

Appendix J. Formal Review Comments



Minnesota River-Mankato Watershed Comprehensive Watershed Management Plan

Formal Review Comments



#	Commenter	Section	Page	Paragraph	Comment	Editorial	Material	Note	Change Needed	Revision
Formal Review Comments										
1	BWSR	4		Figure 4-8	On page 50 of the plan (Figure 4-8), water storage, altered hydrology, and flood damage reduction focus areas are presented. BWSR requests additional targeting, as at least 50% of the Minnesota River - Mankato watershed appears to be listed as "high" priority. BWSR staff do not require a specific percentage from the partnership. However, having roughly 1/3 (or less) of the watershed listed as "high" may be a good starting goal for the team.		X		Y	One subwatershed (between St. Peter and Kasota along the Minnesota River) to be moved to medium, as will developed areas.
2	BWSR	5		5 Table -2	On page 64 of the plan (Table 5-2), 3,960 treated acres appears as a 10-year goal on both WW-1 (Multi-Benefit Agricultural BMPs) as well as WW-2 (Soil Health and Recharge Conservation Practices). Are these goals separate from one another? If they are not, BWSR staff recommends listing WW-1 as indirectly supporting the "Soil Health" goal (with an empty circle), and removing WW-1's acres treated goal.	X			N	These acres are separate, although could overlap (a producer could do drainage water management and cover crops on the same fields).
3	BWSR	7	97	Figure 7-1	On page 97 as well as Figure 7-1 on page 98, the advisory committee's duties and role should be represented more clearly. The Advisory Committee should be consulted at least every two years, with annually being the best practice. Advisory members--- particularly state agency staff--- can provide valuable insights on work plans and potential projects in the planning area. <i>If an Advisory Committee will be involved in work planning and plan review, pages 106 (Local Planning) and possibly page 107 (Assessments) will also need to be subsequently changed.</i>		X		Y	Advisory Committee role added to Figure 7-1. Added role to 'Consult the AC at least every other year' and added that the AC will be asked to review the annual work plan.
4	BWSR	7	102		On pages 102 and 105, collaborative approaches to competitive grant applications are briefly mentioned. Recommend a connection with the implementation decision making process for the collaboration. Does an LGU partner bring a potential grant opportunity to the Steering and/or Advisory Committee? Often, close collaboration with multiple partners makes grant applications more competitive.		X		Y	Added: 'Implementation partners will pursue grants in collaboration with other LGUs and/or state agencies where possible to make grant applications more competitive'
5	BWSR	7	108		On page 108, under "Reporting", we recommend the following editorial change. "However, reporting related to grants and programs developed collaboratively and administered under this plan (including WBIF) will be may be reported by the fiscal agent and/or coordinator."	X			Y	Changed as requested
6	DNR	General			The large array of multipurpose agricultural and urban BMPs proposed to address erosion, nutrient loading, and bacteria included within this plan is very encouraging, as many areas will be able to benefit from the variety of project types and applications.			X	N	Thank you for your comment
7	DNR	General			The DNR applauds the preference for native vegetation enhancement for streambanks, bluffs, and ravines to reduce erosion. Land adjacent to water bodies and watercourses provides critical habitat corridors for plants and animals, and enhancement with native vegetation will provide many beneficial ecosystem services.			X	N	Thank you for your comment

