

# Appendix D

## Plan Comments and Responses



Bois de Sioux - Mustinka Comprehensive Watershed Management Plan  
 Formal Review and Public Hearing

Date	Commenter	Comment #	Section	Comment	Material	Editorial	Other	Change (Y/N)	Proposed Resolution
8/17/2020	Greg Fynboh	1	1	the elevation maps would be easier to read if the legend was in "feet" instead of or in addition to "meters".		x		Y	Map revised to read in "feet."
10/27/2020	MPCA	1	General	The Minnesota Pollution Control Agency (MPCA) has reviewed the 60-day Review Draft Bois de Sioux and Mustinka One Watershed One Plan (Plan) dated September 8, 2020, and have no comments at this time.			x	N	Comment noted, with thanks.
11/2/2020	MDA	1	4	(Page 3-5, 4.6, 4.11, 4.15, 4.19, 4.23) Soil management is used to describe practices that could benefit soil health, (residue management, rotations, cover crops, etc.) which may be somewhat misleading or too general to the reader.  A suggestion would be to change "soil management practices" to "soil health practices", or "new soil and residue management practices" in order to be specific regarding the improvement or implementation of management practices that can help the soil health acreage goals.		x		Y	Revised to "soil health practices"
		2	4	(Page 4.6, 4.11, 4.15, 4.19, 4.23, Item 5) It may be a good idea to add "dealer, equipment representative, or consultants" to the Responsibility column, as opposed to just "Co-ops." Word of mouth from non-government staff would be a very useful tool to involve farmers and ag industry representatives to help promote and implement new projects and practices within the watershed.		x		Y	Revised as suggested.
		3	General	One of MDA's roles that relates to the 1W1P process is technical assistance. The MDA maintains a variety of water quality programs including research, on-farm demonstrations, as well as ground and surface water monitoring. Our goal is to provide you with the data from the programs to help address resource concerns and further engage the agricultural community in the 1W1P process, including the watershed wide and planning region focus of the implementation schedule. Listed below are project weblinks, data results, as well as other information that can be considered during the implementation phase.			x	N	Noted for implementation purposes, with thanks.
11/5/2020	MDH	1	2	Section 2.3 Priority Issues (page 2-17): Groundwater quality protection is listed as a high priority in the table but is a medium priority on page 2-11. Ensure priority issues ranking is consistent throughout the plan.	x			Y	Changed to read "Medium" for Groundwater quality protection across all planning regions.
		1	General	Didn't we rename the Technical Advisory Committee?? Too many of us have existing committees with this name.		x		Y	Revised to "Steering Committee"
		2	Page ES-1	1st paragraph - Please put "two watersheds" in bold.			x	Y	Revised as suggested.
		3	Page ES-1	Please add to the 3rd Paragraph: "Activities described in this plan are voluntary, not prescriptive, and are meant to allow flexibility in implementation. This plan is a list of goals that the organizations may accomplish in the next 10 years. This plan in no way represents an agreement or contract between any or all of the 13 independent LGU's and the State of Minnesota or any of its departments or agents."		x		Y	Revised as suggested.
		4	Page ES-12 & P	The Policy Committee has no authority to receive or require Base 1 or Base 3 implementation funds from plan participants outside of watershed-based implementation fund programs. Please change the first bullet point to: "Receive information regarding plan participant implementation funds."				Y	Revised as suggested.
		5	Page ES-12 & P	The Technical Advisory Committee has no authority to recommend confiscation to redistribute Base 1 or Base 3 available implementation funds from plan participants for uses determined by the Policy Committee. Please split the first bullet under Technical Advisory Committee to: "Review the status of available implementation funds determined by individual plan participants" and  "Recommend the use of watershed-based implementation fund to the Policy Committee"	x			Y	Revised as suggested.
		6	Page 1-1	The last statement is not wholly true - this plan is more than a "tool to assist" - it also serves as the watershed's basis to implement 103D.605 projects. Please change to, "This plan will assist local governments and landowners with protecting and/or improving water management....."		x		Y	Revised as suggested.
