

Informal Review Period Notes/Comments

Commenter	Comment Date	Plan Section	Comment	Plan Change Made (Y/N)	Comment Response and/or Action
Danielle Anderson	11/8/2019	Acknowledgements	Stephanie Adams is not listed in the Acknowledgments	Y	ML 11/20/19
Danielle Anderson	11/8/2019	Section 1: Executive Summary	On page 10 1st paragraph, 4th line it says "JPA members" and I believe it should say "JPB members"	Y	ML 11/20/19
Micayla Lakey	11/18/2019	Cover	Insert "Watershed" so it reads "Comprehensive Watershed Management Plan"	Y	ML 11/20/19
Micayla Lakey	11/18/2019	Cover	Change "Local Water" to "Watershed"	Y	ML 11/20/19
Micayla Lakey	11/18/2019	Cover	Insert "and" where it says "Soil Water Conservation Districts"	Y	ML 11/20/19
Micayla Lakey	11/18/2019	Acknowledgements	Lonergan is misspelled	Y	ML 11/20/19
Micayla Lakey	11/18/2019	2.2	Insert period after Mississippi River at end of first paragraph	Y	ML 11/20/19
Micayla Lakey	11/18/2019	3.4.1	Why is Achieve italicized in goal 1 and goal 2, but in goal 3 Reduce is not italicized? TAC discussion	Y	ML 12/4/19
Micayla Lakey	11/18/2019	3.4.1	Pomme is misspelled	Y	ML 11/20/19
Micayla Lakey	11/18/2019	3.5.1	This sentence makes it sound like we should be protecting aquatic invasive species. Change "protected" to "managed"	Y	ML 11/20/19
Micayla Lakey	11/18/2019	3.6.2	Aerial is misspelled on the photo caption	Y	ML 11/20/19
Micayla Lakey	11/18/2019	4.3	Watershed is sometimes capitalized and sometimes not, make it consistent	Y	ML 11/20/19
Micayla Lakey	11/18/2019	5.4.1 Zoning etc.	Why is Right-of-Way capitalized? Doesn't seem necessary	Y	ML 11/20/19
Micayla Lakey	11/18/2019	5.6.2 MDH	Manganese, radionuclides, nitrate don't need to be capitalized	Y	ML 11/20/19
Micayla Lakey	11/18/2019	6.2.3 Coordination	Change "exists" to "exist"	Y	ML 11/20/19
Micayla Lakey	11/18/2019	6.3	lowercase "the" MN Land Trust and spell out Minnesota	Y	ML 11/20/19
Micayla Lakey	11/18/2019	6.3	remove "and" in front of Lake Associations and make lowercase L and A	Y	ML 11/20/19
Micayla Lakey	11/18/2019	6.4.3	lowercase "the" Environmental Protection Agency	Y	ML 11/20/19
Micayla Lakey	11/18/2019	6.4.3	lowercase "project development"	Y	ML 11/20/19
Micayla Lakey	11/18/2019	6.5.1	lowercase "local"	Y	ML 11/20/19
Micayla Lakey	11/18/2019	6.5.1	lowercase "best professional judgment" and judgment is misspelled	Y	ML 11/20/19
Micayla Lakey	11/18/2019	6.7.1	lowercase "local government"	Y	ML 11/20/19
Micayla Lakey	11/18/2019	6.7.1	capitalize "board" as in Joint Powers Board	Y	ML 11/20/19
Micayla Lakey	11/18/2019	6.7.1.1 Step 1	capitalize "the" Technical Advisory Committee	Y	ML 11/20/19
Micayla Lakey	11/18/2019	6.7.1.1 Step 2	lowercase "the" Joint Powers Board	Y	ML 11/20/19
Micayla Lakey	11/18/2019	A.1 Watershed Overview	First sentence is incomplete; should say "is located" and no comma after Watershed	Y	ML 12/3/19
Micayla Lakey	11/18/2019	A.2 Topography	Insert apostrophe in "watershed's"	Y	ML 12/3/19
Micayla Lakey	11/18/2019	A.3.1	Change "watersheds" to "watershed's"	Y	ML 12/3/19
Micayla Lakey	11/18/2019	A.7	remove comma after "northern"	Y	ML 12/3/19
Micayla Lakey	11/18/2019	A.9	Bullet points look like a different font size; make it the same for consistency	Y	ML 12/3/19
Micayla Lakey	11/18/2019	A.14.1	Hillsides is misspelled in bottom right cell of table A-9	Y	ML 12/3/19
Micayla Lakey	11/18/2019	A.14.2	Change "Forester's tern" to "Forster's tern" in second paragraph	Y	ML 12/3/19
Micayla Lakey	11/18/2019	Table A-14	If the 35-acre SNA is referring to Egret Island SNA, SNA stands for Scientific and Natural Area, not Scenic Natural Area - change "Scenic" to "Scientific and"	Y	ML 12/3/19
Micayla Lakey	11/18/2019	A.15	Below Table A-15, remove hyphen in Fergus Falls	Y	ML 12/3/19
Micayla Lakey	11/18/2019	A.16	After prairie turnip, insert in parentheses (Pediomelum esculentum (Pursh) Rydb.)	Y	ML 12/3/19
Micayla Lakey	11/18/2019	A.16	Change "eating" to "eaten"	Y	ML 12/3/19
Micayla Lakey	11/18/2019	A.16	Hyphenate "off-farm"	Y	ML 12/3/19
Micayla Lakey	11/19/2019	1. Executive Summary	Footer of Section 1: Executive Summary has "Executive" misspelled on all pages	Y	ML 12/3/19

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Andy Albertsen	11/19/2019	Table of Contents	Section numbers should be consistent font/size. Formatting of these seem off.	N	Looks ok in the Word document
Andy Albertsen	11/19/2019	1. Executive Summary	Hardwood Forests doesn't need to be capitalized	Y	ML 11/20/19
Andy Albertsen	11/19/2019	1. Executive Summary	Remove the "s" on BMPs	Y	ML 11/20/19
Andy Albertsen	11/19/2019	1. Executive Summary	Remove the "s" on BMPs	Y	ML 11/20/19
Andy Albertsen	11/19/2019	1. Executive Summary	Should say Board of Water and Soil Resources, not Board of Soil and Water Resources in bottom right cell of table	Y	ML 11/20/19
Andy Albertsen	11/19/2019	Table 2-1	Bottom two cells in center column should say Soil and Water	Y	ML 11/20/19
Andy Albertsen	11/19/2019	Figure 2-3	In Watershed-wide box, change Watershed education to Watershed outreach. TAC discussion	N	Who has editing capability for this map?
Andy Albertsen	11/19/2019	3.1.1	Remove the "s" on BMPs	Y	ML 11/20/19
Andy Albertsen	11/19/2019	Table 4-2	Change 2029 to 2030 in row 2 column 3	Y	ML 11/20/19
Andy Albertsen	11/19/2019	Table 4-2	In row 5 column 5, amount seems low. TAC discussion.	Y	No change
Andy Albertsen	11/19/2019	Table 4-2	In row 5 column 4, wherever "watershed-wide" is mentioned in these tables, every SWCD and county should be marked as project leads. TAC discussion.	Y	No change
Andy Albertsen	11/19/2019	Table 4-5	In row 4-5 column 3, are CNMPs and pit closures 4 per year, or 4 over 10 years? It doesn't specify here or where it is stated earlier in the plan. Funding amounts should reflect this. TAC discussion.	Y	Changed CNMPS to 4 per year and pit closures to 4 over 10 years. Adjusted funding amounts accordingly in table 4.5 and table 4.1.
Andy Albertsen	11/19/2019	Table 4-6	In row 3 column 3, what are these meetings? TAC discussion.	Y	No change
Joe Montonye	10/24/2019	cover	Replace cover photo of birders at North Ottawa Compound with a photo of ag production from within the watershed. Provided a photo to use instead.	Y	ML 12/5/19

Formal Review Period Notes/Comments

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MPCA	2/11/2020	Executive Summary	6	The plan identifies five priority areas which covers approximately 75% of the watershed, 11 priority issues and 20 measurable goals which it hopes to accomplish in the next 10 years. Is there enough resources (manpower and funding) to adequately address all these issues or should additional prioritization occur?	N	Yes - we have adequate resources	Planning Team
DNR	2/11/2020	Executive Summary	44	Under Drinking Water Protection Priority, the Implementation Activity of "Convert cropland to perennial vegetation" does not address all land uses within the DWSMAs. Cropland is a relatively small portion of the acreage (see MDH letter). Consider an implementation activity of contacting landowners and public water suppliers in DWSMAs to discuss best management practices and then replace the convert cropland activity with installation or implementation of BMPs. Goal could then be a number of BMPs in the vulnerable DWSMAs over ten years.	N	We have implementation activities to contact landowners about BMPs	Planning Team
MPCA	2/11/2020	Executive Summary	5	The text indicates that the watershed is 559,968 acres. Throughout the document and most notably in the appendix there are different numbers given for the size of the watershed, ranging from 559,968 to 560,399. Please verify which number is correct.	N	559,968 acres seems to be the consensus: MPCA, NRCS, and PDTRA staff have all found this to be the total acreage of the PDT watershed. Table A-13 in the appendix is taken directly from the NRCS Rapid Watershed Assessment: Pomme de Terre River Watershed. In said document, the NRCS states in the narrative that the PDT watershed is 559,968 acres, then states in this same table that it is 559,977 acres. We will leave the table as is, and use 559,968 acres as our official measurement of PDT watershed area. <a href="https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs142p2_023187.pdf">https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs142p2_023187.pdf</a>	Micayla
DNR	2/11/2020	Executive Summary	46	Inconsistent Measurable Goals - On pages 4-9, the listed Goals for Priority Issues and the list of Measurable Goals in the tables in Section 4, and the list of Goals in section 3 do not match. Some have missing words (3.1.1 DW - "educational"); others use different words (3.2.1 Altered Hyd - "public water basins" and "non-contributing areas", 3.6.2 Lakeshore Education - "shoreland" and "lakeshore"); and many are truncated (3.4.1 Excess Pollutants - "Reduce stormwater runoff impacts" and all of the goals in 3.6.1). Recommend using the full and complete goal in all three locations in the document.	N	In executive summary, tables are summary tables, and goals are summarized or "truncated" to fit the tables onto one page. Number of goals matches between the narrative in section 3 and implementation tables in section 4. See narrative in section 3 for full and complete goals.	Micayla
BWSR	2/11/2020	Executive Summary	54	Please ensure the # of goals and # of implementation activities are consistent from executive summary, to section 3 to section 4. Examples below for Drinking Water protection, Groundwater Conservation & Altered Hydrology - Drinking Water Protection: Goals: 2 on pg 6, 3 on pg 19; Implementation Activities 2 on pg 6, 5 on pg 20 & pg 41/42 - Groundwater Conservation: Goals: 1 on pg 6, 2 on pg 21 & 1 on pg 42; Implementation Activities 4 on pg 4, 5 on pg 21 but 4 in Table 3-2 - Altered Hydrology: Implementation Activities 6 on pg 6 and 8 on pg 23	N	Repeat of DNR comment #3, cumulative comment #46	Micayla
BWSR	2/11/2020	Executive Summary	55	Status column in table summary of section 1 not mentioned/described in section 6.6 pg 85. Coordinated use between these sections is unclear to me.	Y	Add a sentence in 6.6.1 to explain how the status column will be used to track progress on an annual basis. Also used to inform public of progress via website, handouts, etc. Used to present progress to policy folks.	Micayla
BWSR	2/11/2020	Executive Summary	56	Within the box detailing the JPB's role/function: Broaden from 'BWSR' to 'grantors' regarding approving reports.	Y	changed as suggested	Micayla
Andy Rice/ Douglas SWCD	2/11/2020	Executive Summary	167	The names of the individual soil and water conservation districts should not include the word county. Example: Douglas Soil and Water Conservation District.	Y	Deleted counties as suggested	Micayla
DNR	2/11/2020	Executive Summary	45	There are in fact 21 Measurable Goals (not 20 as stated on page 3). The missing goal is listed on page 21, under Groundwater Conservation (3.1.2), but is missing from the Executive Summary. Goal 2: Fill groundwater monitoring data gaps through request of the County Geologic Atlas and continuation of ongoing observation well monitoring efforts. The accompanying implementation activities are listed in Section 4 (pg. 42) under Goal 1, rather than Goal 2.	Y	Goal 2 under Groundwater Conservation was deleted; see response to cumulative comment #73	Micayla
MPCA	2/11/2020	Prioritization	2	While PTMApp acronym is listed on this page, nowhere in the document does it explain what PTMApp is nor is there any outputs provided from PTMApp. Without explaining what PTMApp is or providing outputs from the model it leaves the reader wondering how you arrived at so many of the goals.	Y	A table summarizing what tools were used to identify measurable goals was added to Section 2.3.	EOR
MPCA	2/11/2020	Prioritization	7	Prioritizing areas for implementation - In the second sentence it should be noted that series of maps is provided in the appendix so that the reader may review the maps.	Y	Added reference to appendix	Micayla
MPCA	2/11/2020	Prioritization	8	Also in relationship to item 2 above, the plan should provide the reader with information as to why one model (HSPF) was used for prioritization and a different model was used for targeting (PTMApp).	Y	See response to cumulative comment #2	EOR
BWSR	2/11/2020	Prioritization	57	Shaded box with 5 key areas - Why were Drywood Creek & PDT Corridor selected? The other 3 clearly state 'Selected for...' Suggest editing to consistent sentence structure.	Y	Drywood Creek & PdT Corridor were edited to clarify their selection criteria.	EOR
DNR	2/11/2020	General	47	Figure 2-3 and Figure 2-4 both contain a call-out box for the Pomme de Terre River Lakes Chain Area. In Figure 2-4, Drinking Water Protection is missing.	N	Figure 2-3 gives the information	Micayla
BWSR	2/11/2020	General	58	At either the beginning of Section 3 or 4, please differentiate/define "Activity Outcome Measurability" in implementation tables, "Measure for Pace of Progress" in certain subsections in Section 3, and "Pace of Progress" in Section 3.	Y	Changed AOM in all implementation tables to "Pace of Progress"	Micayla
BWSR	2/11/2020	General	59	Please number/letter the actions consistent with the implementation tables, ex. Table 4.2's ID# 3.1.1-A could be A. "Conversion of 500 acres..."	Y	Assigned letters to each implementation activity in the narrative, to match the letters in the implementation tables in section 4	Micayla
MPCA	2/11/2020	Drinking water	9	Targeted Implementation Activities - In the third bulleted sentence, it states an activity is to contact landowners about completing BMP projects. The plan should describe what type of BMP projects should be discussed. It is also noted that there is no funding (page 41) associated with implementing the proposed BMPS and only funding for the landowner contact. Is there other funding sources identified to implement the BMPs?	Y	Stated in the justification for goals that there are very few ag landowners in the DWSMAs and not enough acreage to target for BMPs	Planning Team

