

Sauk River One Watershed, One Plan - Summary of comments and responses

Page Number	PDF Pg	Commenter	Comment	Recommended Action	Action Response
1-9, 8-2		Advisory Committee	Remove language regarding citizens Advisory Committee from CWMP.		Removed callout for Citizens Advisory Committee from table 1-3 and table 8-1.
5-2, 5-3		TNC	Edit language discussing TNC's multiple benefits.		Adopted recommended language per TNC's request on pages 5-2 and 5-3 of the plan.
4-50 - 4-52		MDA	Please consider revising to indicate MDA's role on pages 4-50 to 4-52. (The Groundwater Protection Rule designates priority DWSMAs with elevated nitrate additional efforts to provide protection. Page 5-39, 5-68, 5-90. The MDA could be listed as an additional supporting entity for Groundwater Quality in the implementation tables related to the Melrose, Roscoe, and Cold Spring DWSMAs		Changes MDH to MDA where appropriate. Left MDH citations in first three paragraphs as it is referencing GRAPS report which was published by MDH but has MDA data in there. This is likely where the error came from.
5-39, 5-68, 5-90		MDA	Page 7-24. The MDA also samples 8 groundwater wells in the watershed. Please consider adding this to the Groundwater list in the gray highlighted box as it could provide valuable data to assist with the plan. The information below was listed in the initial priority letter from the MDA.		Added MDA to supporting entities for all implementation actions under groundwater quality that overlapped with Melrose, Roscoe, and Cold Spring DWSMAs.
7-24		MDA	Page 5-64 – first paragraph. Currently, the MDA does not plan to form a local advisory team in Roscoe due to the Level 1 designation. However, the MDA conducts an annual review of well data, which may result in changes to the mitigation level determination. The planning team may want to consider incorporating that information into the plan.		Changed MDH to MDA in the 4th bullet point on page 7-24.
5-64		MDA	MDH asks that you recognize arsenic as a contaminant, especially for private well users...		Added text provided by MDA with addition of sentence to state that MDA will provide support on page 5-33, and 5-64.
3-16, 7-8		MDH	MDH/MDA mixup.		Added arsenic to list of COC's on page 3-16 and to callout on page 7-8
4-50 - 4-52		MDH	Partners should consider expanding list of implementation actions.....		Addressed in comment from MDA above on pages 4-50 and 4-52 Added language under "groundwater quality" in each management areas stating that for DWSMAs with high and very high vulnerability we intend to utilize all available tools as much as possible. "Project partners intend to utilize all available tools to work towards achieving the groundwater quality goals."
5-23, 5-33, 5-64, 5-78, 5-89, 5-99, 5-106		MDH	Add an "Key terms and abbreviations" page to help the reader recall what these various items mean in this document. Ex. AUID, HUC, CWMP, SRW, DO, TP, etc.		Added a formatted version of key terms and abbreviations along with a list of common units.
NA	NA	Cole Loewen			

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NA		Cole Loewen	TOC: The PDF bookmarks do not match the TOC chapters (ex. 6 - on TOC, "Targeted Implementation Schedule," but on bookmark, "6 Watershed-Wide Programs Implementation Schedule. Also, the TOC Chapter titles do not always match the titles for the actual chapters. Ex. chapter 3: TOC has "Priorities and Goals," actually chapter title is "Issue Prioritization: Process and Results." There aren't goals in chapter 3. Make sure the TOC reflects the actual chapter and appendix titles, and the pdf bookmarks match as well.		Update TOC to accurately reflect chapter titles and added page numbers and callouts for management districts in chapter 5.
	4				
1-1		Cole Loewen	The first sentence is hard to read. Rewording recommended. Examples of potential changes: "The Sauk River Comprehensive Watershed Management Plan (CWMP) is an evolutionary step in local water planning to streamline programs and authorities of nine government units by facilitating the progressive restoration and protection of resources." "The Sauk River Comprehensive Watershed Management Plan (CWMP) is an evolutionary step in local water planning to streamline programs and authorities of nine government units by facilitating both the progressive restoration of impaired and degraded resources and the protection of high-quality resources from adverse future impacts."		RESPEC will update this.
	5				
1-2		Cole Loewen	Both in callout box and second paragraph of text, remove "the" from "...and protect the high-quality resources from..."		RESPEC will update this.
	6				
1-3		Cole Loewen	First sentence, right after SRW is the HUC-8 code in parenthesis. Only experienced individuals are going to know that is a HUC code, so either denote this is a HUC-8 code, or drop it.		We will indicate that this is a HUC-8/Hydrologic Unit Code).
	7				
1-4		Cole Loewen	This is the first instance where the Advisory Committee is noted. There is no explanation of the AC, its purpose or its makeup. Recommend at least adding the purpose of the AC here and a general note of its makeup, with a reference to Appendix E. Can use the AC language on page 2-3 (pdf page 18).		added a few words to explain AC's roll. With this being the executing summary I am leaving the specifics of defining the committee's rolls to the introduction section that provides more of the information on each committee's responsibilities and reference to Appendix E that calls out members.
	8				

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1-5	9	Cole Loewen	Table 1-1's contents are not the same as table 3-2 (pdf page 35) - see line "Surface Water - Protecting high water quality resources." These are the same tables and content should be the same.		RESPEC will update this. Please also update the tables names to match each other.
1-5	9	Cole Loewen	Table 1-1, last line's Resource Category is "Natural Resources." This is the same as table 3-2. However, in section 4 (page 4-65, pdf page 115), this is referred to as "Habitat," not Natural Resources. Recommend changing so the same term for this resource concern is used throughout the document. Since "Habitat" is the term used for this resource concern throughout the remainder of the document (ex. page 5-4, page 5-11), recommend changing these two tables from "Natural Resources" to "Habitat."		RESPEC will update this.
1-7	11	Cole Loewen	In the "Implementation Plan" figure, the symbol used for "Land Use and Regulatory Controls" does not match the symbol use for the same on page 1-6 (pdf page 10). Recommend adjusting this figure by using the symbol on page 1-6 for this item.		RESPEC will update this.
1-7	11	Cole Loewen	In the "Implementation Plan" figure, change from "Conduct Ongoing Monitoring and Acquire Data" to "Conduct Monitoring, Studies and Planning" to be consistent with language use throughout plan.		RESPEC will update this.
1-7	11	Cole Loewen	Last paragraph, change from "The Advisory Committee is committed to implementing the plan using..." to "The partnership is committed to implementing the plan using..."		RESPEC will update this.
1-7	11	Cole Loewen	Just noticed there is no text on "Perform Operation and Maintenance" as listed in the "Implementation Plan" figure. Could add a sentence on this in the last paragraph as part of the adaptive management approach?		Text was added following the introduction of CIP and landowner BMPs in the second paragraph on pg 1-6.
1-8	12	Cole Loewen	The list of 10-year plan goals does not include the measures. While these details are provided in the following sections, since this is a executive summary, does it not make sense to include those here?		RESPEC will make this change.
2-2	17	Cole Loewen	The callout box is missing the following county percentages: 64% Stearns County, 21% Todd County.		RESPEC will update this (this was also noted in comments from Stearns SWCD).

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2-3	18	Cole Loewen	In the graphic, the Advisory Committee text is exactly the same as the Steering Committee text. Need to create unique text for the AC.		Formatting, add following text to the Advisory Committee callout "The Advisory Committee consisted of the Steering Committee members and representatives from state agencies, nonprofit and civic organizations, lake associations, agricultural organizations, the University of Minnesota Extension Service, and the City of St. Cloud. This workgroup provided logistical and day-to-day decision-making in the planning process. The Advisory Committee was responsible for overall guidance for developing the plan content, including the priorities, implementation plan, implementation programs, and funding. The Advisory Committee provided oversight to all of the content development and plan review."
2-4	19	Cole Loewen	Table 2-1: under the Total Area (mi2) column, the data is not uniformly aligned (Cold Spring and Mini Metro are left justified; remainder looks to be right-justified).		RESPEC will correct formatting alignment of the column to be consistent.
2-7	22	Cole Loewen	Figure 2-2: the caption states this is the land cover from the 2011 NLCD, but figure 2-3 is the 2016 NLCD. If the data behind figure 2-2 is truly from 2011, this needs to be updated to reflect the 2016 NLCD.		RESPEC will look into this and update if the data represented in the figure is from 2011.
3-2	31	Cole Loewen	Figure 3-1: quality (resolution) is low; graphic is grainy. Can the resolution be improved (aka make it more pretty)?		I don't have the actual graphic...someone else must have made it. I did crisp the letters with contrast adjustment
3-4	33	Cole Loewen	Table 3-1: since this table breaks across the page, the caption should continue across pages. Also, I find the coloring for the land lines confusing. By my reading, there are three land resources: all, riparian, rural/ag. For each resource, the concern is the same: all surface waters. But for the draft issue statements, it is not clear to which land resource these belong. Do all the statements belong to all three (that is how I interpret this coloring)? Or are the statements that refer to riparian strictly for riparian? Suggest changing coloring to clarify this.		Formatting; I added the original version of the document in pdf form for reference in the "Final Doc w Edits" folder which will show you how to organize/group rows. The specific reference table is on pages 21-22 of the report. Merge "Resource" values columns but make row lines clear. Have a heavier line that differentiates between Resources and lighter lines within each resource to connect the resource concern with the draft issue statement column line items. For the Land resource category you will need to carry row lines across to separate the 3 different sub categories but keep them the same green color to signify they are a part of the same resource.

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3-5	34	Cole Loewen	Last statement in last paragraph: "The sustainability of land use decisions is also a top priority;..." Not as high a priority as altered hydrology and sediment & nutrient impairments though? That's how I read this - either it is a priority with these two or its not, regardless of how it will be implement. To me, it should be included in the callout box on the next page.		Changed "top" to "high" to differentiate between the first two.
3-15	44	Cole Loewen	The white space on this page seems off to me. I think it could be respaced, or perhaps incorporate some images of the watershed?		Comment noted.
3-18	47	Cole Loewen	Figure 3-4: shows pink areas outside of the watershed. Remove those areas.		Pink data layer is a Map Service internet layer so cant be edited/exported. To more clearly define area within 1W1P planning area I moved the pink layer below the mask to make the color more muted for areas outside of the watershed.
4-3	53	Cole Loewen	Under "Pace of Progress," this sentence is awkward and needs to be rewritten, "If the HSPF-SAM automated calculators contained in the implementation spreadsheet are not applicable, other methods, such as tracking the numbers or practices implemented or acres protected or estimating nutrient or sediment reductions using professionally accepted calculators such as the MPCA MIDS calculator." The thought is not finished.		RESPEC will edit this and finish the thought/sentence.
4-4	54	Cole Loewen	Last paragraph, add bolded word, "...at the USGS gage in St. Cloud will be monitored relative to precipitation."		RESPEC will make this change.
4-8	58	Cole Loewen	For this and every following "Key Strategies" table (pdf pages 66, 79, 84, 91, 96, 104, 113, 120), the "monitoring, studies and planning" and "land use and regulatory" sections are flip-flopped. You can tell by reading the contents; for example, "evaluate opportunities to convert urbanized public drainage systems, such as CD 17, to a storm water utility, is a land use and regulatory strategy. This table and all following tables need to have this corrected.		RESPEC will make this change.
4-8	58	Cole Loewen	These Key Strategy Tables' designs are nice, but when you have instances where there is a lot of text and you can't rely on empty space to delineate individual lines in a single category (such as this table), may need to add hard lines to help readers make that distinction.		This was also noted by Stearns SWCD. RESPEC will add bullet points or hard lines to help with this.

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4-9	59	Cole Loewen	Could we insert a simple drawing showing what a two-stage ditch looks like? There are a lot of drawings online we could use.		RESPEC will make this change.
4-18	68	Cole Loewen	Second paragraph: first sentence is missing its start. Current it reads, "are over 10 acres in size (SRWD, 2014). Add, "The SRW contains more than 250 basins that are..."		This was also noted by Stearns SWCD. RESPEC will make this change.
4-20	70	Cole Loewen	Add reach A10 after A230; that is also a priority reach per AC decision.		RESPEC will make this change.
4-21	71	Cole Loewen	First paragraph, fourth sentence needs to be reworded, "These model subwatersheds were aligned with management district's boundaries to establish eight targeting end points (Figure 4- 5)." When comparing this figure with Figure 1-2 (mgmt. districts), the eight end points do not always align with the mgmt districts. Ex. A10 and A70 do not. Perhaps add the word "roughly" to "These model subwatersheds were roughly aligned with..."?		RESPEC will make this change.
4-22	72	Cole Loewen	Add a break line between ranking 4 & 5		RESPEC will make this change.
4-28	78	Cole Loewen	Table 4-10: extra line of empty space at bottom of table		RESPEC will remove the empty row at the bottom of table 4-10.
4-31	81	Cole Loewen	Figure 4-8: its caption needs to be updated, since the map now shows impaired lakes on the main stem.		RESPEC will make this change.
4-33	102	Cole Loewen	First paragraph, add bolded language, "...designated mitigation level, and groundwater sensitivity (Figures 4-15 and 4-16)."		RESPEC will make this change.
4-52	103	Cole Loewen	Seems odd to me to take up so much space for so little text. And the content doesn't seem to really advance the narrative. Could drop completely, or convert to a callout box embedded in the above text instead. Also, a sinkhole isn't a contaminant; it is a high vulnerable land feature.		Comment noted. RESPEC will remove sinkhole from the list of potential contaminants.
4-53	115	Cole Loewen	Are the two "Important Bird Area" sites denoted on figure 4-18 (pg 4-72, pdf page 122)?		No shapefile available to represent these areas in the map.
5-46		Stearns SWCD	Grassed waterway lists 40 acres of grassed waterways. Other MDs reference treated acres divided by 10 for actual acres i.e. 40 acres treated=4 acres grassed waterways (That's a lot of grassed waterways)		Will update Grassed Waterway information (bottom row, page 5-46) to read, "Install 4 acres of grassed waterway"
5-65		Stearns SWCD	No funds tied to steam channel restoration in Section 30 Farming Township		What Biennium do you want this in?

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5-66		Stearns SWCD	100 acres of Filter Strips seems very high (others have 2-4 acres)		This is acres treated so reduced to 100/10 = 10 acres of filter strips
5-66		Stearns SWCD	Cover Crops and Filter Strips listed twice		Will remove one row of Cover Crops for Backes Lake Reach A350 and one row of Filter Strips for Backes Lake Reach A350.
5-67		Stearns SWCD	80 acres of Filter Strips seems very high		This is acres treated so reduced to 80/10 = 8 acres of filter strips
5-80		Stearns SWCD	Excluded Conservation Crop Rotation from Reach A385		Added "/Conservation Crop Rotation" to the cover crop line
1-11		Stearns SWCD	County boundaries are not very clear on watershed map		No changes
4-1		Stearns SWCD	Typo, Establishing Goals, 2nd paragraph: "...the Advisory Committee consider a set of clarifying questions..."		Will change so that it reads, "the Advisory Committee considered a set of clarifying...."
4-4		Stearns SWCD	Extra space in 1_8.6 million acres of wetlands before statehood		Will remove space so that it reads, "approximately 18.6 million acres before statehood...."
4-8		Stearns SWCD	Consider adding bullet points or some other visual marker for each item (they are hard to distinguish within each section)		Will add bullet points in Strategy column of table on page 4-8.
4-16		Stearns SWCD	Replace altered hydrology with E.coli in the title		Will update title of table on page 4-16 to read, "Key Strategies to Address E.coli Concern"
4-36		Stearns SWCD	Move Land Use section after Groundwater section to stay consistent with order in Table 1-1/3-2		Will move this section.
4-59		Stearns SWCD	Add a map of the St. Cloud Drinking Water Priority Area A and B		Added priority area's A and B into figure 4-14
		Stearns SWCD	In the section with implementation tables include a map or better description where the identified projects (each line) are located in the management district.		Added a new map at the start of Ch 5 to highlight the priority resources as well as the HSPF subwatersheds with implementation actions identified.
8-267		Sarah	The plan goes from page 8-10, to 8-267 to 8-12. Please change page number 8-267 to page 8-11. Also missing a page 8-7, goes from 8-6 to 8-8, please fix. Thank you!		RESPEC will make this change.
Table of Contents		BWSR	The chapter titles are inaccurate.	Please revisit the chapter titles in the Table of Contents and within each chapter of the plan and rename as necessary.	Thank you for noting this inconsistency, we will make this change.
Executive Summary		BWSR	A consolidated list of all priority resources are missing from the plan. There are different priorities identified throughout the plan and within each management district that make it difficult to see how implementation will be prioritized either geographically or by issue.	List all priority resources in rank order as appropriate in the Executive Summary or other chapter to provide a clear framework for understanding how the partnership will work through priorities during implementation.	Due to the complex prioritization structure used by the partnership, text will be added to clarify the framework and how it will be used to help the partners prioritize during implementation as we feel this information will be more beneficial than a bulleted list.
General		BWSR	All maps appear to print out on 8.5x11 paper, making the font in legends extremely small.	Ensure all appropriate maps are set to print on 11x17 paper as agreed to by the Advisory Committee.	printer settings need to be changed to allow for printing, document has 11x17