		7	Page 1-6	Last paragraph, please remove the word "unsurprisingly" and rearrange the picture - in the PDF, the picture is cutting off the text in the last sentence.		x		Y	Revised as suggested.
		8	Page 2-22	In the 2nd sentence, please change "statues" to "statutes"		x		Y	Revised as suggested.

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		9	Page 2-22	Please remove the "inconsistent Administration and Enforcement of Minnesota Rules and Statutes" from the plan. We believe it might be a holdover from the plan template, or hastily considered at the beginning of the planning process. Please add a statement on page 4-30 to the end of the first paragraph that states, "Local government units may seek opportunities to align specific regulatory standards across county boundaries."	x			Y	Revised as suggested.
		10	Page 3-6	Please add a caveat that for implementation of flood storage projects, it may not make sense or be practical to split a long-term, large-scale impoundment goal into smaller "short-term goals."	x			Y	Revised as suggested.
		11	Page 3-6	What does the * mean?		x		Y	Clarified to read "Goal source"
		12	Page 4-1	Last sentence, "Execution of these types of actions will require considerable coordination and cooperation." Please change "will" to "may." Many of these actions can be completed by individual LGU's - and faster and cheaper than dragging 12 other LGU's into them.			x	Y	Revised as suggested.
		13	Page 4-4	The first three paragraphs make it sound like all of our Targeting efforts are the sole result of PTMApp...but we know the watershed projects, and some SWCD projects, cannot be targeted using PTMApp.  Please change paragraph 1 to say "This plan leverages existing PTMApp data to identify where many new practices are feasible, and of these practices, how much each practice will cost, what the estimated water quality benefit is, and how much progress implementation of a practice can make toward planning region goals."  Please add to the 4th paragraph - "Clean water practices within ditch retrofits are not recognized by PTMApp, but are contained in the Actions Tables. Information regarding these practices are based on engineering technical standards, calculations, and modeling. Stream restoration benefits are not recognized by PTMApp; location, cost, and water quality benefits are derived from in-depth engineering plan and design processes and are described in the Capital Improvement Projects Table."  Please change the second sentence in the fourth paragraph to read: "Examples of these practices include wind breaks, cattle exclusions, side inlet culverts, grade stabilization structures, continuous berms, and large-scale stream restorations."  Please add paragraph 4 to paragraph 1 - just so that the reader understands immediately that the first three paragraphs don't apply to everything in the document.	x			Y	Revised as suggested.
		14	Page 4-4	Reference/Footmark 2. Please change to: "Cost figures for actions described under Projects and Practices were calculated by doubling the 2016 EQIP rate, in order to include staff administrative, technical, and project development costs."		x		Y	Revised as suggested.
		15	Page 4-8	Please change, "Lake Traverse Water Quality Imp. Project #1" to "Lake Traverse Water Quality Imp. Project Phase No. 1, 2, & 3"			x	Y	Revised as suggested.
		16	Page 4 - 26	Please change the full sentence above the table to read "...They will be funded by the Data Collection and Monitoring Implementation Program,...."			x	Y	Revised as suggested.
		17	Page 4-29	#10 - please remove "newspaper"		x		Y	Revised as suggested.
		18	Page 5-2	Not all of the grants that each 13 LGU receives will be applied for jointly. Counties receive many, many grants that are not related to the issues in this plan. SWCD's also. We each retain the right and authority to obtain grants for our own entities, for our own projects.  Please change text in the first paragraph to "Grant applications to fund the New Projects Program <u>may be</u> prepared jointly through the Bois de Sioux - Mustinka Watersheds CWMP Partnership, <u>when mutually beneficial to promote consistency in services and maximize efficiency in implementation across the plan area.</u> "	x			Y	Revised as suggested.
