

Blue Earth River Comprehensive Watershed Management Plan

Formal Review Comments and Resolutions: July 28-September 26

#	Commenter	Section	Page	Paragraph	Comment	Editorial	Material	Note	Change Needed	Resolution
1	JSE	General			<p>Per the grant agreement, "11.1. Publicity. Any publicity regarding the subject matter of this Grant Agreement must identify the Board as the sponsoring agency. For purposes of this provision, publicity includes notices, informational pamphlets, press releases, research, reports, signs, and similar public notices prepared by or for the Grantee individually or jointly with others, or any subcontractors, with respect to the Program, publications, or services provided resulting from this Grant Agreement." And 18. Signage.</p> <p>It is the responsibility of the Grantee to comply with requirements for project signage as provided in Minnesota Laws 2010, Chapter 361, Article 3, Section 5(b) for Clean Water Fund projects.</p> <p>Therefore, I'm suggesting the BWSR logo be added to the "acknowledgements" page or a "funded by" heading (similar to "local planning" "created in") and the CWF logo stays on the front.</p>	X			Y	BWSR logo added to acknowledgements
2	JSE	Executive Summary			<p>REMINDER - The Executive Summary is one of the sections pulled and provided to the BWSR Board during South Committee Review as well as when sent to the full board. Be sure you are happy with how it is written, which maps are included, etc. Be sure that any changes/edits made elsewhere are also made in this section. Double-check that you are happy with the level your information meets plan content requirements. If something "just meets PCR" then you may want to add a bit more detail. (PCR v 3.0 . . . page 5)</p>	X			N	Updates made to ES per changes in this comment table
3	JSE	LWRN	17 (2-3)	1	Since we are well into 2025, suggest double-checking the feedlot numbers in case they have changed. (second sentence)	X			Y	Numbers checked and updated
4	JSE	LWRN	17 (2-3)	Figure 2-2	"developed, 5.6%" is missing it's line to the applicable pie chart section	X			Y	Line added to pie chart
5	JSE	LWRN	17 (2-3)	2	<p>Talk about MAWQCP at the end of the paragraph, but I immediately thought, "why?" What's this got to do with the watershed? If you want to keep this, then put in information about the number of farms that are ag certified and how that relates to the subject matter.</p> <p>Herman will have these</p>	X			Y	Removed MAWQCP text as recommended
6	JSE	LWRN	19	1	"six" should be spelled out and not a number 6 if we are using common writing rules	X			Y	Spelled out number
7	JSE	Executive Summary	21 (2-7)	Stormwater/D rainage Probably paragraph 2	Suggest adding information about the number of miles of open ditch and county tile in the watershed. Even if it has to be extrapolated from county records. There are a few plan content requirements and/or state statute requirements that would be better met if this information were to be included.	X			Y	Added language: There are an estimated 360 miles of public open ditches and 1,400 miles of public subsurface tile drainage in the watershed.
8	JSE	LWRN	24 (2-10)	1	six should be spelled out and not a number 6 if we are using common writing rules	X			Y	Spelled out number
9	JSE	LWRN	28 (2-14)	1	It is not just our precipitation levels that lead to less irrigation in the watershed. Prevalent soil types also plays a role. You do have irrigation and it is in the pockets of areas with sandier soils.\	X			Y	Added detail on irrigation occurring with sandy soils
10	JSE	LWRN	28 (2-14)	2	Suggest using BERW or Blue Earth River Watershed in sentence 2.	X			Y	Replaced county names with BERW
11	JSE	Priority Issues	38 (3-6)	Table 3-2	AIS. Are we wanting to only talk about AIS outcompeting native VEGETATION or do you want this issue to encompass native SPECIES as a whole?	X			Y	Changed to "species" to be more inclusive