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2-03		BWSR	There is reference to a Steering Committee, which was not used throughout the planning process.	Clarify the Steering Committee was only used during the very early stages of planning.	We will remove, "and providing guidance and direction to the Policy and Advisory Committees throughout the development of the plan".
3-06		BWSR	On page 3-6 the plan identifies altered hydrology and water quality as the most important issues. The issues related to groundwater, land use, and habitat could be implied as issues of lesser priority.	Seek clarity with the planning partnership that the information provided on these issues are lesser priorities and will be addressed once the two top priority issues (altered hydrology and water quality) have been exhausted, at least in relation to BWSR funding and programming.	We will add text to clarify that the priorities are not intended to be entirely ordinal in terms of first to least, but rather providing partners with a prioritization process for selecting which project to do when faced with a decision. Part of this clarification will include a paragraph in the executive summary clarifying the relationship between the narrative and the implementation tables, how the prioritization framework will be used to make decisions based on targeting and prioritization, and also to clarify that our partnership has created a truly comprehensive plan for water management within the Sauk River Watershed.
4-16		BWSR	The header on the page is not correct	Identify this box as Key Strategies for E. Coli Impaired Streams	We will change the header on page 4-16 to read, "Key Strategies to Address E.coli Impaired Streams".
4-18		BWSR	The second column must have words that are cut off - it starts in mid-sentence.	-	We will add, "The SRW contains over 250 basins that" to the beginning of the sentence on the top of page 4-18.
4-62		BWSR	The plan states that priority areas cannot be determined until a risk assessment is completed. Has the partnership considered portions of Priority Area A of the St Cloud Source Water Protection Plan as the priority area for this management district until further inventory and assessment is complete?	Consider declaring a priority area for this priority issue in the interim until the risk assessment is complete. Listing none could hamstring the partnership for access to Watershed Based Implementation Funding.	After in-depth discussion with the Advisory Committee and City of Saint Cloud staff regarding this comment, clarification language will be added to identify the connection this information has to actions called out in chapter 5, and to clarify that the risk assessment will be used to identify focus areas within Priority Area A.
5-7 and 5-8		BWSR	Prioritization for the altered hydrology issue is somewhat confusing. Page 5-8 states the priority area is JD2, however there are implementation actions proposed in subwatersheds A13, A15, and Faille Lake.	Clearly list the priority resources and ensure the implementation actions are within priority areas in all management districts for the altered hydrology issue.	We will utilize the maps we develop based on discussions in the Advisory Committee meeting, along with adding additional language about prioritizing additional areas as needed to help clarify this information.
4-04		BWSR		If possible, please note when the DNR flow analysis is intended to be completed to more accurately measure progress toward the altered hydrology goals. Can it be completed as part of the 5-year plan evaluation?	This information was requested from DNR via email on December 29th, 2020. They anticipate the analysis will be completed at the end of the fiscal year. We will incorporate this information as requested.
4-04		BWSR		Please describe in the plan how the storage goals were derived for the management districts.	We will add this information.

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4-04		BWSR		Define "storage" in the plan so partners can consistently track the outcomes/hydrologic benefits of installed BMPs. Does "storage" include temporary storage for purposes of addressing altered hydrology? How would outcomes (ac-ft) for controlled tile drainage or alternative tile intake practices be estimated, for example?	Added clarification that focus is on permanent storage but I don't think it is appropriate to go into the details of how specifically to track storage in this document without losing public's interest/attention. It will be the job of project partners to track progress throughout each workplan towards achieving storage goals.
	44306	BWSR	The table on the bottom of the page is somewhat confusing. Is it necessary to list the TP and TSS "annual average achieved" (rows 2 and 4)?	Provide additional clarity to or modify the table for plain language purposes.	RESPEC will determine if it is easy to back-calculate these amounts using the reduction values. If it is, we will remove the annual average achieved values. If it is not, we will clarify what this is. The average reduced plus the average achieved equals the current average annual load so average achieved can just be calculated from existing load minus the load reduction.
4-20, 4-21, 4-22		BWSR	There is confusion about the different priority level of the endpoints/river reaches. On page 4-20, there are three priority endpoints listed: A370, A150, and A230. On page 4-21 at the end of the paragraph in the second column, there are four priority four endpoints listed (A370, A150, A230, and A10). On 4-22, all eight endpoints are listed but no indication of break points. This reveals some inconsistencies. In addition, it appears there is implementation scheduled for the bottom four ranked endpoints in the first few years of the plan, calling into question the prioritization and targeting scheme.	Clearly identify which reaches are priorities for implementation of impaired water activities, particularly for plan years 1-5. Standardize this discussion of prioritization throughout this section of the document. Consider a schedule for addressing these priority endpoints/reaches, i.e. early, middle, late years of plan implementation.	After in-depth discussion with the Advisory Committee, the following changes will be made: Add breakpoints in table to signify the priority endpoints vs other. Need to review and reconcile endpoint vs management area prioritization and why actions are included for areas downstream of the priority endpoints. Reference what Cole has said about how he plans to use information to prioritize practices. This will come down to improving dialogue throughout plan document to make clear the hierarchy of prioritization and how that translates to implementation actions called out in the tables. Either include dialogue similar to what Cole explained in meeting laying out the decision process for selecting a project or turning this process into a graphic.
4-27		BWSR	For clarity, does the partnership intend to work through priority one to implementation exhaustion before moving onto Tier four and tier five?	Highlight that implementation will follow the prioritization tiers.	We will provide clarification language that explains that the focus will be to address actions for the high priority/tier one lakes prior to moving on to tier 4, etc.
4-27 and 4-28		BWSR	Goals for Impaired and High Quality Lakes are listed in both chapters 4 and 5.	Since Chapter 4 lists goals, we advise consolidating goals by adding a phosphorus reduction goal column in Tables 4-9 and 4-10, as well as in the "high quality lakes" section.	I added the numbers for the impaired lakes but given the current formatting style I did not add to the protection lakes. These measurable goals are still located in the respective management district sections, if project partners want these included they can be.
4-33		BWSR		On the call out box on page 4-33, identify the salmon box as the tier one lakes and the green boxes as the tier 2 lakes.	We will make this change.
4-33		BWSR	Carnelian Lake appears to be both increasing and decreasing transparency trends	Remove Carnelian Lake from the improving transparency box.	We will make this change.

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4-44		BWSR		Measure/Indicator #2 - Please clarify the priority areas or specific wells that pertains to this goal and indicator.	Added "Sauk Lake, Cold Spring, and Grand Pearl Management Districts" to the second measure
4-68		BWSR	In the Issue box, Measure/Indicators #1 and 2 address permanently protected habitat. However the background information stated that approximately 15,000 acres of CRP could expire. Thousands of acres coming out of CRP could have a cascading affect downstream.	Consider a goal and associated actions to maintain CRP acres in the watershed.	At this time, the partners are not going to add a goal on this topic, but will add dialogue to the call out that CRP could expire and that will need to be addressed as it occurs to maintain the existing level of protection.
Chapter 5		BWSR	Many management districts contain a table listing flow regimes in relation to E.coli. What do the percentages mean?	Describe in the plan the relationship between the 10-year E.coli goals from Chapter 4 ("Reduce acute exceedances..." and "Reduce chronic exceedances..."), Table 4-5, and the E.coli tables in Chapter 5. Consider captions for the tables in Chapter 5.	I added the number of samples to table 4-5, the percentages just show what percentage of the total number of samples exceed each standard respectively. Regarding the tables in Ch 5, these are TMDL tables that are used to support the targeting by showing the source of the e.coli impairments so I'm not sure what connection they want made here?
5-63, 5-87		BWSR	Does the partnership feel it is necessary to list both the cumulative storage goal in addition to the management district- specific storage goal? Also, please note that the cumulative storage goals for the Chain of Lakes Management District (p.5-73) and Cold Spring Management District are the same.	If keeping the cumulative goal, the language in each callout box should be clarified that it pertains to upstream storage as stated in the St Roscoe callout box.	The partners have decided to keep the cumulative storage goal and update the dialogue to match the St. Roscoe callout box. RESPEC Note: Some values changed when going back to the original calculations it appeared that there was an error in copying over the right values. No changes were made to the storage calculations.
General		BWSR	The PTMApp model has been run for a couple of the minor subwatersheds in the Sauk River watershed. How will those outputs be utilized during implementation?	Provide an explanation on how the PTMApp outputs will be used in conjunction with HSPF-SAM and other targeting approaches described in the Plan, and add relevant language to p.5-1 to 5-3.	removed "potentially" and "may" from dialogue to make it state that the project team will complete these analysis to identify specific areas. This in addition to adding PTMApp to the implementation table with costs should address this.

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p.5-1 to 5-3		BWSR	BWSR is pleased to see that the plan targets BMPs to the 12HUC subwatershed level. However, the plan falls short of describing how the partnership WILL target to the field/parcel scale. We understand there is a desire to complete hydro-conditioning for the watershed but it is unclear what will be done with that information once acquired. Also the plan needs to more clearly describe an approach to targeting to be used by all partners prior to acquiring a hydro-conditioned DEM. How will projects be identified for priority lakes, for urban stormwater, for nonstructural practices such as cover crops, or BMPs that may be a shortcoming for HSPF-SAM? Bottom line, how will BWSR be assured that the projects proposed for Watershed Based Implementation Funds will be targeted?	Please provide more process detail to the statement on p.5-2, "Until these analyses are completed, the Implementation Team will use various GIS analyses, data generated from previously completed studies, and practitioner knowledge as well as BMP requirements to target practices." Could this approach include Terrain Analysis and Stream Power Index? Consider separate section(s) or callouts in either Chapter 4 or 5 to outline targeting approaches so they do not get buried in the text. Listing all proposed targeting approaches in one section of Chapter 5 would be advantageous.	removed "potentially" and "may" from dialogue to make it state that the project team will complete these analysis to identify specific areas. This in addition to adding PTMApp to the implementation table with costs should address this.
4-14		BWSR		Clarify that the targeting approach to be used for livestock management practices is "within 500' of a tributary". Also, how is "tributary" defined?	I'm not sure what needs to be clarified? It clearly states in the previous paragraphs that the TMDL results are used to identify/target sources of e.coli impairments. These tables are shown in each of the management districts with e.coli priorities. The second section which this comment is referring to is specifically about Sauk river and unnamed creek. It does not have a TMDL completed for it but is identified as a priority because a TMDL is scheduled for 2021 (we are working on this now). Tributary is referring to each of these reaches so I clarified that in the text.
4-26		BWSR		Source and fate load maps are included for priority endpoint 370, but missing for the other priority endpoints. Consider adding associated fate load maps for the other 2-3 priority endpoints.	Reworded text to refer to these maps as an example of the fate transport analysis for the highest priority endpoint and that the rest of the fate/transport maps are located in a new appendix H
3-9, 3-11		BWSR	Actions in Chapter 3, such as "Modeling climate change impacts...using Climate Change Module in HSPF-SAM..." appear missing in the corresponding implementation table.	Ensure all actions listed in Chapter 3 are reflected with estimated cost and completion timeline in an implementation table.	We will add this line into Table 6-1, Watershed Wide Data, Monitoring and Planning Implementation Schedule.
Chapter 5		BWSR	It is unclear how the implementation strategies/actions and the associated costs are reflected in the implementation tables for certain priority resources such as Smith Lake, Little Sauk Creek, McCormic Lake, Round Prairie Creek, to name a few.		This will be addressed as a part of the overarching dialogue added about priority hierarchy and that activities included in the implementation table include all actions the project partners are undertaking to manage their resources.

Page Number	PDF Pg	Commenter	Comment	Recommended Action	Action Response
p.4-4 to 4-7		BWSR	Numerous streambank stabilization projects are proposed under the altered hydrology issue, which do not seem to directly address the proposed storage goals or the watershed discharge: precipitation relationship.	Describe in Chapter 4 how streambank projects relate to or make progress toward the altered hydrology goals.	Added sentence "A combination of practices will be utilized to achieve the storage goals by reducing tile drainage runoff, restoring altered waterways, and expanding floodplains." at end of section to state what actions will be addressing.
8-05		BWSR		Under the Plan Amendments section, there is nothing compelling the partnership to follow cited MN Rule 8410.0140, which applies to metro watershed management plans. This rule reference can be stricken.	We will remove the cited rule from the text.
8-06		BWSR		We recommend adding in the estimated 20 percent costs for project development and technical assistance into the total cost of implementation, rather than including it as a footnote. We understand it is an estimate.	We will increase the estimates by 20% to account for the project development and technical assistance and remove the footnote that currently notes this.
44414		BWSR	1W1P guidance states "The plan should contain an estimate of locally generated funds." Version 2.0 of plan content requirements states "clearly outline the participants' local commitments to implementing the plan." While the plan does a good job of describing potential local funding sources, it does not estimate how much locally generated funds will be committed to funding plan implementation.	Add the aggregated local funding commitment that all partners intend to bring to the plan for implementation. Refer to the example table below as an example.	It is the intent of the partners to shift the average annual current expenditures to the anticipated local contribution, as each agency will be using this plan as their primary guidance for the work they are doing. We will update the language in the plan to reflect this.
		RESPEC			Update final costs and review that all tables are accurate
		RESPEC			Create Appendix H of fate/transport maps and add to TOC.
		RESPEC			After formatting is completed check that random "t" does not still show up in 10-year plan goals callout on page 1-9.
		RESPEC			Remove all "Draft" from report

January 30th, 2021

“Public”

Zoom Attendee during Sauk River CWMP Public Hearing

RE: Response to Public Comment on Sauk River Comprehensive Watershed Management Plan

Dear Zoom Attendee “Public” –

Thank you for taking the time to attend the public hearing for the Sauk River Comprehensive Watershed Management Plan (CWMP), and for expressing your concerns regarding funding for the implementation of the plan.

To directly answer your questions, please see the responses in *Italics* below (I have copied your questions from the Zoom chat in regular font):

What is the escape clause for the group if the money runs out? *There is not an escape clause for the plan itself, as it is a document that the local units of government are required to have per Minnesota State Statute (a plan for water resource management). The nine entities will have a Joint Powers Collaborative agreement that states how they will formally work together to implement the CWMP. This agreement does have an escape clause for an entity to leave the partnership, though it is not necessarily related to a funding shortage. This agreement will be brought to each individual board within the next six to eight months. If you are interested in the individual board discussions regarding this agreement, I encourage you to contact those boards directly and/or watch their meeting agendas for when this item will be up for board discussion.*

The 350 pages did not contain a business continuity plan. *Thank you for the comment. While the plan may not explicitly describe a business continuity plan and label it as such, many of the steps required for continuity planning were a part of the planning process and therefore exist within the content of the plan.*

So taxing is an option? *The partnership of nine entities will be forming a Joint Powers Collaborative for implementing the plan. The Joint Powers Collaborative will not have taxing authority. However, creating the Joint Powers Collaborative will not take away the taxing authorities of the individual entities that already have that authority.*

If you have additional questions or would like to talk through this information in more detail, I would be happy to do so.

Thank you again for taking the time to provide comments on our Comprehensive Watershed Management Plan, we look forward to working with you in the future.

Kind Regards –

Sarah Boser on behalf of the Sauk River One Watershed One Plan Policy Committee and Partnership Plan Coordinator, Sauk River One Watershed One Plan/Comprehensive Watershed Management Plan

CC:

Sauk River One Watershed One Plan Policy Committee
Jason Weinerman, Board of Water and Soil Resources
Brad Wozney, Board of Water and Soil Resources

January 30th, 2021

Mitch Manoski
41037 Sauk Lake Road
Sauk Centre, MN 56378
320.282.8312
mitchmanoski@gmail.com

RE: Response to Public Comment on Sauk River Comprehensive Watershed Management Plan

Dear Mr. Mitch Manoski –

Thank you for taking the time to attend the public hearing for the Sauk River Comprehensive Watershed Management Plan, and for asking about phosphorus loading information within the plan. We appreciate you taking the time to review our plan, and to attend our public hearing.

Reductions to the phosphorus loading within the Sauk River Watershed is one of the priority goals/focus areas within the Sauk River Comprehensive Watershed Management Plan (CWMP). Excessive nutrients have a significant impact on both lakes and rivers within the Sauk River Watershed, which can lead to other challenges within the water resource and its surrounding ecosystem. The overall goals for phosphorus can be found on page 4-20 of the CWMP (for Lakes: Achieve the 10-year phosphorus reduction goals established by the Minnesota Pollution Control Agency/MPCA for each prioritized lake; for Streams: Achieve a 10% reduction in total phosphorus and total suspended solids at targeted endpoints on the Sauk River – the numeric reductions are available in the table on the bottom of page 4-20).