		19	Page 5-2	This CWMP literally provides our prioritized actions and activities. The Partnership may decide to further refine this, if needed.  Please change the 1st paragraph text to: "During implementation, the Partnership <u>may create decision-making processes</u> for prioritizing what practices get funded, and how much <u>watershed-based implementation</u> funding practices will receive. Funding received by the Bois de Sioux - Mustinka Watersheds CWMP Partnership will be preferentially given to projects and practices identified with the Action Table <u>and any subsequent amendments</u> , consistent with the priority issues and goals established in this plan.	x			Y	Revised as suggested.

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		20	Page 5-21	Please change the last sentence of the first paragraph under 5.12 to say: <u>"...flexibility includes changes to the activities, capital improvement projects, and water management districts. Because pursuant to Minn. Stat. §§ 103B.801(6) the authorities granted to local government through chapters 103C and 103D are retained, locally approved actions, capital improvement projects, 103D.605 basic water management projects, and 103D.729 water management districts will be considered amended to the Plan if implemented in accordance with State statute. The local board shall notify the Policy Committee of the addition and the Policy Committee shall update the plan with the amendment. Actions and CIP's will be added to the appropriate table and water management district plan amendments will be added to the appropriate appendix."</u>	x			Y	Thorough re-write of Plan Amendment section per consult from BdSWD and BWSR.
		21	Page 5-3	Please add:  <u>Our local government units recognize that project funds are extremely limited, and that requests for information, tracking, evaluation, and assessment are activities that require staff time and office resources, decreasing the amount of funds available for our high and medium priority projects. Outside of projects through watershed-based implementation funds, each local government unit will be responsible for providing assessment, tracking, evaluation, and reporting data for their own organization's activities. Requests for additional information shall be filed in accordance with Minnesota Government Data Practices Act. Other requests will be considered optional, by each LGU, on a case-by-case basis, unless the request is required by a specific grant agreement or state statute.</u>	x			Y	Revised as suggested.
		22	Page 5-3	Please remove "Proving" from table 5-1. The purpose of our plan to the prioritize, target, and measure. For measurements, we relied on state recommendations, models and industry technical standards. A simple model-prediction-validation system does not work for the types of activities that we are doing in this plan - and none of our organizations have the resources to provide a "proving" level of tracking and documenting a wide and long-term scale. It is not within our ability to prove whether these models are accurate.  BWSR has stated that our LGU's will be evaluated on all aspects of the plan, and the watershed does not intend to allocate resources towards a "proving" activity. If we include "proving" as an example application in our plan, BWSR may require our LGU's to "complete it" - and, instead of fixing the problem of spending too many resources on studies, we are instead going to be required to spend too many resources on proof models and state recommendations.	x			Y	Revised as suggested.
		23	Page 5-5	County ordinances can address a <b>wide</b> variety of topics - many outside of water regulations. I do not think it is reasonable for us to require that each of our six counties and the watershed notify each county and the watershed prior to any proposed ordinances or amendments. There are statutory publication requirements that we must all meet to enact a new ordinance or amendment - that process has been adequate.  Please change the text in the first sentence to: "Counties and the BdSWD will meet as needed to discuss changes to the following water-related ordinances and ordinance amendments:"	x			Y	Revised as suggested.
		24	Page 5-6	Please remove "In Grant County, alternative practices are not allowed in lieu of a buffer on public waters but are on public drainage systems. In addition, all required buffers on public waters must be 50-feet wide within Grant County." Grant County could change their ordinances in the span of our 10-Year plan, or another county could decide to adopt custom requirements. A reference to find the information would be more helpful than potentially including outdated information. Please replace with: "Questions or requests for information about buffer or shoreland ordinances should be directed to the respective county soil and water conservation district."	x			Y	Revised as suggested.
		25	Page 5-7	Paragraph 1 under 5.5: "Capital improvements are beyond the "normal" financial means of the Partnership and require external funding."  Add "Some" to the beginning of this sentence - we have CIP's that the watershed board can decide to construct without outside funding.			x	Y	Revised to: "Some capital improvements are beyond the 'normal' financial means of the Partnership, often exceeding \$250,000, and are unlikely to get constructed without external funding." Inclusive of BWSR Comment #12.