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12	JSE	Measurable Goals			<p>The first three goals do a decent job of connecting the short-term goal to the desired future condition. The rest do not make that connection well – and for all but the first three goals, the measurable goals are counts of actions. I understand why this is the case and it's not wrong. But looking at the desired future conditions, there's no way of knowing what magnitude of effort is needed to get to the desired future condition for those goals. I know BWSR doesn't require the desired future condition, and I'm glad you included it, but creating a better connection so readers understand the level of effort required to get to the desired future condition and the progress that implementing THIS plan will make towards that desired future condition would be really helpful to the reader. It would also help communicate the watershed needs vs what local governments can do with available resources for this watershed.</p> <p>I wonder if there was any discussion about this during planning? I also wonder if, for any of the widget-based goals, you have baseline data or inventories available (e.g., # of existing connectivity barriers, or unsealed wells) or again, some sense of the existing condition (e.g. how many waters have AIS infestations?).</p>	X			N	<p>Desired Future Conditions are not always an extension of the short-term goal, and more quantifiable desired future conditions could be reassessed in future plan amendments/renewals if desired.</p> <p>Baseline condition discussed in the description of each goal where data is available, number of lakes with AIS not listed as it can change.</p>
13	JSE	Measurable Goals			General Question/suggestion - There is a list of 8 High Priority Issues and a list of 7 medium priority issues. Having a visual way of quickly identifying if a goal is for a high priority issue or medium priority issue could be impactful. To be clear, the tables at the end also do this. I was envisioning a "badge"	X			Y	H badge added to replace water droplet for high priority issues, M badge added for medium priority issues
14	JSE	Measurable Goals	44 (4-3)	SBs	What tool was used to calculate the carbon storage number? Could be added here or in appendix	X			N	COMET-Planner was used to estimate carbon benefits. Details referenced in Appendix D on page 4-1
15	JSE	Measurable Goals	46 (4-5)		Was the Nutrient Reduction Strategy used to assist in setting the 10-year nutrient goals?	X			N	Local targets are used instead, such as specific lake targets, TMDL targets, or WRAPS milestone targets.
16	JSE	Measurable Goals	47 (4-6)	Desired Future Conditions	The Nutrient Reduction Strategy supplies some goals for the Blue Earth that could be added to the Desired Future Conditions or take the place of what is currently drafted. (TN 2721 / 45.9%.....TP 50.8 MT / 28.7%)	X			Y	Add text about the Nutrient Reduction Strategy in the narrative.
17	JSE	Measurable Goals	52	Figure 4-4	The priority map is just for the lake shore projects. How/where will you be targeting the streambank/ravine projects?	X			N	The Partnership will be prioritizing smaller scale projects / efforts that protect infrastructure and accrue multiple benefits. Larger efforts are included in the CIP table. For this reason, streams will not be prioritized as part of this goal .
18	JSE	Measurable Goals	53	ST	May want it to say, "reduced streambank/ <u>shoreline</u> erosion" instead of just streambank.	X			Y	Added shoreline erosion to stormwater benefits
19	JSE	Measurable Goals	55	ST Goal	"incentivize set-backs" BWSR isn't going to allow our definition of incentives to be used with WBIF money. However, I know Federal programs still use that term. A suggestion only, change the language to something like, "Promote and implement set-backs (e.g. CRP) near bacteria sensitive waterbodies."	X			Y	Update to "Promote and implement set-backs (e.g. CRP) near bacteria sensitive waterbodies. "
20	JSE	Measurable Goals	57	SB box	Is there a type or word missing from the recreation bullet?	X			Y	No, spacing pushes recreation onto the following line. Reworded as 'protection of aquatic recreation' for clarity
21	JSE	Measurable Goals	57	Description	Consider including information about how many lakes have infested waters and for which AIS. Could put in a chart/table to replace the picture of curly leaf....although I do like the picture. Another option is to put it in the appendix and reference it. Or put an insert into the map with a list (if not too long).	X			N	Per DNR map, no lakes in the watershed are on the infested water inventory.
22	JSE	Measurable Goals	59	Description	Numbers. Common writing rules say to spell out numbers nine and less. 8 lake outlet....8 waterfalls...5 perched culverts...4	X			Y	Numbers spelled out
23	JSE	Measurable Goals	60	Figure 4-8	I only see four (4) perched culvert green circles. Is there supposed to be five (5)?	X			N	DNR Characterization Report says 5 perched culverts, GIS data shows 4. The latest dataset will be used during implementation
24	JSE	Measurable Goals	63	Description - paragraph 1	I think one more sentence is needed. Is 4.9" of estimated recharge rate high (which would be concerning as the last sentence says, average, low (which would also be concerning)?	X			Y	This is standard for that region of the state. Intent of the the text is altered hydrology and land use changes can / have reduced recharge, making groundwater supply protection important. Will remove sentence on high recharge rates increasing likelihood of contamination.

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25	JSE	Measurable Goals	65	Description - paragraph 1	Should or could it be "...presently in production". The current language reads as if we're promoting taking highly productive land out of production and I don't think that is necessarily the case.	X			Y	Rephrased as suggested.
26	JSE	Targeted Implementation			General Question/suggestion - There is a list of 8 High Priority Issues and a list of 7 medium priority issues. Having a visual way of quickly identifying if an action is targeting a high priority issue or medium priority issue could be impactful. More importantly, could be helpful in targeting where to work and implement. Could be shown by bolded font, different colored font, an asterisk with a footer note, etc.	X			Y	High priority goals in pink, Medium in green text to align with colors in Tables 4-1 and 4-2.
27	JSE	Targeted Implementation	74		Question. Does this mean that the partnership is going to take your annual partnership budget and divide it up based on these percentages.....and that is how targeting is going to be done? Then on top of that, use the individual issues/goals map to even more fine-tune the targeting? That is how your plan reads.	X			Y	Updated numbers in the pie chart. Rephrased first sentence to say actions are distributed amongst planning regions according to focus areas shown for each goal in Section 4.
28	JSE	Targeted Implementation		lots of places	Wetland Restoration.....not sure what you want to do with the word "incentivize" per my previous comment from the goals section.	X			Y	The term "incentivize" kept based on local implementation actions. Goal increased to 500 acres, with cost remaining unchanged.
29	JSE	Targeted Implementation	starting on 77 (5-8)	WW-1 10-year output	What/how is the "acres" number getting generated? Could/should that column be better explain in the narrative ahead of the tables?	X			N	See page 5-6- 'outputs for ag BMPs and soil health practices are determined by PTMApp'.
30	JSE	Targeted Implementation	77	WW-11	None of the goals is bolded to signify direct progress	X			Y	Bolded wetland and altered hydrology goals
31	JSE	Targeted Implementation	78	PPE-2	None of the goals is bolded to signify direct progress being made. Was that done on purpose or accidentally forgotten?	X			N	This is intentional, not all actions directly address goals but rather support them. For PPE-2, holding outreach events is not a goal metric.
32	JSE	Targeted Implementation	78	PPE-3	None of the goals is bolded to signify direct progress being made. Was that done on purpose or accidentally forgotten?	X			N	This is intentional, not all actions directly address goals but rather support them.
33	JSE	Targeted Implementation	78	PPE-4	None of the goals is bolded to signify direct progress being made. Was that done on purpose or accidentally forgotten?	X			N	This is intentional, not all actions directly address goals but rather support them.
34	JSE	Targeted Implementation	78	PPE-5	None of the goals is bolded to signify direct progress being made. Was that done on purpose or accidentally forgotten?	X			N	This is intentional, not all actions directly address goals but rather support them.
35	JSE	Targeted Implementation	78	PPE-6	None of the goals is bolded to signify direct progress being made. Was that done on purpose or accidentally forgotten?	X			N	This is intentional, not all actions directly address goals but rather support them.
36	JSE	Targeted Implementation	78	PPE-8	None of the goals is bolded to signify direct progress being made. Was that done on purpose or accidentally forgotten?	X			N	This is intentional, not all actions directly address goals but rather support them.
37	JSE	Targeted Implementation	78	PPE-9	None of the goals is bolded to signify direct progress being made. Was that done on purpose or accidentally forgotten?	X			N	This is intentional, not all actions directly address goals but rather support them.
38	JSE	Targeted Implementation	78	PPE-10	None of the goals is bolded to signify direct progress being made. Was that done on purpose or accidentally forgotten?	X			N	This is intentional, not all actions directly address goals but rather support them.
39	JSE	Targeted Implementation	78	PPE-11	None of the goals is bolded to signify direct progress being made. Was that done on purpose or accidentally forgotten?	X			N	This is intentional, not all actions directly address goals but rather support them.
40	JSE	Targeted Implementation	78	PPE-12	None of the goals is bolded to signify direct progress being made. Was that done on purpose or accidentally forgotten?	X			N	This is intentional, not all actions directly address goals but rather support them.
41	JSE	Targeted Implementation	79	RDG-1	None of the goals is bolded to signify direct progress being made. Was that done on purpose or accidentally forgotten?	X			N	This is intentional, not all actions directly address goals but rather support them.
42	JSE	Targeted Implementation	79	RDG-2	None of the goals is bolded to signify direct progress being made. Was that done on purpose or accidentally forgotten?	X			N	This is intentional, not all actions directly address goals but rather support them.

