 2021. The Budget table does not have funds associated with this activity until 2022.	Y	Section 3	Changed to 2022

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Board of Water and Soil Resources (BWSR)	34	4	Pages 71-74; Figure 3-9 to Figure 3-12; Information in the legend is not in the figures (maps do not contain impaired lakes, protection lake, and unsure what pollutant impaired stream refers.	Y	Section 3	Legends updated.
Board of Water and Soil Resources (BWSR)	35	4	Pages 75-76, 3.2.1-A: Agricultural Runoff and Leaching Loss, 10-Year Measurable Goals – Table 3-13 states 3-5% reductions. The Desired Future Condition states 12%. Please clarify for consistency. This is also Applicable for Goal 2; Tables do not match. Is the goal of 20% reduction your 10-Year Reduction Goal or Desired Future Condition?	Y	Section 3	10-year goals modified based on total reductions achieved through implementation of plan, here and elsewhere.
Board of Water and Soil Resources (BWSR)	36	5	Page 109, 3.3.3-A: Recreational Value – The 10-Year Measurable Goal, Activities and Pace of Progress do not line up. Reevaluate.	Y	Section 3	Goal has been modified to address issues related to access.
Board of Water and Soil Resources (BWSR)	37	5	Page 116, 4.1.1. Resource Targeted Implementation Table. Where possible, include measurable outcomes, not only outputs. Examples: 3.1.1-C-5, 5 feedlot runoff projects; give an average reduction estimate; 3.1.1-C-7; since a specific number of acres is known (7,192), calculate and provide reduction estimate.	Y	Section 4	Added reduction estimates for other practices where possible.
Board of Water and Soil Resources (BWSR)	38	5	Page 116, 4.1.1. Resource Targeted Implementation Table, ID 3.1.1-B-1 – States, "Complete lake management plans to identify phosphorus sources", with a measurable goal of achieving the water quality standards for each impaired lakes. Lakes plans which heavily rely on to set activities will not be completed until 2027. Timeline for activity needs to be reevaluated. Also applies to Page 36.	Y	Section 4	Impaired Lake Management Plan schedule changed to 2021-2023
Board of Water and Soil Resources (BWSR)	39	5	Page 116, 4.1.1. Resource Targeted Implementation Table, ID 3.1.1-C-1 – States: "One large (approximately $250,000 worth) stream restoration project……completed every two years". The value of $250,000 will vary throughout this Plan. Consider using feet of stream bank as measurement instead. Referencing Section 3 and clarifying unit of measurement will allow you to explain how large scale projects will get to reductions. Once feet of stream is determined, the 10-year measurable goal can be calculated.	Y	Section 4	Determined to be 1,700 ft per project.
Board of Water and Soil Resources (BWSR)	40	5	Page 116, 4.1.1. Resource Targeted Implementation Table, ID 3.1.1-C-3 to 3.1.1-C-6 – The 10-Year Measurable Goal is inconsistent with the Activity Measurability Outcome.	Y	Section 4	Corrected.
Board of Water and Soil Resources (BWSR)	41	5	Page 117, 4.1.1. Resource Targeted Implementation Table, ID 3.1.2-A-1 – Numbers do not match across the row. Correct for consistency.	Y	Section 4	Varying levels of implemenation based on PWG input - numbers are correct.
Board of Water and Soil Resources (BWSR)	42	5	Page 117, 4.1.1 Resource Targeted Implementation Table, ID 3.1.2-A-1 – There are inconsistencies with the Activity Outcome Measurability and the 10-Year Measurable Goal. Also, provide the criteria for targeting or delete the language that state: "or else in the subwatershed".	Y	Section 4	Removed other sub-watersheds
Board of Water and Soil Resources (BWSR)	43	5	Pages 119-120, 4.1.2. Landscape Alterations Targeted Implementation Table, Table 4-3, ID 3.2.1-A-1 to 3.2.1-A-4 – Regarding the 10-Year Measurable Goal, percentages are difficult to track. Provide a baseline that will be utilized and consider using pounds instead of percentage.	Y	Section 4	Pounds added to 10-year goal as well.