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11/6/2020	BdSWD	26	Page 5-7	<p>Please remove this sentence: "Additional discussions are needed among plan participants to develop the specific process for implementing capital improvements with base funding."</p> <p>The watershed is the only entity with CIP's under this plan. The watershed board managers retain their authority to spend their base funding according to board action and to establish capital improvement and watershed projects according to statute.</p>	x			Y	Revised as suggested.
		27	Page 5-7	<p>2nd Paragraph, 2nd Sentence: "Specifically, members of the Policy Committee or the Partnership's individual and representative Boards are expected to discuss the means and methods for funding new capital improvements with potential funding partners before an implementation timeline can be established."</p> <p>Please remove the text, "before an implementation timeline can be established." <b>We don't always know who the final funding partners are until we near, or begin, construction. In the case of the RRWMB, we have been awarded grants retroactively, because RRWMB designed a new grant opportunity and a project we already started qualified for the grant.</b> Most often we have an implementation timeline that we bring to funding partners because the funding partners want to know what the start dates are (for eg, an application for BWSR's Multipurpose Drainage Management grant must be submitted in August, and will give an award notice in December - before this time, we have to have a landowner petition and viewer redetermination work nearly completed, and preliminary engineering plans in the works, and we will have given landowners an idea of how a project will progress via a timeline).</p> <p>Please change the sentence to: "Members of the Policy Committee or the Partnership's individual and representative Boards may discuss the means and methods for funding new capital improvements with potential funding partners."</p>	x			Y	Revised as suggested.
		28	Page 5-8	<p>Please remove this sentence, in case there is a legislative change within the plan's 10-year period: "The WMD funding option can only be used to collect charges to pay costs for projects initiated under MS 103D.601, 103D.605, 103D.611, or 103D.730. "</p> <p>Please change the next sentence to: <b>Effective in 2020, and subject to future changes,</b> to use this funding method, Minn. Stat. § 103D.729 requires that the WMD includes an identification of the area, the amount to be charged, the methods used to determine the charges, and the length of time the WMD is expected to remain in force.</p>	x			Y	Revised as suggested.
		29	Page 5-9	Please add a footnote that this graphic is meant to simply describe the process dictated by Minnesota Statutes; if the information in the graphic deviates from or contradicts with Minnesota Statute requirements, Minnesota Statutes will be followed		x		Y	Revised as suggested.
		30	Page 5-9	<p>Please add to the first paragraph:</p> <p>"Because the existing authority of the watershed district is maintained, water management districts need only be approved by the corresponding watershed district to initiate a plan amendment, pursuant to the amendment process outlined under Minn. Stat. §§ 103D.729 and 103D.411. The watershed district shall notify the Policy Committee of the addition and the Policy Committee shall update plan documents as the state statute is followed and the Comprehensive will be considered amended."</p>	x			Y	Revised to: As of the date this plan was written, there is one water management district enacted. See Appendix M for active water management districts. Because the existing authority of the watershed district is maintained, water management districts need only be approved by the corresponding watershed district to initiate a plan amendment, pursuant to the amendment process outlined under Minn. Stat. §§ 103D.729 and 103D.411. The watershed district shall notify the Policy Committee of the addition and the Policy Committee shall update plan documents as the state statute is followed and the CWMP will be considered amended."
		31	Page 5-9	Please remove the first paragraph. The watershed has absolutely no intention to use a planning region as a water management district, and both District Engineer Chad Engels and Administrator Jamie Beyer remember that we discussed removing this option, because we didn't want landowners to feel like something was buried in this CWMP that wasn't brought transparently to them for their comments. If the watershed maintains its authority to approve water management districts, and once locally approved are considered an official plan amendment, we do not need to include any reference other than to the already approved Lake Traverse Water Quality Improvement Project No. 1 water management district approved by BWSR in 2020.	x			Y	Revised as suggested.