Within chapter 5 of the CWMP, the water management districts (smaller areas within the Sauk River watershed) are looked at one by one. Individual goals are identified within those water management districts.

The phosphorus reduction goals within the CWMP are based on data from other reports, water quality monitoring analysis, and existing Total Maximum Daily Load (TMDL) studies (TMDLs are studies required for water bodies that impaired to assist water resource professionals with improving the water quality).

If you have additional questions, I would be happy to talk through them with you.

Thank you again for taking the time to provide comments on our Comprehensive Watershed Management Plan, we look forward to working with you in the future.

Kind Regards –

Sarah Boser on behalf of the Sauk River One Watershed One Plan Policy Committee and Partnership Plan Coordinator, Sauk River One Watershed One Plan/Comprehensive Watershed Management Plan

CC:

Sauk River One Watershed One Plan Policy Committee
Jason Weinerman, Board of Water and Soil Resources
Brad Wozney, Board of Water and Soil Resources

January 30th, 2021

Jerry Rapp
11418 Minnesota Rd NW
Alexandria, MN 56308
jerryr@co.douglas.mn.us; rapp@rea-alp.com
320.766.2065

RE: Response to Public Comment on Sauk River Comprehensive Watershed Management Plan

Dear Commissioner Rapp –

Thank you for taking the time to attend the public hearing for the Sauk River Comprehensive Watershed Management Plan (CWMP), and for expressing your concerns regarding funding for the implementation of the plan and having a remote public hearing.

While we understand your concern that the Watershed Based Funding provided through the Board of Water and Soil Resources (BWSR) will not be sufficient for implementing the entire plan, it is also important to acknowledge the other funding sources that the nine partners have access to. Each of the nine entities have, and will still be encouraged to, apply for other grant funds. Each of the counties and the watershed district will still have their general levy funds, as well as the ability to utilize special assessments for water quality projects. The Soil and Water Conservation Districts will still receive their annual allotment of the counties' general levy funds. Each of these different funding sources have legal requirements and processes that the partners must abide by. The plan itself is not intended to limit the funding options for the entities, and it will help the partners pursue additional grant funding from other sources. Additionally, with the Policy Committee decision to move forward as a Joint Powers Collaborative, we will **not** be creating an additional unit of government, nor will we be adding additional taxing authorities.

Regarding the decision to hold a remote public hearing for the Sauk River CWMP, this decision was made at the Policy Committee meeting on January 4th, 2021. There was a motion made to host the public hearing remotely using Zoom as a platform, with a call in option. The motion passed with all nine members of the Policy Committee in favor. Additionally, Policy Committee members had the option to host separate public hearings with their respective boards/entities. None of the Policy Committee members expressed interest in moving forward with that option.

Thank you again for taking the time to provide comments on our Comprehensive Watershed Management Plan, we look forward to working with you in the future.

Kind Regards –

Sarah Boser on behalf of the Sauk River One Watershed One Plan Policy Committee and Partnership Plan Coordinator, Sauk River One Watershed One Plan/Comprehensive Watershed Management Plan

CC:

Sauk River One Watershed One Plan Policy Committee
Jason Weinerman, Board of Water and Soil Resources
Brad Wozney, Board of Water and Soil Resources

Hi Sarah,

I just wanted to submit a general comment for the Watershed Plan.

I was hoping to see a statement with regards to the Sauk River Watershed District leading an effort to create a sanitary district around Lake Osakis...or to help extend the sanitary district around Lake Osakis. I see that is a very important multi-jurisdictional effort that would require an organization, such as Sauk River Watershed District, that spanned the political boundaries, had access to funding mechanisms, and would communicate the benefit that would provide our lake and the end users of our watershed. In my opinion, this would be the most worthwhile effort in improving the water quality of the watershed district, with Lake Osakis being one of the main bodies of water through which our watershed filters.

Thanks for your work on this plan and I hope this is incorporated!

Justin Dahlheimer

First National Bank of Osakis

Chief Executive Officer and Chairman of the Board of Directors

NMLS #718100

INVESTING IN YOU

Direct: (320) 335-5801

Mobile: (320) 527-9737

Fax: (320) 859-3680

Email: jdahlheimer@fnbosakis.net

Submitted via email on Friday, December 18th, 2020.

December 21st, 2020

Justin Dahlheimer
Osakis City Council Member
Chief Executive Officer at First National Bank of Osakis

RE: Response to Public Comment on Sauk River Comprehensive Watershed Management Plan

Dear Mr. Justin Dahlheimer –

Thank you for taking the time to reply to our request for public comment on the Sauk River Comprehensive Watershed Management Plan. We appreciate you taking the time to review our plan, and to provide a suggestion for a water quality project in the Osakis area.

Early in the One Watershed One Plan planning process, Sauk River Watershed District (SRWD) staff met with partners in both Todd and Douglas County to discuss conservation and ordinance issues and coordination. The idea of installing septic cluster systems around Lake Osakis was discussed and did not have the support of all of the partners to be added to the Comprehensive Watershed Management Plan. Since we were unable to gain the support to create the smaller scale cluster systems, the partnership did not pursue the concept of a larger scale sanitary district.

Further discussions regarding the creation of a sanitary district around Lake Osakis could be initiated with SRWD staff, however, a project of this magnitude would require strong political support to make it through the necessary statutory project initiation process. This is something that would need to be discussed at length, and political and public support would need to be gained before the project could move forward.

Thank you again for taking the time to provide comments on our Comprehensive Watershed Management Plan, we look forward to working with you in the future.

Kind Regards –

Sarah Boser on behalf of the Sauk River One Watershed One Plan Policy Committee and Partnership Plan Coordinator, Sauk River One Watershed One Plan/Comprehensive Watershed Management Plan

CC:

Sauk River One Watershed One Plan Policy Committee
Jason Weirnerman, Board of Water and Soil Resources
Brad Wozney, Board of Water and Soil Resources

Dear Sarah,

I took the opportunity to review the plan located at the following [website](#). I have the following comments that I would like forwarded to the appropriate parties:

Comment: The document proposes a 10-year budget with annual "Adaptive management to evaluate program effectiveness" (Table 6-3). What the document lacks is rational or criteria for early termination of the project/partnership. While documenting the end-goal, there is no point in the methodology or evaluation criteria that determine if the value being spent is equal to or greater than the project goals. How is that in the best interest of the public or taxpayer?

Comment: Section 8-4 and 8-5 of the document identify the action that will be taken if the goals are not being met. The only action listed is to " An assessment will be made as to whether the 10-year goals will be met with the current pace of progress, if additional resources are needed, or if the delivery of services should be adjusted to strengthen implementation efforts. If these changes are deemed necessary, the Policy Committee will initiate a plan-amendment process". At no point in this section is the question about rate of return or value received versus investment ever addressed. Without such guidelines, money will continue to be 'thrown' at a problem following an unsuccessful project management methodology. How is that in the best interest of the public or taxpayer?

Comment:. Table 8-2 does not clearly indicate the cost to local funding sources. What really concerns me about this table are the call-outs and (a,b,c) and the lack of inflationary adjustments. Curiously, callout b is a major factor in this collaborative project, yet there is no further information provided. It is as if you are requesting a blank check for a project that has not yet been decided or approved. How is that in the best interest of the public or taxpayer?

Comment: At the conclusion of this project/partnership, what is the expected annual maintenance and operating cost to municipalities, if the partnership is terminated? How is that in the best interest of the public or taxpayer?

Comment: While documenting goals and ambiguously defining measurements with phrases like "explore" or "evaluate", is a good first step one thing that has been critically missed in this document is "what if it does not work"? How is that in the best interest of the public or taxpayer?

Sincerely,

Peter

Submitted via email by Peter Koel (mrpeterkoel@gmail.com) on October 27th, 2020.

December 28th, 2020

Peter Koel
Landowner
Osakis, MN

RE: Response to Public Comment on Sauk River Comprehensive Watershed Management Plan

Dear Mr. Peter Koel –

Thank you for taking the time to reply to our request for public comment on the Sauk River Comprehensive Watershed Management Plan. We appreciate you taking the time to review our plan, and to provide questions you had as you were reading the plan.

Regarding the context of the plan as a whole, we would like to acknowledge that the plan is focusing on an area of over 1,042 square miles in five counties with a focus of protecting and improving water quality and water quantity concerns. As staff, supervisors, board members and commissioners for local units of government, we understand the importance of the impact, including financial, to the individual/public/taxpayer, while also keeping in mind the importance of the greater good of this community as a whole, as it relates to water quality. Our goal, as a partnership, is to protect and improve water quality for this generation, as well as future generations. The unfortunate reality of that goal is that protecting and improving water quality does cost money, but the cost now is far less than what it will be if we wait until there are significant problems to start taking care of our water resources. It is important to note that it is *not* the intention of the partners to fund the entire plan implementation locally. The partners still intend to continue researching and applying for grants and additional funding sources to implement the plan, in addition to local contributions.

In response to the comments you provided, we would like to clarify a few items within the plan, and with the planning process itself. I have copied your comments in *Italics* below, to clearly note where your comment ends and our formal response begins.

The document proposes a 10-year budget with annual "Adaptive management to evaluate program effectiveness" (Table 6-3). What the document lacks is rational or criteria for early termination of the project/partnership. While documenting the end-goal, there is no point in the methodology or evaluation criteria that determine if the value being spent is equal to or greater than the project goals. How is that in the best interest of the public or taxpayer? Termination of the partnership is addressed in the Joint Powers Collaborative agreement which the members of the Policy Committee will sign to express their commitment to the partnership after the plan has been approved by the Board of Soil and Water Resources. Termination of the partnership would not eliminate any of the partner entities, it would simply mean less collaboration between the agencies. Regarding the adaptive management strategy you referenced in table 6-3, Watershed-Wide Outreach and Education Implementation Schedule, the partnership strongly believes in the importance of education and outreach regarding the work that we do. By creating the Watershed-Wide Outreach and Education program described in table 6-3, the

partners would be developing different strategies and methods for providing information to the general public, while also allowing them to be involved in different planning teams as desired. The effectiveness of a program such as this can be difficult to measure in concrete terms, and since the program has not been developed, the effectiveness evaluation criteria has not been developed either. The program development will be in the best interest of the public and taxpayer for the reasons listed above, including, providing information and an avenue for public involvement in water quality.

Section 8-4 and 8-5 of the document identify the action that will be taken if the goals are not being met. The only action listed is to "An assessment will be made as to whether the 10-year goals will be met with the current pace of progress, if additional resources are needed, or if the delivery of services should be adjusted to strengthen implementation efforts. If these changes are deemed necessary, the Policy Committee will initiate a plan-amendment process". At no point in this section is the question about rate of return or value received versus investment ever addressed. Without such guidelines, money will continue to be 'thrown' at a problem following an unsuccessful project management methodology. How is that in the best interest of the public or taxpayer? It is in the best interest of the public/taxpayer to protect and improve water quality while it is still a feasible undertaking. As indicated in the Assessment and Evaluation section on pages 8-4 and 8-5, if the projects and programs being utilized to achieve the goals in the plan are not working, alternative projects and programs will be utilized to achieve the goals because the reality is that ignoring the problem will not make it disappear. Rate of return and value received evaluations will be done on a case by case basis as projects are selected for implementation.

Table 8-2 does not clearly indicate the cost to local funding sources. What really concerns me about this table are the call-outs and (a,b,c) and the lack of inflationary adjustments. Curiously, callout b is a major factor in this collaborative project, yet there is no further information provided. It is as if you are requesting a blank check for a project that has not yet been decided or approved. How is that in the best interest of the public or taxpayer? The local funding contribution to the plan implementation as a whole cannot be calculated at this time because we are unable to predict what grants will be received by the partners and how much those grants will be worth, along with the amount of local funding contribution each grant may, or may not, require. Any local contribution to the project/plan implementation will still need to be approved through the existing processes (tax allocation from a county, watershed taxing authorities, etc.). In regards to callout (b), most, if not all, of the education and outreach program can be developed with the existing staff and resources within the partnership. Until the program is developed, we are unable to provide an implementation cost. It is in the best interest of the public/taxpayer to understand that Table 8-2 Summary of the Current Local Funding, Estimated Annual Cost, and Total Cost to Fund the Sauk River CWMP is the best information we have at this time, and to note that the partnership will continue to apply for grant funding whenever possible to minimize the amount of local contribution needed. It is also important to remember that any funding provided through the implementation of the comprehensive water management plan (watershed-based funding) is to be utilized to augment the work that all of the partners are continuing to do.

At the conclusion of this project/partnership, what is the expected annual maintenance and operating cost to municipalities, if the partnership is terminated? How is that in the best interest of the public or taxpayer? At this time, it is the intent of the partnership to continue as a partnership. If the partnership would terminate, the individual partners would maintain their unique roles and continue working to improve water quality via the implementation of this plan. If the municipalities work with the entities with plan implementation activities, there may be annual maintenance and operating costs that will be

discussed prior to project implementation. Capital Improvement Projects (CIPs)/large scale projects will have a Project Team that includes members of the public to participate in the project development and implementation process. Interested members of the public should look for notices in the newspaper, on partner websites, and other avenues for opportunities to participate on these teams.

While documenting goals and ambiguously defining measurements with phrases like "explore" or "evaluate", is a good first step one thing that has been critically missed in this document is "what if it does not work"? How is that in the best interest of the public or taxpayer? Items with phrases such as "explore" and "evaluate" are intended for those purposes – to explore and evaluate these items to determine whether it makes sense to proceed with them – financially, feasibly, etc. to achieve the water quality and quantity goals of the plan. If these items described as explore or evaluate are determined to be inefficient, ineffective, or counterproductive to the goals of the plan, they will not be pursued. This is in the best interest of the public/taxpayer as it gives the partners the opportunity to explore different implementation actions, regulations, and opportunities prior to committing to them.

Overall, the reoccurring theme in your comments was "how is this in the best interest of the public or taxpayer". This planning process brought together nine local entities, along with a number of state agencies and organizations that eliminated duplication of efforts, identified clear roles and responsibilities, and provided a unified approach for pursuing grant funding. This intentional process has allowed us, as water quality and natural resource professionals, to clearly identify where we should be focusing our efforts and our resources to protect and improve water quality for our generation, and the generations to come – those generations are collectively the public and taxpayers.

If you have additional questions or concerns, or would like to discuss this in greater detail, please feel free to contact me.

Thank you again for taking the time to provide comments on our Comprehensive Watershed Management Plan, we look forward to working with you in the future.

Kind Regards –

Sarah Boser on behalf of the Sauk River One Watershed One Plan Policy Committee and Partnership Plan Coordinator, Sauk River One Watershed One Plan/Comprehensive Watershed Management Plan

CC:

Sauk River One Watershed One Plan Policy Committee
Jason Weirnerman, Board of Water and Soil Resources
Brad Wozney, Board of Water and Soil Resources

Comments to the Sauk River Comprehensive Watershed Management Plan

My concerns are in regards to the portion of the plan involving:

- E Coli Impaired Streams:
- Centre Sauk Management Plan:

My particular area of concern:

Improve pasture management practices, including rotational grazing in pastures and flash grazing along stream banks and shorelines. Exclude livestock from streams and lakes and provide alternative watering facilities.

I agree that it is important to have good quality water; however, making policies that “one size fits all” is unacceptable. I believe that it is important to look at what each farm is doing on their own merit to protect the quality of the water. It is hard enough to make money farming and every time a government agency implements new polices/regulations, the one thing that always happens is it costs the person being regulated even more money.

To provide clarification to my comments in the above paragraph, I will use my farming operation as an example.

My family has owned property along Stearns County Ditch #9 for well over 100 years. I am the fourth generation to own this property. Throughout this entire period of time there has been livestock on this farm. For this farm to continue to be in existence it has been a well-managed farming operation. This farm like most farms has obstacles to deal with. In our case it includes being an irregular shaped farm with a limited number of tillable acres and a lot of drainage ditches. Approximately only 55% of the acres are considered tillable. Many of these tillable acres are located in smaller sized irregular shaped fields. With many acres on our farm not conducive to row crops, small grain or alfalfa, we have utilized the land for what it best serves; that being meadows and pasture. The meadows consist of many small fields of which most are irregular shaped. A significant number of the pasture acres are located in areas that are best suited for use as a pasture.

Since this farming operation was always a dairy operation up to the summer of 2016 and still continues to raise dairy cattle, we continue utilizing the farmland acres for its best use. That use has been for crops such as alfalfa, small grain and meadows and also pasture. Since County Ditch #9 runs through our pasture, it has always been and continues to be the livestock’s source of water during the day when the livestock are in the pasture.