Board of Water and Soil Resources (BWSR)	44	5	Page 120, 4.1.2. Landscape Alterations Targeted Implementation Table, Table 4-3, ID 3.2.1-A-4 – The Activity Outcome Measurability is not clear. How will this be completed (how will you know this activity is finished)? Also, what will $2,400/year be used for once the funding sources are documented?	Y	Section 4	Clarified that both activities occur annually.
Board of Water and Soil Resources (BWSR)	45	5	Page 121, 4.1.2. Landscape Alterations Targeted Implementation Table, Table 4-3, ID 3.2.2-A-3 – Regarding the 10-Year Measurable Goals, this cell was left blank. Provide information.	Y	Section 4	Information added to cell.

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Board of Water and Soil Resources (BWSR)	46	5	Page 122, 4.1.2. Landscape Alterations Targeted Implementation Table, Table 4-3, ID 3.2.2-B-1 – The Implementation Activity and 10-Year Measurable Goal contradicts with Activity Outcome Measurability. This needs to be updated for consistency.	Y	Section 4	Removed 'one per year' in outcomes.
Board of Water and Soil Resources (BWSR)	47	5	Page 122, 4.2. Landscape Alterations Targeted Implementation Table, Table 4-3, ID 3.2.2-B-5 – The Implementation Activity needs to be reworded. Not a complete sentence (not readable) and does not coordinate with information in the Activity Outcome Measurability column.	Y	Section 4	No change made to the activity. More information added to outcomes i.e. with public to promote establishment.
Board of Water and Soil Resources (BWSR)	48	6	Page 122, 4.1.2. Landscape Alterations Targeted Implementation Table, Table 4-3, ID 3.2.2-B-6 – This activity is already completed and is required in the DNR Annual Shoreland Report. Delete activity.	N	Section 4	The activity is needed, full text of the activity in the Plan (page 87) describes summary and analysis as part of activity.
Board of Water and Soil Resources (BWSR)	49	6	Page 124, 4.2. Landscape Alterations Targeted Implementation Table, Table 4-3, ID 3.2.3-A-7 – The Activity, Budget and Activity Outcome Measurability contradict. Reevaluate and make changes.	N	Section 4	Budget does not presume that one MDM plan is $20,000, the planning partners are building the budget to develop 4 MDM plans over 10 years.
Board of Water and Soil Resources (BWSR)	50	6	Page 127, 4.1.3. Socioeconomic Factors Targeted Implementation Table, ID 3.3.1-A-1 – The information pertaining to financial stipends is not needed.	Y	Section 4	References to stipends have been removed from the Implementation Actities in Section 3 and the Targeted Implementation Schedule.
Board of Water and Soil Resources (BWSR)	51	6	Page 129, 4.1.3. Socioeconomic Factors Targeted Implementation Table, Table 4-4, ID 3.3.2-A-1 and 3.3.2-A-2 – Both Activities do not have 10-Year Measurable Goals or Targeted Implementation Areas filled out.	Y	Section 4	Information added.
Board of Water and Soil Resources (BWSR)	52	6	Page 129, 4.1.3. Socioeconomic Factors Targeted Implementation Table, Table 4-4, 3.3.2-A-1 – Clarify that the intent is to only make phone calls and invite CRWP and MS4s. If so, the dollar amount associated with the activity should be reduced/eliminated as it is not clear why this activity would have the associated cost since it is administrative.	N	Section 4	Cost will remain as. Costs includes any mailings, staff time, etc. Costs are calculated in the working implementation spreadsheet that was provided to planning partners.
Board of Water and Soil Resources (BWSR)	53	6	Page 129, 3.3.2-B-1: Activity Outcome Measurability does not include development of the website. Is the intent to create a stand-alone, new website the first year?	Y	Section 4	Outcome measurability has been revised to address comment.