Formal Review Period Notes/Comments

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MDH	2/10/2020	Drinking water	40	<p>MDH recognizes that there have been changes to the Barrett and Appleton Drinking Water Supply Management Areas (DWSMAs) since the initiation of the watershed planning process. Changes to the maps and text were incorporated into the draft plan for these DWSMAs during plan development. However, the drinking water implementation activity <i>to convert 500 acres of cropland to perennial vegetation through perpetual easements or 10 to 15 year contracts</i> may need to be reconsidered based on the DWSMA size and vulnerability changes. Below is a breakdown of the vulnerable acres in DWSMAs.</p> <p>Appleton: Moderately vulnerable = 406 acres, Highly vulnerable = 79 acres                      Barrett: Moderately vulnerable = 442 acres                      Morris: Highly vulnerable = 299 acres, Very highly vulnerable = 216 acres</p> <p>This results in a total of 1,442 acres of vulnerable land in DWSMAs. Of this, only a minimal portion is in agricultural production. Consider having one implementation activity to contact landowners and public water suppliers in DWSMAs to discuss BMPs and then replace the cropland conversion activity with an activity to coordinate and implement/install those BMPs. Goal or measure could be 5-10 BMP projects in vulnerable DWSMAs over the course of the 10 year plan. This may allow for a variety of projects depending on the need. Examples of BMP projects in these DWSMAs could include stormwater retrofits, hazardous materials management, lake/river/ditch buffers, SSTS upgrades, cover crops, alternative crops, nutrient management initiative, conservation tillage, soil testing, agricultural pesticides/insecticides best practices, retirement of marginal/erodible land, etc.</p>	Y	Changed Action A to implement 5-10 ag BMPs in DWSMAs instead of convert 500 acres to perennial grassland. There are now only 5 landowners with ag parcels in the 3 DWSMAs (Appleton, Barrett, Morris), for a total of 175 acres. Converting any amount of ag land to perennial grassland would be a win.	Planning Team
BWSR	2/11/2020	Drinking water	61	Goal #1 'protect', 'provide', 'reduce' without a number are very difficult to measure. Please edit to provide measurability. Please add a measurable component such as acreage or percentage of DWSMA areas. MDH's letter may have addressed this also.	Y	<p>Changed Goal 1 to: Implement city wellhead protection plans and provide best management practice technical assistance to protect public drinking water supplies with moderate and high vulnerability in Appleton, Morris, and Barrett.</p> <p>Changed Goal 2 to: Host at least six well water nitrate testing clinics annually, and provide at least 65 arsenic testing kits to private well owners each year. See numbers in response to cumulative comment #71.</p>	Planning Team
BWSR	2/11/2020	Drinking water	62	Goal 1: Technical assistance is mentioned within goal, but conversion of 500 acres (first Implementation Activity), any consideration of including other BMPs and funding for them? If yes please add.	N	See response to cumulative comment #9	Planning Team
BWSR	2/11/2020	Drinking water	63	Goal 2: 'protect', 'provide', 'reduce' without a number are not measurable. Add a measurable component to this goal and/or the actions associated with it. Add language to the Plan on how you plan to target private wells with arsenic.	N	See response to cumulative comment #61	Planning Team
BWSR	2/11/2020	Drinking water	64	Goal 3: Add a measurable component to this goal. Approximately how many unsealed wells are there? Or why 134 wells were selected as the numbers.	N	Answered elsewhere in plan	Planning Team
BWSR	2/11/2020	Drinking water	68	Action A - A) Clarify how close 500 acres will achieve the goal. B) Please distinguish between this action and Action 3.2.1-A and -B. How are they not overlapping? And C) Assume conversion or land retirement programs. What about working w/ land occupiers regarding other BMPs for current CRP acreage that does not remain in the program and is converted back to cropland?	Y	A) Goal updated by Planning Team, see response to cumulative comment #40. B) Steering Team decided to switch to 5-10 BMPs in the Drinking Water Protection priority areas. Overlapping BMPs have been clarified with Table 3-3. C) Activity clarified to state that BMPs are activities that reduce nitrate leaching/runoff such as nutrient management, buffers or WASCObS.	EOR
BWSR	2/11/2020	Drinking water	65	Within Desired Future Condition 'Partner w/ state to establish/track long-term monitoring of groundwater arsenic and nitrate concentration.' This doesn't seem to be a goal more of an Implementation Activity.	Y	Deleted first sentence. 2nd sentence, replaced "with" with "have"	Planning Team
BWSR	2/11/2020	Drinking water	66	Justification of Goal - Sealing wells only. No cropland conversion or other BMPs. Is this a missed opportunity?	N	See response to cumulative comment #9	Planning Team
BWSR	2/11/2020	Drinking water	67	Actions - general. Consider adding actions/BMPs/approaches to address this goal if landowners are unwilling to convert cropland to perennial vegetation. Only cropland conversion, no other types of BMPs? What if landowners don't want to retire their land? What do the DWSMAs recommend? MDH comment? Are there urban practices that are appropriate to add as well?	N	See response to cumulative comment #9	Planning Team
BWSR	2/11/2020	Drinking water	69	Action B - Do the 3 wellhead plans have actions beyond cropland conversion and sealing wells that could be inserted now, with associated costs for each of the 3 DWSMAs? For the Activity Outcome Measurability (AOM) in Table 4-2, consider changing it from "number of meetings" to "number of BMPs or practices implemented". If not specify the towns to be contacted/worked with.	Y	Changed the AOM in Table 4-2 to say one wellhead meeting attended annually	Planning Team
BWSR	2/11/2020	Drinking water	70	Action C - Explain what is meant by "contacting" - does one mailing count? Contact landowners not measurable. Consider something such as - How many landowners, # of parcels, or % of parcels?	Y	Change Implementation Activity in Table 4-2 to say "contact agricultural landowners about completing BMPs within DWSMAs"	Planning Team
BWSR	2/11/2020	Drinking water	71	Action D - Host how many clinics? Can SWCDs or counties do the arsenic test? I'm confident they do nitrate testing. Edit if needed.	Y	Changed Action D to state "Host annual well water nitrate and arsenic testing clinics (at least one of each per year in each county) and coordinate with environmental labs to have nitrate and arsenic testing kits available to the public." Based on SWCDs' # of nitrate clinics hosted per 10 yrs: 10 Swift, 10 WOT, 5 Grant, 6 Stevens, 10 Douglas. # of arsenic kits handed out per year: 2 Big Stone, 6 Stevens, 25 WOT, 1 Swift, 6 Douglas, 26 Grant	Planning Team
BWSR	2/11/2020	Drinking water	72	Pace of Progress - What about including the 'tracking system' for existing BMPs described elsewhere in this plan? Or if other BMPs are existing or established during 10 yrs?	N	DWSMAs are such a small area, low priority, not an effective way to gather data	Planning Team

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BWSR	2/11/2020	Groundwater conservation	77	Action A - Describe the methodology/tool for identifying projects since PTMApp does not cover groundwater concerns very well. Maybe MDA's vulnerable area map could assist with this (found at <a href="https://www.mda.state.mn.us/chemicals/fertilizers/nutrient-mgmt/nitrogen-plan/mitigation/wrpr/wrprpart1/vulnerableareamap">https://www.mda.state.mn.us/chemicals/fertilizers/nutrient-mgmt/nitrogen-plan/mitigation/wrpr/wrprpart1/vulnerableareamap</a> ) This may be best explained in Section 6.5.1. For Activity Outcome Measurability (AOM) in Table 4-2, consider a better connection to the number of ag irrigation and golf course wells as noted in the issue background.	Y	Additional information added in Section 2.3 Draft Issues Statement & Measurable Goals Table 2-2: Models, tools, and studies used to develop measurable goals for each issue. Action A revised to include the following text: "using the MDA vulnerable area map (see Table 6 1)". MDA vulnerable area map added to Table 6-1 in Section 6.5.1. Activity updated to target 50% of the 185 landowners with agricultural irrigation wells.	EOR
BWSR	2/11/2020	Groundwater conservation	73	only 1 goal in Table 4-2 vs 2 here. Inconsistencies: 4 implementation activities vs. 5 pace of progress intentional? Edit as needed.	Y	Combined goal 1 & 2; edited goal in implementation table as well.	Micayla
BWSR	2/11/2020	Groundwater conservation	74	Priority Area - Clarify priority areas to work - the issue statement lists some specific groundwater dependent resources whereas Table 4-2 states Pomme de Terre River Corridor only.	Y	Added sentences to issue statement and priority area summary. That sentence about specific groundwater dependent resources is a background statement, not necessarily focus areas. Edited issue statement.	Micayla
BWSR	2/11/2020	Groundwater conservation	75	2 goals here but only 1 in Table 4-2. Inconsistencies. Please edit as needed.	Y	See response to comment #73	Micayla
BWSR	2/11/2020	Groundwater conservation	80	Action D - How many ob wells within PDT? Use that somehow to provide measurability. Is there a need to add more observation wells? The Table 4-2 may need to be changed accordingly.	Y	Edited Action to state that monitoring will continue on the 19 DNR wells in the PDT.	Micayla
BWSR	2/11/2020	Groundwater conservation	76	Goal 1. Add a measurable component. How will you know you have reached your goal?	Y	Activity A and D provide numbers of irrigation well landowners to contact and DNR-monitored observation wells that will continue to be monitored	Planning Team
BWSR	2/11/2020	Groundwater conservation	78	Action B - List the counties that will or have not yet requested the Geologic Atlas.	Y	Listed which counties have already requested Geologic Atlas	Planning Team
BWSR	2/11/2020	Groundwater conservation	79	Action C - The AOM should also include number of BMPs or similar, as there are two parts to the action - identification and focused installation of BMPs.	Y	changed wording of Action C	Planning Team
MPCA	2/11/2020	Altered hydrology	10	10 Year Measurable Goal - Please verify the calculation for acre-feet. (.08"/12" x 559,968 acres (from page 1) = 3,733 acre-feet) If water storage would not include "open water" areas, removing open water (49451 acres from table A-15 in the appendix) from the total acres the total acre-feet would be 3,403.	Y	An HSPF scenario was run by Ted Fuller at MPCA (results emailed to Trevor Rundhaug and Paul Wymar on 7/31/2019) based on implementing all of the wetland source reduction areas identified by PTMApp in the watershed (shapefile provided by EOR to MPCA). MPCA watershed area estimate was 560,000 acres. The average annual volume reduction from the Baseline model for 1996-2016 was 3,527 ac-ft/yr. The average runoff reduction from the Baseline model for 1996-2016 was 0.08 in/yr. Recommend the goal be based on the HSPF volume reduction and calculate the equivalent runoff reduction. Information about the HSPF model run provided in the Justification for Goals. Goal was revised to be based only on acre-feet. 3,527 acre-feet/559,968 acres x 12 inches/foot = 0.076 inches, or with rounding, 0.08 inches. But because of rounding, difficult to determine the precise acre-feet FROM the runoff in inches per year without many significant digits.	EOR
MPCA	2/11/2020	Altered hydrology	12	Targeted Implementation Activities - The third bulleted sentence states implement 581 structural agricultural BMPs based on PTMApp and the fourth bulleted sentences states implement 9,340 acres of nonstructural BMPs based on PTMApp. Is there a list of these identified practices? Different practices have different reduction efficiencies, only knowing the number of practices or number of acres does not provide the reader with enough information to determine if they will meet the .08" reduction in runoff. If this information was developed utilizing PTMApp please include the scenarios developed and include the information in the appendix. This information would also be useful to validate the funding amounts identified in Table 4-2 through 4-7.	Y	Reference to the PTMApp Targeted Implementation Plan (Houston 2018) included, as well as the list of practices identified by PTMApp: Non-structural practices include the use of conservation tillage, cover crops, conservation reserve program (CRP) and permanent vegetative cover. Structural practices are "constructed" and include farm ponds, grassed waterways, nutrient reduction wetlands, bio-reactors, and other common agricultural practices.	EOR
BWSR	2/11/2020	Altered hydrology	93	Outlet management plans. Track # of plans developed and ac-ft seem to have disconnect. Could the developed plans provide an ac-ft change in hydrograph?	Y	EOR changed table	EOR
BWSR	2/11/2020	Altered hydrology	81	Goal 2 - Not measurable. No increase from what/when or what run-off event?			EOR
BWSR	2/11/2020	Altered hydrology	82	Action A - Describe in Section 6.5.1 how ac-ft of storage will be calculated for nonstructural and perennial vegetative practices. How do you intend to account for storage for 3-year contracts/commitments? The AOM appears to be incomplete. Additionally, why wouldn't AOM be ac-ft storage?	Y	Acre-feet of storage will be through running an HSPF scenario as listed in Table 6-2. A scenario was run to determine the 10-year Altered Hydrology goal. Storage will be based on current levels of implementation and contracts. In 10-years, if all 3-year contracts end, the achieved goal would be less. Acre-feet added to AOM.	EOR
BWSR	2/11/2020	Altered hydrology	83	Action A - Are any of the perennial veg acres in priority areas other than drinking water's 500 acres? If yes could those areas be listed w/ acres?	Y	A table was added that lists the priority area acres by practice.	EOR
BWSR	2/11/2020	Altered hydrology	84	Action B - Clarify these 2,920 acres are or are not included in the 20,840 acreage of Action A. Suggest listing those priority areas where the 2,720 ac wetland restoration will be targeted.	Y	See response to cumulative comment #83.	EOR
BWSR	2/11/2020	Altered hydrology	85	Action C - Suggest listing the priority areas the 383 structural practices will be targeted.	Y	See response to cumulative comment #83.	EOR