		32	Page 5-9	<p>Please remove the first paragraph.</p> <p>Please replace the first paragraph with: "As of the date this plan was written, there is one water management district enacted. See Appendix XXX for active water management districts. The BdSWD retains its authority to establish future WMDs via plan amendments pursuant to Minn. Stat. §§ 103D.729 and 103D.411"</p>	x			Y	Revised as suggested. Response also combined with BdSWD Comment #30

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		33	Page 5-12	The Bois de Sioux & Mustinka Watersheds CWMP Partnership is not a separate legal entity. Please change the first sentence of the last paragraph to read:  "In collaboration with the fiscal agent, the Bois de Sioux - Mustinka Watersheds CWMP Partnership may apply for collaborative competitive or non-competitive grants."	x			Y	Revised as suggested.
		34	Appendices	Please change the Title of Appendix M to "BdSWD Rules, Policies, and Amendments" in both the section and the Table of Contents - and add the Lake Traverse Water Quality Improvement Project Amendment approved by BWSR in 2020 to this appendix.	x			Y	Revised as suggested.
		35	Page 5-6	Please replace this .jpg with the actual text - we often use the text search option, and it won't work for this section, and it contains words that are not repeated in any text nearby.		x		Y	Revised as suggested.
		36	Page ES-8	Our plan describes over \$82,000,000 of projects for a 10-year period - as such, this plan includes both our to-do list and our wish list, with both dependent upon significant amounts of both funding cooperation with private landowners. We will not complete (or even initiate) all of the actions in this plan.  Please change "This plan identifies actions that will be implemented in the next 10 years...." to "This plan identifies actions that may be implemented in the next 10 years."		x		Y	Revised as suggested.
		37	Page ES-9	Please change "Making progress toward goals is largely dependent on funding. With more funding...." to "Making progress toward goals is largely dependent on funding and private landowner participation. With more funding and landowner cooperation...."		x		Y	Revised as suggested.
		38	Page ES-11	A number of implementation agreements have not been drafted, so it would be premature and impossible to bind independent authorities to a stated outcome in this plan.  Our 13 LGU's do have the independent choice to implement the plan on their own, without watershed-based implementation funds, outside of whatever "partnership" structure is employed to direct watershed-based implementation funds.  Please change "Two committees will administer this plan during implementation:" to "At least two committees may administer this plan during implementation...."		x		Y	Revised as suggested.
		39	Page ES-11	Please change the Policy Committee description to: "This committee will be comprised of elected and appointed board members (county commissioners, SWCD board supervisors, and watershed board managers).	x			Y	Revised as suggested.
		40	Page 5-18	Please change "Two committees will serve this plan...." to "Two committees may serve this plan...."		x		Y	Revised as suggested.
		41	Page ES-11	Please add a notation that the BWSR Board Conservationist serving the Technical Advisory Committee is non-voting, ex-officio.		x		Y	Revised as suggested.
		42	Page ES-11	Please add the second sentence to the existing first sentence: "It is anticipated that the parties will enter into a formal agreement for purposes of receiving watershed-based implementation funding. Individual local government units are individually responsible for their roles implementing this plan."	x			Y	Revised as suggested.
		43	Page ES-12	Please change the "Approve grant applications" bullet to "May approve joint grant applications, if needed"		x		Y	Revised as suggested.
		44	Page ES-12	Please change the bullet "Approve plan amendments" to "Approve plan amendments for amendments not initiated and approved according to state statute"	x			Y	Revised as suggested.
		45	Page ES-12	Please add an asterisk behind Policy Committee and add below the bullets -> * the governing board of the partnership's local fiscal agent may need to ratify Policy Committee actions		x		Y	Revised as suggested.
		46	Page 5-18	Please add an asterisk behind Policy Committee and add below the bullets -> * the governing board of the partnership's local fiscal agent may need to ratify Policy Committee actions		x		Y	Revised as suggested.
		47	Page 5-18	Please change "Fiscal and administrative duties will be assigned to a member LGU..." to "Fiscal and administrative duties may be assigned..."		x		Y	Revised as suggested.
		48	Page 5-19	We list a few of the benefits of belonging to the Partnership, but possible disadvantages should be listed, too. Please add, "However, there are costs associated with collaboration - for example, increased meeting and travel time; increased tracking, assessment, evaluation, and reporting requirements; a decrease of efficiency when actions must be coordinated in concert with 13 separately governed organizations, and possible increases to project completion timelines."	x			Y	Revised as suggested.