Water quality and reducing soil erosion has been important to us. From approximately 1970 – 2016 there were **no** row crops grown on our farm. It was strictly an alfalfa/small grain crop rotation on the tillable acres. Since 1980 there was **no** manure applied to frozen ground. All manure went either into a manure pit or was stacked. Soil testing became important to us as well as testing the manure for nutrient levels. These practices have been a part of this farm for many years and in the early 2000’s a crop consultant was hired to take on these tasks. In 2016 I enrolled in the Sauk River Watershed District

Hay Buffer Program and installed a 54 foot wide hay buffer strip along both sides of a private ditch which had tillable acres on both sides of it.

Although beginning in 2017, most of the tillable acres were rented out. The focus still continues on the importance of water quality and soil erosion. The tillable acres have gone to an alfalfa/corn/small grain rotation.

In the area of pasture management, our pasture management practices have changed over the years, due to the realization of the importance of water quality and soil erosion. Presently all ditches, (County Ditch #9 and the private ditches) that run through are farm, are all buffered with grass. Beginning in the 1980's a fence was put up in the spring and taken down in the fall along the portion of County Ditch #9 which runs through our pasture except for a small area for the livestock to cross to the other side of the pasture and for the livestock to access to their only source of water. The length of the ditch available to the livestock is only approximately 30 feet. The banks of the ditch in this area are gradual. They are not muddy and are not eroding away. In 2017 I enrolled in the Sauk River Watershed District Hay Buffer Program and installed a 120 foot wide hay buffer strip in my pasture along a portion of a private ditch and along County Ditch #9 with the exception of the 30 foot long area that the livestock have access to.

Reviewing the Sauk River Comprehensive Watershed Management Plan has me very concerned as to what is going to happen to my farming operation. Protecting/improving the quality of water is important; however, in particular seeing the proposal of excluding livestock from bodies of water and also depending on what types of improvements in pasture management practices, such as rotational grazing in pastures is a red flag to me. Without County Ditch #9 being a source of water for the livestock on my farm will mean the end of livestock for me and also will lead to additional land that would be difficult to farm even for hay. It would also mean a loss of farm income to me as well as a portion of my building site will have no purpose or value anymore. I would imagine there would be another way for a source of water; however, that would run into many additional dollars out of my pocket. I'm sure it would get quite expensive to install and would most likely be a constant cost to me to operate and maintain. Pasture management practices such as rotational grazing would add additional cost to me to set up and additional continued maintenance. Rotational grazing also would not work well in my pastures due to the layout of my pastures and the fact that my field roads run through the pastures.

As mentioned previously, water quality is important us. The livestock on my farm utilizing the county ditch is a very small portion of the total use of the county ditch. As you know this ditch is used to drain many acres of land. This includes farmland, land used for rural residences, towns, business, roads, etc. The GEMS Sanitary System uses County Ditch #9 for emptying its ponds into this county ditch. Wildlife also access the county ditch.

From my observation of the county ditch, under normal conditions the water running in the county ditch is clear when it goes through my property; however, when we get large amounts of rain, the water running through the ditch is not clear. During these large rainfall events the water running through the county ditch is very dirty looking sometimes. When I have taken time to observe the water in the county ditch when the GEMS Sanitary System uses County Ditch #9 for emptying its pond into, the water

running through the ditch is definitely not clear. It is brown in color and I think the water looks disgusting.

Since there is concern about livestock getting into bodies of water, what about wildlife? How is this going to be addressed? The wildlife also have an impact on water quality.

To sum it up, the bottom line is common sense needs to be used. It is hard enough to make money farming and every time a government agency implements new polices the one thing that always happens is it costs the person being regulated even more money. As I mentioned above, the quality of water is important; however, making policies that "one size fits all" is unacceptable. I believe that it is important to look at what each farm is doing to protect the quality of the water. Changes in farming practices that are recommended and/or required **need** to be made on an individual farm basis. Any changes needed should be based on what **each** farm is already doing on their own merit and their size of the farming operation, not as a "one size fits all" concept.

Thank you.

Dean Meyer

dkmeyer@meltel.net

Cell phone # 320-429-2280

December 22nd, 2020

Dean Meyer
Landowner and Farmer
Centre Sauk Water Management District

RE: Response to Public Comment on Sauk River Comprehensive Watershed Management Plan

Dear Mr. Dean Meyer –

Thank you for taking the time to reply to our request for public comment on the Sauk River Comprehensive Watershed Management Plan. We appreciate you taking the time to review our plan, and to provide detailed support and examples for the comments you provided. The work you have done on your farm to protect and improve water quality is admirable and we are grateful for your dedication to water quality and sustainable farming practices. This is valuable information that we will utilize as we transition from the planning phase into implementation.

Regarding the context of the plan as a whole, we would like to acknowledge that the plan is focusing on an area of over 1,042 square miles in five counties with a focus of protecting and improving water quality and water quantity concerns. As staff, supervisors, board members and commissioners for local units of government, we understand the importance of the impact to the individual, while also keeping in mind the importance of the greater good of this community as a whole, as it relates to water quality. Our goal, as a partnership, is to protect and improve water quality for this generation, as well as future generations. Our goal is not for anyone to lose their operation as a result of these efforts, but instead to find ways to operate more efficiently while ensuring clean water is available for future generations.

In response to the comments you provided, we would like to clarify a few items within the plan. The text you referenced from page 4-16 of the plan, *Improve pasture management practices, including rotational grazing in pastures and flash grazing along stream banks and shorelines. Exclude livestock from stream and lakes and provide alternative watering facilities* is not a one size fits all watershed wide approach. The table on page 4-16 serves to identify the primary actions the partnership could, and in many cases should, take to address waters with E.coli impairments. That being said, there are many water bodies within the Sauk River Watershed that do not have E.coli impairments, and these strategies would not be a priority in those areas. It is also important to note that not all of the actions called out in the plan are regulatory. What this means is that in some cases, excluding livestock from streams and providing alternative watering facilities could be as simple as reaching out to the landowners in a particular area and offering funding (usually about 75% of the total cost) to help the landowner install fencing and an alternative watering source, and participation would be voluntary.

There are some regulatory items within the plan as well, and some of them do recommend exploring a regulation for livestock exclusion. Again, this is not a watershed wide approach. A regulatory action of this nature would be directed to a specific area of the watershed (such as a specific creek or stream) that would benefit from such a regulation. Regulations would not be implemented overnight. This

process involves public meetings and public hearings to ensure that there is an awareness of the proposed regulation, and ideally, that there is also support of the regulation. In reference to regulatory actions, it is not feasible to create regulatory actions on an individual landowner basis, but we also acknowledge that one size does not fit all, and have landed in the middle and decided to focus on a smaller area (such as a specific creek or stream) for specific regulatory items. For your reference, CD 9 is not called out within the plan as an area of focus for cattle exclusion as a regulatory action.

If you have additional questions or concerns, or would like to discuss this in greater detail, please feel free to contact me.

Thank you again for taking the time to provide comments on our Comprehensive Watershed Management Plan, we look forward to working with you in the future.

Kind Regards –

Sarah Boser on behalf of the Sauk River One Watershed One Plan Policy Committee and Partnership Plan Coordinator, Sauk River One Watershed One Plan/Comprehensive Watershed Management Plan

CC:

Sauk River One Watershed One Plan Policy Committee

Jason Weinerman, Board of Water and Soil Resources

Brad Wozney, Board of Water and Soil Resources



642 Lincoln Road
Sauk Centre MN 56378
Phone: (320)-352-2231
Fax: (320)-352-6455
Web: www.srwdmn.org

December 7th, 2020

Dear Policy Committee –

On behalf of the Sauk River One Watershed One Plan Advisory Committee, I would like to formally request the removal of language regarding the Citizen Advisory Committee from the Sauk River Comprehensive Watershed Management Plan. As a committee, we feel that this is not needed as we plan to either utilize the Sauk River Watershed District's existing Citizen Advisory Committee or utilize the Project Team Framework, which includes citizens, as outlined in Appendix G of the plan.

The Advisory Committee discussed and provided a consensus decision on this matter, but thought it would be appropriate to formalize the request as a public comment due to the timing of this request.

Thank you for your time,

Sarah Boser, Plan Coordinator, on behalf of the Sauk River One Watershed One Plan Advisory Committee

BOARD OF MANAGERS

Bill Becker, Donavon McKigney, Gary Barber
Lee Bautch, Scott Klatt, Larry Ladwig, Emily Wolf, Paul Hartmann

STAFF

Scott Henderson, Melissa Roelike, Adam Hjelm, Sarah Jo Boser, Jon Roeschlein

December 18th, 2020

Advisory Committee of the Sauk River 1W1P
642 Lincoln Road
Sauk Centre, MN 56378

RE: Response to Public Comment on Sauk River Comprehensive Watershed Management Plan

Dear Advisory Committee –

Thank you for taking the time to formally request the removal of the language regarding the Citizen Advisory Committee from the Sauk River Comprehensive Watershed Management Plan. In support of the consensus of the Advisory Committee, the Policy Committee also requests the removal of this language with the understanding that existing Citizen Advisory Committees and or the Project Team Framework will be utilized as appropriate throughout the plan implementation to ensure citizens have the opportunity to provide feedback and participate in the implementation process.

Kind Regards –

Sarah Boser on behalf of the Sauk River One Watershed One Plan Policy Committee and Partnership Plan Coordinator, Sauk River One Watershed One Plan/Comprehensive Watershed Management Plan

CC: Sauk River One Watershed One Plan Policy Committee
Jason Weirnerman, Board of Water and Soil Resources
Brad Wozney, Board of Water and Soil Resources



Minnesota Department of Natural Resources
1200 Warner Road
St. Paul, MN 55106

December 10, 2020

Sarah Jo Boser
Water Resource Manager
Sauk River Watershed District
642 Lincoln Road
Sauk Centre, MN 56378

RE: Response to submittal of Sauk River Comprehensive Watershed Management Plan: One Watershed, One Plan

Dear Ms. Boser,

The Minnesota Department of Natural Resources (DNR) thanks you for the opportunity to review the draft Sauk River One Watershed, One Plan (1W1P). We appreciate the collaborative efforts of those who participated in its development and the enthusiasm and level of interest that participants showed.

The draft plan, with its focus on altered hydrology, best management practices, and land stewardship goals, does largely address the priorities the DNR brought to the advisory committee. DNR and our technical staff look forward to continuing our work with the watershed to improve our land and water resources. We are committed to providing the necessary science and support to protect, restore, and improve the function and health of the watershed as the plan moves toward implementation.

We would like to reiterate that MN DNR is a very willing and able partner to help the Sauk River Watershed stakeholders pursue the goals in the 1W1P. Please contact our DNR lead for 1W1P in this watershed, Craig Wills Craig.Wills@state.mn.us, if you have any questions or concerns.

Sincerely,

A handwritten signature in blue ink that reads 'Grant L. Wilson'.

Grant L. Wilson
Central Region Director
Minnesota Department of Natural Resources

Minnesota Department of Natural Resources
1200 Warner Road
St. Paul, MN 55106

EC: Barbara Weisman, MNDNR
Dan Lais, MNDNR
Tim Crocker, MNDNR
Craig Wills, MN DNR
Jason Weinerman, BWSR
Anna Bosch, MPCA
Ryan Lemickson, MDA

December 18th, 2020

Grant L. Wilson
Central Region Director
Minnesota Department of Natural Resources
1200 Warner Road
Saint Paul, MN 55106

RE: Response to Public Comment on Sauk River Comprehensive Watershed Management Plan

Dear Mr. Wilson –

Thank you for taking the time to reply to our request for public comment on the Sauk River Comprehensive Watershed Management Plan. The support of the DNR, as well as the willingness to partner to help us achieve the goals within the plan is a valuable asset to our partnership!

We would also like to thank Craig Wills, DNR lead for our planning effort, along with Nicola Blake-Bradley for their active participation, insight, and knowledge throughout the development of our plan.

Our partnership is truly looking forward to collaborating with the MN DNR as we move into the implementation phase of our plan.

Kind Regards –

Sarah Boser on behalf of the Sauk River One Watershed One Plan Policy Committee and Partnership Plan Coordinator, Sauk River One Watershed One Plan/Comprehensive Watershed Management Plan

CC: Craig Wills, MN DNR

Nicola Blake-Bradley, MN DNR

Sauk River One Watershed One Plan Policy Committee

Jason Weinerman, Board of Water and Soil Resources

Brad Wozney, Board of Water and Soil Resources

I sincerely apologize for missing last week's Friday deadline for comment; I should have made myself a calendar reminder (I usually do but I just had a few unexpected things come up in the last couple of weeks. _

I hope these can still be helpful/useful to you?

Overall, I would say that the plan is thorough and comprehensive and looks great – in particular, the graphics and graphic design are well-done!

With respect to Section 5 – Geographic Management Areas and how the Multiple Benefits analysis will be used to inform targeting: I appreciate the commitment to “multiple benefits,” as well as the acknowledgment that additional expertise and information is needed in conjunction to determine what specific activities are most appropriate to implement to actually produce multiple benefits at each of the areas highlighted by the Multiple Benefits maps. I appreciate the plan acknowledging that some information, data, and analysis will be completed later in order to inform targeting of specific actions (e.g. ACPF or PTMApp), whereas some targeting and activity selection can be based on practitioner knowledge and existing BMP siting criteria.

So, just some suggestions for editing language on page 124-125: [additions in red font; deletions using ~~strikeout~~]

“The Nature Conservancy’s (TNC’s) multiple benefits analysis is a science-based process completed in 2017 for the Upper Mississippi River Basin ~~Habitat~~ **to inform spatial targeting of protection and restoration.**”

“This analysis considers fish and wildlife habitat, drinking water source protection, **surface and groundwater quantity and quality**, and flooding and erosion control **benefits, both in combination and in separate-themed modules (integrating many datasets and map layers already discussed in earlier section of this plan).** It can be used to identify areas where protection and restoration activities, including in-field and edge-of-field agricultural conservation practices, are likely to provide multiple benefits. For each of these priority areas, determining what specific activities should be implemented to produce multiple benefits will depend on existing physical characteristics, resource issues, land use and management considerations at each site. In addition to practitioner knowledge and expertise, additional tools, data, and analyses may be needed or helpful in determining the most appropriate implementation actions on-the-ground. For example, developing hydroconditioned digital elevation models (DEMs) and completing the Agricultural Conservation Planning Framework (ACPF) or Prioritize, Target, and Measure Application (PTMApp) in priority subwatersheds **can be used to determine the most effective and appropriate type and placement of in-field or edge-of-field agricultural BMPs throughout a subwatershed.**

... “Until these analyses are completed, the Implementation Team will use various GIS analyses, data generated from previously completed studies, and practitioner knowledge as well as BMP requirements **and siting criteria** to target practices. For example, locations for some drainage practices can be identified using GIS analysis that select for annual cropland with slopes of less than 1 percent and are within 500 feet of a drainage system or public water. The Implementation Team will establish consistent protocols for identifying targeted implementation actions to ensure that investments provide the greatest advancement towards goals.

Kristen Blann, Ph.D.

Freshwater ecologist

kblann@tnc.org

[\(218\) 330-9612](tel:(218)330-9612) (Mobile)

nature.org

The Nature Conservancy

40234 US 10

Cushing, MN 56443



Submitted via email on Monday, December 21st, 2020.

December 28th, 2020

Kristen Blann, Freshwater Ecologist
Leah Hall, Freshwater Project Manager
The Nature Conservancy
Minnesota Field Office
1101 West River Parkway
Suite 200
Minneapolis, MN 55415

RE: Response to Public Comment on Sauk River Comprehensive Watershed Management Plan

Dear Ms. Blann and Ms. Hall –

Thank you for taking the time to reply to our request for public comment on the Sauk River Comprehensive Watershed Management Plan. The support of TNC is a valuable asset to our partnership!

We would be happy to incorporate the edits you provided regarding the TNC Multiple Benefits Analysis, thank you for taking the time to provide additional detail to this section of the plan. Your edits provide a more thorough understanding for the reader.

We would also like to thank Leah Hall for her active participation, insight, and knowledge throughout the development of our plan.

Our partnership is truly looking forward to collaborating with TNC as we move into the implementation phase of our plan.

Kind Regards –

Sarah Boser on behalf of the Sauk River One Watershed One Plan Policy Committee and Partnership Plan Coordinator, Sauk River One Watershed One Plan/Comprehensive Watershed Management Plan

CC:

Sauk River One Watershed One Plan Policy Committee
Jason Weinerman, Board of Water and Soil Resources
Brad Wozney, Board of Water and Soil Resources



December 18, 2020

Sarah Boser
Water Resource Manager for the SRWD and Plan Coordinator for Sauk River 1W1P
642 Lincoln Road
Sauk Centre, MN 56378
320.352.2231
sarah@srwdmn.org

RE: Sauk River Comprehensive Watershed Management Draft Plan review

Sarah,

Thank you for the opportunity to review the draft Sauk River Comprehensive Watershed Management Plan, (One Watershed One Plan). The Minnesota Department of Agriculture (MDA) commends everyone involved in the planning process for their efforts, especially for considering groundwater quality protection and an opportunity for increased cost sharing for new practices located in Drinking Water Supply Management Areas (DWSMAs).