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8	DNR	5			References for “land use/cover, drainage, and altered hydrology and their impacts to this watershed occur multiple times within the plan (page # 16, 19, 22, 42, 44, 49, 87,95)”. Hydrology within this watershed has been substantially altered by a variety of factors that include changes to land use and land cover, precipitation patterns, and public/private drainage influences. DNR applauds the inclusion of Altered Hydrology and Loss of Water Storage as high priority issues within the watershed, however, we suggest that more direct actions be included as implementation strategies to address these issues. While several capital improvement projects have strategies to address the loss of water storage/altered hydrology, we suggest including action items within the regional action tables to promote water storage and watershed flow reductions. Consider incorporating smaller-scale water storage practices in addition to the large capital improvement projects to show actionable goals addressing the loss of water storage and altered hydrology.		X		N	Language added to Water Storage goal during Internal Review to provide examples of ways additional water storage can be achieved through plan actions beyond CIPs. Actions in the Projects and Practices table (wetland restoration, multi-benefit agricultural BMPs, soil health and recharge conservation practices, urban stormwater BMPs, etc.) also summarize indirect progress towards Water Storage goals (outline circle = indirect progress towards goal).
9	DNR	5			On Page 49, the plan states: “Southern Minnesota experienced devastating flooding in 2024. The watershed has seen a 137% increase in flood duration, 129% in the rate of flood rise, and increases in all flow stages when compared to conditions before 1983(DNR, 2023). A lack in water storage and changed land uses combined with an increase in annual precipitation and heavier rainfalls have worsened flooding”. This statement alludes to the relationship between altered hydrology and flood damage, and demonstrates the need for practices that incorporate water storage to alleviate flooding concerns. The DNR highly encourages prioritizing water storage projects that leverage natural features and processes, demonstrating multiple benefits not only to water quantity and quality but also to aquatic and terrestrial ecosystems, fish and wildlife species, and public and private infrastructure/property. Temporary storage via channels with well-connected floodplains and restored natural wetlands for long-term retention are preferred methods to achieve those objectives, especially in the watershed’s upper part. These practices help to mitigate the effects of flooding and should be considered a higher priority. Consider including strategies in the plan to emphasize the importance of flood damage reduction and restoring floodplain connectivity. As flooding is ranked as a medium priority (Page 5, Table 1-2), please consider including practices that directly aid in reducing flood damage while also providing other “stacked” benefits such as water storage, nutrient retention, and restoring floodplain connectivity.		X		Y	Language added to Water Storage goal during Internal Review to provide examples of ways additional water storage can be achieved through plan actions beyond CIPs. Actions in the Projects and Practices table (wetland restoration, multi-benefit agricultural BMPs, soil health and recharge conservation practices, urban stormwater BMPs, etc.) also summarize indirect progress towards Water Storage goals (outline circle = indirect progress towards goal). Additional language added to Water Storage goal for examples of CIPs "(which can also include floodplain and stream connectivity issues)" See also Comment #1
10	DNR	General			The hydrology of the watershed has been significantly altered by drainage and contains many drainage systems, both public and private. Page 22 states that “about 65% of streams have been altered”, and Page 19 indicates “... the watershed has lost between 30-65% of historical wetlands”. The CWMP plan contains sections that discuss drainage and its impacts. While the DNR is hopeful the watershed plan will influence future public and private drainage projects, the options considered in the plan for offsetting drainage impacts may not be enough to produce measurable results. Consider looking for more firm and specific commitments from the drainage authorities to develop projects with numeric goals, moderate drainage coefficients, and landscape-suitable water storage alternatives. The DNR suggests identifying where Watershed Based Implementation Funding (WBIF) can be utilized to implement projects that are not required to offset impacts from drainage projects and that will result in positive gains in water storage on the landscape.		X		N	Drainage actions planned to the extent that is feasible with existing resources. Plan partners may expand drainage goal if desired during through a plan amendment or renewal process. Actions RDG-2 and -3 include planning for water storage projects, which could consider offsetting impacts of drainage.