Formal Review Period Notes/Comments

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BWSR	2/11/2020	Altered hydrology	86	Action C - Table 3.3 shows some actions having no progress toward goal (0.00 ac-ft storage). A brief narrative should be added explaining the connection between structural practices (with 0.00 ac-ft storage) and Goal #1 and the priority issue statement.	Y	A footnote was added to Table 3-3 describing the current deficiencies in HSPF for determining volume reductions from structural practices. The 10-year goal is currently based on implementing only wetland restoration acres and nonstructural practices, but implementation of structural practices is still important for achieving the long-term goal and will be tracked as part of the Altered Hydrology goal using future versions of HSPF-SAM that include scientifically based flow reductions for structural practices.	EOR
BWSR	2/11/2020	Altered hydrology	87	Action D - Suggest naming the priority areas the 7370 acres of non-structural acres will be targeted.	Y	See response to cumulative comment #83.	EOR
BWSR	2/11/2020	Altered hydrology	88	Action E - Not in Exec Summary Priority Issue. I assume it should be added.	Y	Added a row in exec summary priority issues to include this action	Micayla
BWSR	2/11/2020	Altered hydrology	92	Action H - Not in Exec Summary Priority Issue. I assume they should be added.	Y	Added "future" to the action about controlled outlets	Micayla
MPCA	2/11/2020	Altered hydrology	11	Justification for goals - While the 10 year measurable goal is reasonable, consideration should be given to the long term goal. The plan states that runoff has increases 1.5 inches since 1949 and it is anticipated that additional runoff will occur because of climate change. Will the 0.5 inch reduction be sufficient to address the concerns in the future?	N	Reduction is sufficient - will revisit in 10 years	Planning Team
MPCA	2/11/2020	Altered hydrology	13	In the third "Type of Project" row, the plan indicates structural practices (e.g. alternative tile intakes, filter strips, contour buffers strips, water and sediment control basins) are to be used. Many of these practices may reduce the speed in which water will reach a stream but they will have a limited effect on the amount of water entering the stream. These practices would be better suited for a goal related to reducing the peak flow of the Pomme de Terre River. However, if the intent is that filter strips and contour buffers count towards the 20,840 acres of perennial vegetation the table should be modified to reflect the measure as currently there is no measure for perennial vegetation.	Y	Added a sentence to Justification for Goals for structural practices.	Planning Team
BWSR	2/11/2020	Altered hydrology	52	BWSR staff anticipates the partnership will receive a question from the BWSR Board regarding strategies for climate resilience. We suggest that a paragraph be added to the plan summarizing those approaches with watershed landowners, stakeholders, and industry (i.e. how will the partnership help prepare landowners' properties for the next big storm event?) Information within BWSR's Climate Change Trends and Action Plan ( <a href="https://bwsr.state.mn.us/sites/default/files/2019-09/ClimateChangeTrends%2BActionPlan_Sept2019.pdf">https://bwsr.state.mn.us/sites/default/files/2019-09/ClimateChangeTrends%2BActionPlan_Sept2019.pdf</a> ) should be useful in that regard.	Y	Added a few sentences at the end of Justification for Goals to state how conservation practices will promote climate resilience in PDT.	Planning Team
BWSR	2/11/2020	Altered hydrology	89	Action E - What will be the criteria used to include completed BMPs (timeframe in the past it was installed?)	Y	Edited Action E in narrative and implementation table to say "Previously completed functioning BMPs..."	Planning Team
BWSR	2/11/2020	Altered hydrology	90	Action F - the action states only public water basins will be identified. Consider including other landlocked basins that are not public waters but may hold up to a 10-year storm event. Could PTMApps map of non-contributing area to the 10 yr-24 hr event be useful?	N	We are only addressing public water basins due to limited resources and no local support for new ordinances that would affect non-public waters. Non-public waters are not a priority at this time.	Planning Team
BWSR	2/11/2020	Altered hydrology	91	Actions G & H - Please provide measurability such as the proposed number of plans.	Y	Removed Action G (existing outlet structures). Action H & corresponding Implementation Activity in table 4-3: changed to say "Pursue management plans for 100% of future proposed controlled outlets..."	Planning Team
MPCA	2/11/2020		14	Priority Area Summary - It should be noted that Pomme de Terre Lake and Artichoke Lake are not listed as impaired and Barrett Lake was just recently listed and a TMDL has not been developed. Recommend to re-word the sentence to state "Lakes threatened by or impaired for eutrophication..."	Y	Edited as suggested	Micayla
MPCA	2/11/2020	Poor quality lakes	19	The estimated load reductions for shoreline restorations on North Turtle Lake and Pomme de Terre Lake are incorrect based on the 0.2 pound reduction per year per 2,500 square feet of restoration. Based on the amount of stated restoration area, the amounts should be 3.2 and 3 respectively.	Y	Table 3.6 has been revamped by EOR	Micayla
MPCA	2/11/2020	Poor quality lakes	15	In the long-term goal column, how were these numbers developed? They appear to be BATHTUB Model reductions (from lakes that have completed TMDLs) multiplied by the PTMAApp loading estimates. These reduction numbers do not represent reductions sufficient to achieve water quality standards. The BATHTUB model includes internal loading and atmospheric deposition. In some cases, BMPs on the uplands will not be sufficient to achieve water quality standards due to large amount of internal lake loading. The MPCA recommends to either use the actual TMDL and BATHTUB Model pounds of reduction or change the title of the table removing the indication that it related to the TMDL. IT should also be noted that there has been no studies to indicate what the actual reductions needs are for Artichoke, Barrett and Pomme de Terre lakes as they are either not impaired or just recently listed (see comment 14).	Y	Load tables have been revised to clarify data sources and split between long-term goal tables (based on MPCA modeling data) and 10-year goal tables (based on implementation). Table 3-6 was renamed as 10-year goals instead of load reductions by activity and moved to just below Table 3-5. A footnote was added for Artichoke, Barrett, and PdT that a TMDL study has not been completed in Table 3-5.	EOR
BWSR	2/11/2020	Poor quality lakes	100	Column heading for nonstructural practices 'number' of practices or 'acres' of practices?	Y	Changed column heading to reflect acres. After that change, Table 3-6 has been revamped by EOR	Micayla
MPCA	2/11/2020	Poor quality lakes	18	Pace of Progress - In the first bulleted sentence, what is the primary measure? The number of practices installed or the amount of load reduction? Because different practices have different efficiencies it is important to know how the plan's work will be measured.	Y	Ask EOR to include Pace of Progress narrative either in Table description or put it back in the narrative. EOR: Done.	Planning Team/EOR
BWSR	2/11/2020	Poor quality lakes	97	Action A - Why lead with this activity, which is not in the LGUs' wheelhouse or really a strength of the LGUs? Suggest moving to the bottom of the list. It is unclear if the partnership will be completing in-lake management activities in this plan as stated in the action description. If so, the budget will need to account for potential feasibility studies. Add more details as to what these management activities could entail.	Y	Moved that activity to the bottom of the list -EOR: please fix table 4-4 so that Action A regarding lake outreach process is now Action G, and fix other rows accordingly. EOR: Done	Planning Team

