

Le Sueur River CWMP 60-Day Review

Comment Number	Page Number	Section	Commenter	Comment	Request for Content Change	Formatting / Grammatical / Clarifications / Content Suggestions	Commentary Note / Question	Change Made to Plan (Yes/No)	Response	Date Completed
1	3		Randy - Bass Lake Ambassador	"University of Mankato" should be "Minnesota State University, Mankato"		X		Yes	Update per request.	2/14/2023
2	8		Randy - Bass Lake Ambassador	for the even-numbered bullet points the word "County" should be placed before SWCD		X		Yes	Legal names for each county SWCD was updated on pg 8. Blue Earth, Faribault, and Freeborn include the word "county" and Waseca does not. For simplicity and consistency the word "county" will not be included in the rest of the plan. Decision made by Steering Team during meeting on 2/27/2023	2/27/2023
3	8	Participating Local Governments (highlighted paragraph)	Jill Sackett Eberhart - BWSR	The process BWSR uses for the planning grants is a Request for Proposals (RFP) and not a Request for Interest.		X		Yes	Updated per request.	2/17/2023
4	18		Randy - Bass Lake Ambassador	item #7 in Table 0.2 should include cyanobacteria in addition to E. Coli, shouldn't it?	X			No	While cyanobacteria is a type of bacteria that is present, it is not a criteria the MPCA utilizes to determine impairment status for bacteria or E.coli. Cyanobacteria a common bacteria that is present in lakes and contributes to poor water quality and reduced water clarity through algae blooms. Poor water quality in lakes is noted under issue statement item No. 2. More detailed analysis of Water Quality in Lake issues are outlined on pg. 94. No changes made to the Plan.	2/14/2023
5	19		Scott Matteson - MDA	Recommend the BMP tracking spreadsheet developed by the Steering Team be made available through the 1W1P website, with annual updates, to provide transparency on the practices have been implemented and the modeled reductions.			X	No	The tracking sheet will be developed after or concurrently to the Plan is approval and local adoption. The Steering Team will become the Le Sueur Implementation Team during the implementation phase of the Plan will continue to include and be transparent with the Technical Advisory Committee which includes local, state, and federal entities nonprofit organizations, lake associations, and citizens members. The TAC will be provided the opportunity to review and provide comments at major milestones of the Plan implementation such as work plan development, plan amendments, annual assessments, and five year evaluation. Assessments on progress and five year evaluation will include dollars spent, practices implemented, and expected pollution reductions.	2/16/2023

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6	19	Plan Approval Process, Administration, and Coordination	Jill Sackett Eberhart - BWSR	<p>OP v2.1 - IV Plan Development Procedures - C. Formal Review and Public Hearing: This information is not a Plan Content Requirement so could be deleted. However, if the decision is made to keep this subsection, then corrections and clarifications must be made. The Operating Procedures are still very important in the planning process. The information in this paragraph continues to not be quite right. For this subject, both the BWSR Operating Procedures 2.0 and the planning partnership’s Memorandum of Agreement (MOA) need to be taken into account.</p> <p>1.Sentence one references a Statute that isn’t necessarily the only one dealing with watershed planning content and process. 103B.315 and 103B.801 at a minimum (as referenced in the Operating Procedures 2.0).</p> <p>2.Sentence two is unclear if it is discussing the 60-day process or the 90-day process; it’s incorrect for one, correct for the other (depending on a combination of Operating Procedures and MOA language).</p> <p>3.Sentence eight is not quite correct. It’s talking about the process for submitting the final draft, but it neglects to include the MOA language that talks about final submittal and the fact that “...approval of the plan for submittal by each party...”</p> <p>4.Sentence nine is not quite right. The Plan should be locally adopted by all county and soil and water conservation districts (SWCDs) located within the boundaries of the watershed (of which there is 12). If not locally adopted by any entity, that entity will need to have a county or SWCD plan. In addition, each entity has the option of joining the Joint Powers Collaborative Agreement if they would like to be part of the recommendation and decision-making processes related to the Plan and any implementation funds obtained. What is currently written is not incorrect, but it is not the whole story.</p>	X			Yes	Deleted plan approval process from header and corresponding text about the plan approval process. Discussed during Steering Meeting on 2/27/2023.	2/27/2023
7	25		Randy - Bass Lake Ambassador	second ¶ should be “Coarse-textured soils” (Δ spelling + w/ the hyphen) for “Course textured soils”		X		Yes	Updated per request.	2/14/2023
8	30		Randy - Bass Lake Ambassador	Table 1.1 (Impaired Lakes) – Bass Lake should also show Aquatic Recreation has been impacted by Nutrients (but I see there is a cross-reference to the 2022 MPCA Impaired Waters List that omits this – hence my phone call today)	X			No	Bass Lake did not meet MPCA standards to be classified as impaired for nutrients in 2022 - no changes made to plan.	2/14/2023