Board of Water and Soil Resources (BWSR)	54	6	Page 129, 3.3.2-B-3: Activity Outcome Measurability stating 12 JAA approvals per year. What does this refer to? 12 projects are completed? 12 new staff obtain JAA? Clarify intent and why it needs to be in this table. Staff Individual Development Plans should cover this.	Y	Section 4	Added JAA to glossary and update outcomes to reflect 12 staff receiving JAA review per year.
Board of Water and Soil Resources (BWSR)	55	6	Page 130, 4.1.3. Socioeconomic Factors Targeted Implementation Table, ID 3.3.2-B-5 – Remove section related to providing stipends to employees. “Provide staff training in outreach and communication to more effectively communication…..by providing stipends to employees”.	Y	Section 4	Section removed.
Board of Water and Soil Resources (BWSR)	56	6	Page 131, 4.2. Prioritization of Programs and Projects, Box, Allocation of Resources – Clarify the intent of this sentence. Unsure why: emphasis on “shovel-ready” description is included.	N	Section 4	The Policy Committee and Planning Work Group discussed and wanted priority placed on shovel ready projects. Furthermore, early success will help garner momentum.
Board of Water and Soil Resources (BWSR)	57	6	Page 131, 4.2. Prioritization of Programs and Projects, Box, Funding – This contradicts the first listed criteria. Provide additional information.	Y	Section 4	The text for the first bullet in the box has been modified to address the confusion.
Board of Water and Soil Resources (BWSR)	58	6	Page 132, 4.2.1. Identification of Roles and Responsibilities towards Implementation, paragraph three – A “workload analysis” is identified (for the first time). No information is provided on how this will be completed and it is not included in the Implementation Table. Clarify.	Y	Section 4	Annual Administrative costs have been added to the Targeted Implementation Scehedule to account for these types of routine activities that will be performed by the Planning Partners.
Board of Water and Soil Resources (BWSR)	59	6	Page 134, Table 4-5 and Page 135, first paragraph –Reference Table 4-1 in the narrative (Page 135, first paragraph) to clearly explain the breakdown of funds and funds needed. Also, there is $6,000,000 currently allocated annually to water management activities in the Planning Area and Table 4-1 indicates each year’s budget is significantly less than $6M. Are these the funding needs above and beyond that $6M? Needs clarification.	Y	Section 4	Clarifying langauge has been provided in the paragrpah under Table 4-5.

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Board of Water and Soil Resources (BWSR)	60	6	103D.405 requires revised watershed management plans to include "a statement of the extent that the purposes for which the WD had been established have been accomplished". The BCWD 2011 plan contained specific accomplishments related to septic/sewage assistance, structure maintenance, waterway cleanouts, educational events, and permits. Provide similar updated accomplishments for BCWD to meet statutory requirement.	Y	Section 4 BCWD	Accomplishments of the BCWD have been added to Section 4.4.1 of the Plan.
Board of Water and Soil Resources (BWSR)	61	6	Table 3-10 indicates that perennial cropland conversion and nutrient management BMPs will be taking place within Belle Creek. Is it intentional that there are no action items in BCWD's implementation plan for these activities? Will they be handled solely by the SWCD and NRCS in this watershed?	N	Section 4 BCWD	It was intentional that the implementation activities identified in Table 3-10 are not included in the Belle Creek WD's Implementation Plan as these are new activities that the Planning Partners have idenitfied through the development of the Comprehensive Watersehd Management Plan and are committed to securing funds for implementation.
Board of Water and Soil Resources (BWSR)	62	7	How are the activities in the BCWD implementation plan tied to the measurable goals established for Belle Creek on page 46? Utilize a tool to estimate 10-year reduction values for implementation of new practices. Example, for Activity 1.A.2: 10 retention BMPs implemented reducing an estimated 220 tons of sediment per year, or 33% of 10-year goal.	Y	Section 4 BCWD	All entities (beyond the BCWD) are implenting local priorities as discussed in the Plan. These activities will contribute to water quality improvements and reductions in flooding thereby helping to achieve the plan goals more quickly. Local partners are in the process of developing a tool to account for both CWMP performance as well as local performance. A sentence describing this process has been added to Section 6.5.1 Annual Evaluation.