Formal Review Period Notes/Comments

Commenter	Comment Date	Plan Section Title	Cumulative Comment #	Comment	Plan Change Made (Y/N)	Comment Response and/or Action	Responder
MPCA	2/11/2020	Poor quality lakes	17	Targeted Implementation Activities - On the sixth and seventh bulleted sentences, similar comment as comment #12 above, without knowing the activities the reader cannot determine if the practices are adequate to achieve the goal or if the funding is appropriate.	N	To keep the plan concise, we won't be listing practices multiple times.	Planning Team
BWSR	2/11/2020	Poor quality lakes	94	Consider adding a schedule when each lake will be targeted during the Plan, i.e. early, middle, or later years of the plan. A systematic approach will help ease creation of annual workplans and help LGUs know when to focus efforts on each priority lake.	Y	Added a sentence to Priority Area Summary to clarify a tentative schedule.	Planning Team
BWSR	2/11/2020	Poor quality lakes	96	Justification for Goals - Why is the 10-yr goal for Pomme de Terre (142) nearly 2x long-term goal (79)? Please consider changing to something closer (beware editing ripple dangers) otherwise be prepared to explain to NRC.	N	See response to cumulative comment #16	Planning Team
BWSR	2/11/2020	Poor quality lakes	98	Action B - The AOM is not relevant to the activity. Consider number of systems inspected and/or number of lakes with completed inspections.	Y	Action B is now Action A because of response to cumulative comment #97. Changed AOM in implementation table to # of inspections completed and upgrades.	Planning Team
BWSR	2/11/2020	Poor quality lakes	99	Action D - Add measurability such as number of lakes per year. Which lakes will be completed in 2022 vs. 2028? Adding this specificity will aid in work planning for LGUs.	Y	Added a sentence to Action D indicating when each lake will be completed.	Planning Team
MPCA	2/11/2020	Poor quality lakes	16	Tables and Justification for Goals - Even with the explanation in the justification, it is unclear why the plan calls for more reduction from the 10-year measurable goal that what is needed from the long-term goal in Pomme de Terre, Clear and Spitzer lakes. Why not just set the 10-year goal and the long-term goal as the same and allocate the resources within this plan?	N	The 10-year goals reflect the total feasible level of implementation over the next 10 years by the planning partners - and was used to determine the total cost of the plan. Because there are other hurdles to implementation, such as landowner willingness, the partners felt it more appropriate to redistribute efforts to other resources during the annual work planning process once the 10-year or long-term goal is achieved, whichever comes first.	EOR
MPCA	2/11/2020	Poor quality lakes	20	The plan indicates septic system load reductions were based on 2010 county census information and average loading per person. So why do lakes located in the same county have different load reductions per septic system installed? For example the lakes in Otter Tail County (North Turtle, South Turtle, Stalker, Eagle, Clear and Spitzer) the amount of phosphorus reduced per septic system replaced ranged from .975 pounds per year to 1.1 pounds per year, should they not all be the same as the information is based at the county level?	Y	Load reductions per septic system replaced is also based on per capita estimates, which varies by County. This has been clarified in the Pace of Progress description as follows: • Phosphorus reductions from an expected number of septic systems to be updated from noncompliant to compliant over the next ten years, the average number of persons per household area-weighted to the fraction of each county in the drainage area and the county-specific persons per resident from the 2010 Census (which varies from 2.16 in Big Stone to 2.58 in Stevens), and an average of 1.95 pounds of phosphorus produced per person per year.	EOR
BWSR	2/11/2020	Poor quality lakes	95	Justification for Goals - All LGUs should be able to clearly articulate Table 3-5 columns. Is the long term goal calculated using the TMDL % reduction on the PTMAApp Watershed P load? Add language on how 10-year numeric goals were determined, including how PTMAApp was used. Clarify the relationship of Table 3-5's 10-yr goal and Table 3-6.	Y	See response to cumulative comment #15	EOR
MPCA	2/11/2020	High quality lakes	23	Pace of Progress - In the first bulleted sentences, see comment #18 above.	Y	Ask EOR to include Pace of Progress narrative either in Table description or put it back in the narrative. EOR: Done.	Planning Team/EOR
MPCA	2/11/2020	High quality lakes	22	Targeted Implementation Activities - On the fifth and sixth bulleted sentences, similar comment as comment #12 above, without knowing the activities the reader cannot determine if the practices are adequate to achieve the goal and if the funding is adequate.	N	To keep the plan concise, we won't be listing practices multiple times.	Planning Team
BWSR	2/11/2020	High quality lakes	101	Consider adding a schedule when each lake will be targeted during the Plan, i.e. early, middle, or later years of the plan. A systematic approach will help ease creation of annual workplans and help LGUs know when to focus efforts on each priority lake.	Y	Added a sentence to Priority Area Summary to clarify a tentative schedule. Consider adding the Northcentral Hardwood Forest Lake Standard to Table 3-7.	Planning Team
DNR	2/11/2020	High quality lakes	48	The 10 year goal for Spitzer (95) is higher than the current load (80).	N	See explanation in Justification for Goals and response to cumulative comment #16.	Planning Team
BWSR	2/11/2020	High quality lakes	102	Justification for goals - All LGUs should be able to clearly articulate the columns of Table 3-8. Where does 12% reduction for the long term come from? Add language on how 10-year numeric goals were determined, including how PTMAApp was used. Clarify relationship of Table 3-8's 10-yr goal and Table 3-9.	Y	See response to cumulative comment #15 and #21	Planning Team
BWSR	2/11/2020	High quality lakes	104	Goal 1 - Provide rationale in the plan for proposed load reductions that exceed the long term goal for Spitzer and Clear Lakes. Be prepared to explain to NRC why 10-yr goal for Spitzer Lake (95) is nearly 10x long-term goal and exceeds the total PTMAApp load. Or change to something closer but beware editing ripple dangers.	N	See explanation in Justification for Goals and response to cumulative comment #16.	Planning Team
BWSR	2/11/2020	High quality lakes	105	Action A - Why would the AOM not include number of completed SSTS inspections?	Y	Changed the AOM to same as comment #98	Planning Team
BWSR	2/11/2020	High quality lakes	106	Action C - Add measurability such as number of lakes per year. Which lakes will be completed in 2022 vs 2028? Adding this specificity will aid in work planning for LGUs.	Y	Added a sentence to Action C indicating when each lake will be completed.	Planning Team
MPCA	2/11/2020	High quality lakes	21	Table 3-8 - The long-term goals indicate a 12% reduction is needed. Please provide a statement explaining why a 12% reduction is needed for these lakes. The plan bases the reduction goals for streams on the 2014 Minnesota Nutrient Reduction Strategy goals calling for a 12% reduction of phosphorus, is the intent to do the same for lakes or is there a different reason?	Y	Yes - the intent was to set the High Quality lake phosphorus reduction goals equal to the 2014 Minnesota Nutrient Reduction Strategy goal of 12%. This has been clarified in the Justification for Goals and the footnote of Table 3-8.	EOR
BWSR	2/11/2020	High quality lakes	103	Justification for goals - Consider if using PCA's lake standards for Northern Glaciated Plains or North Central Hardwood Forests help in justification of goals? And another means to establish the goal?	N	See response to cumulative comment #21	EOR
MPCA	2/11/2020	Shallow basins	24	Justification for Goals - If the estimation has been made, please state the estimated total acres of wetlands and grasslands located in the Christina-Pelican Lakes Priority Area to inform the reader of the amount.	Y	Ask EOR if they have the estimate of total acres in that area. Also try to find expiring conservation acres #. Andy R will try to get this together. EOR: Added Andy's estimate to the Justification for Goals, including the total acres of wetlands and grasslands in the Christina-Pelican Lakes Priority Area.	Micayla/EOR

Formal Review Period Notes/Comments

Commenter	Comment Date	Plan Section Title	Cumulative Comment #	Comment	Plan Change Made (Y/N)	Comment Response and/or Action	Responder
MPCA	2/11/2020	Shallow basins	25	Pace of Progress - Please provide a base line as to what this will be compared to and how acres with expiring conservation cover programs contracts will be tracked.	Y	Compare to number of expiring acres (figure out that number). Use years 2020-2030. Find out if using PTMApp for pollution reduction estimates - Ben? EOR? EOR: TP load reduction estimate methodology added, similar to the other sections that overlap with Altered Hydrology BMPs.	Planning Team/EOR
BWSR	2/11/2020	Shallow basins	107	Short Term Goal - "Protect" makes this difficult to measure. Suggest editing to enable pace of progress/make this goal measurable.	Y	Changed wording of the goal and the targeted implementation activity	Planning Team
BWSR	2/11/2020	Shallow basins	108	Justification and Targeted Implementation Activities - Clarify/strengthen the tie between the justification (seems to be weak) and activities' 2,700 acres.	Y	Additional information was added to Justification for Goals.	EOR
MPCA	2/11/2020	Excess pollutants	32	The title of the table indicates it is only for Drywood Creek but includes information for the River Corridor. The title of the table should be changed to reflect the River Corridor information.	Y	Added Pomme de River Corridor to table title.	Micayla
BWSR	2/11/2020	Excess pollutants	114	Goal 3 - Add measurability such as addressing a percentage or acreage of untreated impervious cover. BWSR and the watershed partners need to be able to tell when the goal has been reached. Pace of progress omitted for urban related Implementation Activities.	Y		Planning Team
MPCA	2/11/2020	Excess pollutants	33	The number located in the "number of practices" in the nonstructural practices rows (for both Drywood and River Corridor) should be identified as number of acres not number of practices.	Y	Ask EOR if these numbers are in # of practices or # of acres; put non-structural practices in terms of acres. 1180 acres seems low - is this # per year? Also double check wetland restorations - is this a count or acreage? EOR: Units added to spreadsheet. Amounts are for the 10-year period.	Micayla
BWSR	2/11/2020	Excess pollutants	113	Clarify relationship of Table 3-10 and 3-11's 10-yr goal and Table 3-12. All LGUs should be able to articulate how the 10-year goal was determined and the relationship between Tables 3-10 and 3-11's 10 year goal and Table 3-12. Be prepared to explain to the NRC, but best to also describe in the Plan.	Y	Wait until EOR is done revising tables. EOR: Done	Planning Team/EOR
MPCA	2/11/2020	Excess pollutants	26	Goal 2 - Please provide what the baseline sediment loads from the mid-1990s was and how this information was determined as sediment load monitoring was not established in the Pomme de Terre Watershed by the MPCA through the Watershed Pollutant Load Monitoring Network (WPLMN) until 2007 at Appleton and 2013 at Hoffman.	Y	See response to cumulative comment #27	EOR
MPCA	2/11/2020	Excess pollutants	27	The PTMApp existing watershed sediment loads seem excessively high. These numbers are almost four times what the MPCA estimates comes out of the entire Pomme de Terre watershed based on the data from the WPLMN. Data from the WPLMN indicates the average sediment loading is only 12,000 tons per year. The plan should carefully consider modeled data and what it representing as the connection between field erosion predicted by PTMApp and the actual amount reaching surface waters as indicated by the WPLMN appear to be significant. This differences may result in significant over or under estimations of the actual reductions needed in the watershed.	Y	Paul Wymar (MPCA) used HSPF-SAM to determine 1996-2009 average annual base scenario TSS and TP loads for the Dry Wood Creek (HSPF subbasin A210) and the Pomme de Terre River Outlet (HSPF subbasin A10). Stream TP reductions were based on the reductions needed to achieve the stream TP standard of 0.15 mg/L based on the 1996-2009 average annual TP concentration for the Dry Wood Creek (HSPF subbasin A210; 0.32 mg/L) and the Pomme de Terre River Outlet (HSPF subbasin A10; 0.16 mg/L). Revised Table 3-10 with the footnote: – Existing Annual Loads are based on HSPF 1996-2009 Average Annual Loads. – Sediment reduction goals are based on existing TMDL studies (73% for Drywood Creek, 2015 Pomme de Terre River Watershed TMDL Report; 53% for the Lower Pomme de Terre River, 2010 Turbidity TMDL for the Pomme de Terre River). – Phosphorus reduction goals are based on HSPF modeling results to reduce 1996-2019 stream total phosphorus concentrations to the river eutrophication standard of 150 µg/L, communication from Paul Wymar (MPCA).	EOR
MPCA	2/11/2020	Excess pollutants	28	Please state how the long-term goal numbers were developed. They do not appear to match the reductions called for in the TMDL. They also do not match the percent reduction called for in the TMDL if the PTMApp load is utilized (Drywood Creek 24,700 tons/year x 53% reduction = 13,091 tons/yr; PdT Corridor 46,200 tons/year x 73% reduction = 33,726).	Y	See response to cumulative comment #27	EOR
MPCA	2/11/2020	Excess pollutants	29	The PTMApp existing Watershed Phosphorus loading number seem quite low. The Minnesota Nutrient Reduction Strategy estimated the baseline loading of phosphorus (as identified in goal 1) for the entire watershed at 135.2 metric tons. Drywood Creek is about 11% of the entire watershed area. Doing simple proportioning that would equate to approximately 33,000 pounds for Drywood Creek. Utilizing actual WPLMN data of the average watershed loading (128,000 lbs at Appleton) the 11% proportion would be 14,000 pounds.	Y	See response to cumulative comment #27	EOR
MPCA	2/11/2020	Excess pollutants	30	The long term goal indicate the reductions are to meet TMDL requirements. There are no stream phosphorus TMDLs in the Pomme de Terre Watershed and therefore no TMDL reductions called for. The reductions here appear to be due to the stated goal of reducing phosphorus by 12% based on the Minnesota Nutrient Reduction Strategy. The numbers appear to be derived from 12% of the existing load as determined by PTMApp and not the mid 1990s baseload. The MPCA recommends renaming this column to reflect what is depicted or utilize information from the Minnesota Nutrient Reduction Strategy for both baseline and reductions.	Y	See response to cumulative comment #27	EOR