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43	JSE	Targeted Implementation	79	RDG-3	None of the goals is bolded to signify direct progress being made. Was that done on purpose or accidentally forgotten?	X			N	This is intentional, not all actions directly address goals but rather support them.
44	JSE	Targeted Implementation	79	RDG-4	None of the goals is bolded to signify direct progress being made. Was that done on purpose or accidentally forgotten?	X			N	This is intentional, not all actions directly address goals but rather support them.
45	JSE	Targeted Implementation	79	RDG-5	None of the goals is bolded to signify direct progress being made. Was that done on purpose or accidentally forgotten?	X			N	This is intentional, not all actions directly address goals but rather support them.
46	JSE	Targeted Implementation	79	RDG-6	None of the goals is bolded to signify direct progress being made. Was that done on purpose or accidentally forgotten?	X			N	This is intentional, not all actions directly address goals but rather support them.
47	JSE	Targeted Implementation	79	RDG-7	None of the goals is bolded to signify direct progress being made. Was that done on purpose or accidentally forgotten?	X			N	This is intentional, not all actions directly address goals but rather support them.
48	JSE	Targeted Implementation	79	RDG-8	None of the goals is bolded to signify direct progress being made. Was that done on purpose or accidentally forgotten?	X			N	This is intentional, not all actions directly address goals but rather support them.
49	JSE	Targeted Implementation	79	RDG-9	None of the goals is bolded to signify direct progress being made. Was that done on purpose or accidentally forgotten?	X			N	This is intentional, not all actions directly address goals but rather support them.
50	JSE	Targeted Implementation	80	CIP table	Consider adding a Rapidan Dam restoration item.	X			N	Not enough information known at this time. Paragraph included as a placeholder.
51	JSE	Targeted Implementation	80	CIP table	It is part of the implementation table but it isn't meeting the Plan Content Requirements. We need to reformat it. (Remember per PCR, the CIPs need to be identified in the targeted implementation schedule and that has 6 very specific requirements. Location and timeframe no greater than 2 years, specifically.)	X			Y	Focus areas and 2 year timelines added. See comment #62.
52	JSE	Targeted Implementation	83	EC-11	None of the goals is bolded to signify direct progress being made..	X			Y	Bolded wetland and altered hydrology goals
53	JSE	Targeted Implementation	86	CL-11	None of the goals is bolded to signify direct progress being made..	X			Y	Bolded wetland and altered hydrology goals
54	JSE	Targeted Implementation	89	LBE-11	None of the goals is bolded to signify direct progress being made..	X			Y	Bolded wetland and altered hydrology goals
55	JSE	Targeted Implementation	92	UBE-11	None of the goals is bolded to signify direct progress being made..	X			Y	Bolded wetland and altered hydrology goals
56	JSE	Targeted Implementation	95	EB-11	None of the goals is bolded to signify direct progress being made..	X			Y	Bolded wetland and altered hydrology goals
57	JSE	Targeted Implementation	96	paragraph 2	Blue Earth's WBIF for FY26/27 (first grant) \$1,481,521 (\$740,760.50 over two years.....\$493,840.33 over three years). Not sure if this changes any of the narrative in this area of the section.	X			N	Estimate used for purposes of informing the plan and modeling scenario, as this number is subject to change throughout implementation.
58	JSE	Implementation Programs.	102	Financial Assistance Programs - paragraph 2	The language about recommended inspection schedules has been taken out of the BWSR GAM. Feel free to use what you have, but it is not what is necessarily required. Inspection schedules are based more on the practice being installed, weather, etc. In addition, other funding streams or statute/laws/rule may dictate specific O&M.	X			N	Noted for implementation