The MDA also appreciates the inclusion of many initiatives, partnerships, and research funded projects that will be of assistance to the plan, specifically the Rosholt Research Farm, Forever Green Initiative, and Minnesota Agricultural Water Quality Certification Program (MAWQCP).

MDA draft review comments for consideration

- **Page 4-50 – fourth paragraph.** The plan mentions that MDH assigns mitigation levels to community-water supplies under the Minnesota Groundwater Protection Rule (1573.0040), as well as the forming a local advisory teams (LATs) in communities that are assigned a mitigation level. This role is delegated to the MDA, not MDH.
 - **Please consider revising to indicate MDA’s role on pages 4-50 to 4-52.** (The Groundwater Protection Rule designates priority DWSMAs with elevated nitrate additional efforts to provide protection.
- **Page 5-39, 5-68, 5-90.** The MDA could be listed as an additional supporting entity for Groundwater Quality in the implementation tables related to the Melrose, Roscoe, and Cold Spring DWSMAs.

- **Page 7-24.** The MDA also samples 8 groundwater wells in the watershed. Please consider adding this to the Groundwater list in the gray highlighted box as it could provide valuable data to assist with the plan. The information below was listed in the initial priority letter from the MDA.
 - The MDA samples eight sites in the watershed. Each site consists of one to three, water table aquifer monitoring wells. Sampling began at four sites in 2000 and sites have been added throughout the watershed through 2010. All sites have been sampled at least once a year since they were established. Pesticide and nitrate data are available for the sites. Semi-annual water level measurements are also available from each site and continuous water level measurements are available for one site.

- **Page 5-64 – first paragraph.** Currently, the MDA does not plan to form a local advisory team in Roscoe due to the Level 1 designation. However, the MDA conducts an annual review of well data, which may result in changes to the mitigation level determination. The planning team may want to consider incorporating that information into the plan.
 - **Please consider updating the language in the first paragraph to:** City of Roscoe: The MDA has reviewed data from the Roscoe public wells and completed a nitrate fertilizer point source review. Based on the reviews, the MDA has defined Roscoe at a mitigation level 1, which means that at least one of the city wells has had nitrate levels at or above 5.4 ppm within the last 10 years and no point source for this has been identified. In level 1 DWSMAs, the MDA will work with SWCDs, U of M Extension and other local partners to promote nitrogen fertilizer BMPs and other practices using education and outreach strategies.

Additional information to consider, assist with plan implementation, and develop opportunities for additional partnerships

One of MDA's roles that relates to the 1W1P process is technical assistance. The MDA maintains a variety of water quality programs including research, on-farm demonstrations, as well as ground and surface water monitoring, many of which are directly referenced in the plan.

Our goal is to provide you with updates and data from the programs to help address resource concerns and further engage the agricultural community in the plan. Listed below is information that can be considered for the on the ground implementation, or outreach and education activities, in the future.

Text and associated weblinks submitted by Jeff Berg, MDA.

Page 4-50 -58. 5-30. 5-33. 5-39. 5-64. 5-77. 5-88.

- **Groundwater Protection Rule and local advisory teams (LATs)** are active or being formed in priority DWSMAs. <https://www.mda.state.mn.us/chemicals/fertilizers/nutrient-mgmt/nitrogenplan/mitigation>, which include the cities of Cold Spring and Melrose. You

may wish to include this mitigation level map in the plan (as a new or incorporated in an existing figure (See: <https://www.mda.state.mn.us/mitigation-level-determination>)

- Part 1 of the Groundwater Protection Rule includes vulnerable areas in the watershed that are restricted from fall and frozen soil nitrogen fertilizer application (exceptions apply). <https://www.mda.state.mn.us/chemicals/fertilizers/nutrient-mgmt/nitrogenplan/mitigation/wrpr/wrprpart1/vulnerableareamap>
- This vulnerable area map could be incorporated into the plan for reference and/or targeting.

Page 4-56. 5-36. 5-39. 5-46. 5-56. 5-58-59. 5-80. 5-81. 5-83. 5-90. 5-100. 5-109.

- The recently completed **Vegetative Cover in Minnesota** report (<https://wrl.mnpals.net/islandora/object/WRLrepository%3A3609/datastream/PDF/view>) includes the central sands area of MN as an opportunity area for increasing cover and perennial crops.

Page 4-56. 5-36. 5-39. 5-46. 5-56. 5-81. 5-83. 5-90. 5-100. 5-109.

- The **Forever Green Initiative** has a focus on kernza planting in Minnesota, especially in vulnerable DWSMAs. (<https://www.mda.state.mn.us/protecting/cleanwaterfund/forevergreen> and <https://kernza.org/perennial-progress-at-university-of-minnesota/>

Page 4-45 –47. 5-21. 5-28. 5-101.

- MDA (using Clean Water funding) supports U MN – Extension positions (3) that address nitrogen management (2) (<https://www.wrc.umn.edu/about-us/staff/gregory-klinger> and <https://www.wrc.umn.edu/about-us/staff/taylor-becker>) and irrigation management. (<https://www.swac.umn.edu/directory/faculty/vasudha-sharma>) Activities supported by these positions can be beneficial in the Sauk watershed; especially in the irrigated coarse textured soils such as the Bonanza Valley.

Page 4-29, 4-29, 4-41. 5-28. 5-39. 5-47. 5-58. 5-66. 5-80. 5-81. 5-100. 5-109. 7-1. 7-2.

- The MAWQCP should be included and may be applicable to several implementation activities in the plan. In DWSMAs, the program stipulates drinking water specific practice implementation including perennial plantings, perennials in rotation, cover crops and more. Additionally, every MAWQCP assessment and certification process identifies risks posed to drinking water and requires mitigation to obtain certification.
 - MAWQCP implements cover crops adoption throughout the state, with MAWQCP dedicated funding from NRCS, MAWQCP internal grant program, and other incentives including a Soil Health Endorsement for exemplary effort.
 - The MAWQCP has developed several watershed specific partnerships with activities that include: **Ecosystem Services Market Consortium** partnership,

<https://ecosystemservicesmarket.org/2020/10/09/minnesota-pilot-project-launched-to-increase-farmer-participation-in-ecosystem-services-markets/> GHG metrics of implemented practices; and MAWQCP Climate Friendly Farm Endorsement.

Thank you again for the opportunity to provide input during the planning process, review the draft plan, and offer relevant information to the 1W1P process. Please do not hesitate to contact me if you have any questions or comments.

Sincerely,

Ryan Lemickson
MDA
23070 North Lakeshore Drive
Glenwood, MN 56334
ryan.lemickson@state.mn.us

December 21st, 2020

Ryan Lemickson
Minnesota Department of Agriculture, MDA
23070 North Lakeshore Drive
Glenwood, MN 56334

RE: Response to Public Comment on Sauk River Comprehensive Watershed Management Plan

Dear Mr. Ryan Lemickson –

Thank you for taking the time to reply to our request for public comment on the Sauk River Comprehensive Watershed Management Plan. The support and collaboration of the MDA is a valuable asset to our partnership! Please see the formal response to your public comments below.

- Page 4-50 through 4-52: Yes, the partnership would be happy to make this change to accurately reflect the appropriate agency (MDA). Thank you for bringing this to our attention.
- Page 5-39, 5-68, 5-90: Thank you for your willingness to partner with us on Groundwater Quality activities listed within the implementation tables noted. We would be happy to list you as a supporting entity for these implementation items!
- Page 7-24: We apologize for the mix-up on this information and will correct the appropriate agency with the indicated activities.
- Page 5-64: Thank you for your recommendation for updating this paragraph. We will incorporate the first two sentences verbatim; however, the third sentence removes some of the specific implementation actions that partnership would like listed. We will be sure to incorporate the information you have provided in the third sentence while still listed the specific information that meets the needs of the partners.
- Page 4-50 to 58, 5-30, 5-33, 5-39, 5-64, 5-77, 5-88: Thank you for providing the state wide DWSMA map and vulnerable area nitrogen fertilizer application map. At this time we are not planning to add this map into the plan, but do plan to utilize it as we move forward in the implementation process.
- Thank you for providing additional reports and information on vegetative cover, kernza planting, and nitrogen management. The partners will utilize this information as we enter the implementation phase of the plan.
- Pages 4-29, 4-41, 5-28, 5-39, 5-47, 5-58, 5-66, 5-80, 5-81, 5-100, 5-109, 7-1, 7-2 regarding the addition of the MAWQCP: While the partners agree that MAWQCP is an extremely important tool for implementing conservation projects, we view it as a programmatic tool rather than a specific implementation action. We fully intend to utilize MAWQCP, however, we will be utilizing it as a means to achieve the specific implementation actions listed in the implementation tables. MAWQCP is referenced in the text on 7-2.

We would also like to thank you for your active participation, insight, and knowledge throughout the development of our plan.

Our partnership is truly looking forward to collaborating with the MDA as we move into the implementation phase of our plan.

Kind Regards –

Sarah Boser on behalf of the Sauk River One Watershed One Plan Policy Committee and Partnership Plan Coordinator, Sauk River One Watershed One Plan/Comprehensive Watershed Management Plan

CC:

Sauk River One Watershed One Plan Policy Committee

Jason Weinerman, Board of Water and Soil Resources

Brad Wozney, Board of Water and Soil Resources

December 16, 2020

RECEIVED
DEC 21 2020
BY: *ML*

Sarah Boser
Water Resource Manager for the SRWD and Plan Coordinator for Sauk River 1W1P
642 Lincoln Road
Sauk Centre, MN 56378

RE: Sauk River Comprehensive Watershed Management Plan 60-Day Review Period

Dear Sarah Boser:

The Minnesota Pollution Control Agency (MPCA) has reviewed your draft Sauk River Comprehensive Watershed Plan (Plan) dated October 14, 2020, and we are providing the following comments as part of the official 60-Day review and comment period.

The MPCA appreciates the opportunity to provide input throughout your Plan development process. The Sauk River Watershed District and RESPEC have been diligent in responding to MPCA comments and input throughout this process, and MPCA is satisfied that all of its concerns have been adequately addressed.

Again, thank you for the opportunity to review and comment on the draft Plan. If we may be of further assistance, please contact Scott Lucas at 218-833-9843 at the MPCA's Brainerd office.

Sincerely,

Nicole Blasing

This document has been electronically signed.

Nicole Blasing
Manager
Northwest & Central Section
Watershed Division

NB/SL:jls

December 21st, 2020

Nicole Blasing
Manager
Northwest & Central Section
Watershed Division, MPCA
7678 College Road
Suite 105
Baxter, MN 56425

RE: Response to Public Comment on Sauk River Comprehensive Watershed Management Plan

Dear Ms. Blasing –

Thank you for taking the time to reply to our request for public comment on the Sauk River Comprehensive Watershed Management Plan. The support of the MPCA is a valuable asset to our partnership!

We would also like to thank Anna Bosch and Scott Lucas for their active participation, insight, and knowledge throughout the development of our plan.

Our partnership is truly looking forward to collaborating with the MN MPCA as we move into the implementation phase of our plan.

Kind Regards –

Sarah Boser on behalf of the Sauk River One Watershed One Plan Policy Committee and Partnership Plan Coordinator, Sauk River One Watershed One Plan/Comprehensive Watershed Management Plan

CC: Scott Lucas, MPCA
Anna Bosch, MPCA
Sauk River One Watershed One Plan Policy Committee
Jason Weinerman, Board of Water and Soil Resources
Brad Wozney, Board of Water and Soil Resources



Protecting, Maintaining and Improving the Health of All Minnesotans

December 18, 2020

Sarah Jo Boser
Water Resource Manager
642 Lincoln Road
Sauk Centre, MN 56378

Dear Ms. Boser,

Subject: Minnesota Department of Health Comments for the Sauk River One Watershed One Plan - 60 Day Public Plan Review

The Minnesota Department of Health (MDH) Source Water Protection Unit appreciates the opportunity to review the draft Sauk River One Watershed One Plan (1W1P). MDH commends the plan partners for including drinking water as a priority concern and acknowledges the positive gains to protect drinking water quality that have already been accomplished in the watershed. Thank you for allowing MDH the opportunity to be part of the technical advisory committee and for incorporating our ideas and suggestions into the draft plan.

MDH comments to the draft plan include:

- The plan represents a vested interest by the partners to target community public water systems for protection in their implementation activities, however it lacks a similar response to protect private well users. Forty percent of the residents within the watershed obtain their drinking water from private wells (GRAPS, 2018). MDH identified protection of private wells as a priority concern for the watershed.
 - MDH acknowledges land management priorities identified in the plan will help achieve multiple benefits offering protection to private well users. We ask that language in the plan clarifies the partners approach to protecting private wells.
 - Additionally we ask that you prioritize well sealing throughout the watershed regardless of vulnerability or status within a DWSMA.
- Chemistry data collected by MDH at the time of well installation demonstrates nitrate and to a greater extent arsenic are common contaminants found in groundwater throughout the watershed (GRAPS, 2018). The plan failed to identify arsenic as a contaminant.
 - MDH asks that you recognize arsenic as a contaminant, especially for private well users, and include information about risk and water testing as part of your education efforts to private landowners.
- Groundwater Availability, 4-43: MDH acknowledges the need to prioritize groundwater recharge as a necessary strategy to maintain sustainable water use for future generations, especially in the DNR Bonanza Valley Groundwater Management Area. MDH asks the

partners to evaluate existing land use and consider the impacts to groundwater quality when implementing groundwater recharge activities, being the same soil properties that enhance infiltration also increase the risk for groundwater contamination.

- As partners consider management of stormwater runoff, MDH asks that you adhere to the guidance provided in the Minnesota Stormwater Manual, in the section titled “stormwater and wellhead protection”
https://stormwater.pca.state.mn.us/index.php/Stormwater_and_wellhead_protection.
- Groundwater Quality, 4-50: The plan states under Minnesota Groundwater Protection Rule, the MDH assigns mitigation levels. MDA is the entity implementing the Groundwater Protection Rule and all references should be corrected to acknowledge MDA, this includes the reference section in the back of the report.
- Priority Resources, 4-52: Please add an additional column to Table 4-11 that recognizes the public water systems with moderate and low groundwater vulnerability not prioritized in the plan so there is a record of these systems.
 - MDH asks that partners consider prioritizing well sealing in these DWSMAs, since unsealed/unused wells are the primary pathway for contamination, especially in low vulnerable settings.
- Table 5-1. Priority Concerns Addressed by Each Implementation Action and the Relative Impact of the Implementation Action on Each Priority Concern, 5-4: MDH requests that the table be revised to accurately reflect benefits to groundwater quality and surface water/drinking water – St. Cloud.
- Geographic Management Areas, 5-1: MDH appreciates the partners approach to target high and very high vulnerable DWSMAs being they require the highest level of management to protect drinking water quality. Therefore, partners should consider expanding the list of implementation actions to manage the diverse land uses in DWSMAs.
 - MDH asks that you evaluate the implementation tables for each geographic management area and consider expanding the set of tools to achieve groundwater quality goals in the DWSMAs. To avoid duplication you could consider adding the DWSMA name under the targeted resource column for each appropriate implementation action. Watershed partners are already doing nutrient/manure management, feedlot fixes for example in these vulnerable DWSMAs and we would like to see that good work continue.
- For wise application of limited conservation dollars and targeted BMP application for groundwater benefit, we request that the MDH delineations be used in project development/implementation. Many of the DWSMAs in the watershed have mix vulnerability ranging from very low to very high, however in the plan the vulnerabilities have been lumped together to reflect the highest assigned vulnerability for each DWSMA. This approach works well for plan development, however a more refined approach is needed for project implementation. For example, SSTS upgrades is a key strategy in the watershed for DWSMAs, however the groundwater protection benefit is only achieved in a high or very highly vulnerable setting. MDH geospatial data can be obtained at:
<https://www.health.state.mn.us/communities/environment/water/swp/maps/index.htm>

- Geographic Management Areas: Please review the DWSMA vulnerabilities noted in the plan for accuracy. Additionally ensure there is consistency between the narrative and the supporting figures.
- MDH asks that you include MDA's Township Testing Program data and information in the plan and prioritize identified townships as a means to target groundwater implementation and resources for private wells within the watershed.

We commend the planning team for their work in developing the plan. If you have any questions please contact me at (651)251-4695 or carrie.raber@state.mn.us.