Formal Review Period Notes/Comments

Commenter	Comment Date	Plan Section Title	Cumulative Comment #	Comment	Plan Change Made (Y/N)	Comment Response and/or Action	Responder
MPCA	2/11/2020	Excess pollutants	31	Targeted Implementation Activities - The fourth bulleted sentence (restore 20 acres of shallow basin), sixth bulleted sentence (four pit closures) and seventh bulleted sentence (60 urban BMPs) are not represented in table 3-12. Does the plan not anticipate phosphorus and sediment reductions from these practices? If the plan does, the information should be included in Table 3-12.	Y	Fourth bulleted activity clarified to say that drained shallow basins will be restored through wetland restorations. These practices were added to Table 3-12 with reductions of "TBD" with the following footnote: TP and sediment reductions for waste pit closures, nutrient management plans, and urban BMPs will be determined based on final designs/specifications and tracked as part of the annual work planning process (see Section 6.5). These practices likely represent a small fraction of the total load reductions achieved from implementation of the PTMApp structural practices, PTMApp nonstructural practices and wetland restorations.	EOR
BWSR	2/11/2020	Excess pollutants	109	Issue statement and background - If this issue statement included approximate sediment and phosphorus loading from urban vs non-urban land uses in the watershed, assuming it exists, could help focus level of conservation efforts.	Y	Issue Statement and Background revised to include: Phosphorus and E. coli inputs to streams come primarily from agricultural runoff, with less significant sources from urban runoff, feedlot runoff, and wastewater discharge.	EOR
BWSR	2/11/2020	Excess pollutants	110	Desired Future Condition - Reference to 2014 MN reduction strategy's 12% by 2025 is confusing, if the 2025 doesn't apply to this plan please clarify that. I assume this plan is merely using the 12% as it seemed prudent and reasonable and tie to Table 3-11's long-term goal.		See response to cumulative comment #27	EOR
BWSR	2/11/2020	Excess pollutants	111	Desired Future Condition - Are there more current baseline phosphorus conditions that could be referenced other than mid-1990s?	N	The NRS is based on that baseline, and the PTMApp model is also assumed to represent 1980-1996 conditions.	EOR
BWSR	2/11/2020	Excess pollutants	112	Magnitude of scale difference between Table 3-10's sediment reductions (73% and 53%) and Table 3-11's phosphorus 12% reduction seems odd. Be prepared to explain to NRC.		See response to cumulative comment #27	EOR
BWSR	2/11/2020	Excess pollutants	115	Targeting - BWSR staff recall a slightly different targeting approach for identifying projects in the Pomme de Terre Corridor, which may have involved using the Stream Power Index (SPI) in conjunction with 'catchment' sediment loadings. If so, this approach should be outlined in Table 6-1 and described in Priority Area Summary.	N	All of the targeting has been based on PTMApp so far or the 2018 DNR erosion inventory. We discussed the idea of SPI but completed it.	EOR
BWSR	2/11/2020	Excess pollutants	116	Action G - Clarify how WRAPS PMZs is a tool to help identify targeted urban projects. Add "Urban BMPs" to Table 6-2 with corresponding methodology for estimating pollutant reductions.	Y	The use of WRAPS PMZs is included in Table 2-1 and targeted priority areas for Buffers, Severe Erosion Sites, Shoreline Stabilization, Stormwater Control and Wetland Restoration identified through the 2013 WRAPS civic engagement process. Urban BMPs was added to Table 6-2 and pollutant reductions from urban BMPs will be determined in the future based on similar types of BMPs in PTMApp.	EOR
BWSR	2/11/2020	Loss of in-stream habitat	120	Action E - "other waters" not defined in Plan. At least I couldn't find it. Suggest adding within an Appendix.	Y	Added section A.7.6 Other Waters Resolution to Appendix A. Includes Grant SWCD other waters resolution as an example; other SWCDs have similar or identical other waters resolutions.	Micayla
BWSR	2/11/2020	Loss of in-stream habitat	121	Pace of Progress - Clarify that intent is to track ac-ft for buffers/nonstructural practices.	Y	changed acre-feet to acres	Micayla
BWSR	2/11/2020	Loss of in-stream habitat	122	Pace of Progress - "...required width." What is this? I know but everyone might not know.	Y	added a phrase to indicate width as required by MN buffer law	Micayla
BWSR	2/11/2020	Loss of in-stream habitat	117	Long-term goal - Long-term goal's "...necessary for meeting the life history requirements of desired aquatic species." What is this? If LGUs are not comfortable with this please edit.	Y	Removed the phrase about life history reqs and edited sentence fragments into one sentence.	Planning Team
BWSR	2/11/2020	Loss of in-stream habitat	118	Goal 1 - How will the improvement be assessed? Add measurability to this goal, such as number of DNR identified erosion sites to be addressed. Related to this, it would be informative for the long term goal to state the total DNR identified erosion sites. Alternatively, bank erosion rates or other stream stability measures could be used if the DNR has such information, particularly for Drywood Creek.		Find the DNR list of erosion sites. If it exists, change the goal to include a reasonable (low) number of sites to address in-stream habitat improvement.	Planning Team
MPCA	2/11/2020	Loss of in-stream habitat	34	Pace of Progress - Is there a baseline in which to measure from for both of the identified measures?	Y	"since the 2018 DNR inventory" was added	EOR
BWSR	2/11/2020	Loss of in-stream habitat	119	Action E - Is it the intent to limit BMPs to buffers if alternatives produce similar outcomes? The AOM should include pollutant reductions.	Y	Goal 1 modified to add "at 10 of the DNR-identified erosion sites from the 2018 inventory" based on implementing 1 streambank stabilization project per year. The other implementation activities would support overall improvement in habitat along the river. The AOM is really more about improving habitat - no pollutant reductions are included for these practices.	EOR
BWSR	2/11/2020	AIS	123	Action A - AOM seems lacking. Ultimately as an outcome, doesn't the partnership want to track number of coordinated activities as a result of the coordination meetings?	Y	Changed AOM wording to say "to hold one annual staff workshop or meeting to discuss county & SWCD AIS programs"	Planning Team
BWSR	2/11/2020	AIS	124	Action D - Inspections - could there be a number here for the public access workers if there are any? Thought there were in OTC but maybe not in the PDT.	Y	Changed goal to state that we'll track AIS inspection sites/numbers.	Planning Team
BWSR	2/11/2020	AIS	125	Pace of Progress - We recommend adding a bit more substance to this section than assuming meetings and workshops will accomplish the goal of controlling aquatic invasives. Providing detailed pace of progress for the last two actions may help bolster this.	Y	Added a Pace of Progress bullet point "tracking number of AIS inspections" and another "tracking number of outreach commitments (mailings, billboards, etc.)"	Planning Team
BWSR	2/11/2020	Socioeconomic factors	128	Second paragraph - First sentence sounds like "St. Paul Speak" LGUs comfortable with this? If not please edit.	Y	Delete the whole second paragraph - it's all fluff	Planning Team
MPCA	2/11/2020	Education & outreach	35	Pace of Progress - The fifth bulleted sentence indicates the measure will be the number of cost share sign-ups as a result of demonstrations/workshops. How will the plan measure this? Will this be some sort of survey or question on cost share applications?	Y	Edited sentence to say: "Number of meeting attendees indicating on sign-in sheet their interest in implementing a certain BMP."	Planning Team

Formal Review Period Notes/Comments

Commenter	Comment Date	Plan Section Title	Cumulative Comment #	Comment	Plan Change Made (Y/N)	Comment Response and/or Action	Responder
BWSR	2/11/2020	Education & outreach	130	Goals 1 & 2 - Overall with these two goals, setting key audiences will help determine when you've achieved your goals. So BWSR challenges the partnership to narrow the focus from "all watershed residents" to key stakeholders. It would be difficult to target everyone effectively and targeting education and outreach efforts offer a much better return on investment. Who are your highest leverage stakeholders? For Goal 2, how will increased BMP adoption rates be determined?	Y		Planning Team
BWSR	2/11/2020	Education & outreach	131	Goal 4 - This goal is very basic and unmeasurable with no sense of when the goal could be accomplished. It may be best deleted and incorporated into the first three goals or adding actions to address the need.	Y	Edited goal to be more measurable.	Planning Team
BWSR	2/11/2020	Education & outreach	132	Action A - Add measurability - give yourselves something to strive for. 3 groups, 1 group annually, consider establishing a rotation of the groups?	Y	Edited Action A to say: "Establish and facilitate networking/advisory groups for targeted groups (lakeshore, urban, agriculture, etc.). Each group should convene on a rotation, i.e. if there are three groups, each group will meet on a rotating basis once every three years."	Planning Team
BWSR	2/11/2020	Education & outreach	133	Action E - Not a sentence. Add measurability with frequency and number of soil health teams.	Y		Planning Team
BWSR	2/11/2020	Education & outreach	134	Actions H & I - How many meetings or how often?	Y		Planning Team
BWSR	2/11/2020	Education & outreach	135	Actions J & M - Only doing these actions once in the 10-year duration of the plan?	Y		Planning Team
BWSR	2/11/2020	Education & outreach	136	Action N - What's "...a list serve..." and how frequently will it be developed, i.e. what's a more routine basis?	Y	Changed action wording	Planning Team
BWSR	2/11/2020	Education & outreach	137	Pace of Progress - 14 Activities and only 6 means of measuring pace of progress? Seems there should be more than 6.	N	Pace of Progress measures generally account for all activities.	Planning Team
BWSR	2/11/2020	Education & outreach	138	Pace of Progress - Last one mentions "...state/federal officials..." yet these groups are not mentioned above/previously. Why not? Should they be?	N	Addressed in Activities	Planning Team
BWSR	2/11/2020	Socioeconomic factors	126	If investing time and money in education and outreach efforts, how do you know if it's effective? Will the actions lead to what you want for change in behavior/learning and ultimately improvement in the resource?	Y	Added sentence to Goal 1 about implementing survey. Changed implementation table accordingly.	Planning Team
BWSR	2/11/2020	Socioeconomic factors	129	3rd paragraph's "...numerous stakeholder groups..." Specify or use the 3 "large groupings" the PDT's used previously - ag, lakeshore, & urban? Referenced in 1st implementation activity.	Y	Clarified 3 main groups	Planning Team
BWSR	2/11/2020	Socioeconomic factors	127	First paragraph's "...reviewing legal systems..." What is this? LGUs need to be able to articulate what this is or edit.	Y	Changed to land use and regulatory programs	EOR
BWSR	2/11/2020	Education & outreach	139	Goal 1 - Add measurability perhaps by stating linear feet of shoreline improved/protected. How will the partnership know when there is an increased understanding by lakeshore residents?	Y	Edited the Goal to include a plan for conducting a survey, and edited actions to include survey distribution.	Planning Team
BWSR	2/11/2020	Education & outreach	140	Action - general. We suggest adding an action to work with Extension Service on a survey or other tool to help measure knowledge and attitudes near the beginning and again near the end of the 10 year plan for lakeshore residents.	Y	See response to comment #139	Planning Team
BWSR	2/11/2020	Education & outreach	141	Actions. "Provide", "educational material distributed" are hard to measure pace of progress. Suggest edits to improve measurability.	Y	See response to comment #139	Planning Team
MDH	2/10/2020	Implementation Table	38	Targeted Implementation Schedule: where numbers are listed within the implementation activities clarify if these are annual amounts or total over the course of the 10 year plan.	Y	Added a bullet point in 4.1 to state that all activities will occur over the 10 year timeframe unless otherwise stated in the implementation tables.	Planning Team
MDH	2/10/2020	Implementation Table	36	ID # 3.1.1-B: Project partner title should be Minnesota Rural Water Association or MRWA.	Y	added "Association" to the project partner title	Micayla
MDH	2/10/2020	Implementation Table	39	ID # 3.1.2-A: MDH recommends expanding the action item language to include examples of practices such as those listed below: Promote and encourage the adoption of irrigation water management BMPs that increase water conservation and decrease conditions for nitrogen loss to the root zone by utilizing: - Irrigation water scheduling to control the volume, frequency, and application of irrigation water - Conversion to low flow pressure irrigation nozzles - Proper timing of irrigation through the use of online tools that identify local climate, growing degree days (GDD) and evapotranspiration (ET) conditions - Test irrigation water and take credit for nitrate present as a fertilizer source	Y	Add these in the first targeted implementation activity in section 3.1.2. "...such as...irrigation scheduling etc."	Micayla
MDA	2/10/2020	Implementation Table	42	ID # 3.1.1. MDA can be listed as an additional partner. Please refer to the links below in the future regarding the MDA's Nitrogen Fertilizer Management Plan and Township Testing Program for opportunities to work together.	Y	Added MDA as partner on all activities in 3.1.1 in Table 4-2	Micayla
DNR	2/11/2020	Implementation Table	49	In the Altered Hydrology issue, under Implementation Activities there are numbers of practices that "will be targeted within priority areas." Yet in Priority Area column shows only "Watershed Wide". Consider adding "and priority areas."	N	See Table 3-3: Altered hydrology will be addressed watershed-wide, but certain practices will focus on different priority areas.	Micayla
BWSR	2/11/2020	Implementation Table	147	Section 3.1.2 has 2 goals, only 1 here.	N	See response to cumulative comment #73	Micayla
BWSR	2/11/2020	Implementation Table	150	AOM for 3.3.1-D and 3.3.2-C has a misspelling "conservational" - should be "conservation practices", delete "activities".	Y	Deleted and changed as suggested	Micayla
BWSR	2/11/2020	Implementation Table	152	Where the tables state "See AH", please indicate the specific action(s) it is referencing.	Y	Clarified to say "See AH budget in Table 4-3"	Micayla
Andy Rice/ Douglas SWCD	2/11/2020	Implementation Table	168	Douglas County should also be listed as a local project lead under the following ID #: a. 3.1.2-C should also list Douglas County (C) and Douglas SWCD (S)	Y	Added Douglas County and Douglas SWCD as local project leads	Micayla
Andy Rice/ Douglas SWCD	2/11/2020	Implementation Table	169	For ID #'s 3.3.2-A through F, I think this goal should also include Pelican Lake based on the table that it is referencing. We should confirm this with Joe Montonye. If this is the case, Douglas County or Douglas SWCD should also be listed as a local project lead under the following ID #'s. a. 3.3.2-A should also list Douglas County (C) b. 3.3.2-B should also list Douglas County (C) c. 3.3.2-C should also list Douglas County (C) and Douglas SWCD (S) d. 3.3.2-D should also list Douglas SWCD (S) e. 3.3.2-E should also list Douglas SWCD (S) f. 3.3.2-F should also list Douglas SWCD (S)	Y	Added Pelican Lake to the goal in this table, as well as the goal in section 3.3.2, and added Douglas County & Douglas SWCD as local project leads where suggested.	Micayla
Andy Rice/ Douglas SWCD	2/11/2020	Implementation Table	170	Douglas County should also be listed as a local project lead under the following ID #: a. 3.6.2-C should also list Douglas County (C)	Y	Added Douglas County as local project leads	Micayla