9	38		Randy - Bass Lake Ambassador	“early 2010’s” should be “early 2010s” (this is a common mistake, but the apostrophe isn’t used when describing a decade like this – see <i>Chicago Manual of Style</i> 9.34)		X		Yes	Updated per request.	2/14/2023
10	55		Amanda Strommer - MDH	Land and Water Resources Summary, Groundwater Resources (page 55): The ‘Nitrate’ definition box is not the most relevant definition given that this section is related to nitrate in groundwater. Consider replacing language with: “Consuming too much nitrate can affect how blood carries oxygen and can cause blue baby syndrome.” Source: https://www.health.state.mn.us/communities/environment/water/contaminants/nitrate.html		X		Yes	Updated definition as requested.	2/17/2023

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11	55		Amanda Strommer - MDH	Land and Water Resources Summary, Groundwater Resources (page 55): On page 110 in Desired Future Conditions, manganese is mentioned in regard to private well owners. This is the first mention of manganese within the plan about a concern for private well owners. On page 55, consider adding a Manganese description such as: "Manganese occurs naturally in rocks and soil across Minnesota. Children and adults who drink water with high levels of manganese for a long time may have problems with memory, attention, and motor skills. Infants may develop learning and behavior problems if they drink water with too much manganese in it." Source: https://www.health.state.mn.us/communities/environment/water/contaminants/manganese.html	X			Yes	Updated with description of manganese and its impacts to humans through drinking water on pg. 55 in land and water resources summary.	2/17/2023
12	55		Amanda Strommer - MDH	Land and Water Resources Summary, Groundwater Resources (page 55): The plan mentions that 28 lakes within the watershed are groundwater dependent and discusses the potential surface water and groundwater connection in this setting. One future possibility for Data and Studies might be to include a study that focuses on this relationship and the impact on groundwater quality and quantity that is the result of this connection.	X			Yes	Added evaluation of groundwater - surface water relationships on groundwater dependent lakes and their impacts to groundwater quality and quantity to Table 5.5 : Future Monitoring and Data Collection Efforts on pg. 180	2/21/2023
13	58		Randy - Bass Lake Ambassador	under the Rainfall paragraph the math is wrong: "The average annual precipitation in 2021 was 23.95 inches for the watershed. In the last decade, annual precipitation has ranged from 23.95 inches (2021), up to 45.39 inches (2019)." The problem is with the first sentence: if the lowest rainfall in the past decade was 23.95 (with an upper range >45) the average can't then also be 23.95. There is also a problem, in the first sentence, with last of time frame as reference. I <i>think</i> what these two sentences are trying to say is something like "The ten-year average rainfall (2012-2021) is ___ inches; in that period the wettest year was 2019 (45.39 inches) and the driest was 2021 (23.95 inches)."		X		Yes	Updated to read: The ten-year average rainfall in the watershed (2012-2021) was 35.61 inches. In that period, annual precipitation has ranged from 23.95 inches in 2021, up to 45.39 inches in 2019.	2/16/2023
14	78		Randy - Bass Lake Ambassador	bottom two bullet points should include "County" after both Faribault and Waseca		X		No	Legal names for each county SWCD was updated on pg 8. Blue Earth, Faribault, and Freeborn include the word "county" and Waseca does not. For simplicity and consistency the word "county" will not be included in the rest of the plan. Decision made by Steering Team during meeting on 2/27/2023	2/27/2023
15	84	Table 2.3, item 1	Jill Sackett Eberhart - BWSR	The word "degraded" is not the same language used in Section 03. They should align.	X			No	Confirmed with Steering Team during 2/27/2023 meeting. Maintained language in Table 2.3 and updated language in Section 3 to match.	2/27/2023
16	84	Table 2.3, item 2	Jill Sackett Eberhart - BWSR	The word "poor" is not the same language used in Section 03. They should align.	X			Yes	Confirmed with Steering Team during 2/27/2023 meeting. Updated language to "degraded" to match language in Section 3.	2/27/2023

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17	90	Issue Statement	Jill Sackett Eberhart - BWSR	The word "poor" is not the same language used in Table 2.3. They should align.	X			Yes	Confirmed with Steering Team during 2/27/2023 meeting. Maintained language in Table 2.3 and updated language in Section 3 to match with the word "degraded".	2/27/2023
18	94	Issue Statement	Jill Sackett Eberhart - BWSR	The word "degraded" is not the same language used in Table 2.3. They should align.	X			No	Confirmed with Steering Team during 2/27/2023 meeting. Maintained language in Section 3 to note the word "degraded". This matches updated language in Table 2.3.	2/27/2023