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11	DNR	5			In our April 26, 2024 priority concerns letter, we noted that the cumulative effect of increased drainage is straining public infrastructure, contributing to stream channel erosion, and increasing the risk of flooding for homes and farmland. Per statutory requirements, the DNR is responsible for reviewing and commenting on the adherence of drainage improvement projects to MN Statutes, including 103E.015, which involves environmental considerations and the identification of alternative measures in locally adopted water management plans. It states, "This investigation shall include early coordination with applicable soil and water conservation district [SWCD] and county and watershed district water planning authorities about potential external funding sources and technical assistance for these purposes and alternative measures. The drainage authority may request additional information about potential funding or technical assistance for these purposes and alternative measures from the executive director of the Board of Water and Soil Resources [BWSR]". The DNR recognizes the importance of early coordination with the drainage authorities, drainage engineers, and local conservation agencies. DNR also understands the complexity of achieving adequate drainage and mitigating the negative environmental consequences of increased drainage system capacity.			X	Y	Local staff will reach out to DNR for drainage assistance if needed during implementation. Added a direct mention of early coordination to RDG-4: Conduct multipurpose drainage managing planning <i>and engage in early coordination</i> . Added DNR as partner to action See also existing language on Page 95: "Counties should follow criteria outlined in Statute §103E.015 for early consideration and coordination of multipurpose drainage management."
12	DNR	General			Stream connectivity benefits the health of a watershed, aquatic organisms, and floodplain access. Stream connectivity concerns are a low priority issue in the plan (Page 33, Table 3-3). The DNR suggests more emphasis in the plan on increasing stream connectivity. As implementation work proceeds and conservation practices are installed throughout the watershed, stream connectivity can be considered and incorporated into many of these practices.		X		N	As not all issues can be addressed as high priorities, progress towards addressing connectivity barriers will be made by RDG-7 (identify barriers) and direct connectivity projects may occur by partners or as opportunities arise.
13	DNR				DNR also recommends that the plan consider the importance of perched culvert replacement or restoration and culvert sizing to enhance stream connectivity. Identifying areas within the watershed where streams show relatively good stability and prioritize stream bank stabilization and restoration within those areas. Healthy streams with longitudinal connectivity can transport the water and sediments of their watershed over time, in a sustainable balance. Perched, or improperly sized culverts require long-term maintenance and are at risk of failure during flood periods. Improving lateral connectivity (floodplain access) should also be considered for prioritization in this watershed, and DNR may be able to assist with project selection and design implementation.		X		N	See comment #12. Implementation partners may choose to address connectivity barriers if feasible during a plan amendment or renewal process.
14	DNR	5			Local DNR Clean Water Specialists and Area Hydrologists are available to assist with project identification, design recommendations, and review.			X	N	Noted for implementation, thank you
15	DNR	5			Historic wetland loss and protection and restoration of existing wetland are referenced several times within the plan, and wetland restorations also address multiple other high-priority issues prioritized within this plan. The existing wetlands provide multiple benefits including water storage, wildlife habitat/corridors, groundwater recharge, and overall ecology of the area. Consideration should be given to additional strategies around wetland restoration/enhancement, particularly Swan Lake and the surrounding wetland complexes. Target areas that offer higher cost/benefit scenarios, promote wildlife corridors, and maximize water storage.		X		N	WW-10 includes 200 acres of wetland restoration and the Swan-Sevenmile Implementation Region plans for 45 acres of restoration. CREP and RIM already prioritizes habitat, however, this is a low priority for this plan.

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16	DNR	5,6,7			Consideration should be given to adding language that increases eligibility for both current easement programs and opportunities that may arise in the future. Using the current RIM 1W1P scoring workbook would be a good place to start for drawing that language.		X		Y	Added to Land Protection section in Section 6: BWSR RIM 1W1P program provides funding for RIM projects in CWMP priority areas. This could be an option to meet action WW-9 (land protection). Applications are eligible if they protect, restore, or enhance habitat, and do one or more of the following: 1) contribute to a measurable goal, 2) be located in a priority area, 3) and/or address an issue or implementation action in a CWMP. Specific benefits and location of the projects are ranked to determine the grant award and projects will be considered for these in the planning stage. Projects implemented within priority areas and / or that address CWMP plan issues and goals make the Partnership more competitive in this grant application and others.
17	MDH	4			A 10-year goal within the plan is to "Protect or treat 395 acres of vulnerable Drinking Water Supply Management Areas (DWSMAS)". Review to ensure that the protection goal of 395 acres include all very high and highly vulnerable acres within DWSMAS, including surface water contribution areas identified within a DWSMA, that the plan wants to prioritize. There are many highly vulnerable DWSMA acres within the watershed and the need to prioritize is recognized.		X		Y	As currently written, all 395 acres will occur in highly vulnerable DWSMAS (considered to be ranked as moderate, high, or highly vulnerable), but not all land in highly vulnerable DWSMAS will be treated. Goal revised to differentiate between surface water DWSMAS and groundwater focused DWSMAS. Group will add an additional goal for surface water DWSMAS for Minneopa and Minnesota River Implementation Regions: "Protect or treat 2,575 acres of vulnerable surface water Drinking Water Supply Management Areas (DWSMA-SW)." This represents the 475 of soil health practices in the Minneopa IR and 2,100 acres of soil health practices in the Minnesota River IR.
18	MDH	5			During the development of this draft 1W1P the MPCA recently completed its update to the Statewide Nutrient Reduction Strategy. This document should be reviewed for a list of practices that can help to prevent surface and groundwater contamination. Many of the practices listed in the nutrient reduction strategy report are already included within you draft 1W1P. A quick review might help strengthen practices specific to ground/drinking water benefits.		X		Y	NRS identifies a reduction in nitrate leaching to groundwater from row crops as one of three main needs. Practices to address this are identified as: 1) Increase cover crops, crop rotation, perennial crops, and a conversion from row crops to pasture 2) Implement nutrient management and improve it where already implemented (fertilizer rate, timing, form). Most of these practices are already mentioned in the plan. Perennial crops added to WW-2 (soil health practices)
19	MDH	4	47		On page 47, Groundwater Quality/Surface Water Interaction, the last sentence in the first paragraph reads: "Protection and treatment of 395 acres cropland in vulnerable DWMSAs encapsulates a variety of projects or practices that increases groundwater recharge and /or reduces contaminants to groundwater, such as nutrient management, conservation easements, or manure BMPs". Increasing groundwater recharge on its own can have a negative effect on groundwater quality if the recharge water contains contaminants. The way I read the and/or, it appears the increased recharge and reduce contaminants are considered separate outcomes. Maybe clarify to indicate that reduced contaminant levels are reaching the groundwater through the implementation practices even with increased recharge also being the result of some of the implemented practices.	X			Y	Rephrased to '...that <i>either</i> increase groundwater recharge and/or reduce contaminants to groundwater...'
20	MDH	General			Overall, the plan meets the goal of addressing the issues raised in the priority concern letter. This was accomplished either through proposed practices or educational opportunities such as water testing. I did not see a reference to the 35 non-community public water supplies that exist within watershed. These non-community public water supply systems were included within the initial priority concern letter. A statement addressing protection of these public water supplies or the inclusion of these systems under a specific practice would suffice to address the concerns laid out in the initial comment letter.		X		Y	Added number of noncommunity public water supplies to LWRN and added that groundwater actions benefit them to the stacked benefits box