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		49	Page 5-21	We have a number of programs that we coordinate between our LGU's - it would be a very large reporting burden to now require all of these programs to go through brand new, continued tracking, assessment, evaluation, and reporting processes. It would be easier not to collaborate - these requirements are a disincentive.  Please change "However, reporting related to grants and programs developed collaboratively and administered under this plan will be reported by the Technical Advisory Committee" to "However, reporting related grants and programs developed collaboratively and administered under this play <u>may</u> be reported by the Technical Advisory Committee."	x			Y	Revised as suggested.
		50	Page 5-21	Please change "The parties will be entering into a formal agreement for purposes of implementing this plan" to "The parties anticipate entering into a formal agreement for purposes of receiving watershed-based implementation funding. Individual local government units, governed separately by their respective boards, are individually responsible for their roles implementing this plan."	x			Y	Revised as suggested.
		51	Page 5-20	For consistency, please change "watershed-based funding" to "watershed-based implementation funding."		x		Y	Revised as suggested.
		52	Page 5-20	Please change the 2nd sentence, "This feedback will be presented to the Policy Committee to set the coming year's priorities for achieving the plan's goals and to decide on the direction for <u>collaborative</u> grant submittals."	x			Y	Revised as suggested.
		53	Page 5-8	Please add the underlined text: "In example, watershed projects may be initiated by petition, <u>with government aid, or as part of a plan</u> , per Minnesota Statutes Chapter 103D...."			x	Y	Revised as suggested.
		54	Page 5-8	Somewhere...if not Page 5-8, elsewhere, please add these limitations:  "This plan does not implicitly grant a power or authority of one LGU to act on behalf of another. No LGU shall have any authority to act for or bind another party in any way, or to represent that it has such authority. Nothing in this Comprehensive Watershed Management Plan shall be construed in and of itself as creating any agency or partnership or other form of joint enterprise between the LGU's, and no LGU may create any obligation or responsibility on behalf of the other LGU's. Implementation may be carried-out individually or jointly, at the sole decision of each LGU's governing board. No clause in this plan shall create a rule or law where one previously does not exist."	x			Y	Language added to "Implementation and Existing Authorities" section.
		55	Page 2-14	Second sentence. Please change "Steering Committee" to "Advisory Committee."		x		Y	Revised as suggested.
		56	Page 5-19	Please Add to the 1st paragraph: "Although collaboration informally and formally is encouraged by this plan, mandatory participation in the Partnership is not required by this plan. Local government units who adopt this Comprehensive Watershed Management Plan have the ability to choose whether or not to approve and participate in future formal implementation agreements."	x			Y	Revised as suggested.
		57	Page 5-3	Please change "WRAPS Cycle 2" to "Cycle II Watershed Assessments."		x		Y	Revised as suggested.
11/9/2020	DNR	1	2	Section 2.1, page 2-6. The issue "Loss and degradation of riparian habitat" should be written as "Loss and degradation of aquatic and riparian habitat." This may seem like a minor detail, however riparian applies to the border/streambank while aquatic refers to the streambed and fish habitat. The DNR can often help with local stream projects, or assist with applying for grants to do the work, provided there is an application toward fish habitat. Including "aquatic habitat" within the framework of issues makes the connection more direct. In the Issue Impact column on page 2-6, aquatic habitat and streambeds are referenced, indicating this issue was meant to cover both areas. The DNR recommends that this be remedied by using "Loss and Degradation of Aquatic and Riparian Habitat" consistently throughout the document. (Changes needed pages: 2-15, 2-18 (Table 2-3), 3-3 (priority issues))			x	Y	Revised as suggested.
		2	4	Section 4.2, page 4-6. Protection practices, located in each planning region's Projects and Practices Action Table. Please add DNR to the list of responsible organizations. Streambank protection and streambank restoration are listed as examples of the types of work that may be done and DNR has expertise in this area. (additional adds to 4-11, 4-15, 4-19, 4-23).		x		Y	Revised as suggested.