Sincerely,

Carrie Raber

Carrie Raber, Principal Planner
Minnesota Department of Health
Source Water Protection Unit
625 Robert St. N.
St. Paul, MN 55164

CC: Mark Wettlaufer, MDH Source Water Protection Unit
John Woodside, Area Hydro, MDH Source Water Protection Unit
Derek Richter, MDH Source Water Protection Unit
Chris Elvrum, MDH Well Management Section
Jason Weinerman, BWSR Board Conservationist
Brad Wozney, BWSR Clean Water Specialist
Craig Wills, DNR
Scott Lucas, MPCA
Ryan Lemickson, MDA

December 22nd, 2020

Carrie Raber
Minnesota Department of Health, MDH
625 Robert Street North
Saint Paul, MN 55164

RE: Response to Public Comment on Sauk River Comprehensive Watershed Management Plan

Dear Ms. Carrie Raber –

Thank you for taking the time to reply to our request for public comment on the Sauk River Comprehensive Watershed Management Plan. The support and collaboration of the MDH is a valuable asset to our partnership! Please see the formal response to your public comments below. Our responses have been provided in blue to clearly show where the comment provided ends and the formal response begins.

- The plan represents a vested interest by the partners to target community public water systems for protection in their implementation activities, however it lacks a similar response to protect private well users. Forty percent of the residents within the watershed obtain their drinking water from private wells (GRAPS, 2018) (This figure is shown on page 4-50 of the plan). MDH identified protection of private wells as a priority concern for the watershed.
 - MDH acknowledges land management priorities identified in the plan will help achieve multiple benefits offering protection to private well users. We ask that language in the plan clarifies the partners approach to protecting private wells. The topic of protecting both public and private wells was discussed at length by the partners during the planning process. As stated on page 4-50, because land management practices have a strong influence on groundwater, the partners have prioritized on-the-ground implementation actions that will reduce the risk of groundwater contamination, particularly in areas that are highly vulnerable to contamination or are designated as a nitrogen mitigation area – see figures 4-14 and 4-15. All private wells within these areas will benefit from these actions. Also, on page 4-51, it is noted that there exists gaps in data for private wells in the SRW are noted, leading to the strategy on page 4-55 to address these gaps. In addition, several of the actions stated within the GRAPS strategies tables for private wells have been incorporated in the Plan – examples can be found on pages 4-55, 5-45, 6-5, 6-9, 6-10. The partnership does not have the local authority or capacity to dedicate additional resources towards the protection of

private wells. If MDH has resources to contribute or partnership opportunities, the partnership would be happy to take those into consideration as we move into the implementation phase of the plan.

- Additionally we ask that you prioritize well sealing throughout the watershed regardless of vulnerability or status within a DWSMA. The Advisory Committee decided to address private wells primarily through Education and Outreach. From an implementation perspective, we prioritized based on local capacity and decided to focus those efforts to public water suppliers with the highest vulnerability.
- Chemistry data collected by MDH at the time of well installation demonstrates nitrate and to a greater extent arsenic are common contaminants found in groundwater throughout the watershed (GRAPS, 2018). The plan failed to identify arsenic as a contaminant.
 - MDH asks that you recognize arsenic as a contaminant, especially for private well users, and include information about risk and water testing as part of your education efforts to private landowners. Arsenic is a naturally-occurring contaminant, and therefore there are no implementation actions that the partnership can take to address arsenic. The partnership does plan to address arsenic through its Education and Outreach program, and would be willing to add a paragraph explaining this to the contaminants section of the plan if that would be helpful.
- Groundwater Availability, 4-43: MDH acknowledges the need to prioritize groundwater recharge as a necessary strategy to maintain sustainable water use for future generations, especially in the DNR Bonanza Valley Groundwater Management Area. MDH asks the partners to evaluate existing land use and consider the impacts to groundwater quality when implementing groundwater recharge activities, being the same soil properties that enhance infiltration also increase the risk for groundwater contamination.
 - As partners consider management of stormwater runoff, MDH asks that you adhere to the guidance provided in the Minnesota Stormwater Manual, in the section titled “stormwater and wellhead protection” https://stormwater.pca.state.mn.us/index.php/Stormwater_and_wellhead_protection. As the primary local agency addressing large scale stormwater management in the SRW, the SRWD plans to utilize the guidance in the MPCA’s Minnesota Stormwater Manual for guidance. Thank you for calling our attention specifically to the section titled, “Stormwater and Wellhead Protection”.
- Groundwater Quality, 4-50: The plan states under Minnesota Groundwater Protection Rule, the MDH assigns mitigation levels. MDA is the entity implementing the Groundwater Protection Rule and all references should be corrected to acknowledge MDA, this includes the reference section in the back of the report. Thank you for bringing this mix-up to our attention. We will make this correction.

- Priority Resources, 4-52: Please add an additional column to Table 4-11 that recognizes the public water systems with moderate and low groundwater vulnerability not prioritized in the plan so there is a record of these systems. [The purpose of this table is to list the prioritized DWSMAs, not all the DWSMAs in the watershed, and as such, the requested change will not be made.](#)
 - MDH asks that partners consider prioritizing well sealing in these DWSMAs, since unsealed/unused wells are the primary pathway for contamination, especially in low vulnerable settings. [At this stage in the planning process, the partnership is not comfortable changing the prioritization process that we have used during the planning process.](#)
- Table 5-1. Priority Concerns Addressed by Each Implementation Action and the Relative Impact of the Implementation Action on Each Priority Concern, 5-4: MDH requests that the table be revised to accurately reflect benefits to groundwater quality and surface water/drinking water – St. Cloud. [The partnership is not clear on what changes you are looking for with this comment, and as a result, no changes were made.](#)
- Geographic Management Areas, 5-1: MDH appreciates the partners approach to target high and very high vulnerable DWSMAs being they require the highest level of management to protect drinking water quality. Therefore, partners should consider expanding the list of implementation actions to manage the diverse land uses in DWSMAs.
 - MDH asks that you evaluate the implementation tables for each geographic management area and consider expanding the set of tools to achieve groundwater quality goals in the DWSMAs. To avoid duplication you could consider adding the DWSMA name under the targeted resource column for each appropriate implementation action. Watershed partners are already doing nutrient/manure management, feedlot fixes for example in these vulnerable DWSMAs and we would like to see that good work continue. [At this stage in the process, the partners do not feel that this is a feasible request. We will, however, add language to the text under “Groundwater Quality” in each of these geographic management areas stating that for DWMSAs with high and very-high vulnerability, we intend to utilize all available tools as much as possible. For example, if we have a feedlot polluting within a high vulnerable DWSMA, it is going to be viewed as a priority by the collaborative to address, compared to a feedlot that is not in a prioritized location.\]](#)
- For wise application of limited conservation dollars and targeted BMP application for groundwater benefit, we request that the MDH delineations be used in project development/implementation. Many of the DWSMAs in the watershed have mix vulnerability ranging from very low to very high, however in the plan the vulnerabilities have been lumped together to reflect the highest assigned vulnerability for each DWSMA. This approach works well for plan development, however a more refined approach is needed for project implementation. For example, SSTS upgrades is a key strategy in the watershed for DWSMAs, however the groundwater protection benefit is only achieved in a high or very highly vulnerable setting. MDH geospatial data can be obtained at:

<https://www.health.state.mn.us/communities/environment/water/swp/maps/index.htm> . Our understanding of this comment is that when we are developing/evaluating individual projects MDH would like us to use their geospatial data, which is a feasible request, though we are not planning to make changes to the plan document as a result. We are hoping to have an MDH representative participating in our Technical Advisory Committee moving forward to remind the partners of resources such as the one listed above, provide insight and guidance throughout the implementation process.

- Geographic Management Areas: Please review the DWSMA vulnerabilities noted in the plan for accuracy. Additionally ensure there is consistency between the narrative and the supporting figures. If MDH found inaccuracies in this information while reviewing the plan, please clearly identify them for the partnership so that we are able to correct them. We have the information that we believe to be accurate within the plan, and if it is not correct, we would appreciate your guidance in correcting it.
- MDH asks that you include MDA's Township Testing Program data and information in the plan and prioritize identified townships as a means to target groundwater implementation and resources for private wells within the watershed. Throughout the planning process it was recommended that the partnership did not use the township testing information for targeting because it is not widespread and only represents those that volunteered to have their water tested. As such, no changes will be made in response to this comment.

We would also like to thank you for your active participation, insight, and knowledge throughout the development of our plan.

Our partnership is truly looking forward to collaborating with the MDH as we move into the implementation phase of our plan.

Kind Regards –

Sarah Boser on behalf of the Sauk River One Watershed One Plan Policy Committee and Partnership
Plan Coordinator, Sauk River One Watershed One Plan/Comprehensive Watershed Management Plan

CC:

Sauk River One Watershed One Plan Policy Committee
Jason Weirnerman, Board of Water and Soil Resources
Brad Wozney, Board of Water and Soil Resources

Comment Number	Page Number	PDF page #	Commenter	Comment Type	Comment	Response
1	NA	NA	Cole Loewen	G	Add an "Key terms and abbreviations" page to help the reader recall what these various items mean in this document. Ex. AUID, HUC, CWMP, SRW, DO, TP, etc.	A list of acronyms was in the internal review draft, along with a list of figures, tables, etc. Please add those back into the plan.
2	NA	NA	Cole Loewen	G	On the acknowledgements pages, are we missing any? I can't quickly recall all the entities that served on the AC, but we should be sure they are all listed.	After discussion at the Advisory Committee meeting, the group decided to leave this page as is, as it lists all of the active partners.
3	NA	4	Cole Loewen	G	TOC: The PDF bookmarks do not match the TOC chapters (ex. 6 - on TOC, "Targeted Implementation Schedule," but on bookmark, "6 Watershed-Wide Programs Implementation Schedule. Also, the TOC Chapter titles do not always match the titles for the actual chapters. Ex. chapter 3: TOC has "Priorities and Goals," actually chapter title is "Issue Prioritization: Process and Results." There aren't goals in chapter 3. Make sure the TOC reflects the actual chapter and appendix titles, and the pdf bookmarks match as well.	RESPEC will update this.
4	1-1	5	Cole Loewen	G	The first sentence is hard to read. Rewording recommended. Examples of potential changes: "The Sauk River Comprehensive Watershed Management Plan (CWMP) is an evolutionary step in local water planning to streamline programs and authorities of nine government units by facilitating the progressive restoration and protection of resources." "The Sauk River Comprehensive Watershed Management Plan (CWMP) is an evolutionary step in local water planning to streamline programs and authorities of nine government units by facilitating both the progressive restoration of impaired and degraded resources and the protection of high-quality resources from adverse future impacts."	RESPEC will update this.
5	1-2	6	Cole Loewen	G	Both in callout box and second paragraph of text, remove "the" from "...and protect the high-quality resources from..."	RESPEC will update this.
6	1-3	7	Cole Loewen	G	The figure does not have a caption denoting the figure # and the name of the figure. This is consistent throughout, so I assume that is a design decision. Looks like principally only maps are given a figure caption (figures 2-2 & 3-1 seem to be exceptions). I am fine with this design decision, but future referencing may be more difficult.	No update needed per Advisory Committee discussion.
7	1-3	7	Cole Loewen	G	First sentence, right after SRW is the HUC-8 code in parenthesis. Only experienced individuals are going to know that is a HUC code, so either denote this is a HUC-8 code, or drop it.	We will indicate that this is a HUC-8/Hydrologic Unit Code).
8	1-4	8	Cole Loewen	G	This is the first instance where the Advisory Committee is noted. There is no explanation of the AC, its purpose or its makeup. Recommend at least adding the purpose of the AC here and a general note of its makeup, with a reference to Appendix E. Can use the AC language on page 2-3 (pdf page 18).	RESPEC will update this.
9	1-5	9	Cole Loewen	G	Table 1-1's contents are not the same as table 3-2 (pdf page 35) - see line "Surface Water - Protecting high water quality resources." These are the same tables and content should be the same.	RESPEC will update this. Please also update the tables names to match each other.
10	1-5	9	Cole Loewen	G	Table 1-1, last line's Resource Category is "Natural Resources." This is the same as table 3-2. However, in section 4 (page 4-65, pdf page 115), this is referred to as "Habitat," not Natural Resources. Recommend changing so the same term for this resource concern is used throughout the document. Since "Habitat" is the term used for this resource concern throughout the remainder of the document (ex. page 5-4, page 5-11), recommend changing these two tables from "Natural Resources" to "Habitat."	RESPEC will update this.

Comment Number	Page Number	PDF page #	Commenter	Comment Type	Comment	Response
11	1-7	11	Cole Loewen	G	In the "Implementation Plan" figure, the symbol used for "Land Use and Regulatory Controls" does not match the symbol use for the same on page 1-6 (pdf page 10). Recommend adjusting this figure by using the symbol on page 1-6 for this item.	RESPEC will update this.
12	1-7	11	Cole Loewen	G	In the "Implementation Plan" figure, change from "Conduct Ongoing Monitoring and Acquire Data " to "Conduct Monitoring, Studies and Planning " to be consistent with language use throughout plan.	RESPEC will update this.
13	1-7	11	Cole Loewen	G	Last paragraph, change from "The Advisory Committee is committed to implementing the plan using..." to "The partnership is committed to implementing the plan using..."	RESPEC will update this.
14	1-7	11	Cole Loewen	G	Just noticed there is no text on "Perform Operation and Maintenance" as listed in the "Implementation Plan" figure. Could add a sentence on this in the last paragraph as part of the adaptive management approach?	RESPEC will update this.
15	1-8	12	Cole Loewen	G	The list of 10-year plan goals does not include the measures. While these details are provided in the following sections, since this is a executive summary, does it not make sense to include those here?	RESPEC will make this change.
16	2-2	17	Cole Loewen	G	The callout box is missing the following county percentages: 64% Stearns County, 21% Todd County.	RESPEC will update this (this was also noted in comments from Stearns SWCD).
17	2-3	18	Cole Loewen	G	In the graphic, the Advisory Committee text is exactly the same as the Steering Committee text. Need to create unique text for the AC.	RESPEC will update this (this was also noted in comments from Stearns SWCD).
18	2-4	19	Cole Loewen	G	Table 2-1: under the Total Area (mi2) column, the data is not uniformly aligned (Cold Spring and Mini Metro are left justified; remainder looks to be right-justified).	RESPEC will correct formatting alignment of the column to be consistent.
19	2-7	22	Cole Loewen	G	Figure 2-2: the caption states this is the land cover from the 2011 NLCD, but figure 2-3 is the 2016 NLCD. If the data behind figure 2-2 is truly from 2011, this needs to be updated to reflect the 2016 NLCD.	RESPEC will look into this and update if the data represented in the figure is from 2011.
20	3-2	31	Cole Loewen	G	Figure 3-1: quality (resolution) is low; graphic is grainy. Can the resolution be improved (aka make it more pretty)?	RESPEC will update this.
21	3-4	33	Cole Loewen	G	Table 3-1: since this table breaks across the page, the caption should continue across pages. Also, I find the coloring for the land lines confusing. By my reading, there are three land resources: all, riparian, rural/ag. For each resource, the concern is the same: all surface waters. But for the draft issue statements, it is not clear to which land resource these belong. Do all the statements belong to all three (that is how I interpret this coloring)? Or are the statements that refer to riparian strictly for riparian? Suggest changing coloring to clarify this.	RESPEC will work on making this more intuitive.
22	3-5	34	Cole Loewen	G	Last statement in last paragraph: "The sustainability of land use decisions is also a top priority;..." Not as high a priority as altered hydrology and sediment & nutrient impairments though? That's how I read this - either it is a priority with these two or its not, regardless of how it will be implement. To me, it should be included in the callout box on the next page.	RESPEC will make this change.
23	3-15	44	Cole Loewen	G	The white space on this page seems off to me. I think it could be respaced, or perhaps incorporate some images of the watershed?	Comment noted.
24	3-18	47	Cole Loewen	G	Figure 3-4: shows pink areas outside of the watershed. Remove those areas.	RESPEC will update the chloride impairment risk layer to only show within the SRW boundary.