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59	JSE	Implementation Programs.			<p>Periodic Practice/Project Inspection. Inspections shall confirm that the operation and maintenance plan is being followed and the project has not been altered or removed. Inspections must:</p> <p>Be completed by Technical Assistance Provider(s);</p> <p>Verify that all components of the practice, including upland protection or contributing watershed treatment, remain in place and are in good repair;</p> <p>Identify necessary repairs to maintain effectiveness of the practice and any further assessment or action needed. The expected lifespan, specific site conditions of the practice or project, and findings of previous inspections will determine the frequency of inspections. Extreme weather events may necessitate additional inspections.</p>	X			Y	Provided detail added to text on operations and maintenance.
60	JSE	Implementation Programs.	6-6 (105)	Research and Data Gaps section - Table 6-2	FOR ESTIMATING AND MODELING - Could the two rows be combined? PTMApp is the only one listed. The Plan itself references carbon sequestration, so I'm wondering how that number was estimated and should that be added to this table? And are their other models that may be used to implement and track the plan, especially around topics/issues that we know PTMApp doesn't do well or at all. MPCA's BEET, BATHTUB for lakes. etc. FOR MEASURING (MONITORING?) - WRAPS is the only item mentioned. But the Plan just talk about ground water quantity and that is measured with observation wells (and other). Are there any other monitoring sites by the partners or DNR?	X			Y	"Example" added to table header. Language added to Estimating row "PTMApp may be used to estimate the edge of field benefits of projects as they are implemented." Modeling row "PTMApp may be used to estimate downstream water quality benefits of a large suite of implemented projects."
61	JSE	Implementation Programs.			RELATED TO THIS - Suggest that the narrative on the previous page and the table better align and clarify.	X			Y	Added text describing Table 6-2.
62	JSE	Section 5			<p>Not Fully Meeting Plan Content Requirements</p> <p>o Section 6. Implementation Programs. Capital Improvement Projects: Watershed-Wide. Page 5-11 (80). Per Plan Content Requirements III.E. Targeted Implementation Schedule, "Each plan must have a targeted implementation schedule with:</p> <ol style="list-style-type: none"> 1. A brief description of each action 2. Location targeting where the action will occur 3. Identification of roles and the responsible government unit for the action 4. An estimate of cost for implementing the action 5. An estimate of when the implementation will occur within the ten-year timeframe of the plan in increments of two years or less 6. A description of how the outcomes of the action will be measured <p>These requirements can be articulated in a table and/or narrative form. The schedule must clearly identify the actions the planning partners will undertake with available local funds versus the actions that will be implemented only if other sources of funds become available and should be supported by maps indicating the location(s) of the targeted activities. Specific (field scale) locations for individual practice types are not required, but the plan must identify approaches that will be used to locate different types of BMPs or focus programs during implementation. Specific actions, such as capital improvement projects that are local priorities (but not priorities for the watershed plan) or initiatives that are unique to a particular LGU (but that have not been identified as priorities for the partnership) may be included in the plan but must be clearly indicated as local priorities." And PCR III.F. Plan Implementation Programs, 2. Capital Improvements, "[.....] identified in the targeted implementation schedule."</p> <p>□ Possible solution(s): The table on page 5-11 (80) could be reformatted in order to meet PCR. In particular, location targeting/focus area (added) and estimated timeframe within the 10-year plan in increments no greater than 2 years (replacing the start/end dates).</p>		X		Y	Added priority areas and estimated timeframe to match implementation tables.

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63	JSE	Section 6	6-6	Table 6-2	Research and Data Gaps section (PCR Data Collection and Monitoring). Table 6-2. Page 6-6 (105). The information included in the “BERW Application” doesn’t seem to be complete. Plan goals and targeting were developed with more than PTMApp, so one would assume that the implementation tracking will be completed with more than just PTMApp. The WRAPS process isn’t the only way to monitor and measure changes to water quality, water quantity, and the other goals. <input type="checkbox"/> Possible solution(s): Consider adding items to make the table a more complete reflection of what is being used. <u>See attached spreadsheet for further detail.</u>		X		Y	"Example" added to table header. Language added to Estimating row "PTMApp may be used to estimate the edge of field benefits of projects as they are implemented." Modeling row "PTMApp may be used to estimate downstream water quality benefits of a large suite of implemented projects."
64	JSE	Plan Administration and Coordination	111-112	Decision Making (specifically the committees)	Per Plan Content Requirements - This section is expected to describe the PLANNING COMMITTEES and if they will stay or go or change for the Implementation of the Plan. The addition of 1 or 2 sentences will likely clear this up.		X		Y	Added text describing planning committees and the transition to JPE Board. Added text on the formation of Local Working Groups to meet Farm Bill requirements
65	JSE	Plan Administration and Coordination			Per Policy Committee PCR - <u>Describe if the policy committee created to develop the plan will continue through plan implementation.</u> If the policy committee will not continue, clearly outline an alternative method to provide oversight and maintain accountability throughout plan implementation. Describe the anticipated role of the policy committee or alternative in plan implementation and its relationship to plan participants		X			
66	JSE	Plan Administration and Coordination			Per Advisory Committee PCR - <u>Describe if the advisory committee(s) created for plan development will continue through plan implementation</u> and/or describe alternative methods to ensure a dependable forum to exchange information and knowledge about the watershed and implementation of the plan, and to meet the statutory requirements for ongoing advisory committees of counties (Minnesota Statutes §103B.301-103B.3355) and watershed districts (Minnesota Statutes §103D.331-103D.337). Also, identify opportunities to coordinate with federal partners to convene Local Working Groups to fulfill federal Farm Bill requirements. The plan should establish procedures for engaging state agencies and describe the ongoing roles and commitments of the state agencies for plan implementation.		X			
67	JSE	Plan Administration and Coordination	Funding section Table 7-2 (and sentence below it).	<i>Excel comment</i>	The terms “baseline” and local implementation funding” are confusing and possible misnomers particularly as it relates to Plan Content Requirements. See pages 27 and 28 of the 1W1P Guidebook for a description of local funding sources. Per Plan Content Requirements (page 10) state that the plan must describe distinct funding types (below). It would be helpful to have a clearer breakdown somewhere in the plan that lays this out. In addition, how it relates to Table 7-3 and the terminology there.		X		Y	Local Implementation Funding revised to "Baseline + Implementation Funding". Narrative summarized before Table 7-2.
				<i>PDF comment</i>	Table 7-2 and Table 7-3 (and the applicable narrative describing the tables). Pages 7-3 and 7-4 (113-114). The tables are confusing and when compared to the narrative/descriptions on page 7-4 (114), are counter to plan content requirements. Possible solution(s): Move the subsections for “Local Funding,” “State Funding,” and “Federal Funding” before the tables so that explanations of the funding (meeting Plan Content Requirements) come first. For Table 7-2, have language explaining what each row is, how it was calculated, and consider not using the word “local” to describe funding that is not solely locally derived.		X			
68	JSE		7-4 (114)	State Funding	Paragraph 1 should make it clearer that the items being discussed are state grants .		X		Y	Edited to 'the planning partnership may apply as an entity for collaborative state grants...'
69	JSE		7-4 (114)	State Funding	Paragraph 1, last sentence. Due to the looming renewal of the Land and Legacy Amendment, it is suggested that language clarifying WBIF being funded by the amendment and/or CWF be added.		X		Y	Edited to 'WBIF (and/or Clean Water Funds) are anticipated to be the largest source of funding...'
	JSE	Plan Administration	7-4, 7-7 but also 5-2 and 1-1 (w/o hyphen)	State Funding	Do NOT use “non-competitive” when talking about WBIF (or frankly, other grants). “Formula-based” is okay. Or perhaps just strike “non-competitive”?		X		Y	Changed to 'formula based'
70	JSE		7-5 to 7-6 (115-116)	Additional Funding	Second paragraph. Not all of the programs mentioned are grants. Recommend changing the language from "state and federal grants" to "state and federal funding"		X		Y	Changed 'grants' to 'funding'