Board of Water and Soil Resources (BWSR)	63	7	103D.405 also requires "an analysis of the effectiveness of the WD's rules and permits in achieving its water management objectives in the WD." The WD rules are referenced on Page 162. To meet this statutory requirement, information is needed on whether the existing rules are sufficient to achieve the goals of this Plan, or if they need to be revised.	Y	Section 4 BCWD	Text addressing the effectivenss of the BCWD's rules has been added to Section 5.4.2 of the Plan.
Board of Water and Soil Resources (BWSR)	64	7	Include the BCWD Rules in Table 5-4.	Y	Section 4 BCWD	The appropriate cells have been marked to indicate that the BCWD has rules in place to protect resources from certain land use changes. Additionally, text referring the reader to Appendix G (which is where the rules are located) has been provided in the introductory narrative.
Board of Water and Soil Resources (BWSR)	65	7	As written this Plan does not sufficiently meet the requirements of MN Rule Part 8410 for NCRWMO to adopt the Plan for reference. Either provide a detailed description of the physical environment and identification of water related issues within the NCRWMO, as well as a description of the official controls implemented by local communities; or remove the language on Page 144 allowing local government units to adopt the Plan by reference, and describe the information that would need to be included in a local government unit plan to meet the requirements of 8410.0160.	Y	Section 4 NCRWMO	See response to Metropolitan Council comment #1.
Board of Water and Soil Resources (BWSR)	66	7	Page 151, 5.1. Incentive Programs, first paragraph – What does 'the local context' refer to?	N	Section 5	No change needed, local context simply means that the counties and SWCD should use their experience and professional judgement to create prorams and policies that work for their areas in the watershed and their landowners.
Board of Water and Soil Resources (BWSR)	67	7	Reevaluate Table 5-1 with partners to ensure correctness with existing programs.	Y	Section 5	Partners made additional revisions to the tables which are refelcted in the Plan.
Board of Water and Soil Resources (BWSR)	68	7	Page 155, 5.2. Capital Improvements, first paragraph – Define what "normal" is or reword. Second paragraph add the authorities of counties and SWCDs in regards to capital projects.	Y	Section 5	Changed to typical.
Board of Water and Soil Resources (BWSR)	69	7	Page 157, 5.2.1. Drainage – The Plan identifies maintaining existing programs to decrease sediment to drainage ditches to decrease maintenance costs and improve water quality however, the WRAPS document indicates that more needs to be done. Consider making more consistent with WRAPS recommendations.	Y	Section 5	According to the WRAPS, "Point sources,tile drainage, and groundwater outflow pathways each contribute less that 1% of the overall sediment delivery". Additional drainage management goals were not needed to address sediment delivery to the system at this time.
Board of Water and Soil Resources (BWSR)	70	7	Page 158, Table 5-3 and paragraph three; Operations and Maintenance – Paragraph three mentions very specific programs: "no-till seed drill programs and tools, septic pumping logs, well water testing programs….." Reference is given to Table 5-3, which does not include any of those items.	Y	Section 5	References to specific programs was a carry-over from when Table 5-3 contained explicit programs (which were later lumped together). This Section of the Comprehensive Watershed Management Plan has been modified so this comment is no longer relevant to the improved content.

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Board of Water and Soil Resources (BWSR)	71	7	Page 158-159, 5.3. Operation and Maintenance – Section contradicts itself, identifying flood prevention structures that Belle Creek WD is responsible for and then states the partners do not own any projects in the planning area. Additionally, no funding is identified for operations and maintenance of the PL566 structures. This is important for Belle Creek WD if they intend to adopt this Plan.	Y	Section 5	The text re: the BCWD's flood prevention structures has been clarified and the cost associated with these activities has been added to the Targeted Implementation Schedule.