Comment Number	Page Number	PDF page #	Commenter	Comment Type	Comment	Response
25	4-3	53	Cole Loewen	G	Under "Pace of Progress," this sentence is awkward and needs to be rewritten, "If the HSPF-SAM automated calculators contained in the implementation spreadsheet are not applicable, other methods, such as tracking the numbers or practices implemented or acres protected or estimating nutrient or sediment reductions using professionally accepted calculators such as the MPCA MIDS calculator." The thought is not finished.	RESPEC will edit this and finish the thought/sentence.
26	4-4	54	Cole Loewen	G	Last paragraph, add bolded word, "...at the USGS gage in St. Cloud will be monitored relative to precipitation."	RESPEC will make this change.
27	4-8	58	Cole Loewen	G	For this and every following "Key Strategies" table (pdf pages 66, 79, 84, 91, 96, 104, 113, 120), the "monitoring, studies and planning" and "land use and regulatory" sections are flip-flopped. You can tell by reading the contents; for example, "evaluate opportunities to convert urbanized public drainage systems, such as CD 17, to a storm water utility, is a land use and regulatory strategy. This table and all following tables need to have this corrected.	RESPEC will make this change.
28	4-8	58	Cole Loewen	G	These Key Strategy Tables' designs are nice, but when you have instances where there is a lot of text and you can't rely on empty space to delineate individual lines in a single category (such as this table), may need to add hard lines to help readers make that distinction.	This was also noted by Stearns SWCD. RESPEC will add bullet points or hard lines to help with this.
29	4-9	59	Cole Loewen	G	Could we insert a simple drawing showing what a two-stage ditch looks like? There are a lot of drawings online we could use.	RESPEC will make this change.
30	4-18	68	Cole Loewen	G	Second paragraph: first sentence is missing its start. Current it reads, "are over 10 acres in size (SRWD, 2014). Add, " The SRW contains more than 250 basins that are... "	This was also noted by Stearns SWCD. RESPEC will make this change.
31	4-20	70	Cole Loewen	G	Add reach A10 after A230; that is also a priority reach per AC decision.	RESPEC will make this change.
32	4-21	71	Cole Loewen	G	First paragraph, fourth sentence needs to be reworded, "These model subwatersheds were aligned with management district's boundaries to establish eight targeting end points (Figure 4-5)." When comparing this figure with Figure 1-2 (mgmt. districts), the eight end points do not always align with the mgmt districts. Ex. A10 and A70 do not. Perhaps add the word "roughly" to "These model subwatersheds were roughly aligned with...?"	RESPEC will make this change.
33	4-22	72	Cole Loewen	G	Add a break line between ranking 4 & 5	RESPEC will make this change.
34	4-28	78	Cole Loewen	G	Table 4-10: extra line of empty space at bottom of table	RESPEC will remove the empty row at the bottom of table 4-10.
35	4-31	81	Cole Loewen	G	Figure 4-8: its caption needs to be updated, since the map now shows impaired lakes on the main stem.	RESPEC will make this change.
36	4-33	83	Cole Loewen	G	The graphic at the bottom of the page: Carnelian Lake is listed as a lake with both an improving and declining transparency trend. That doesn't make sense, so pick one.	RESPEC will review data and remove Carnelian from the incorrect list.
37	4-52	102	Cole Loewen	G	First paragraph, add bolded language, "...designated mitigation level, and groundwater sensitivity (Figures 4-15 and 4-16)."	RESPEC will make this change.
38	4-53	103	Cole Loewen	G	Seems odd to me to take up so much space for so little text. And the content doesn't seem to really advance the narrative. Could drop completely, or convert to a callout box embedded in the above text instead. Also, a sinkhole isn't a contaminant; it is a high vulnerable land feature.	Comment noted. RESPEC will remove sinkhole from the list of potential contaminants.
39	4-65	115	Cole Loewen	G	Are the two "Important Bird Area" sites denoted on figure 4-18 (pg 4-72, pdf page 122)?	Asked Cole for clarification.

Comment Number	Page Number	PDF page #	Commenter	Comment Type	Comment	Response
	1-11		Stearns SWCD		County boundaries are not very clear on watershed map	The county boundaries can be darkened slightly to make them easier to see. Please keep in mind, the primary focus for this particular map is the Management District boundaries, so those should still be the most obvious boundary.
	2-2		Stearns SWCD		Why are only the smallest counties listed in watershed stats?	The watershed stats should be updated to include all five counties and the corresponding percentages.
	2-3		Stearns SWCD		Define Advisory Committee-It is defined the same as Steering Committee	This will be updated. Thank you for catching this error.
	2-12		Stearns SWCD		Are the Lakes that Provide Recreational and Tourist Opportunities only the CoL or also others?	Many of the lakes within the SRW provide recreational and tourism opportunities. Since it is not feasible to list all of the lakes and their benefits/uses here, this paragraph was intended to highlight a few.
	3-3		Stearns SWCD		Why are Preliminary resource concerns included in the body of the plan? Could be moved to an Appendix?	Our understanding is that this is a BWSR requirement. We (the Advisory Committee) did discuss moving this to an appendix, but the overall consensus was to leave it within the plan content.
	4-1		Stearns SWCD		Typo, Establishing Goals, 2nd paragraph: "...the Advisory Committee consider a set of clarifying questions..."	Will change so that it reads, "the Advisory Committee considered a set of clarifying...."
	4-4		Stearns SWCD		Extra space in 1_8.6 million acres of wetlands before statehood	Will remove space so that it reads, "approximately 18.6 million acres before statehood..."
	4-8		Stearns SWCD		Consider adding bullet points or some other visual marker for each item (they are hard to distinguish within each section)	Will add bullet points in Strategy column of table on page 4-8.
	4-16		Stearns SWCD		Replace altered hydrology with E.coli in the title	Will update title of table on page 4-16 to read, "Key Strategies to Address E.coli Concern"
	4-18		Stearns SWCD		Missing text at beginning of right column	Will update/add the missing text at the beginning of the right column on page 4-18.
	4-36		Stearns SWCD		Move Land Use section after Groundwater section to stay consistent with order in Table 1-1/3-2	Will move this section.
	4-59		Stearns SWCD		Add a map of the St. Cloud Drinking Water Priority Area A and B	Will add a map showing the referenced Priorities areas A and B.
	5-2		Stearns SWCD		Should mention the need to adjust the timing of the implementation activities not just the activities themselves	We feel that this is implied through the key factors identified in the bullet points.
	5-23		Stearns SWCD		Sauk Lake implementation activities' timeframe is front-loaded to the beginning of the planning timeframe. May not be appropriate/feasible for all activities (especially because there is not a countervailing back-loading elsewhere in the implementation timeframe)	While we agree, the partners were tasked with determining the timeframe for activities within the implementation tables and this is the timeframe that was put in the tables.

Comment Number	Page Number	PDF page #	Commenter	Comment Type	Comment	Response
	5-35		Stearns SWCD		Centre Sauk implementation activities' timeframe is front-loaded to the beginning of the planning timeframe. May not be appropriate/feasible for all activities (especially because there is not a countervailing back-loading elsewhere in the implementation timeframe)	While we agree, the partners were tasked with determining the timeframe for activities within the implementation tables and this is the timeframe that was put in the tables.
	5-35		Stearns SWCD		Missing nutrient management, plans, and feedlot improvements in reach 110 and 130 for E.coli. Draft included E.coli BMPs in CD 44.	The tables in the public review draft match what was in the internal review draft as far as we can tell, including the items you listed here.
	5-46		Stearns SWCD		Grassed waterway lists 40 acres of grassed waterways. Other MDs reference treated acres divided by 10 for actual acres i.e. 40 acres treated=4 acres grassed waterways (That's a lot of grassed waterways)	Will update Grassed Waterway information (bottom row, page 5-46) to read, "Install 4 acres of grassed waterway"
	5-55		Stearns SWCD		GUS Plus implementation activities' timeframe is front-loaded to the beginning of the planning timeframe. May not be appropriate/feasible for all activities (especially because there is not a countervailing back-loading elsewhere in the implementation timeframe)	While we agree, the partners were tasked with determining the timeframe for activities within the implementation tables and this is the timeframe that was put in the tables.
	5-65		Stearns SWCD		No funds tied to steam channel restoration in Section 30 Farming Township	Will add a dollar amount of \$396,000 as shown in the internal draft.
	5-65		Stearns SWCD		Saint Roscoe implementation activities' timeframe is front-loaded to the beginning of the planning timeframe. May not be appropriate/feasible for all activities (especially because there is not a countervailing back-loading elsewhere in the implementation timeframe)	While we agree, the partners were tasked with determining the timeframe for activities within the implementation tables and this is the timeframe that was put in the tables.
	5-66		Stearns SWCD		100 acres of Filter Strips seems very high (others have 2-4 acres)	This is the number your staff identified in the implementation table.
	5-66		Stearns SWCD		Cover Crops and Filter Strips listed twice	Will remove one row of Cover Crops for Backes Lake Reach A350 and one row of Filter Strips for Backes Lake Reach A350.
	5-67		Stearns SWCD		80 acres of Filter Strips seems very high	This is the number your staff identified in the implementation table.
	5-80		Stearns SWCD		Excluded Conservation Crop Rotation from Reach A385	Cover Crops are listed for reach A385. Are you asking for them to be removed?
	5-100		Stearns SWCD		Was a "0" missed? Was it supposed to be 1000 acres for Conservation Crop Rotation and 500 acres for Cover Crops?	The information in the implementation tables in the public comment draft was assumed to be correct as it matches what staff submitted in the draft implementation tables.
	5-146		Stearns SWCD		Grassed waterway lists 40 acres of grassed waterways. Other MDs reference treated acres divided by 10 for actual acres i.e. 40 acres treated=4 acres grassed waterways (That's a lot of grassed waterways)	There is no 5-146. We are assuming this was supposed to refer to page 5-46, to which we provided a response above.
	6-1		Stearns SWCD		Are there any watershed-wide on-the-ground implementation activities? For instance, municipal programs (Turf to Native, raingardens), greenbelts along waterways, etc.?	See chapter 6 titled, "Watershed-Wide Programs Implementation Schedule". Regarding landowner practices, these items were removed because it was determined that listing them as watershed wide did not meet BWSR's targeted and prioritized requirement for the plan.

Comment Number	Page Number	PDF page #	Commenter	Comment Type	Comment	Response
			Stearns SWCD		Include opportunity for specialized water quality monitoring, in example, North Browns Lake area of concern. Observed water quality improvements from implementation of conservation practices could be used in outreach and education activities with landowners.	The SRWD plans to continue taking on specialized water quality monitoring as appropriate. The monitoring efforts that we have information on at this point in time are listed in the implementation table in chapter 6. The SRWD's long term monitoring program will capture any sizable improvements to water quality from the implementation of conservation practices. It is not feasible to monitor each individual conservation practice for improvements.
			Stearns SWCD		In the section with implementation tables include a map or better description where the identified projects (each line) are located in the management district.	This will be addressed by creating two separate maps, tease out impairment/resources concerns then another with priority areas for implementation. Make sure for implementation maps that HSPF subwatersheds are hatched for everything that's called out in imp. Table. Use to make more clear hierarchy of "priority" units. i.e. priority endpoints/priority resources/priority implementation.
	8-267		Sarah		The plan goes from page 8-10, to 8-267 to 8-12. Please change page number 8-267 to page 8-11. Also missing a page 8-7, goes from 8-6 to 8-8, please fix. Thank you!	RESPEC will make this change.

December 21st, 2020

Cole Loewen
Stearns County Water Planner
Environmental Services Department
3301 County Road 138
Waite Park, MN 56387

RE: Response to Public Comment on Sauk River Comprehensive Watershed Management Plan

Dear Mr. Cole Loewen –

Thank you for taking the time to reply to our request for public comment on the Sauk River Comprehensive Watershed Management Plan. The support and collaboration of the Stearns Environmental Services Department is a valuable asset to our partnership! Please see the attached spreadsheet to view the specific responses to each comment you provided.

We would also like to thank you for your active participation, insight, and knowledge throughout the development of our plan.

Our partnership is truly looking forward to collaborating with the Stearns Environmental Services Department as we move into the implementation phase of our plan.

Kind Regards –

Sarah Boser on behalf of the Sauk River One Watershed One Plan Policy Committee and Partnership Plan Coordinator, Sauk River One Watershed One Plan/Comprehensive Watershed Management Plan

CC: Chelle Benson, Director of Environmental Services
Sauk River One Watershed One Plan Policy Committee
Jason Weinerman, Board of Water and Soil Resources
Brad Wozney, Board of Water and Soil Resources

December 21st, 2020

Dennis Fuchs
Stearns SWCD Administrator
Marketplace Mall
110 2nd Street South
Suite 128
Waite Park, MN 56387

RE: Response to Public Comment on Sauk River Comprehensive Watershed Management Plan

Dear Mr. Dennis Fuchs –

Thank you for taking the time to reply to our request for public comment on the Sauk River Comprehensive Watershed Management Plan. The support and collaboration of the Stearns SWCD is a valuable asset to our partnership! Please see the attached spreadsheet to view the specific responses to each comment you provided.

We would also like to thank you for your active participation, insight, and knowledge throughout the development of our plan.

Our partnership is truly looking forward to collaborating with the Stearns SWCD as we move into the implementation phase of our plan.

Kind Regards –

Sarah Boser on behalf of the Sauk River One Watershed One Plan Policy Committee and Partnership Plan Coordinator, Sauk River One Watershed One Plan/Comprehensive Watershed Management Plan

CC: Kyle Weimann, Grants & Administration Coordinator
Nathan Hylla, Project Management Supervisor
Sauk River One Watershed One Plan Policy Committee
Jason Weinerman, Board of Water and Soil Resources
Brad Wozney, Board of Water and Soil Resources

Comment Number	Page	Comment	Recommended Action	Formal Response
GENERAL AND PLAN ORGANIZATION				
1	Table of Contents	The chapter titles are inaccurate.	Please revisit the chapter titles in the Table of Contents and within each chapter of the plan and rename as necessary.	Thank you for noting this inconsistency, we will make this change.
2	Executive Summary	A consolidated list of all priority resources are missing from the plan. There are different priorities identified throughout the plan and within each management district that make it difficult to see how implementation will be prioritized either geographically or by issue.	List all priority resources in rank order as appropriate in the Executive Summary or other chapter to provide a clear framework for understanding how the partnership will work through priorities during implementation.	Due to the complex prioritization structure used by the partnership, text will be added to clarify the framework and how it will be used to help the partners prioritize during implementation as we feel this information will be more beneficial than a bulleted list.
3	General	All maps appear to print out on 8.5x11 paper, making the font in legends extremely small.	Ensure all appropriate maps are set to print on 11x17 paper as agreed to by the Advisory Committee.	Settings will be adjusted to have maps print out on 11x17 paper as agreed to by the Advisory Committee.
4	2-3	There is reference to a Steering Committee, which was not used throughout the planning process.	Clarify the Steering Committee was only used during the very early stages of planning.	We will remove, "and providing guidance and direction to the Policy and Advisory Committees throughout the development of the plan".
PRIORITIZATION				
5	2-3	The bullet points for steering committee and advisory committee within the governance structure graphic contains the same text.	Change the text for the advisory committee to better reflect the accurate description of the advisory committee.	We will update the description of the Advisory Committee to accurately reflect the Advisory Committee's role.
6	3-6	On page 3-6 the plan identifies altered hydrology and water quality as the most important issues. The issues related to groundwater, land use, and habitat could be implied as issues of lesser priority.	Seek clarity with the planning partnership that the information provided on these issues are lesser priorities and will be addressed once the two top priority issues (altered hydrology and water quality) have been exhausted, at least in relation to BWSR funding and programming.	We will add text to clarify that the priorities are not intended to be entirely ordinal in terms of first to last, but rather providing partners with a prioritization process for selecting which project to do when faced with a decision. Part of this clarification will include a paragraph in the executive summary clarifying the relationship between the narrative and the implementation tables, how the prioritization framework will be used to make decisions based on targeting and prioritization, and also to clarify that our partnership has created a truly comprehensive plan for water management within the Sauk River Watershed.
7	4-16	The header on the page is not correct	Identify this box as Key Strategies for E. Coli Impaired Streams	We will change the header on page 4-16 to read, "Key Strategies to Address E.coli Impaired Streams".
8	4-18	The second column must have words that are cut off - it starts in mid-sentence.	-	We will add, "The SRW contains over 250 basins that" to the beginning of the sentence on the top of page 4-18.

Comment Number	Page	Comment	Recommended Action	Formal Response
9	4-62	The plan states that priority areas cannot be determined until a risk assessment is completed. Has the partnership considered portions of Priority Area A of the St Cloud Source Water Protection Plan as the priority area for this management district until further inventory and assessment is complete?	Consider declaring a priority area for this priority issue in the interim until the risk assessment is complete. Listing none could hamstring the partnership for access to Watershed Based Implementation Funding.	After in-depth discussion with the Advisory Committee and City of Saint Cloud staff regarding this comment, clarification language will be added to identify the connection this information has to actions called out in chapter 5, and to clarify that the risk assessment will be used to identify focus areas within Priority Area A.
10	5-7 and 5-8	Prioritization for the altered hydrology issue is somewhat confusing. Page 5-8 states the priority area is JD2, however there are implementation actions proposed in subwatersheds A13, A15, and Faille Lake.	Clearly list the priority resources and ensure the implementation actions are within priority areas in all management districts for the altered hydrology issue.	We will utilize the maps we develop based on discussions in the Advisory Committee meeting, along with adding additional language about prioritizing additional areas as needed to help clarify this information.
GOALS				
11	4-4	-	If possible, please note when the DNR flow analysis is intended to be completed to more accurately measure progress toward the altered hydrology goals. Can it be completed as part of the 5-year plan evaluation?	This information was requested from DNR via email on December 29th, 2020. They anticipate the analysis will be completed at the end of the fiscal year. We will incorporate this information as requested.
12	4-4	-	Please describe in the plan how the storage goals were derived for the management districts.	We will add this information.
13	4-4	-	Define "storage" in the plan so partners can consistently track the outcomes/hydrologic benefits of installed BMPs. Does "storage" include temporary storage for purposes of addressing altered hydrology? How would outcomes (ac-ft) for controlled tile drainage or alternative tile intake practices be estimated, for example?	We will clarify/add this information.
14	4-4	-	Do the partners intend to track storage benefits from land management practices that increase soil organic matter? If so, this should be described in this plan section.	We are not aware of a good measurement/calculation tool for storage benefits from land management practices that increase soil organic matter so at this time we will not be tracking this information. The partners would be open to tracking this information in the future if a reliable method becomes available.
15	4-13 and 4-15	Does the partnership believe it is realistic to achieve the E.coli reduction goals for all proposed priority resources in 10 years given the average cost of livestock waste management practices?	Revisit the priority resources and implementation tables as necessary.	After discussing this during the Advisory Committee meeting, the partners have decided not to take the recommended action. We have already decreased our E.coli goals (during the internal review), and would like to have ambitious goals in our plan.