Formal Review Period Notes/Comments

Commenter	Comment Date	Plan Section Title	Cumulative Comment #	Comment	Plan Change Made (Y/N)	Comment Response and/or Action	Responder
DNR	2/11/2020	Implementation Table	50	ID # 3.3.1-B Activity is to conduct 950 hours of SSTS inspections. The Activity Outcome Measurability column (last column) states "A series of outreach meetings for 3 lakes." Should be the number of inspections. Also clarify if the 950 hours is over 10 years.	Y	See above comment and changes to this activity	Planning Team
MDA	2/10/2020	Implementation Table	43	The conversion of 500 acres of cropland to perennial vegetation in Drinking Water Supply Management Areas (DWSMA) could be difficult and may need to be reconsidered based on changes in the area, and if there are enough acres available to meet that goal. - That goal may need to be revised to consider other alternative management tools or additional cropping systems based on direct input from the farmers and crop advisers in those vulnerable areas, other than just a focus on perennial vegetation conversion by an easement approach. - Incentive or other financial assistance programs could be used to evaluate new cropping systems or alternative management tools (cover crops/alfalfa/kernza are examples) or more specific farm practices that are of interest to the cooperating landowners/operators. Additional options and information may become available in the future as part of MDA Nitrogen Fertilizer Management Plan as well as from new ideas that generate from other statewide DWSMAs relating to drinking water protection.	Y	Reconsidered this goal and decided it was not feasible; changed goal to "Implement 5-10 BMPs within DWSMA areas over the 10 year period." Changed implementation table accordingly. <b>Need to update budgeted amounts - EOR. EOR: Done.</b>	Planning Team
BWSR	2/11/2020	Implementation Table	145	How is project development and technical assistance & engineering factored in to the 10 year implementation budget? Action 3.4.1-A specifically calls out 1-on-1 landowner meetings, whereas other subsections do not. Could technical assistance and engineering be a bottleneck to accomplishing all proposed implementation? Is there any ramp up in staffing needed in the early years of the plan?	Y	SWCD staff from N & S review implementation budget to see if staff time is factored in - did everyone include PD&TA in budget estimates? Clarify why PD/TA is separate in this table and not the other instances where we have BMPs. <b>Ask EOR how we came up with budget amounts - was PD/TA included in implementation \$s? North folks think it was included, but not sure.</b> EOR: total costs are based on County-estimated staff hours at County-provided hourly rates plus any cost-share associated with implementing the practices. The detailed cost breakdowns are in the 'Implementation Schedule' spreadsheet Stephanie created and that EOR has been modifying to address revisions to implementation activities. I've added the unit cost table from the 'Implementation Schedule' spreadsheet to the introduction of Section 4.1.	Planning Team/EOR
BWSR	2/11/2020	Implementation Table	149	Action E - Is this spatial database going to be useful for tracking pace of progress of other Priority Goals? If yes, articulate that somehow.	Y	Added clarifying language in five year evaluation section and in activities.	Planning Team
BWSR	2/11/2020	Implementation Table	146	Action 3.1.1-D only mentions contacting landowners within the DWSMA areas, but no funds for cost-share BMPs. Is that the wishes of the LGUs?	N	This action can stay as it is, since there is money for BMPs in Action 3.1.1-A, but <b>the budgeted amounts need to change in the implementation table to reflect the new goal 1 of 5-10 BMPs completed in DWSMA areas.</b> EOR: Done. Assumed 50 hours at \$73/hr per year plus the cost-share of one structural BMP (\$7,434).	Planning Team
BWSR	2/11/2020	Implementation Table	148	List the priority areas for Actions A, B, C and D vs "___ that will be targeted within priority areas."	Y	List how many acres will be targeted within each priority area. <b>Identify what are the priority areas - are they the Drinking Water protection priority areas? Or main priority areas? Ask EOR where these numbers came from.</b> EOR: this is from Table 3-3 which summarizes all of the issues associated with these implementation activity and how they are distributed across the Priority Areas. Added to B-D the reference to Table 3-3, and Priority Area descriptions for A-D now read: Priority Areas (see Table 3-3) and Watershed Wide.	Planning Team/EOR
BWSR	2/11/2020	Implementation Table	151	Are the Priority Areas correct for the Poor Quality Lakes and the High Quality Lakes? They seem odd to me.	Y	Changed to direct drainage area to Priority Poor Quality and High Quality Lakes	EOR
BWSR	2/11/2020	Programs	154	Last sentence first paragraph "...provides the regulatory framework for managing the public drainage systems." Suggest deleting "regulatory".	Y	Deleted "regulatory" as suggested	Micayla
BWSR	2/11/2020	Programs	153	Although specific capital improvement projects may not be specifically known, BWSR challenges the partnership to describe/list potential feasibility studies or engineering reports that may address potential large scale projects, such as 103E multi-purpose drainage management retrofit projects in Section 5.2.1, large scale erosion problems affecting public infrastructure (roads, bridges), urban stormwater management facilities/projects, etc. for this plan.	Y	Added one sentence to 5.2 4th paragraph to indicate possible capital improvement projects.	Planning Team
BWSR	2/11/2020	Programs	155	Add BWSR as a funding entity for CREP in addition to FSA	Y	Added BWSR as a funding entity for CREP	Micayla
BWSR	2/11/2020	Programs	156	Buffer Management - Amendments referred to in the Land and Water Inventory. Didn't see the referenced "other waters" described in the Land and Water Inventory. If not included please add the narrative description the SWCDs used.	Y	Added Other Waters Resolution to Appendix A, section A.7.6	Planning Team
BWSR	2/11/2020	Programs	157	First sentence - The counties can delegate administration of the programs if the SWCD agrees to receive it, but not typically enforcement, the Noxious Weed Law and Wetland Conservation Act are only applicable programs here. Consider edits to better articulate what's happened.	Y	Edited first sentence to clarify program administration	Planning Team
BWSR	2/11/2020	Programs	158	If the counties have a Comp Land Use Plan please list them and year they were adopted.	Y	Listed which counties have a CLUP and year it was adopted.	Micayla
MDH	2/10/2020	Programs	37	Edit first sentence under Public Water Supply Testing and Monitoring to - "MDH and public water suppliers monitor and test for contaminants..."	Y	Edited as suggested	Micayla

Formal Review Period Notes/Comments

Commenter	Comment Date	Plan Section Title	Cumulative Comment #	Comment	Plan Change Made (Y/N)	Comment Response and/or Action	Responder
DNR	2/11/2020	Programs	51	Existing Implementation Programs - Sentinel Lakes paragraph. Consider revising the entire paragraph, as the last sentence refers to a table that doesn't exist, and the program information is inaccurate. We suggest "This monitoring program targets representative lakes across different ecoregions in Minnesota. The long-term monitoring program looks at physical, chemical and biological changes in lakes, helping us understand and develop management approaches. Artichoke Lake, selected to represent shallow prairie lakes in western and southern Minnesota with high Phosphorus levels, is the only sentinel lake in the Pomme de Terre Watershed. Information can be located at <a href="https://www.dnr.state.mn.us/fisheries/slice/artichoke-lake.html">https://www.dnr.state.mn.us/fisheries/slice/artichoke-lake.html</a> "	Y	Deleted existing paragraph and added revised paragraph as suggested.	Micayla
BWSR	2/11/2020	Programs	159	Table 5-18 and 5-19 - Should this be an action item within Sections 3.3.1 & 3.3.2? Maybe have a goal to increase the number and specific lakes that are not currently doing this? If no lake association maybe another action item to help establish associations for all the priority lakes with 3.3.1 & 3.3.2?	Y	Added a sentence at the beginning of 5.6.2 to clarify that the following section indicates which agencies are doing what types of monitoring.	Planning Team
BWSR	2/11/2020	Programs	160	Tables 5-18, 5-19, 5-20, 5-23, 5-26 - What's the difference that leads to 5 separate tables for lake monitoring? If consolidated into a single table is that editing worth doing?	Y	5-19 combined with 5-18; renumber all tables following this	Planning Team
BWSR	2/11/2020	Programs	161	Tables 5-21, 5-22, 5-25 - What's the difference that leads to 3 separate tables for stream monitoring? If consolidated into single table is that editing worth doing?	N	There is justification for separate tables because monitoring methods are different.	Planning Team
BWSR	2/11/2020	Administration	143	General comment - How easy is it for the partnership to generate an annual workplan? BWSR suggests LGUs review the plan to make it as user friendly as needed.	N	Suggestion accepted, use other watersheds' first biennium priority workplan as guideline	Planning Team
BWSR	2/11/2020	Administration	144	General comment - We suggest the partnership revisit the implementation action for achievability in the first 2-3 years of the plan, particularly since this plan won't be approved and locally adopted until after July 2020.	N	Suggestion accepted, use other watersheds' first biennium priority workplan as guideline	Planning Team
BWSR	2/11/2020	Administration	162	Second paragraph "PDTRA and local partners will be responsible for reviewing and approving the Plan prior to submittal to BWSR and adopting the Plan." Does this mean all 12 of the LGUs must adopt the plan once state approved along with the JPB? Review the JPA to ensure the Plan's wording and the JPA is consistent. Suggest editing if not consistent.	N	No response - we have sufficiently addressed this in the plan	Planning Team
BWSR	2/11/2020	Administration	163	To assist in the 5 year evaluation, the partnership should plan to consider at that time if re-running PTMAp is a worthwhile effort.	Y	Added a sentence to 6.6.3 to state that we will consider it at that time.	Planning Team
BWSR	2/11/2020	Administration	164	"This plan extends through December 31, 2030..." - The BWSR Order approving this CWMP will state the end date of the plan, which will be 10 years from that approval date. Not the end of the calendar year. Suggest editing to reflect that and create a placeholder in the appendix for the BWSR Order to be added once approved.	Y	Changed this sentence to state the plan will extend to 10 years from the approval date. Added a placeholder to put the BWSR order of approval in an appendix.	Planning Team
BWSR	2/11/2020	Administration	165	"This plan will remain in full effect until a revision is approved by BWSR." - This is terminology used for the metro area based on different statutes. Suggest deleting this sentence as it's not applicable. The BWSR Order states the date 10 years from Board meeting approval date.	Y	Deleted as suggested	Micayla
Andy Rice/ Douglas SWCD	2/11/2020	General	166	Under policy committee - should Micayla be listed here also?	Y	Added Micayla to the list	Planning Team
MDH	2/10/2020		41	Consider if changes should be made to Appendix A (page 39) in light of the DWSMA changes. The reference to the items provided during the bus tour could be deleted and instead summarize the number, type, and vulnerability of the various DWSMAs. Suggested language is listed below: In Figure A- 19, Drinking Water Supply Management Areas (DWSMA) for the watershed are ranked based on vulnerability <sup>12</sup> . These areas are managed by the entity identified in a wellhead protection plan. During the 2018 Pomme de Terre LW1P Watershed Bus Tour, MDH included the following information about the Ashby, Barrett, and Morris DWSMAs: • There are six DWSMAs that have low vulnerability including the communities of Ashby, DWSMA is 213 acres Chokio, Dalton, Donnelly, Elbow Lake, Underwood, and a portion of the Morris DWSMA. • The Appleton DWSMA contains 486 acres in the watershed and is moderate and high vulnerability. The wells have high chloride/bromide ratios, which indicate a connection to surface water. The city also treats for arsenic, which is naturally occurring. • The Barrett DWSMA is 442 acres, and is one of the most vulnerable but most protected DWSMA. Many acres of conservation easements have been secured by the Grant County SWCD for this community's wellhead protection area and for the area around Barrett Lake. • The Morris DWSMA is 2,814 acres, and has the greatest number of and shallowest (most average 58-82 feet) public water supply (PWS) wells. This community provides drinking water to the city of Alberta.	Y	Edited App A section A.8.1 as suggested.	Micayla
BWSR	2/11/2020	General	53	Appendix A - delete header of maps that shows the EOR document path and date.	N	This is important to keep in the document if future revisions are needed from EOR. Is this a big deal to BWSR? <b>When the plan is final &amp; handed over to PDTRA, we don't want the document path in there.</b> EOR: these are now hid using the Format-Cropping tool in Word. Note that any future map/data requests of EOR will require those links so we can find the map in the project folder (in the event of staffing changes) you can uncover the links by using the Format-Cropping tool.	Planning Team
BWSR	2/11/2020		60	We will be referencing the Implementation Activities as described above.		Not a comment. No response required.	
BWSR	2/11/2020	General	142	General comment for the "Anticipated Outcome Measurability" statements, indicate measurable outcomes, not only outputs, wherever possible.	Y	Looked through AOMs to make sure they have measurable outcomes if possible.	Planning Team
MPCA	2/11/2020	General	1	The acronyms: IBI, IWM, and M-IBI are not used in the document and can be deleted.	Y	Deleted as suggested	Micayla
MPCA	2/11/2020	General	3	The terms "Index of Biotic Integrity (IBI)" and "Natural Shoreline" are not used in the document and can be deleted.	Y	Deleted as suggested	Micayla
MPCA	2/11/2020	General	4	The term "Stream Connectivity" is not in the document and can be deleted.	Y	Deleted as suggested	Micayla