Board of Water and Soil Resources (BWSR)	72	7	Plan Content Requirements state: "consider including opportunities for improved water management associated with county and township roads, and within drainage systems managed through Drainage Law."	N	Section 5	The planning partners did consider opportunities and even had drainage focused sub-group meetings. Drainage is addressed through the existing goals in the Plan, and activities 3.2.3-A-6 thru A-8. Roads were discussed during MS4 conversations and while they did not rise to the top as a priority issue, they are addressed in Section 5, Plan Implementation Programs.
Board of Water and Soil Resources (BWSR)	73	7 & 8	Page 158, 5.3 Operations and Maintenance – According to Plan Content Requirements, v1, this section needs to include the following: "a description of who is responsible for inspection, operation and maintenance of capital projects, stormwater infrastructure, public works, facilities, and natural and artificial watercourses. Specify any new programs or revisions to existing programs needed to accomplish the goals or that may benefit from watershed-wide collaboration." Expand on current language to include all of these required elements.	Y	Section 5	Additional text has been added to Section 5.3 to address this comment.
Board of Water and Soil Resources (BWSR)	74	8	Page 159, Programmatic Gaps for Comprehensive Watershed Management Plan and Implementation – Clarify which Plan priorities will address identified gap.	Y	Section 5	The content under Socioeconomic Factors: Educating Local Landuse Decision Makers addresses BWSR comment #8 by clarifying which activities address the following gap identified during program evaluation: Non-MS4 communities need to improve maintenance activities (addressed by Plan Priorities). As a result, the original text identifying the gap has been removed from this section.
Board of Water and Soil Resources (BWSR)	75	8	Page 162, Table 5-4 – Reevaluate this table with the planning partners for accuracy. Also, clarify who has the authority and who is assisting with implementation.	Y	Section 5	While Table 5-4 has been moved to the appendices (see Appendix H), the table has been modified to identify which entity administers the regulatory program and which enforces the regulatory program.
Board of Water and Soil Resources (BWSR)	76	8	Pages 164-168, The Data Collection and Monitoring section generally describes the existing data collection and monitoring activities; however, it does not connect the activities to the targeted implementation schedule in order to effectively evaluate Plan progress. Plan Content Requirements Section 5. Implementation Programs/Data Collection and Monitoring (Page 12).	Y	Section 5	A table (and text) was added to this section of the plan to more clearly make the connection between monitoring activities and how the data supports demonstrating progress towards meeting the plan goals.
Board of Water and Soil Resources (BWSR)	77	8	Page 173, Table 5-7 (below) – This table needs to be updated for accuracy. Numbers do not match the implementation table. See also 6.3 Funding. Table needs to clarify whether this is funding needs above and beyond the existing funding. NCWMO and Belle Creek WD (PL566s) efforts do not appear to be included. The Targeted Implementation Schedule (Tables 4-1 to 4-4) and this table are inconsistent (both categories and numbers).	Y	Section 5	Section 5, Plan Implementation Programs was re-formated. Table 5-7 is now Table 5-3 and was updated by further breaking down Incentive Programs. Table 4-5 documents existing funds and has a footnote to describe this. All funds in Table 5-3 are need above and beyond existing funds. NCRWMO no longer intends to adopt this Plan as their Plan, therefore efforts do not need to be included. Furthermore, there are no CIP items for NCRWMO. BCWD has Operation and Maintenance that has now been incorporated into Table 5-3. Table 5-3 is a summary of the Targeted Implementation Schedule, and is purposefully in different categories.
Board of Water and Soil Resources (BWSR)	78	8	Page 175-176, 6.2. Collaboration with Other Units of Government – Section is insufficient to meet Plan Content Requirements (5Aii).	Y	Section 6	Additional text has been added to this section to further address plan content requirements.