19	100	Altered hydrology	Scott Roemhildt - MNDNR	Water storage: The draft plan identifies the loss of wetlands and associated wetland functions from historical ditching, drainage, and land use changes as an important issue in the watershed. The plan commits to a water storage goal to mitigate and adapt to land use and climatic changes. The DNR agrees that implementing water storage projects and practices in headwater areas or through reduced drainage coefficient goals should be prioritized and we emphasize that considerably more storage will be necessary to fully address existing and emerging issues in the watershed.			X	No	The number of acre-feet identified within the goal is intended to be achievable by the partners within the 10 year implementation timeframe, however, partners understand that considerably more storage will be necessary to fully address the storage concerns within the Watershed. The partners intend to review the progress towards this goal at the 5 year review and adjust the goal as appropriate. No change to the plan	1/26/2023
20	100	Flooding	Scott Roemhildt - MNDNR	Flooding: We are pleased to see that the complex issue of flooding is a priority in the draft plan. The plan includes several Capital Improvement Project (CIP) options to address flooding, including culvert, bridge, and dam modifications. The DNR encourages sizing culvert and bridge replacements to convey floodwaters, maintain flows, and allow for fish and sediment passage. Please include the DNR when planning for new structures; both the DNR Clean Water Specialist and the Area Hydrologist can provide technical assistance with implementation.			X	No	The partners plan to continue to coordinate and partner with the DNR throughout implementation phases of the Plan. Comment noted - no changes made to plan.	1/26/2023
21	100		Shaina Keseley - BWSR	I'm not seeing this change/addition noted on the internal response to comments: "Added "Did you know" call out to explain the time to travel raster reference." I do see additional text was added about travel time on the same page.		X		No	Wording was updated language to remove the word raster and HUC8 watershed. These are not commonly understood terms outside of water resources professionals. Upon discussion the paragraph explains what time to travel means. In the report "Time to travel refers to the amount of time it takes water that fall to reach the outlet of the Watershed." - No change to the Plan.	2/21/2023

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22	100	Issues and Goals	Jill Sackett Eberhart - BWSR	<p>PCR v2.1 - III. Plan Content Requirements - D Measurable Goals: "Each priority issue must have associated measurable goals for addressing the issue." Three issue statements and only one goal. •One potential solution is to re-write the statement on page 100. Example language: The overarching issue is increased water quantity, rate, and flooding caused by: increases in peak flows and annual flow volume as result of altered hydrology, shift in cropping practices, increases in drainage, and decrease in evapotranspiration; and increased precipitation amount and intensities contributing to higher peak flow rates and increased volume of runoff both of which are creating risks to public safety and vital infrastructure via increased flooding frequency and intensity. (NOTE - fine to keep Table 2.3 as is.)</p>	X			Yes	Updated wording to make one overarching issues statement as suggested. Issue statement wording was updated to read "The issue of water quantity, rate, and flooding is a complex issue facing the Watershed, as it has numerous contributing factors such as increases in precipitation amounts and intensities, altered hydrology, increases in drainage, shifts in cropping practices, and decreases in evapotranspiration. This results in increases in peak flows and annual flow volume as well as increases in flooding frequency and intensity that create risks to public safety and vital infrastructure. " Table 2.3 added astricts to state that the three statements were combined into one issue statement. This allows the table to accurately reflect how the activity and prioritization was completed. Changes were approved by Steering Team during meeting on 2/27/2023.	2/27/2023
23	100	Goals	Jill Sackett Eberhart - BWSR	<p>Per Plan Content Requirements III.D. Measurable Goals, "Each priority issue must have associated measurable goals for addressing the issue." Is the measurable goal to implement 11,246 acre-feet of storage? Or is it "the ultimate goal of these projects will be to achieve a no net increase in runoff from the Watershed?" This last of which is going to be very difficult to measure. One potential solution is to move this sentence to the "Desired Future Conditions" paragraph and add it to what is already there.</p>	X			Yes	Removed "The ultimate goal of these projects will be to achieve a no net increase in runoff from the Watershed" from the measurable goals section. Added "No net increase in runoff from the Watershed" to the desired future condition section. Changes approved by Steering Team during meeting on 2/27/2023.	2/27/2023
24	121		Randy - Bass Lake Ambassador	<p>the list of priority resource concerns (in parentheses) in the second to last paragraph is a mess: I think the comma after "Water Quantity Rate" should be taken out (or the "and" that follows it should go if "Flooding" is a separate concern) – they really should separate these categories of concerns with semi-colons instead of commas....</p>		X		Yes	Update per request with semi-colons. The list now reads: "The targeting criteria for the remaining priority resource concerns (Water Quantity Rate and Flooding; Loss of Wetlands; Leadership, Public Relationships, and Education; Excess Bacteria in Surface Waters; Reduced Riparian and Shoreland Habitat; and Drinking Water and Groundwater Protection) will be used during work planning to target site specific locations within the priority subwatershed."	2/14/2023