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21	MDH	General			We commend the planning team for their work in developing the plan. If you have any questions, please contact me (507) 206-2734 or via email at scott.j.hanson@state.mn.us			X	N	Thank you for your role in plan development
22	Le Sueur County	Acronym List			Plan currently lists BWSR as Board of Soil and Water Resources which is incorrect. Update to the Board of Water and Soil Resources.	X			Y	BWSR corrected
23	Le Sueur County	Acronym List			Plan currently lists the MN DNR as Department of Natural Resources (DNR). Update to Minnesota Department of Natural Resources (MNDNR). This creates consistency in how other state agencies are referenced and clearly identifies what DNR you are referring to.	X			Y	Updated to MNDNR
24	Le Sueur County	1	1	(Figure 1-1)	The Planning Area Boundary is shown in the Figure 1-1; however it is not included within the legend for this figure.	X			Y	Updated legend
25	Le Sueur County	2	26		Where is the number 26,000 (referencing people living in the watershed) coming from? This seems extremely low. I understand it is an estimate, but it is not anywhere near how many people live in the watershed. Seems very arbitrary. Mankato alone has approximately 44,880 residents, St. Peter has approximately 12,000 residents. North Mankato has approximately 14,200. Lake Crystal has approximately 2,500 residents. I was able to get these numbers using census data.	X			Y	Updated population count to 82,000
26	Le Sueur County	7	98	(Figure 7-1)	Policy Committee Role-Currently 3 of 6 bullet points state that the PC is approving things (workplan, plan amendments, assessments). The PC can only recommend approval. These bullet points need to be updated and state recommend approval of workplan, plan amendments, assessments.	X			Y	Added 'recommend' before approve
27	Le Sueur County	7	99	(Figure 7-1)	Local Fiscal Agent and/or Coordinator Role-These should be separate as the fiscal agent is responsible for additional roles that the coordinator is not responsible for. The additional roles missing that the Fiscal Agent is responsible for doing includes: Approval of Workplans, Approval of Plan Amendments, Approval of WBIF Grant Agreements, Approval of Budgets. It needs to be clear that they make the final decisions for implementation of the plan.		X		Y	Revised as recommended
28	Le Sueur County	7	103	(Table 7-3)	State Programs/Grants-Update the Aquatic Invasive Species Control Grant Program and please check the research and data gaps column as these activities are eligible for funding under this program.	X			N	AIS grant is checked for Projects and Practices & Education and Outreach
29	Le Sueur County	General	All Photos		Some of the photos in the plan have a caption and some do not. Some photos in the plan give credit to whoever took the photo and some do not give credit. I would just be consistent throughout the plan.	X			Y	Updated captions to match format: 'Photo: description, source'
30	MPCA	4	7,40	Priority Resources	St. Peter Trout Ponds (Nicollet County) likely refers to Paul's Creek in Le Sueur County. Either swap in Le Sueur for Nicollet or delete Nicollet County. Most likely confusion based on St. Peter being in Nicollet County, but the ponds are in Le Sueur County.		X		Y	Revised to "Le Sueur"
31	MPCA	6	89		Between the MPCA, local entities, and citizens volunteers (through the Citizen Volunteer Lake Monitoring Program and Citizen Volunteer Stream Monitoring Program), streams and lakes throughout the watershed were monitored and findings were shared in the Minnesota River-Mankato WRAPS Report. <u>This wording has been recently changed as part of the program update.</u>	X			Y	Updated program names
32	MPCA	General			Please do a Search/Replace in the document for MPCA. There is at least one instance that MPCA was referenced as MCPA	X			Y	Fixed typo on page 94
33	MDA	General			We appreciate the reference to various MDA plans and programs including the Minnesota Agricultural Water Quality Certification Program, AgBMP Loan Program. Further references to MDA's monitoring in the project area such as the Township Testing Program are also appreciated.			X	N	Thank you for reviewing the plan