Board of Water and Soil Resources (BWSR)	79	8	Page 176, 6.3.1. Local, first paragraph, third sentence – Clarify whether the intent was to exclude general operating expenses of counties vs funds obtained from counties.	Y	Section 6	Sentence has been changed to " Local funding excludes general operating funds obtained by counties, from BWSR and grants or partnership..."
Board of Water and Soil Resources (BWSR)	80	8	Pages 176-177, 6.3.2. State Funding – Describe state funding needed for implementation of the Plan. This can be achieved through separation in the targeted implementation schedule of locally funded projects versus projects that will proceed only with state funds or in the Summary Table 5-7.	N	Section 6	There are other portions of the Plan that summarize funds, including Section 5.7. The planning partners wrote the Plan with the intention that everything existing continues and activities within the Plan will only be achievable with additional funds.
Board of Water and Soil Resources (BWSR)	81	8	Page 177, 6.3.4. Federal Funding; also Page 178, Other Funding Sources – Remove sentence that states: Federal funding/Other Funding Source: "excludes general operating funds obtained from BWSR, counties, service fees, and grants or partnership agreements with state government or other conservation organizations."	Y	Section 6	Sentence modified.

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Board of Water and Soil Resources (BWSR)	82	8	Pages 180-182, 6.4. Work Planning – Unclear how examples in Figure 6-1 and 6-2 connect to the tools identified in Table 6-1.	Y	Section 6	Clarified in text.
Board of Water and Soil Resources (BWSR)	83	9	Page 180, Table 6-1. Targeting and Measuring Tools by Project Type The N/P BMP tool is not to be used for measurement. For Issue 3.1.1-A and 3.1.1-B, suggest adding MIDS calculator and WINSLAM (WINSLAM was used for the sub-watershed assessment work in the Metro, which would correlate well with the lakes region in the Cannon). Also, consider including P-8 or BATHTUB model. BWSR calculator is only for field scale reduction estimates; this needs to be modified.	Y	Section 6	Annually, the Planning Partners will keep track of implementation acres. Every 5-years, they'll input those acreages into HSPF-SAM to measure load reductions achieved. N/P BMP Tool wasn't meant to be measurement - reference to the tool has been removed from the Measuring Tool column. Suggested tools added to 3.1.1-A and 3.1.1-B BWSR calculator moved to field scale column.
Board of Water and Soil Resources (BWSR)	84	9	Page 184, 6.5.4. Reporting – This section describes what each entity is doing; however, it does not describe how the partners could collaboratively approach reporting for the Plan; include a brief description (specifically if there are joint grants or projects).	Y	Section 6	Added text acknowleding that same reporting applies to partnership too.
Board of Water and Soil Resources (BWSR)	85	9	Page 185, 6.6.1. Criteria and Format for an Amendment – Remove the first bulleted item.	Y	Section 6	This change has been made.
Board of Water and Soil Resources (BWSR)	86	9	Page 186, 6.6.2. Major Amendments – See Operating Procedures, Plan Review Agencies (Page 17). Include Met Council and EQB as appropriate.	Y	Section 6	Included.
Public Hearing Lee Dilley	1	NA	Mr. Dilley commended the group for their work on the Plan. He feels that education is needed especially in regards to soil health. There are extensive opprotunities for improving soil health and would like the group to consider regnerative agriculture as a means to healthy soils. One examplae is the work done by CRWP in the Rice Creek watershed, where farmers are implementing cover crops. He stated that public dollars should also be used to help farmers implement cover crops.	N	Multiple Sections	There are goals and activities in the Plan that specifically address soil health, activities include implementation of cover crops, which are part of regenerative agriculture.
Public Hearing BarbJudd	1	NA	Ms. Judd had a question about high water levels in the lakes regions of the watershed and if anything is being done to analyze and address this concern.	N	Multiple Sections	Flooding of Communities was an issue that became a tier 1 issue during the planning process. An example of one activity that will address the water level concern will be to conduct a hydrologic and hydraulic model that analyzes how water moves through the watershed. Other activities address storage, such as wetland restoration