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25	132		Scott Matteson - MDA	The primary source of nitrate-nitrogen in the Le Sueur River is from subsurface tile drainage of agricultural fields. Nutrient management plans can play an important role in maximizing economic benefit while minimizing environmental impacts. The implementation plan recommends "Enroll 4 landowners into Nutrient Management Plans or Manure Management Plans". It is recommended that nutrient management be a larger component of the implementation activities, in that it is much more cost effective to prevent loss of nitrate from over application of fertilizers than to remove the nutrient downstream with other implementation activities.	X			No	Nutrient Management had been identified as a barrier in the watershed. Landowners are very reluctant to share this information and are also reluctant to commit to a nutrient management plan that would meet the requirements of NRCS practice standard. Focus of the Plan is building relationships through outreach and education. Providing guidance on practice or steps to work into farm management at smaller scale that will still make difference even if not at the more stringent requirements of NRCS practice standard. Nutrient management was also called out specifically in the outreach and education section to highlight this as a barrier and work on further outreach and education strategies. No change made in the plan. Response approved by Steering Team on 2/27/2023 meeting.	2/27/2023
26	137		Amanda Strommer - MDH	Implementation Schedules, Table 4.1 BMP Implementation (page 137): MDH commented during the internal review that the number of nutrient management or manure management plans seemed low. We understand there are barriers but agree with MDA that nutrient management be a larger component of the implementation activities.	X			No	Nutrient Management had been identified as a barrier in the watershed. Landowners are very reluctant to share this information and are also reluctant to commit to a nutrient management plan that would meet the requirements of NRCS practice standard. Focus of the Plan is building relationships through outreach and education. Providing guidance on practice or steps to work into farm management at smaller scale that will still make difference even if not at the more stringent requirements of NRCS practice standard. Nutrient management was also called out specifically in the outreach and education section to highlight this as a barrier and work on further outreach and education strategies. No change made in the plan. Response approved by Steering Team on 2/27/2023 meeting.	2/27/2023
27	138	Table 4.1: BMP Implementation	Scott Salisbury - Blue Earth County	In table 4.1 on page 138 for Lakeshore Restorations, "Bray Park on Madison Lake" as the targeted area. I am hoping that we can implement a good project at Bray Park, but I think that we had talked about having projects around the lake which matches up with the 100 linear feet every two years in the timeframe. Request to change to "Bray Park and Madison Lake"	X			Yes	Update per request.	2/7/2023

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28	139	Table 4.1: BMP Implementation	Scott Roemhildt - MNDNR	Consider changing the column title "Support" to "Agency Contact" or provide more context in the description. This column is blank throughout much of the table and the purpose is not clear.		X		Yes	The Plan implementation table maintained "support" column. Additional descriptions on all the columns meaning on the implementation table were included to provide additional context and description for the purpose of each.	2/21/2023
29	139	Table 4.1: BMP Implementation	Scott Roemhildt - MNDNR	BMP 19.2: Remove the DNR from the Support column for this BMP. The DNR should be included throughout the process as the proposal moves forward, however, we have concerns with this type of treatment in Bass Lake. For example, Bass Lake has limited submerged aquatic vegetation which is a critical component to water quality improvement efforts. The proposed feasibility study should identify alternative actions to address both internal and external phosphorus loading in the lake.	X			Yes	Updated per request. See implementation table items D&S 1.4. This study must be a completed and the study must find the in lake biomanipulation is cost effective and proper practice based on lake characteristics.	2/21/2023
30	141		Paul Davis - MPCA	Please list the MPCA in the "Support" column for Subsurface Sewage Treatment System (SSTS) work if you intend to use the Clean Water Partnership loan program. The MPCA offers a low-interest loan program to local units of government for implementation of non-point BMPs including septic system upgrades and replacements. This funding is available year-round to all counties. Information on the program can be found here: https://www.pca.state.mn.us/grants-and-loans/clean-water-partnership-loans .	X			Yes	Added MPCA to support for SSTS repair and replacements. (BMP24.1-24.7 on pg 141 - 142)	1/11/2023
31	143		Paul Davis - MPCA	Please do a Search/Replace in the document for MCPA. There is at least one instance that MPCA was referenced as MCPA.		X		Yes	Updated per request. Two instances were found and corrected on pg. 143 and 144	1/11/2023