Commenter	Comment Date	Plan Section	Cumulative Comment #	Comment	Plan Change Made (Y/N)	Comment Response and/or Action	Responder
Otter Tail	5/12/2020	2.2	1	HUC-12 is used under the PdT River Corridor explanation, but it isn't immediately clear what a HUC-12 is and may be difficult to understand for lay-persons. Recommendation to change to either subwatershed or minor watershed. Three other uses of HUC exist in the plan, could also be changed.	Y	Changed first instance of HUC-12 to say subwatersheds (HUC-12's). HUC is defined in the acronyms section, is that not enough of an explanation?	ML
Otter Tail	5/12/2020	2.2	2	In Table 2-1, the impaired or fully supporting lakes and streams should be identified so it's clear this was a subset for a specific reason. I.e. supporting lakes were picked for protection areas and impaired lakes were picked for restoration areas. OR just say assessed lakes (those with sufficient information)	Y	Added language to clarify that it's the subset of lakes that have been assessed	ML
Otter Tail	5/12/2020	2.3	3	Table 2-2 lists specific names of people that gave presentations or information. Instead of using names, just reference the agency. No need to specifically call anyone out. This is true in other sections of the plan (for example, 3.2.1, 3.3.3 and 3.4.2, table 3-6, 3-6, 3-10, 3-11, others)	Y		ML
Otter Tail	5/12/2020	3.3.1	4	Table 3-7 is cut-off on the side of pdf, it doesn't fit the whole page	Y	Formatted table to fit page	ML
Otter Tail	5/12/2020	3.3.2	5	Table 3-10 is cut-off on the side of pdf, it doesn't fit the whole page	Y	Formatted table to fit page	ML
Otter Tail	5/12/2020	4.1	6	Table 4-1 has septic systems as a 0% cost share percentage, but still includes 100% of the total cost share (\$1,000)	Y	Changed total cost share to \$0.00	ML
Otter Tail	5/12/2020	4.1	7	Does the Source column in The source table 4-1 refer to the source of the cost share \$\$\$, the source of the data used to calculate the cost share, or the source of where the cost number was taken from. It should be a little more clear how the source got the numbers for the cost.	Y	Clarified Source column heading; clarified some of the source explanations. Check appendix for ref to Tyndall& Bowman 2016	ML
Otter Tail	5/12/2020	4.1	8	Table 4-1 How was the shoreline BMPs value calculated? more than just shoreline restorations, engineering, other? 16,000 is otherwise pretty high for a shoreline restoration	N	OK if this estimate is high and we understand some projects might be a lot less than \$16000.	ML
Otter Tail	5/12/2020	4.1	9	Table 4-1 How was the septic systems value calculated? Seems high for just staff time, but low for cost sharing a new system installation	Y	Changed unit cost for SS to \$10,000. Then the math adds up for implementation table and total project cost.	ML
Otter Tail	5/12/2020	4.1.3	10	References to the Altered Hydrology table (AH) should reference table 4-4 not 4-3	Y	Edited to reference Table 4-4	ML
Andy Albertsen	5/13/2020		11	Update date on cover page	Y	Changed to June 2019	ML
MPCA	5/13/2020	Executive Summary	12	Original Comment: The plan identifies five priority areas which covers approximately 75% of the watershed, 11 priority issues and 20 measurable goals which it hopes to accomplish in the next 10 years. Is there enough resources (manpower and funding) to adequately address all these issues or should additional prioritization occur?  PDT Original Response: Yes - we have adequate resources  MPCA Informal Response: There is just too much to do. It seems they are being set up to fail. The Pomme de Terre is a very complex watershed with a lot going on. Maybe they should focus more and fix a few things instead of trying to fix everything at once.	Y	Added a phrase in section 6.6.3 to clarify that we will assess progress at 5 year evaluation time.	ML
MPCA	5/13/2020	3.2.1	13	Original Comment: Justification for goals - While the 10 year measurable goal is reasonable, consideration should be given to the long term goal. The plan states that runoff has increased 1.5 inches since 1949 and it is anticipated that additional runoff will occur because of climate change. Will the 0.5 inch reduction be sufficient to address the concerns in the future?  PDT Original Response: Reduction is sufficient - will revisit in 10 years  MPCA Informal Response: Some language here reflecting on why you think this is sufficient or why you think that this is all you can reasonably achieve would be better.	Y	Changed long-term goal to 1.5 and clarified that the 10-year goal is based on what's feasible in the project duration.	ML

Commenter	Comment Date	Plan Section	Cumulative Comment #	Comment	Plan Change Made (Y/N)	Comment Response and/or Action	Responder
MPCA	5/13/2020	3.2.1	14	<p>Original Comment: Targeted Implementation Activities - The third bulleted sentence states implement 581 structural agricultural BMPs based on PTMApp and the fourth bulleted sentences states implement 9,340 acres of nonstructural BMPs based on PTMApp. Is there a list of these identified practices? Different practices have different reduction efficiencies, only knowing the number of practices or number of acres does not provide the reader with enough information to determine if they will meet the .08" reduction in runoff. If this information was developed utilizing PTMApp please include the scenarios developed and include the information in the appendix. This information would also be useful to validate the funding amounts identified in Table 4-2 through 4-7.</p> <p>PDT Original Response: Reference to the PTMApp Targeted Implementation Plan (Houston 2018) included, as well as the list of practices identified by PTMApp: Non-structural practices include the use of conservation tillage, cover crops, conservation reserve program (CRP) and permanent vegetative cover. Structural practices are "constructed" and include farm ponds, grassed waterways, nutrient reduction wetlands, bio-reactors, and other common agricultural practices.</p> <p>MPCA Informal Response: If they have the information why not include it? Really hard to show if they are meeting WQ goals if they just put down number of BMPs and acres. As the comment states</p>	Y	Added Houston 2018 reference in Appendix A, stated that it is available from PDTRA staff upon request. Added Executive Summary of Houston 2018 report as Appendix E.	ML
MPCA	5/13/2020	3.3.1	15	<p>Original Comment: Targeted Implementation Activities - On the sixth and seventh bulleted sentences, similar comment as comment #12 above, without knowing the activities the reader cannot determine if the practices are adequate to achieve the goal or if the funding is appropriate.</p> <p>PDT Original Response: To keep the plan concise, we won't be listing practices multiple times.</p> <p>MCPA Informal Response: If they have the information why not include it? Really hard to show if they are meeting WQ goals if they just put down number of BMPs and acres. As the comment states each has a different reduction. Even their response shows how widely it can be conservation tillage is not equal to permanent vegetative cover. Furthermore the reference to the Houghston 2018 Targeted Implementation Plan report is not in the list of references nor the appendix</p>	Y	See above response to MPCA cumulative comment #14	ML
MPCA	5/13/2020	3.3.2	16	<p>Original Comment: Targeted Implementation Activities - On the fifth and sixth bulleted sentences, similar comment as comment #12 above, without knowing the activities the reader cannot determine if the practices are adequate to achieve the goal and if the funding is adequate.</p> <p>PDT Original Response: To keep the plan concise, we won't be listing practices multiple times.</p> <p>MPCA Informal Response: If they have the information why not include it? Really hard to show if they are meeting WQ goals if they just put down number of BMPs and acres. As the comment states each has a different reduction. Even their response shows how widely it can be conservation tillage is not equal to permanent vegetative cover. Furthermore the reference to the Houghston 2018 Targeted Implementation Plan report is not in the list of references nor the appendix</p>	Y	See above response to MPCA cumulative comment #14	ML
MPCA	5/13/2020	3.3.3	17	<p>Original Comment: Pace of Progress - Please provide a base line as to what this will be compared to and how acres with expiring conservation cover programs contracts will be tracked.</p> <p>PDT Original Response: TP load reduction estimate methodology added, similar to the other sections that overlap with Altered Hydrology BMPs.</p> <p>MPCA Informal Response: Not enough information to know</p>	N	MPCA is satisfied with original response	ML

Commenter	Comment Date	Plan Section	Cumulative Comment #	Comment	Plan Change Made (Y/N)	Comment Response and/or Action	Responder
MPCA	5/13/2020	3.6.1	18	Original Comment: Pace of Progress - The fifth bulleted sentence indicates the measure will be the number of cost share sign-ups as a result of demonstrations/workshops. How will the plan measure this? Will this be some sort of survey or question on cost share applications?  PDT Original Response: Edited sentence to say: "Number of meeting attendees indicating on sign-in sheet their interest in implementing a certain BMP."  MPCA Informal Response: Indicating interest on a sign in sheet does not show if a participant's mind has been changed by the workshop or if they really want to what is about to be demonstrated, it just means that they came with the intent to do something. Better would be a follow up survey to workshop participants and at the very least an end of workshop survey asking if the information presented changed their mind and they now will do something similar.	Y	Changed fifth bullet point to say "Number of event attendees who implement practices as determined by follow-up surveys or phone calls"	ML
Joe Otto	5/13/2020	3.4.2	19	Targeted Implementation Activities: does Part E refer to the SWCD resolutions required by the buffer law or buffers on 'other waters' inventory from the buffer law? I read through the resolution and would assume the plan refers to voluntary buffers on 'all watercourses where water quality would benefit'	N	Activity E refers to the resolutions adopted by the SWCDs and how that resolution defines "other waters"	ML
DNR	5/13/2020	3	20	Table 3-1 Pace of Progress. Cropland Conversion is still listed as a measure, this was taken out.	Y	Changed top row from Cropland Conversion to BMPs implemented in DWSMAs and the measure to track BMPs implemented in DWSMAs	ML
DNR	5/13/2020	3	21	Table 3-2 Pace of Progress, 2nd row, increased acreage enrolled in conservation programs. There is no match for this in the Targeted Implementation Activities listed above, or in the table in section 4.	Y	Removed 2nd row since it doesn't match any activities in the narrative or in the implementation table.	ML
DNR	5/13/2020	Section 4 and 3.3.3-A	22	Implementation Activity A "Protect/Manage" was deleted on pg 39 as implementation and replaced with "Enroll"	Y	Activity A was changed yet again, and the activity in the implementation table now matches it.	ML
DNR	5/13/2020	Section 4 and 3.4.1-C and D	23	Edits made in section 3 (C and D on pg 42-43) for these activities are not carried over to the table in section 4	Y	Changed activities in the implementation table to match earlier changes to activities in the narrative	ML
DNR	5/13/2020	Section 4 3.4.2 A-E	24	3.4.2 A-E, Priority Area. Add "Pomme de Terre..." River corridor to match section 3	Y	Added Pomme de Terre to each priority area in the implementation table in section 3.4.2	ML
DNR	5/13/2020	5	25	Table 5-22 and 5-23. The only two lakes monitored by the Shallow Lakes Program would be Lake Christina and Lake Anka. FYI: Unnamed basin, 56-1083-00 is Nycklemoe Slough.	Y	Removed Artichoke Lake from this table. Named Nycklemoe Slough.	ML
DNR	5/13/2020	Section 5 pg 92	26	There is an aquatic plant survey done in 2003 for Lake Christina <a href="https://files.dnr.state.mn.us/natural_resources/water/lakes/aquatic_plant_reports/21037500_0924.pdf">https://files.dnr.state.mn.us/natural_resources/water/lakes/aquatic_plant_reports/21037500_0924.pdf</a> (note: I'm not sure if just looking at IBI data, or all data)	Y	Changed the N to Y in the table	ML
DNR	5/13/2020	Section 5 pg 92	27	An aquatic plant survey was done in 2005 by DNR Biological Survey <a href="https://files.dnr.state.mn.us/natural_resources/water/lakes/aquatic_plant_reports/56016000_1158.pdf">https://files.dnr.state.mn.us/natural_resources/water/lakes/aquatic_plant_reports/56016000_1158.pdf</a> (note: I'm not sure if just looking at IBI data, or all data)	Y	Change the N to Y in the table	ML
Andy Rice	5/14/2020	3.3.2-A-F	28	Under the measurable goals pelican lake is not listed at all but in the priority areas pelican lake is listed in all of the areas except 3.3.2-F. It is also listed in table 3.9. I am guessing this should be added in. Could all of 3.3.2-A-F fit on page 57?	Y	Pelican Lake is listed in the narrative under 10-Year Measurable Goals, and it is now included in the implementation table in 3.3.2-F.	ML
Andy Rice	5/14/2020	3.3.3-A	29	Douglas should also have an "S" under local project lead. All of Douglas County in the PDT is in this priority area.	Y	Added an S in the Douglas column	ML
BWSR	5/15/2020	Cover	30	Update to prudent date when submitted for approval. Assume June 2020	Y	Changed date to June 2020	ML
BWSR	5/15/2020	Acknowledgements page v	31	Prudent to add Micayla, but it appears she & Steph are on the Policy Committee/JPB while we know they are staff.	Y	Put Steph and Micayla under a new heading for PDTRA Staff	ML
BWSR	5/15/2020	Section 2.3	32	I don't see where or how the Citizen Advisory Committees are mentioned or their role in this planning effort.	N	They are mentioned elsewhere in the plan	ML
BWSR	5/15/2020	Section 2.4.3/pg 19	33	Do you want to include 'watershed districts' in the 1st paragraph?	Y	Deleted watershed districts	ML