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71	JSE		7-6 (116)	Table 7-4	BWSR section. Not all BWSR Clean Water Fund grants are competitive. Some are awarded via a formula and some are competitive. Plus, WBIF is CWF. Is the desire to show a difference between WBIF and other CWF grants that BWSR has? Soil Health Delivery goes to the SWCDs and is formula based. Projects and Practices is competitive. Buffer Implementation goes to SWCDs and is formula based. etc.		X		Y	Deleted WBIF from grant table
	JSE		7-6 (116)	Table 7-4	BWSR section. The erosion control and water management program sunsetted years ago with the changes to state statute. Delete and change to "Conservation Contracts Program" which can be found in 103C.501		X		Y	Replaced sunsetted program with 'Conservation Contracts Program'
72	JSE		7-6 (116)	Table 7-4	BWSR section. SWCD Capacity funding is no longer an ongoing grant program. New grants haven't been awarded since FY23; those grants will be expiring within the next year or so. That funding is now via Department of Revenue as SWCD Aid.		X		Y	Removed 'SWCD capacity funding'
73	JSE		7-7 (117)	paragraph	It mentions four examples, but there are five boxes?		X		N	Kept as four given one grant is being removed (comment #77)
74	JSE		7-7 (117)	WBIF box	Use the new CWF logo.		X		Y	Logo updated
75	JSE		7-7 (117)	WBIF box	Use the term "formula-based" or simply say that "BWSR has WBIF grant funds available..."		X		Y	Removed "competitive"
76	JSE		7-7 (117)	WBIF box	Consider adding language about the Land and Legacy Amendment and it's renewal needed before 2034		X		Y	Adding 'the Clean Water, Land, and Legacy Amendment was passed in 2008 and increased the sales tax to fund the clean water, outdoor heritage, arts and cultural heritage, and parks and trails. BWSR receives appropriations through this amendment and funds grants including WBIF. This amendment is active into 2034 and will need renewal during the BERW CWMP.'
77	JSE		7-8 (118)	WQS	To be clear, the WQ&S grant did not receive funding for FY26/27 and the last BWSR knew, the RCPP was rescinded.		X		Y	Deleted grant program
78	JSE		7-8 (118)	Soil Health Grants	Clean Water Fund is the money for the Soil Health Delivery Grant. We did not receive any general fund money for the FY26/17 biennium. Ongoing Federal funding via an Alternative Funding RCPP.		X		Y	Removed CWF to just say 'BWSR has grants to support soil health practices ...'
79	JSE		7-8 (118)	1W1P RIM Reserve	This program is called RIM Integrating Clean Water and Habitat (1W1P). The language should be updated and more information can be found on the BWSR website. https://bwsr.state.mn.us/RIM-1W1P		X		Y	Updated program name to match website: RIM 1W1P (Integrating Clean Water and Habitat). Description updated to: 'This program supports RIM projects in CWMP priority areas that contribute to CWMP goals.'
80	JSE		7-9 (120)	Accomplishment Assessment (last sentence)	the use of "five-year evaluations." PCR has "mid-point evaluation" (which you have). Is that what the five-year evaluation is referring to? If so, change the wording. If not, does the group understand that they will be completing an evaluation at the 5-year mark?		X		Y	Replaced five-year with mid-point
81	JSE		7-9 (120)	Reporting. Paragraph 2, last sentence.	The watershed plan doesn't necessarily have REQUIRED annual reporting. But if the partnership includes annual reports in the Plan (such as in the Assessments section), then the partnership will need to complete those. Grants related to the plan may require annual reporting. To make this sentence more technically correct, one suggestion could be to end it having the word "required reports."		X		Y	Removed language on annual CWMP reports
82	DNR - EWR	1	3	Table 1-1	10-year goal for "sedimentation and erosion": needs a qualifier such as <i>reduce sedimentation to water bodies</i> or <i>reduce sediment loading to water bodies</i> or <i>reduce sediment input to water bodies</i> - currently it reads a little vague		X		Y	Expanded to 'reduce upland sediment loading by 10%'
83	DNR - EWR	1	3	Table 1-1	10-year goal for "nutrient loading": clarify if the reduction in P & N is for in situ conditions or if the reduction is intended for future inputs			X	N	Load reductions are estimated with existing loads
84	DNR - EWR	1	3	Table 1-1	10-year goal for "altered hydrology" - on section 4, page 8, reducing peak flows/volumes is identified in both short term goals and desirable future conditions - can this be mentioned in this table as well to underscore the importance? It's mentioned later in the "maintenance/repair of drainage systems," but this is a very important goal, so even an abbreviated version of that same goal in the "altered hydrology" portion of the table would be useful, such as, "reduce peak flows/volumes as part of drainage system maintenance"		X		N	Reducing peak flow through repair/improvement/project is not part of the altered hydrology goal, it's the Drainage System issue goal. They are just both discussed together on page 4-8. Many plan goals apply to multiple issues but ultimately each issue has 1 goal.
85	DNR - EWR	2	5	2	Include plan language around climate refuge for species in greatest conservation need (SGCN), emphasizing riparian shade, wetlands, and prairie remnants.		X		Y	Text on climate refuge added
86	DNR - EWR	2	11	Streams	Mention that high flow volumes increase likelihood for erosion and sediment loading - this then dovetails into the second paragraph that impacts aquatic life as well, particularly in downstream reaches (this is mentioned in Table 3-1, but also deserves a mention here given that it's a high priority issue)		X		Y	Added suggested text on high flow
87	DNR - EWR	2	11	Streams	Perhaps consider a commitment to evaluate thermal regimes in headwater streams, as drainage and climate warming may impact the potential of coldwater species.		X		N	Committee previously determined research actions