Comment Number	Page	Comment	Recommended Action	Formal Response
16	4-20	The table on the bottom of the page is somewhat confusing. Is it necessary to list the TP and TSS "annual average achieved" (rows 2 and 4)?	Provide additional clarity to or modify the table for plain language purposes.	RESPEC will determine if it is easy to back-calculate these amounts using the reduction values. If it is, we will remove the annual average achieved values. If it is not, we will clarify what this is.
17	4-20, 4-21, 4-22	There is confusion about the different priority level of the endpoints/river reaches. On page 4-20, there are three priority endpoints listed: A370, A150, and A230. On page 4-21 at the end of the paragraph in the second column, there are four priority four endpoints listed (A370, A150, A230, and A10). On 4-22, all eight endpoints are listed but no indication of break points. This reveals some inconsistencies. In addition, it appears there is implementation scheduled for the bottom four ranked endpoints in the first few years of the plan, calling into question the prioritization and targeting scheme.	Clearly identify which reaches are priorities for implementation of impaired water activities, particularly for plan years 1-5. Standardize this discussion of prioritization throughout this section of the document. Consider a schedule for addressing these priority endpoints/reaches, i.e. early, middle, late years of plan implementation.	After in-depth discussion with the Advisory Committee, the following changes will be made: Add breakpoints in table to signify the priority endpoints vs other. Need to review and reconcile endpoint vs management area prioritization and why actions are included for areas downstream of the priority endpoints. Reference what Cole has said about how he plans to use information to prioritize practices. This will come down to improving dialogue throughout plan document to make clear the hierarchy of prioritization and how that translates to implementation actions called out in the tables. Either include dialogue similar to what Cole explained in meeting laying out the decision process for selecting a project or turning this process into a graphic.
18	4-27	For clarity, does the partnership intends to work through priority one to implementation exhaustion before moving onto Tier four and tier five?	Highlight that implementation will follow the prioritization tiers.	We will provide clarification language that explains that the focus will be to address actions for the high priority/tier one lakes prior to moving on to tier 4, etc.
19	4-27 and 4-28	Goals for Impaired and High Quality Lakes are listed in both chapters 4 and 5.	Since Chapter 4 lists goals, we advise consolidating goals by adding a phosphorus reduction goal column in Tables 4-9 and 4-10, as well as in the "high quality lakes" section.	We will make this change.
20	4-33	-	On the call out box on page 4-33, identify the salmon box as the tier one lakes and the green boxes as the tier 2 lakes.	We will make this change.
21	4-33	Carnelian Lake appears to be both increasing and decreasing transparency trends	Remove Carnelian Lake from the improving transparency box.	We will make this change.
22	4-39	Given the amount of non-public drainage systems/waters, does the partnership believe it is adequate to only achieve 100% compliance with the Buffer Law?	Consider a buffer goal for non-public waters in high priority subwatersheds. This may be counted as a multiple benefit for cattle exclusion type BMPs.	The partners do not have the means to accurately track this at this point, and therefore no additional goal will be added for this at this time.
23	4-44	-	Measure/Indicator #2 - Please clarify the priority areas or specific wells that pertains to this goal and indicator.	We will clarify/add this information.

Comment Number	Page	Comment	Recommended Action	Formal Response
24	4-68	In the Issue box, Measure/Indicators #1 and 2 address permanently protected habitat. However the background information stated that approximately 15,000 acres of CRP could expire. Thousands of acres coming out of CRP could have a cascading affect downstream.	Consider a goal and associated actions to maintain CRP acres in the watershed.	At this time, the partners are not going to add a goal on this topic, but will add dialogue to the call out that CRP could expire and that will need to be addressed as it occurs to maintain the existing level of protection.
25	Chapter 5	Many management districts contain a table listing flow regimes in relation to E.coli. What do the percentages mean?	Describe in the plan the relationship between the 10-year E.coli goals from Chapter 4 ("Reduce acute exceedances..." and "Reduce chronic exceedances..."), Table 4-5, and the E.coli tables in Chapter 5. Consider captions for the tables in Chapter 5.	We will clarify/add this information.
26	5-63, 5-87	Does the partnership feel it is necessary to list both the cumulative storage goal in addition to the management district-specific storage goal? Also, please note that the cumulative storage goals for the Chain of Lakes Management District (p.5-73) and Cold Spring Management District are the same.	If keeping the cumulative goal, the language in each callout box should be clarified that it pertains to upstream storage as stated in the St Roscoe callout box.	The partners have decided to keep the cumulative storage goal and update the dialogue to match the St. Roscoe callout box.
TARGETING				
27	General	The PTMApp model has been run for a couple of the minor subwatersheds in the Sauk River watershed. How will those outputs be utilized during implementation?	Provide an explanation on how the PTMApp outputs will be used in conjunction with HSPF-SAM and other targeting approaches described in the Plan, and add relevant language to p.5-1 to 5-3.	We will add dialogue on pages 5-2 to 5-3 that indicate that HSPF-SAM identified the reaches that the highest priority and that, where available, PTMApp and other tools will be used to target specific locations for project development.

Comment Number	Page	Comment	Recommended Action	Formal Response
28	p.5-1 to 5-3	<p>BWSR is pleased to see that the plan targets BMPs to the 12HUC subwatershed level. However, the plan falls short of describing how the partnership WILL target to the field/parcel scale. We understand there is a desire to complete hydro-conditioning for the watershed but it is unclear what will be done with that information once acquired. Also the plan needs to more clearly describe an approach to targeting to be used by all partners prior to acquiring a hydro-conditioned DEM. How will projects be identified for priority lakes, for urban stormwater, for nonstructural practices such as cover crops, or BMPs that may be a shortcoming for HSPF-SAM? Bottom line, how will BWSR be assured that the projects proposed for Watershed Based Implementation Funds will be targeted?</p>	<p>Please provide more process detail to the statement on p.5-2, "Until these analyses are completed, the Implementation Team will use various GIS analyses, data generated from previously completed studies, and practitioner knowledge as well as BMP requirements to target practices." Could this approach include Terrain Analysis and Stream Power Index? Consider separate section(s) or callouts in either Chapter 4 or 5 to outline targeting approaches so they do not get buried in the text. Listing all proposed targeting approaches in one section of Chapter 5 would be advantageous.</p>	<p>No additional information will be added. We have targeted down to HUC-12 scale, and even smaller by using HSPF reaches, and have stated that additional tools will be used to target at field-scale when made available. The partners are comfortable with the tools we have and the existing prioritization/targeting work we have done and are confident that we will be able to target and prioritize at the scale needed during implementation.</p>
29	4-7	<p>There is a large number of priority resources throughout the watershed for altered hydrology. Targeting also involves deciding which priority resources and issues you will address first, second, third, and so on. The implementation schedule should follow suit by providing an order of events within the 10-year plan period to guide management actions. This will be a recurring comment for various priority resource categories. How will the partnership know where to work in the first 5 years of plan implementation to address resources in greater need of this work or to make the biggest impact at the USGS gaging station, which is the ultimate measuring point?</p>	<p>Consider listing priority resources that will be addressed in the early/middle/late years of plan implementation to help with biennial work planning.</p>	<p>The implementation tables guide the timeframe for specific implementation activities. This information, and the edits made in response to comment 17 above, are sufficient for the partners to be comfortable moving forward.</p>

Comment Number	Page	Comment	Recommended Action	Formal Response
30	4-14	We commend the partnership for listing the top priority resource for E.coli impairment, Mill Creek. However it may be difficult for partners to know when to address the other priority resources for E.coli.	Consider a schedule indicating when the other priority resources will be addressed, i.e. early/middle/late years of plan implementation. This schedule could be based on a number of factors such as severity of the problem, numbers and sizes of feedlots, etc.	The partners feel that we have sufficient information in the tables and the narrative to clearly identify our priorities and develop our work plans. No changes will be made. We would like to note that while we are not making changes, we do understand that our plan was written to be comprehensive of the work we are doing within the Sauk River Watershed, and that we understand that not all of this work will be funded through watershed based funding from BWSR. We will use the prioritization framework within the plan to make decisions based on watershed based funding.
31	4-14	-	Clarify that the targeting approach to be used for livestock management practices is "within 500' of a tributary". Also, how is "tributary" defined?	We will make this clarification.
32	4-26	-	Source and fate load maps are included for priority endpoint 370, but missing for the other priority endpoints. Consider adding associated fate load maps for the other 2-3 priority endpoints.	If these maps are available, we will add them to the plan. Depending on formatting needs, they may be added to an appendix.
33	4-44, 4-52	How does the partnership know when to work where for the groundwater quantity and quality focus areas?	Consider listing the priority resources that will be addressed in the early/middle/late years of plan implementation to help with biennial work planning.	Due to the sensitive nature and importance of groundwater, the partners have opted to leave the timeframes open. We intend to have on-going conversations with the high risk groundwater area staff/contacts and work with them as opportunities and needs arise, preferably on an ongoing basis.
34	4-68	The Nature Conservancy's Multiple Benefits Analysis is proposed to be used to target habitat projects. Do all partners know how to use the tool?	Generally describe the protocol and consider including output maps from priority areas.	We will incorporate the text changes provided by The Nature Conservancy to better describe the tool and its purpose.
35	5-6 and 5-7	Lake Osakis is identified as the priority within this watershed. However, it is identified as the fourth on the impaired waters priority (reach 10). This creates a little confusion between understanding watershed wide priorities and management district priorities. This may result in the partnership looking at management unit priorities only rather than watershed priorities when it comes to proposing implementation actions.	Refer to comment #3 that looks at providing a tabular or narrative format for explicit partnership priorities and how the partnership will work through the implementation process.	As explained in our response to Comment #2, text will be added to clarify the watershed wide vs management district priority framework and how it will be used to help the partners prioritize during implementation.
IMPLEMENTATION AND BUDGET				

Comment Number	Page	Comment	Recommended Action	Formal Response
36	3-9, 3-11	Actions in Chapter 3, such as "Modeling climate change impacts...using Climate Change Module in HSPF-SAM..." appear missing in the corresponding implementation table.	Ensure all actions listed in Chapter 3 are reflected with estimated cost and completion timeline in an implementation table.	We will add this line into Table 6-1, Watershed Wide Data, Monitoring and Planning Implementation Schedule.
37	Chapter 5	It is unclear how the implementation strategies/actions and the associated costs are reflected in the implementation tables for certain priority resources such as Smith Lake, Little Sauk Creek, McCormick Lake, Round Prairie Creek, to name a few.	-	Thank you for noting this, we will work on providing clarification.
38	p.4-4 to 4-7	Numerous streambank stabilization projects are proposed under the altered hydrology issue, which do not seem to directly address the proposed storage goals or the watershed discharge: precipitation relationship.	Describe in Chapter 4 how streambank projects relate to or make progress toward the altered hydrology goals.	We will add information about geomorphology and creating floodplain to assist with storage goals through streambank stabilizations/stream restorations.
39	4-22, 4-27, 4-28	Is it clear to all partners how to use Tables 4-8, 4-9, and 4-10 for developing biennial workplans? Is it realistic to list lakes in this 10-year plan as priority with a rank of 5?	-	Yes, it is clear to the partners how we will use these tables for developing the biennial workplan. We do think that it is realistic to list the on-channel impaired lakes with a corresponding priority stream of 5 in this 10 year plan.
40	4-39	-	Measure/Indicator #1 Goal E - Who will track these decisions and how? Will this involve all cities in the watershed? Are all partners clear about what constitutes a "sustainable land use practice" in decision-making?	At this time, the partners intend to use this metric objectively. As we move through the implementation process, partners may develop a more concrete tracking method.
41	5-79	Stormwater management practices are mentioned in the narrative (p.5-73) as actions needed, yet they are not reflected in the implementation table.	Amend the implementation table to reflect these priority actions.	Stormwater management practices are consistently listed under "Excess Nutrients and Sediment" throughout the implementation tables. No changes will be made.
42	8-5	-	Under the Plan Amendments section, there is nothing compelling the partnership to follow cited MN Rule 8410.0140, which applies to metro watershed management plans. This rule reference can be stricken.	We will remove the cited rule from the text.
43	8-6	-	We recommend adding in the estimated 20 percent costs for project development and technical assistance into the total cost of implementation, rather than including it as a footnote. We understand it is an estimate.	We will increase the estimates by 20% to account for the project development and technical assistance and remove the footnote that currently notes this.

Comment Number	Page	Comment	Recommended Action	Formal Response
44	8-6	1W1P guidance states "The plan should contain an estimate of locally generated funds." Version 2.0 of plan content requirements states "clearly outline the participants' local commitments to implementing the plan." While the plan does a good job of describing potential local funding sources, it does not estimate how much locally generated funds will be committed to funding plan implementation.	Add the aggregated local funding commitment that all partners intend to bring to the plan for implementation. Refer to the example table below as an example.	It is the intent of the partners to shift the average annual current expenditures to the anticipated local contribution, as each agency will be using this plan as their primary guidance for the work they are doing. We will update the language in the plan to reflect this.

Bois de Sioux – Mustinka
Comprehensive Watershed Management Plan

Page | 5-14

Table 5-4. Summarized Funding Level 1 (existing dollars) for the Bois de Sioux - Mustinka Watersheds CWMP

Implementation Programs	Local		State		Federal		All Sources	
	Annual	Total	Annual	Total	Annual	Total	Annual	Total
Project and Practices- New Projects Program	\$249,948	\$2,499,482	\$297,219	\$2,972,190	\$521,723	\$5,217,228	\$1,068,890	\$10,688,900
Projects and Practices- Land Contracting Program	-	-	-	-	\$9,620,010	\$96,200,100	\$9,620,010	\$96,200,100
Operations and Maintenance	\$368,430	\$3,684,301	\$101,570	\$1,015,699	-	-	\$470,000	\$4,700,000
Capital Improvement Projects	\$870,000	\$8,700,000	-	-	-	-	\$870,000	\$8,700,000
Data Collection	\$26,633	\$266,332	\$3,867	\$38,668	-	-	\$30,500	\$305,000
Education and Outreach	\$158,103	\$1,581,033	\$216,897	\$2,168,967	-	-	\$375,000	\$3,750,000
Regulatory	\$399,356	\$3,993,564	\$185,644	\$1,856,436	-	-	\$585,000	\$5,850,000
Total	\$2,072,471	\$20,724,711	\$805,196	\$8,051,961	\$10,141,733	\$101,417,328	\$13,019,400	\$130,194,000

December 28th, 2020

Jason Weinerman, Board Conservationist
Brad Wozney, Clean Water Specialist
Board of Water and Soil Resources, BWSR
St. Cloud Office
110 Second Street South
Suite 307
Waite Park, MN 56387

RE: Response to Public Comment on Sauk River Comprehensive Watershed Management Plan

Dear Mr. Weinerman and Mr. Wozney –

Thank you for taking the time to reply to our request for public comment on the Sauk River Comprehensive Watershed Management Plan. The support of the Board of Water and Soil Resources is a valuable asset to our partnership!

The partners have reviewed the comments you provided, and to ensure that we responded to each comment, we have provided our formal responses in the Excel spreadsheet you submitted. The partners had in depth conversation about the comments you provided, and appreciate the time and energy you put into providing them for our consideration.

We would also like to thank you both for your active participation, insight, and knowledge throughout the development of our plan.

Our partnership is truly looking forward to collaborating with BWSR as we move into the implementation phase of our plan.

Kind Regards –

Sarah Boser on behalf of the Sauk River One Watershed One Plan Policy Committee and Partnership Plan Coordinator, Sauk River One Watershed One Plan/Comprehensive Watershed Management Plan

CC:

Sauk River One Watershed One Plan Policy Committee
Jason Weinerman, Board of Water and Soil Resources
Brad Wozney, Board of Water and Soil Resources