32	154	Incentive Programs	Jill Sackett Eberhart - BWSR	Per Plan Content Requirements III.F.1. Incentive Programs, "Describe local voluntary cost share or grant programs necessary to achieve the goals, including the general purpose and scope, criteria that will be used to select projects/disperse funds, actions to work with landowners in these critical areas to tailor conservation practices, and how the program(s) will be implemented across the watershed to provide consistency and achieve goals." The opening paragraph references "section 4" but this is not enough to meet Plan Content Requirements for this section. Specifically: 1) criteria that will be used to select projects/disperse funds, 2) actions to work with landowners in these critical areas to tailor conservation practices, and 3) how the program(s) will be implemented across the watershed to provide consistency and achieve goals. *Possible solutions: 1) Provide specific "section 4" references on where to find each of the three incomplete plan content requirements. 2) Add an additional "opening" paragraph to page 154 that discusses the three incomplete plan content requirements. 3) A combination of 1 and 2 if "section 4" in fact doesn't fully explain the three incomplete plan content requirements.	X			Yes	Option 2, add an additional "opening" paragraph to page 154 that discusses the three incomplete plan content requirements. Paragraph: "The partners have identified several criteria that will be used to assist with the project selection and fund dispersal process. These criteria include, but may not be limited to, project location, pollutant reductions or amount of storage achieved, and multiple benefit approach. The highest ranking projects will be selected to move forward as funding allows. Outreach activities that have been outlined in Table 4.2, with a general program outline beginning on page 162. These outreach efforts will be utilized to engage landowners and build working relationships with them, which will encourage the implementation of key practices in critical areas. The implementation tables provide an anticipated schedule for implementation actions to occur throughout the watershed."	2/27/2023

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33	161	Operation and Maintenance	Jill Sackett Eberhart - BWSR	<p>Per Plan Content Requirements III.F.3. Operation and Maintenance, "Include a description of who is responsible for inspection, operation, and maintenance of capital projects, stormwater infrastructure, public works, facilities, natural and artificial watercourses, and legal drainage systems. Specify any new programs or revisions to existing programs needed to accomplish the goals or that may benefit from watershed-wide collaboration." *Possible solutions: 1) Bluntly say who is responsible for inspection and Operation and Maintenance of capital projects, stormwater infrastructure, public works, facilities, natural and artificial watercourses, and legal drainage systems. In other words, is it going to be the watershed JPC? Or is going to be the individual cities and entities? 2) In addition to what is required for this section, the Plan includes "BMPs" in this section. Who will be responsible for inspection and O&M of the installed BMPs? This may differ depending on funding source. If an SWCD assists a landowner in installing a BMP with their State Cost Share funds, who is responsible? If the watershed JPC installs a BMP with Watershed-Based Implementation Funds, who is responsible?</p>	X			Yes	Added the following clarification on parties responsible for O&M activities: "Local entities within the watershed will be responsible for the inspection, operation, and maintenance of capital projects, stormwater infrastructure, public works, facilities, natural and artificial watercourses, and legal drainage systems. Operation and maintenance of legal drainage systems and existing projects will continue under regular operation and maintenance plans of the entities with jurisdiction over these systems. Projects implemented through the Plan will be operated and maintained by the owner of project as outlined in the project contract for the lifespan of the project, though capital projects may be pursued collaboratively by the partners." Also removed BMP reference from this section.	2/27/2023
34	163	Outreach and education Program	Jill Sackett Eberhart - BWSR	<p>Per Plan Content Requirements III.F.6. Public Participation and Engagement, "The plan must describe approaches to public participation and engagement for implementing the plan, including information, outreach, and education program(s). Specifically, opportunities where there are benefits from watershed-wide collaborations and areas where focused or targeted actions will support the priority issues and goals of the plan. At a minimum, include: an analysis of the need for public participation and engagement in meeting plan goals, identification of strategies addressing the needs, and an estimate of the financial and technical support needed by the partnership for carrying out the strategies." The specific concern is the "estimate of the financial and technical support needed by the partnership for carrying out the strategies" and the lack of discussion in this section of the Plan. Possible solution: On page 163, in the Citizen Education and Outreach subsection, include a reference to Implementation Table 4.2 Outreach and Education Implementation and the estimated costs listed there.</p>		X		Yes	Updated text to include reference to actions in Table 4.2: Education and Outreach Implementation with associated costs under the Citizen Education and Outreach Section on pg. 163.	2/17/2023