Commenter	Comment Date	Plan Section	Cumulative Comment #	Comment	Plan Change Made (Y/N)	Comment Response and/or Action	Responder
BWSR	5/15/2020	Section 3.1.1/pg 24	34	The goals have been changed to actions and the first one remains somewhat unmeasurable. Goal 1 says "Implement city wellhead protection plans..." - will the partnership be taking on that responsibility?	Y	Changed Goal 1 to indicate working with cities. Goal 2 ok. Changed Action D to reflect testing & treatment options and how we will inform public of test availability.	ML
BWSR	5/15/2020	Table 3-1/pg 25/26	35	Pace of progress mentions completing an inventory of unsealed wells but there's no action listed to accomplish that. Either add action to do an inventory or delete the reference here.	Y	Deleted complete inventory from this table	ML
BWSR	5/15/2020	Section 3.1.2/pg 27	36	Pace of progress in Tables 3-2 & 4-3 needs to include number of BMPs or pollutant reductions or project development type tracker for the landowners contacted within IDed areas.	Y	Added language to table 3-2 and 4-3 about landowners contacted.	ML
BWSR	5/15/2020	Section 3.1.1/pg 25	37	Not target/talk to landowners about any BMPs or specifically land retirement? Actions below indicate landowners will be contacted.	Y	Added a sentence to justification for goals to state that land uses besides ag will be targeted for BMPs. Struck the sentence about it being unfeasible to target ag landowners for BMPs.	ML
BWSR	5/15/2020	Table 3-3/pg 30	38	Use 'non-structural' to be consistent within the entire document not use the PTMApp speak.	Y	Changed "source reduction area" to "non-structural practices" in heading	ML
BWSR	5/15/2020	Tables 3-7 pg32/33, 3-10 on pg 36, & 3-12 on pg 41	39	Kuddos to the group as we don't know of other Plans that are using PCA models (Table 3-6) and BMP reduction estimates (Table 3-7). Bridging the gap between the 2 models (used for different purposes) to assess short term (10-year) pollution reduction goals with the long term pollution reduction goals. It is not possible in the current draft plan because it would be a comparison of Bathtub (i.e. Table 3-6) and PTMApp (i.e. Table 3-7) modeling results. We advise adding the "PTMApp Long Term Goal" column that was included in the 60-day version of the Plan to the Tables 3-7, 3-10, and 3-12.	Y	Edited and/or replaced tables 3-6, 3-9, and 3-11 with help from BWSR and MPCA staff.	ML
BWSR	5/15/2020	Section 3.3.1/pg 31	40	North Turtle not included. Or should North Turtle be at the top of the list? Work is not going to stop now correct?	Y	Added North Turtle into the list in order of amount of P over standard.	ML
BWSR	5/15/2020	Section 3.3.1/pg 33	41	Get table tile on same page as table and ensure the table fits on the page.	Y		ML
BWSR	5/15/2020	Section 3.3.2/pg 35	42	Is there a table or another means to tie the order of Pelican, Clear, Elk, Spitzer, Stalker, South Turtle & Eagle? OR is it the <40 Total Phosphorus in Table 3-5?	Y	Added standard to table 3-8	ML
BWSR	5/15/2020	Section 3.3.2/pg 36	43	Make table 3-10 fit on page.	Y		ML
BWSR	5/15/2020	Section 3.3.2/pg 37	44	Ensure Houston 2018 report is in references.	Y	Added reference to Houston 2018 in Appendix A	ML
BWSR	5/15/2020	Section 3.3.3/pg 39	45	There appears to be a disconnect between the goal to "maintain wetland and grassland currently enrolled" (3564 acres) and the action to "enroll a total of 2700 acres of wetlands and grassland". Please rectify.	Y	Worked w/ Douglas/OT counties to clarify this. Numbers are now correct estimates of expiring acres from now until 2030. Table 3-3 was corrected as well.	ML
BWSR	5/15/2020	Section 3.4.1/pg 41	46	Goal 3 and Action G are the same. Please reword the goal to make it resource focused or delete goal 3 and move as action with other Goals 1 & 2 actions.	Y	changed language of goal 3 to state "reduce runoff impact by x lb/yr of sediment/phosphorus" check rain garden reports to find reduction estimates average, multiply by 60 to come up with the goal	ML
BWSR	5/15/2020	Section 3.4.1/pg41	47	Math for long-term load reduction needed correct except for PDT River P. $105,655 \times 0.07 = 7,396$ not the stated 7,016	Y	Changed to 7,396	ML
BWSR	5/15/2020	Section 3.4.1/pg 41 & 42	48	TBD doesn't cut the mustard. Understand it depends but there needs to be something other than TBD. The group has completed Pit closures and urban stormwater BMPs. Consider using those estimated reductions as a basic for the estimates here. Nutrient management plans could be number for plans vs TBD.	Y	Removed Nutrient mgmt plan rows from this table. Edited numbers for rain gardens (urban BMPs) and pit closure reduction estimates based on averages from past projects.	ML
BWSR	5/15/2020	Section 3.4.2/pg44	49	'Find the DNR list of erosion sites. If it exists, change the goal to include a reasonable (low) number of sites to address' was in LGU responses. Assume the DNR list does in fact exist and the PDT group has a copy. YES?	N	Conversations with Emily re erosion sites have determined that 10 sites is a reasonable number to address over the life of the plan. PDTRA has a PDF and GIS layer of erosion sites.	ML

Commenter	Comment Date	Plan Section	Cumulative Comment #	Comment	Plan Change Made (Y/N)	Comment Response and/or Action	Responder
BWSR	5/15/2020	Section 3.5.1/pg 46	50	'law enforcement agencies' is this county deputies and sheriff or the LGU administering the AIS program?	Y	Changed law enforcement to AIS	ML
BWSR	5/15/2020	Section 3.6.2/pg50	51	ensure photos fit & titled as prudent.	Y	Edited photo to fit page	ML
BWSR	5/15/2020	Section 4.1/pg 52	52	RIM perpetual easement is forever not 40 years. Consider removing 40 years but don't know if that impacts math within the table.	Y	Removed the row with 40 year easements after discussing with EOR and TAC.	ML
BWSR	5/15/2020	Section 4.1/pg 52	53	Is there a "0" missing? \$1,000 is very low cost from personal experience.	Y	Changed \$1000 to \$10000	ML
BWSR	5/15/2020	Section 5.2/pg70	54	I spoke with Andy Albertson about Capital Improvement projects. Ditch systems and hwy projects which might have water quality improvement aspects to them were examples I offered. This makes it sound like the CWMP is going to be replacing bridges.	Y	Added phrasing to clarify that the capital improvement projects need to have a water quality aspect.	ML
BWSR	5/15/2020	Section 5.7/pg93	55	Assume there's to be a '2017 PDT River Run photo here.	Y	Added photo from river run 2017	ML
BWSR	5/15/2020	Section 6.7.1.1/pg 104	56	Consider removing any references to internal BWSR process, ex "BC consults w/ Regional Manager...." The internal process might change and just confuse the issue in the future.	Y	Looked through these steps and generalized BWSR process	ML

Public Hearings Notes/Comments

Location	Date	Comment	Plan Change Made (Y/N)	Comment Response and/or Action
South - Morris	3/4/2020	One of the priority goals or implementation activities states to convert cropland to perennial vegetation - is there a specific goal for that? Is that a goal watershed wide?	N	Referring to the activity listed in the drinking water priority areas - that activity and goal have been changed because we don't have as much cropland within the Drinking Water Supply Management Areas anymore, so that goal is going to be reduced based on how much acreage could reasonably be converted. Watershed wide we do have some goals for maintaining the amount of perennial vegetation that currently exists in the watershed.
South - Morris	3/4/2020	Since we now have zebra mussels in the Pomme de Terre, could you clarify any AIS concerns and any efforts towards that? Are there any other AIS that are of concern?	N	Aquatic invasive species are a watershed wide priority. Most counties already have a program in place to monitor/contain/prevent spread of AIS and we will continue to work with those programs to implement their plans, work on education and outreach in each county, and stay up to date with DNR's efforts to control AIS. Starry stonewort is a worry but as far as we know is not in the PDT yet.
North - Dalton	3/10/2020	Cattle exclusions - does that mean farmers can't graze on land near the river? What are suggested alternatives? What are average costs for those projects?	N	Explained what a cattle exclusion is; emphasized the voluntary nature of a landowner adopting any project like this; gave an estimated cost share percentage
North - Dalton	3/10/2020	What actions will be required?	N	No actions will be required; every project would be voluntary. The projects described in the plan aren't one-size-fits-all so we need to work with the landowner to figure out whether a project will work on their land
North - Dalton	3/10/2020	Phosphorus is listed - is copper sulfate an issue anywhere in the water?	N	We are not aware of copper sulfate issues in the water but can't speak to exact details regarding that
North - Dalton	3/10/2020	Who is responsible for the dams on the Pomme de Terre?	N	DNR manages them but we don't know exact details of every dam. Those are mostly out of the scope of the plan.
North - Dalton	3/10/2020	Will mound sewer systems be required to update sewer systems on the lakes?	N	Not required; that decision is based on soil type. Mounds aren't mandatory.
North - Dalton	3/10/2020	Would it make sense to do holding tanks? Wouldn't those be better at removing chemicals?	N	Not necessarily; new septic systems, when working correctly, are very efficient at removing everything.
North - Dalton	3/10/2020	If I want to do improvements on my shoreline, do I need a permit? Even if I'm doing something to fix a problem, I still have to pay that permit fee?	N	Yes permits are usually needed. There may be cost share money available, especially if there's an identified whater quality issue.
North - Dalton	3/10/2020	If government puts in an easement and the land changes owner, do easement restrictions still apply?	N	Yes easements are typically perpetual and go with the land, not with the landowner. Other projects are under contracts, which may be 10-15 years.
North - Dalton	3/10/2020	What do you recommend doing if you find nitrates or arsenic in a well?	N	Removing nitrates or arsenic from the groundwater takes a very long time, so we recommend a water treatment system like reverse osmosis. A reverse osmosis system is not always 100% effective; it depends on the model of system you buy and your levels of nitrates/arsenic.
North - Dalton	3/10/2020	Is this plan finalized or still under review?	N	It is still under review and not finalized.
North - Dalton	3/10/2020	Regarding section 6.4.1, what are these tax levies/fees that are listed? I don't know how much it's costing the county, and what are we getting for it?	N	The important thing to note is that none of these are new taxes, these funds already all exist and we are not implementing any new taxes or levies. We're using this money where it's most needed in the watershed.
North - Dalton	3/10/2020	I worry that things that you're calling voluntary now are going to possibly not be voluntary in the future, and individuals will be required to pay for things that are very expensive.	N	This organization wants to keep things voluntary and we do not necessarily want more regulations, but if a regulation comes from a higher level, then we will have to work with that and make sure we're doing it for the right reasons.
North - Dalton	3/10/2020	Are you pursuing buffers (non-voluntary) on the lakes?	N	You're referring to the buffer law, and yes, we will be enforcing buffers on the lakes as required by the buffer law. Perennial vegetation, such as a lawn, is considered a buffer. We would just like to help people go another step beyond lawns, with some shoreline restorations and no-mow practices by the lakeshore.
North - Dalton	3/10/2020	The legacy amendment funding is a source of funding that you should pursue.	N	Yes a lot of the state funding we already get comes through various avenues of the legacy amendment.
North - Dalton	3/10/2020	In this area of the watershed we have problems with the ditches and we want the districts to keep working seamlessly with the ditch authority and the drainage authority.	N	Keep in mind that we are not a watershed district and don't have the same authority as one. We don't deal with a lot of the legal ditch systems because the counties already have the authority there. We will work with those authorities as much as needed.
North - Dalton	3/10/2020	How many of these local entities are affiliated with Rinke Noonan Law Firm?	N	[can't understand response on recording]
North - Dalton	3/10/2020	When will the plan be submitted?	N	Once all comments are addressed, the Joint Powers Board will need to approve that we submit the plan to BWSR. The next JPB meeting will be on April 10 [JPB did not actually meet on April 10 due to COVID-19 and the plan not being ready for submittal].