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34	MDA	General			MDA supports surface water/groundwater interaction being listed as a high priority within this plan. We would also like to see groundwater quality be listed as a high priority but understand that it is less of a priority in this watershed compared to some others. We also support the 395 acres of protection practices targeted towards highly vulnerable DWSMAs. For specific practices that could be utilized for those acres, MDAs Nitrogen Fertilizer Management Plan (NFMP) or the MPCAs Nutrient Reduction Strategy could be referenced.			X	Y	Added reference to these plans in the goal description
35	MDA	4			On page 47, the desired future condition for groundwater is to meet drinking water standards and be free from contamination. While a worthwhile goal, "and is free from contamination" should be omitted as it is likely unfeasible to protect drinking water from all contamination.		X		Y	Removed 'free from contamination' from DFC
36	MDA	5			On all implementation tables that include the action item TIS Prevention and Management, MDA should be added to the list of responsible entities. MDA is the lead state agency for the management of Emerald Ash Borer (EAB) and other insect invasive species.	X			Y	MDA added as lead responsible entity to WW-12
37	MDA				Soil health is listed as a high priority within this plan, which we agree has many stacked benefits that can address multiple resource concerns identified within this plan. We appreciate MDAs various programs and funding sources being listed which can help to augment the work being done in this watershed to expand soil health practices.			X	N	Thank you for reviewing the plan
38	Advisory Discussion		3		From Internal Review: Scott issue statement revision: A significant portion of the population within the watershed obtains drinking water from groundwater that is impacted by surface water runoff contribution areas or is directly under the influence of surface water.		X		Y	Groundwater / Surface Water Interaction issue statement revised to: "A significant portion of the population obtains their drinking water from a groundwater source Some groundwater is influenced by surface water, which makes contamination of drinking water (especially with nitrate) more likely."
Public Hearing Comments										
1	City of Mankato	pg 16 of Appendix			The City of Mankato signed one the Memorandum of Agreement on a page with the header "City of Lake Crystal" instead of "City of Mankato". It was decided to add an errata statement at the beginning of the MOA addressing the error rather than having everyone resign.	X			Y	Added note in red text to the first page of the MOA Appendix page divider



Minnesota River – Mankato 1W1P

Public Hearing

Monday, December 15, 2025 • 3:00 PM

Meeting Location

St. Peter Community Center
Governor's Room
600 S. 5th Street
St Peter, MN 56082

Agenda Items Agenda Items	Time Time
1. Welcome and Policy Committee Introductions	5 min
2. Overview of the Minnesota River-Mankato Comprehensive Watershed Management Plan <ul style="list-style-type: none">• Overview of One Watershed, One Plan• Plan Highlights• Formal Review Comments	15 min
3. Public Comment Period <ul style="list-style-type: none">• <i>Members of the public are welcomed to address the Policy Committee with any comments on the plan. When doing so, please state your name and address. To allow time for all, comments will be limited to three minutes each. Comments will become part of the plan record.</i>	--
4. Next Steps and Close of Public Hearing	5 min