35	172	Groundwater/Surface Water Use	Scott Roemhildt - MNDNR	Remove "Siting Wells" from the heading. The DNR does not perform this action.		X		Yes	Update per request.	1/26/2023

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36	172	Groundwater/Surface Water Use	Scott Roemhildt - MNDNR	Change "DNR Division of Ecological Water Resources" to "DNR"		X		Yes	Update per request.	1/26/2023
37	173	Public Waters - Paragraph 4	Scott Roemhildt - MNDNR	Please adjust the wording to include "Any activities that may change the course, current or cross-section of a public water may require a permit."		X		Yes	Update per request.	1/26/2023
38	173	Public Waters - Paragraph 4	Scott Roemhildt - MNDNR	Please change "in public waters and wetlands" to "public waters".		X		Yes	Update per request.	1/26/2023
39	176		Scott Matteson - MDA	MDA conducts pesticide monitoring at three locations in the watershed; the Le Sueur River, Little Cobb River and Beauford Ditch. Samples are analyzed for approximately 180 pesticides and associated degradates. The data collected is used to identify compounds and/or places where concentrations may exceed established water quality benchmarks, guidance values, and/or standards.	X			Yes	Information pertaining to MDA pesticide monitoring was added to surface water under Current monitoring, Surface water, Streams section on pg 176.	2/16/2023
40	177		Paul Davis - MPCA	In reference to the Surface Waters – Lakes section on Page 177, bacteria, sediment, and dissolved oxygen (DO) were not part of the lake assessments. Please consider the following or other language as you see fit. The MPCA conducts lake monitoring roughly every 10 years as a part of the intensive watershed approach. The first and second round of monitoring in the Le Sueur Watershed began in 2008 and 2018 respectively. Primary impairments found include elevated bacteria, excess sediment, and low dissolved oxygen. <u>Impairments in lakes for recreational use are primarily caused by high levels of internal and external phosphorus loading. Response variables associated with phosphorus loading are chlorophyll-a (chl-a) and Secchi depth.</u>		X		Yes	Updated per request.	1/11/2023
41	177		Paul Davis - MPCA	Please change the wording on Page 177 from: The state's Citizen Volunteer Monitoring Program provides useful information on lake water clarity, which is used to calculate long-term water clarity trends. St. Olaf, Reeds, and Elysian lakes are all monitored by citizens volunteers through this program. This wording has been recently changed as part of the program update.		X		Yes	Updated per request.	1/11/2023
42	180		Shaina Keseley - BWSR	Shouldn't this be Table 5-6?		X		Yes	The table was corrected to Table 5.5. Upon review of chapter figure and table numbers additional edits were made to ensure correct numbering.	2/17/2023

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43	183	Decision Making and Staffing - 2nd paragraph	Jill Sackett Eberhart - BWSR	The term "Policy Advisory Committee" appears to be an issue. Consider the possibility of not using this committee name.			X	No	Discussion tool place during the 3-3-2023 Policy Committee meeting and the committee confirmed name to be Policy Advisory Committee name during implementation phase of the Plan.	3/6/2023
44	184	Committees	Jill Sackett Eberhart - BWSR	Per Plan Content Requirements III.G.1.b. Advisory Committee, "Describe if the advisory committee(s) created for plan development will continue through plan implementation and/or describe alternative methods to ensure a dependable forum to exchange information and knowledge about the watershed and implementation of the plan, and to meet the statutory requirements for ongoing advisory committees of counties (Minnesota Statutes §103B.301-103B.335) and watershed districts (Minnesota Statutes §103D.331-103D.337). Also, identify opportunities to coordinate with federal partners to convene Local Working Groups to fulfill federal Farm Bill requirements. The plan should establish procedures for engaging state agencies and describe the ongoing roles and commitments of the state agencies for plan implementation." The specific issues is the lack of discussion for identifying opportunities to coordinate with federal partners to convene the Local Working Groups.	X			Yes	Added: "The LIT will utilize opportunities to collaborate with federal partners as they arise, specifically in terms of fulfilling federal Farm Bill requirements, such as convening the Local Working Groups."	2/21/2023