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88	DNR - EWR	2	14	1	"DNR monitoring has found a decrease in groundwater elevation over the past few decades at some wells" - was there any correlation as to the area of the watershed, the associated aquifer/geologic layer/well depth range for these wells that may be worth mentioning?		X		Y	Source corrected to DNR Watershed Characterization report. No correlation mentioned, and text expanded that groundwater elevation decreased in the 90s and 2000s but has been trending upwards since 2015.
89	DNR - EWR	4	3	Title	Given that this section is focused on upland area and a later section deals with bank erosion, it may be important to identify in the header that this goal specifically looks at "upland" erosion.	X			Y	Header changed to 'Upland Erosion and Soil Health'
90	DNR - EWR	4	5	3	Clarification: "blending lake water with an emergency well" update to "blending lake water with <i>groundwater sourced from</i> an emergency well"		X		Y	Revised as suggested
91	DNR - EWR	4	3 & 6	2	Sediment and nutrient targets should be cross-checked against MPCA WRAPS load reduction estimates for accountability.		X		N	Numbers kept as is to reduce complexity
92	DNR - EWR	4	8		Part of the discussion on this goal should include an explanation that the increase in drainage practices on the landscape (i.e., tiling, drainage system improvements, etc.) are removing water from the landscape quicker, thereby delivering flow volume to watercourses faster which increases peak flows, contributing to the frequency and severity of flood events. This is the second piece of the water storage conversation that also needs to be addressed here because the "drainage systems" goal currently seems like a footnote versus an equal portion of the equation. This also helps define the term "altered hydrology" as it pertains to this management goal and the prioritization of the areas defined in Figure 4-3		X		N	Comment noted with thanks, but language kept as is
93	DNR - EWR	4	9	Map	The storage goal (1,200 acre-feet) should be linked to <i>priority subwatersheds with the greatest hydrologic alteration (e.g., East Branch Blue Earth River, Middle Branch (Upper Blue Earth) rather than applied watershed-wide.</i>		X		N	Progress towards goal needed watershed-wide. Kept watershed wide to be flexible for implementation of good projects across the watershed.
94	DNR - EWR	4	10	1	"Streambank erosion is estimated to be responsible for the majority of sediment loading in the BERW (MPCA, 2023a)." - in the Soil Health and Erosion section, the statistic of 72% is given; this statistic may be more effective if it were moved (or replicated) to this sentence.		X		Y	Added 72% to goal description
95	DNR - EWR	4	10	1	"It can also be intensified by large waves caused by wakeboats." - a research paper has been published this past July confirming the potential for increased rates of lakeshore erosion with wake boat usage that could be utilized as a citation here: https://conservancy.umn.edu/items/6a47c506-6be5-4c8a-9a96-dfea38f23b2f		X		Y	Cited project report
96	DNR - EWR	4	10	2	"with preference on natural vegetative management where possible." - could add that establishment of natural vegetation in coordination with maintained buffers along watercourses are cost-effective tools in comparison with hard armament. Good list of <i>strategies otherwise!</i>		X		Y	Added suggested text
97	DNR - EWR	4	11	Table 4-4	It would be useful to have a priority map for watercourses similar to Figure 4-4 for basins.		X		N	The Partnership is prioritizing smaller scale projects / efforts that protect infrastructure and accrue multiple benefits. No map is recommended for these projects along streams.
98	DNR - EWR	4	12	1	"Nearly 6% of the BERW is developed, including cities such as Blue Earth, Fairmont, and Winnebago." - Mankato or Greater Mankato (i.e., South Bend Township, West Mankato, Skyline) should be added here too even though only a portion of the city is impacted - or is this area not included due to MS4? If so, maybe a quick note of that here instead		X		Y	Only major cities listed; not inclusive of all urban areas. Mankato added to list.
99	DNR - EWR	4	18		The plan could more clearly define how fish passage improvements will be prioritized (e.g., rank culverts/dams by biological benefit, not only infrastructure condition).		X		N	Prioritization criteria for project selection will be created during implementation
100	DNR - EWR	4	20	Short Term Goals	Update goal to "sealing 100 <i>unused</i> wells"		X		N	Goal language decided by committee
101	DNR - EWR	4	20	Benefits	In the Stacking Benefits box, could add a bullet point for reduced likelihood of surface contamination reaching groundwater.		X		Y	Added suggested benefit
102	DNR - EWR	4	24	3	Include plan language around climate refuge for species in greatest conservation need (SGCN), emphasizing riparian shade, wetlands, and prairie remnants.		X		Y	Added language on climate refuge habitat
103	DNR - EWR	4	24-25		The CWMP should likely include a map of "habitat pinch points" where upland habitat, floodplain corridors, and WMAs almost connect, to prioritize land protection or easements.		X		N	Local implementation partners may consider habitat pinch points to select sites, but watershed-wide focus areas for land protection are established in Figure 4-11
104	DNR - EWR	4	25	Figure 4-11	suggest prioritizing restorable wetland clusters (rather than scattered sites) to maximize flood storage, wildlife corridors, and nutrient reduction benefits.		X		N	Geospatial prioritization in Figure 4-11 already approved by committee.
105	DNR - EWR	5	2		Perhaps clarify how the prioritization criteria (WRAPS, biological integrity, cost-effectiveness, and stakeholder input) will be weighted transparently for project selection.		X		N	Prioritization criteria for project selection will be created during implementation
106	DNR - EWR	5	8	P&P Table	The plan could more clearly define how fish passage improvements will be prioritized (e.g., rank culverts/dams by biological benefit, not only infrastructure condition).		X		N	Prioritization criteria for project selection will be created during implementation