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		3	General	The DNR commends the use of the Minnesota Prairie Plan within the CWMP, and recognition of the stream stabilization and shoreline work needed to benefit our waters. Non-traditional funding sources that prioritize aquatic habitat may be applicable for some of the stream rehabilitation projects mentioned in the plan, please contact Nick Kludt, our Red River Fisheries Specialist (Nicholas.kludt@state.mn.us, 218-846-8298) or Chris Domeier, Area Fisheries Supervisor (Chris.domeier@state.mn.us, 320-305-0618) in regards to those potential options. In addition, floodplain restoration, which can help with water retention, is often less expensive than storage projects and is included in Flood Damage Reduction solutions.			x	N	Comment noted, with thanks.
		1	Cover page	2021 - 2031 is actually 11 years. Also please be aware that the period will be 10 years from BWSR approval order's date. Use this as a placeholder & insert the date of approval +10 years on the cover of the final approved and locally adopted.		x		Y	Date changed to 2030.
		2	Exec Summary pg ES-1	Please consider this is authorized by statute 103B.801; and this Plan will substitute as the CLWMP, SWCD Comp Plan & WD's overall Plans as per 103C, 103B & 103D. Value being - Clearly state in the Plan for future local board members what it is.	x			Y	Language added to Executive Summary: "This plan is authorized by Minnesota State Statute 103B.801 and will substitute as the comprehensive local water management plan, soil and water conservation district comprehensive plan, and watershed district overall plan per 103C, 103B, and 103D."
		3	pgs ES-5 & ES-5 Figure ES-4	This comment maybe due to reviewing in black & white hardcopy print, the groupings of the Priority Issues is potentially confusing. Could boxes or lines to separate by the issues. Doing so would make it easier for future readers to understand for examples that EROSION AND SEDIMENTATION has 2 resource issues while DRAINAGE has 3 and Surface Water Quality has 4.		x		Y	Revised as suggested.
		4	Intro pg 1-1 1st paragraph last sentence	use 'substitute' vs 'replace' to be consistent with statute.		x		Y	Revised as suggested.
		5	pg 2-2. Table 2-1. Sediment	The term "loose" sediment does not seem quite right. Suggest remove the word "loose" or replace with "detached"		x		Y	Revised as suggested.
		6	pg 2-3. Table 2-1. Issue unstable rivers and streams	The first two sentences apply more to issue 4 (alt hydrology) than this one.Suggest alternative description here. Remove first two sentences and start with "Unstable rivers and streams results in degraded water quality....restoring stability....."	x			Y	Revised as suggested.
		7	Table 2-1.	Formatting. Horizontal lines between issues. We looked at a printed version and the PDF version on the screen. Horizontal lines were between all issues in the table when printed but not when viewing the table on the screen. Just double check this.		x		Y	Revised as suggested.
		8	pg 2-19	Encourage expanding on what actions within the CWMP will have indirect or multi-purpose benefits related to climate change vs simply referencing "...as encourage in the BWSR Climate Change Trends & Action Plan."	x			Y	Relevant actions added in narrative summarized in BWSR Comment #9.
		9	pg 2-20	1st sentence 3rd paragraph: 'aim' seems strong. The primary purpose of the actions have an indirect or secondary benefit or use the term 'multi-purpose' somehow?  remove ' aim to '.Consider something along the lines of: Agricultural water management practices can have the added benefits of improving soil health, carbon sequestration, improving food security, and strengthening local economies. Conservation practices in agricultural areas that promote soil health and the ability of soils to capture and store rainfall, store carbon and decrease heat absorption. Conservation practices that minimize impacts from larger storms are highlighted in this section of the toolbox, including cover crops, field terraces, no-till farming, buffer strips, retention areas, and constructed wetlands.  Conservation drainage and drainage water management practices are also key strategies to address water quality and quantity concerns. These practices can reduce runoff and nutrient loss, avoid runoff concentration, protect areas where runoff concentrates, reduce peak flows to reduce erosion, maintain agricultural productivity, improve water quality and habitat, and reduce flooding. Multipurpose drainage practices help make working lands as well as artificial and natural drainage systems more resilient to high intensity rainfall.	x			Y	Text added to replace current paragraph.