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45	185	Work Plan Development	Jill Sackett Eberhart - BWSR	<p>Per Plan Content Requirements III.G.4. Work Planning, “Describe a frequency and method for developing and approving work plans based on: plan priorities, the targeted implementation schedule, and the implementation programs. The work plan can consist of a collaborative work plan for the watershed, elements of individual work plans for each local government participant, or some combination. Describe how the work plan will be finalized and approved. a.) Local Work Plan: Describe an annual commitment to implementing the plan via local budgeting and staffing decisions. Describe an approach to additional collaborative work planning based on the extent of collaboration intended in the implementation schedule, programs, and subsequent agreements, as well as the extent of collaborative grant-making intended. b.) Funding Request: Describe a biennial commitment to collaboratively review and submit a funding request to BWSR.” The entire section is convoluted, and the terminology used makes it very difficult to decide if Plan Content Requirements have been met. In addition, it’s a very important piece of this section and it’s imperative that it reads clearly to aid in implementation by the partners. Possible Solutions:</p> <p>1)Develop clear terms, and use them consistently, for when this section is discussing the local work plan / watershed plan “work plan” and when it is discussing the funding request / grant “work plan(s).”</p> <p>2)The “Local Work Plan” portion of the Plan Content Requirements says to “describe an annual commitment to implementing the Plan via local budgeting and staffing decisions.” Current language of the draft plan says “biennial work plan and budget.” It’s unclear if that language is talking about the Plan or the grants. If talking about the Plan, then the previous language about “annual” applies. One possible solution for this discrepancy is to develop the biennial work plan and budget, but make a point to discuss what’s to be done/spent in each year. This is similar to the Milestones document developed for a BWSR grant.</p>	X			Yes	Changed "The Partnership" to LIT. Clarified watershed/plan work plans vs grant work plan. Added: "In addition to developing the biennial watershed work plan and budget, the LIT will also biennially review the budget and implementation schedule for the BWSR funding request. Within the biennial work plan and budget, the LIT will clearly identify the implementation activities and corresponding funding for each year"	2/27/2023
46	186	Plan Amendments	Jill Sackett Eberhart - BWSR	<p>This section technically meets Plan Content Requirements. However, current language is confusing and includes items that may be overridden by State requirements. The focus of this section should be on the local process for considering plan amendments. A simple reference to state requirements should be included, but the bulk will be about your process.</p> <ul style="list-style-type: none"> • First paragraph, 2nd to last sentence: Plan amendment requirements will ultimately be decided on by the State. Local requirements may be overridden. Suggest deleting. • First paragraph, last sentence: What is meant by “Prioritize, Target, Measure (PTM)?” • First paragraph, last sentence: Plan amendment requirements will ultimately be decided on by the State. Local requirements may be overridden. Suggest deleting. • Second paragraph. Makes assumptions on state requirements. Suggest deleting. • Would a flowchart help make the discussion of this local amendment process clearer? (who it starts with, each committee it goes through, etc.) If there is room, you may want to consider it 	X			Yes	Deleted sentences as recommended. Additional details on the process, and development of flowcharts will be added to collaborative agreement documents as needed.	2/27/2023

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47	187	Reporting	Jill Sackett Eberhart - BWSR	<p>Per Plan Content Requirements III.G.5.d. Reporting, “Describe collaborative approaches to provide accountability to stakeholders and to meet annual reporting requirements of local governments, grant reporting requirements, and specific program and financial reporting requirements. Information on required annual reporting can be found on the BWSR website. Consider a periodic ‘state of the watershed report,’ individualized ‘waterbody report cards’, or other methods to provide accountability and demonstrate outcomes locally.”</p> <ul style="list-style-type: none"> •The first sentence includes, “...annual reporting requirements for the Plan as required...” There currently are no State and/or BWSR annual requirements for Comprehensive Watershed Management Plans. Annual items may be part of the Plan, but are at the discretion of the watershed partners and/or part of planning review. BWSR does have annual requirements related to grant reporting, however, and that is referenced in the Plan Content Requirements. •This section has no mention of how the watershed partners will “provide accountability to stakeholders,” i.e. citizens, agencies, partnership boards, cities, etc. •This section appears to attempt to discuss the JPC and fiscal agents grant reporting requirements, but it needs to be clearer. 	X			Yes	Clarified that the reporting referenced in this section was grant reporting. Added sentence about stakeholder reporting and meeting annual reporting requirements for LGUs, also noted that the format of the report will be determined by the LIT.	2/27/2023
48	188	Table 6.1	Shaina Keseley - BWSR	O&E and BMP should be spelled out.		X		Yes	Updated per request.	2/17/2023
49	188	Funding / Table 6.1	Jill Sackett Eberhart - BWSR	My assumption is that the Implementation Program column in Table 6.1 directly relates to the three different Implementation Tables. Suggest mentioning that a little more clearly in this section (attempt made in third paragraph).		X		Yes	Added references to individual implementation tables in third paragraph.	2/17/2023
50	190	Collaborative Grants	Jill Sackett Eberhart - BWSR	Does the phrase “work plan” refer to the Plan or the future grants? Suggest making this clear.	X			Yes	Removed "work", capitalized P in Plan to indicate that this is based on the Plan.	2/21/2023