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107	DNR - EWR	5	8	P&P Table	Incorporate language requiring stream restoration projects to follow <i>Natural Channel Design principles</i> or the <i>DNR Five-Component Framework for Stream Restoration</i> . This could also (or instead) go on page 5-11 in the Capital Improvements narrative as well as page 6-7		X		Y	Added these guidance documents to stream goal page
108	DNR - EWR	5	8	WW-4	recommend that shoreline BMPs incorporate natural infrastructure approaches (e.g., living shorelines, bioengineered stabilization) before hard armoring is considered.		X		N	This is the intention during implementation, see page 4-10 which says this goal has a 'preference for natural vegetation management'.
109	DNR - EWR	5	10	R&DG Table	Add a commitment to use emerging water quality monitoring tools (continuous nitrate sensors, eDNA for AIS detection, microbial DNA source tracking).		X		N	Local group would be happy to partner on state efforts, but local table of actions kept as is.
110	DNR - EWR	5	11	CIP Table	Add an action to coordinate with MnDOT on transportation infrastructure retrofits (bridges/culverts sized for climate-adjusted hydrology). Could also be added to 6-7		X		Y	Language added to CIP text on 6-7 that coordination with MnDOT will be taken when relevant.
111	DNR - EWR	5	19		Stream, Ravine, and Shoreline Erosion - Streambanks and Ravines - the Lower Blue Earth is going to require a larger percentage than currently allotted given that this area is highly erodable and was mentioned earlier in the plan as being a main contributor to the overall sediment load for the watershed. Potentially reallocate a small portion of the Elm Creek and East Blue Earth to the Lower Blue Earth		X		N	LBE area will primarily focus on larger capital projects rather than smaller efforts. Action item kept as is.
112	DNR - EWR	5	22		Altered Hydrology and Flood Reduction for the Upper Blue Earth should receive a slightly larger allotment - given that this within the upper reaches of the watershed, flood reduction strategies will have the greatest impact here versus downstream - recommend balancing out the allotment for the Chain of Lakes region.		X		N	Number aligns with implementation modeling scenario.
113	DNR - EWR	6	9	4	Shoreland management - in addition to the counties, the cities of Fairmont, Mankato, and Blue Earth administer shoreland ordinances within the city limits		X		Y	Added these cities to the shoreland management paragraph
114	DNR - EWR	7			Note that <i>post-project monitoring of stream stability</i> (including cross-sections, sediment transport, and fish passage surveys) will be required as follow-up work.		X		N	Comment noted for implementation
115	DNR - EWR	7	10	2	Help strengthen <i>adaptive management language</i> by requiring a public mid-point report on progress toward measurable goals (not just internal review).		X		N	Findings of mid-point assessment will be made available to the public
116	DNR - EWR	Appendix - Implementation Process			Perhaps clarify how the prioritization criteria (WRAPS, biological integrity, cost-effectiveness, and stakeholder input) will be weighted transparently for project selection.		X		N	Prioritization criteria for project selection will be created during implementation
117	DNR - EWR	Appendix - Implementation Tables		Land Protection Practices	The CWMP should likely include a map of "habitat pinch points" where upland habitat, floodplain corridors, and WMAs almost connect, to prioritize land protection or easements.		X		N	See Comment #103
118	DNR - Fisheries	wetlands	11	1	Proposing to restore only 100 acres of the 100,000 acres of restorable wetlands based on the their documentation page 2-11. Only restoring 100 acres is not sufficient to make any impact in water storage. The language in the document highlights clearly the impact wetland loss has had on the reduced compacity of water storage in the watershed only 2% remaining of the historical level according to page 2-11. This goal should be greatly increased to provide measurable impact. While understandable wetland restoration is not feasible as the only water storage practice it should have larger goals.		X		Y	Wetland acres increased to 500 acres
119	DNR - Fisheries	Low priority issue	pg. 3-7	increased deve	Categorizing loss and degradation of riparian buffers as low priority is counter intuitive as bank stabilization a high priority is a result of loss of riparian buffers. By not addressing one of the key causes of the bank destabilization which is land use be it development of housing with changing vegetation or agriculture planting right up to the ravine edge will result in ineffective methods for restoration which are not addressing the cause of the erosion and sediment source.		X		N	Unfortunately some issues have to end up as a low priority, it doesn't mean they should not be addressed, just that they are not a focus of this plan. The 'stream, ravine, and shoreline erosion' goal is to stabilize streambanks, preferably with vegetation which will reduce bank erosion.
120	DNR - Fisheries	goal	8	Altered Hydrology and Flood Damage Reduction	Under 10 year outputs only list 1,200 ac ft storage under WW1 while wetland restorations would also contribute toward this goal, however not listed as practice.		X		Y	Page 5-6 and 4-8 state outputs for WW-1 are estimated by PTMApp. It is true that action WW-11 will also add water storage, but ac-ft of storage resulting from wetland restoration is not quantified as a plan benefit. Added text to page 4-8 that wetland restorations will add water storage as well.
121	DNR - Fisheries	Targeted implementation			Specific mention of focus on bio engineering for streambank stabilization was a good thing to see. Hopefully that is the work they reference in Targeted implementation on 2,000 feet of riparian restoration. Not sure what they are specifically mentioning as part of the language engineered management effort to reduce erosion. Hopefully not hard armoring the stream that would increase downstream flows and potentially result in increased erosion.			X	N	Comment noted, thank you
122	DNR - Fisheries				Mention of 2,000 ft of lake shoreline restoration was a good thing to see.			X	N	Comment noted, thank you
123	DNR - Fisheries	Targeted impleme	11		Dutch creek stream restorations including connectivity and pattern profile restoration were good projects specifically mentioned in the plan.			X	N	Comment noted, thank you
124	DNR - Fisheries	Targeted impleme	11		Rock arch rapid installation on George Lake Dam was a good project.			X	N	Comment noted, thank you