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11/9/2020	BWSR	10	pg 3-7	Revised to "...this plan goal is to prevent damage to communities and public infrastructure by providing protection from flood events."  Suggest to be consistent with the short & long term goal terminology "...this plan goal is to reduce the risk of damage to communities and public infrastructure from flood events."		x		Y	Revised as suggested.	
		11	pg 3-8	Revised to "...this plan goal is to reduce damage to farmland by providing protection to agricultural land from flood events."  Suggest to be consistent with the short & long term goal terminology "...this plan goal is to reduce the risk of damage to farmland from flood events."  "must" is very definite.		x		Y	Revised as suggested.	
		12	pg 5-7 1st paragraph last sentence	Suggest deleting the last sentence and edit previous sentence to read "Capital improvements are beyond the 'normal' financial means of the partnership often exceeding \$250,000 and which are unlikely to get constructed without external funding."		x		Y	Revised to: "Some capital improvements are beyond the 'normal' financial means of the Partnership, often exceeding \$250,000, and are unlikely to get constructed without external funding."	
		13	pg 5-7 2nd paragraph	Is the BDSWD good with 2nd and 3rd sentences? If all capital improvements are watershed district projects then this should be stated. Maybe something like this after the first sentence of paragraph 2. "The WD will develop and implement the listed CIPs as authorized under 103E and 103D. CIPs that the watershed district or any other entity intends to implement should be part of implementation work planning discussions to help align multipurpose projects and secure additional funding when needed."....	x			Y	See BdSWD Comment #27.	
		14	pg 5-7 3rd paragraph	Does this need to be tied better to the Capital Improvement Projects discussion in last paragraph. Maybe start the last paragraph with something direct like "Capital Improvement Projects include watershed district projects (103D) and drainage projects (103E) primarily... Then in this paragraph focus on drainage projects. Also suggest adding the term "multipurpose" to the third sentence.		x		Y	Revised as suggested.	
		15	pg 5-7. Section 5.7 1st paragraph	suggest some rewording. Paragraph 1 Sentence one. "individual participants" may want to change to "participating entities". Sentence 2. finish with "statutory authorities." Then, "For example, ..."		x		Y	Revised as suggested.	
		16	pg 5-7 water management districts	It is our understanding that the BDSWD is not comfortable with the current language and we are working with them to come to a resolution.			x		Y	See BdSWD Comment #32 and Proposed Resolution
		17	pg 5-9 image	The image does not 'fit' what's happening/proposed. The sentence 'The first 2 steps are addressed through this CWMP.' is ok but.... The BDSWD will likely weigh in on this and we hopefully will be engaged and included in that discussion.				x	Y	See BdSWD Comment #32 and Proposed Resolution
		18	pg 5-21. Reporting	Add some clarification and context  Consider change to sentence one. "LGUs currently have a variety of reporting requirements related to their activities, programs, and grants or have those that are required by statute (e.g. watershed district annual report, buffer report?). Then continue..."		x			Y	Revised as suggested.
		19	pg 5-21 1st sentence of 5.12	...CWMP is effective through 2031.' Assume approved in 2021 the end of 2031 is 11 years. This plan will be approved for 10 years from date of BWSR approval. Change date to 2030.		x			Y	Revised to "2030."
		20	pg 5-21 section 5.12	It is our understanding that the BDSWD is not comfortable with the current language. We are willing to work with them to come to a resolution meeting both their needs and the Plan Content Requirements related to amending the CWMP to be presented to the Policy Committee.				x	Y	See BdSWD Comment #20 and Proposed Resolution
21	pg 5-12. Section 5.7.	The previous section was also listed as 5.7. This should be section 5.8, correct?		x			Y	Updated section numbering accordingly.		
Public Hearing Comments										
No comments received										