51	191	Table 6.3	Shaina Keseley - BWSR	A few suggestions: Clean Water Funds (specifically WBIF) can be used for studies. Maybe have that column title include "and/or" instead of only "and"? Alternatively you could have a separate column and split monitoring and studies. Also, MPCA no longer has CWP grants, they are low interest loans. DNR, MPCA and MDA also get CWF allocations so not sure why only BWSR is listed. Could have a separate line for WBIF CWFs and competitive CWFs for BWSR.	X			Yes	1. Changed column title to include "or" : monitoring data, acquisition, and/or studies under programs columns. 2. Added check to monitoring data, acquisitions, and/or studies for clean water funds. 3. Removed MPCA CWP grants. 4. Added Watershed Based Implementation Funding row. 4. In BWSR Clean Water Fund row added word "Competitive" to Clean Water Funds.	2/21/2023
52	125-149	Support Column	Jill Sackett Eberhart - BWSR	The majority of this column has been left blank which causes the tables to look incomplete. There are multiple solutions here. Put actual LGU names into the boxes, put a symbol or N/A into the empty boxes, etc.		X		Yes	Added dashed to support column where no organization is listed.	2/17/2023
53	137, 139, 142	Counties in Mgmt Zone	Jill Sackett Eberhart - BWSR	Some boxes in this column have been left blank which causes the table to look incomplete. There are multiple solutions here. Put actual LGU percentages into the boxes, put a symbol or N/A into the empty boxes, etc.		X		Yes	Added NA to "Counties in Mgmt. Zone" column for actions that have watershed wide targeting.	2/17/2023

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54	168-175	Table 5.4 and the descriptions below that	Jill Sackett Eberhart - BWSR	Some of the rows have no "X", so why include them (Aquatic Invasive Species, Forest/Native Prairie Land Protection)? Some of the rows do not have any "corresponding description" which is particularly confusing for some (such as Agricultural Land Protection). Some of the rows and the "corresponding descriptions" do not use the same terminology which is confusing. Better alignment and better terminology consistency would help include the benefit of this section.		X		Yes	1. Deleted regulatory controls that did not have any "X". These included aquatic invasive species (AIS), Drain Tile, and Forest / Native Prairie Land Protection. 2. Updated titles to match as applicable.	2/21/2023
55	183/184	Decision Making and Staffing - 2nd paragraph	Jill Sackett Eberhart - BWSR	The phrase "...may include technical staff from outside organizations" appears to be an issue. This is not how the current planning Policy Committee is made up nor is it included in the definition on page 184 of the Plan. Was the addition of "outside organizations" requested from the planning Steering Team or Policy Committee? Why is the narrative language on page 183 different from the definition on page 184?	X			Yes	Removed "and may include technical staff from outside organizations".	2/21/2023
56		Channel Erosion and Stability / Upland Erosion	Scott Roemhildt - MNDNR	The draft plan divided the priority concern of Increased Erosion into three categories: soil health, upland erosion and near channel sources. Partners are encouraged to use holistic stream restoration in the targeted reaches and work with experienced professionals to address incision, stream pattern, profile, and dimensions. The DNR encourages partners to contact DNR early in the process for assistance.			X	No	The partners plan to continue to coordinate and partner with the DNR throughout implementation phases of the Plan. Comment noted - no changes made to plan.	1/26/2023
57		Land Use Impacting Terrestrial and Aquatic Habitat	Scott Roemhildt - MNDNR	The draft plan includes aquatic habitat restorations, perennial cover, and the creation of habitat corridors. While the plan does not identify Aquatic Invasive Species (AIS) as a priority, the DNR encourages AIS management as it aligns with plan priorities such as riparian habitat.			X	No	The partners will continue to encourage AIS prevention and management. AIS throughout the Watershed will continue to be managed through AIS management plans. AIS efforts conducted may be supported if the efforts align with the goals of the partnership and capacity to assist is available, however is not main priority. The partners encourage the used of AIS grants available through the DNR or other funding mechanisms to implement. Comment noted - no changes made to plan.	1/26/2023
58		Increasing Demand for Outdoor Recreation Opportunities	Scott Roemhildt - MNDNR	Although Outdoor Recreation is not included as a priority in the draft plan, we are pleased to see that promoting hunting walk-in access and walk-in access for paddling is included in the implementation table			X	No	Public recreation is not usually a prime responsibility or priority for the LGUs, but the partners understand its connection to their primary work in protecting and restoring natural resources. LGUs will help to support and promote efforts for public recreation through their work in the Watershed. Comment noted - no changes made to plan.	1/26/2023
59		Plan Administration Chapter	Policy Committee	Change naming of Joint Powers Collaborative to Joint Powers Collaboration		X		Yes	Changed language throughout Plan to be Joint Powers Collaboration.	3/6/2023