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125	DNR - Fisheries	Targeted implementation	11		I question if dredging wetlands given the cost of excavation and short term impact would be better spent restoring wetlands increasing compacity for water storage per dollar spent. Given that wetlands filling with excess sediment at accelerated rates is not ideal the wetland vegetation is still functioning as a filter and storing nutrients. If dredging is considered addressing the sediment source to the wetland prior to dredging should be the first goal to extend the impact the wetland benefits that are provided.			X	N	Comment noted, Wetland rehabilitation project is in preliminary stage
126	MDA				The comments and suggestions provided by the MDA as a part of the advisory committee have been effectively addressed. As written, we believe this plan sufficiently addresses the priority concerns for surface and ground water that were indicated in our initial comment letter for this plan.			X	N	Thank you for your input in this plan!
127	MDH	Acronyms			Check acronym for Stormwater Pollution Prevention Plan as MDH refers to SWIPP as Surface Water Intake Protection Plan. Consider adding Greater Blue Earth River Basin Alliance (GBERBA) to acronym list.	X			Y	SWIPP changed to SWPPP, with thanks. GBERBA added to acronym list
128	MDH	Goals	4-12, 4-14, 4-24		Recommend adding 'Protection of drinking water' to Stacking Benefits for Stormwater Runoff, Bacteria Loading, and Wildlife Habitat and Wetlands.		X		Y	Benefit added as requested
129	MPCA	General			The planning effort was responsive to the MPCA's priorities, concerns, and comments throughout the planning process. The Advisory Committee has already incorporated many of the MPCA's comments and revisions as part of the Plan. The MPCA is appreciative that the Watershed Approach documents (Monitoring and Assessment, Stressor Identification, Total Maximum Daily Loads [TMDLs] and Watershed Restoration and Protection Strategy [WRAPS]) were utilized in this process. The MPCA supports the Plan's efforts towards working to correct water quality impairments. Further understanding of water quality conditions will be forthcoming as the MPCA and its partners complete a second round of monitoring and assessment, stressor identification, and WRAPS report updates. The planning for these updates will start in 2027.			X	N	Thank you for your input in this plan!
130	Faribault Co Drainage				I would like to comment on a potential project that is addressed by the plan but minimally funded through the implementation schedule. The location of the potential project is within the East Branch Blue Earth Planning Region, specifically on the Main Stem of the Brush Creek in Seely Township Section 13 SENE (T101N-R25W-S13). This stretch of altered stream also happens to be part of Faribault County Ditch #72 Main Trunk open ditch. An in-channel grade control structure exists in the centerline of the CD72 Main Trunk open ditch that is a barrier to fish passage. The reach of the Brush Creek is also on the impaired waters list for fishes bioassessment. This impairment is likely due in part to the in-ditch grade control structure. The East Branch Blue Earth Planning Region is slated for 2 of the goal of 4 fish barrier removals in the 1W1P implementation plan. There is an opportunity to replace this in-ditch grade control structure with an alternative design that allows for fish passage. The current structure that exists is beginning to fail, so time is of the essence. If the structure continues to deteriorate and ultimately fails without a plan in place for an alternative design, the Drainage Authority for CD72 could be forced to repair the grade control structure as originally designed. According to the Action Table for the East Branch Blue Earth Planning Region (pp 5-26), the estimated cost for a fish barrier project is \$230,000, but only \$30,000 is ear-marked for funding by the plan, calling for a majority of the funding to come from Federal or Partner organizations. I see several issues with a majority of the funding planned to come from other sources. Some of those issues include the fact that this stream reach is also a part of a 103E Drainage System (land ownership is private), that the practice is an in-channel structure (some BWSR programs do not allow for in-channel structures), and the urgency of the need (the current structure is failing). I comment that the East Branch Blue Earth Planning Region Action Table increase the local 10-year cost to cover the replacement of one fish barrier and that the timeline be changed to 2026-2027. See attached documentation.		X		Y	This information added to the CIP table

Blue Earth River Watershed Planning Partnership Policy Committee Meeting Minutes

November 17, 2025

Members Present: Larry Cowing, Martin SWCD; Roger Pohlman, Jackson County; Jeff Bell, Faribault SWCD; Nicole Eckstrom, Freeborn County; Kevin Paap, Blue Earth County; Kevin Kristenson, Martin County; Curt Helland, Freeborn SWCD; Chantil Kahler-Royer, Martin SWCD Alternate.

Staff Present: Rachel Olm, HEI; Ashley Brenke, Martin SWCD; Nate Carr, Faribault SWCD; Lindsey Cornell, Freeborn SWCD; Rachel Wehner, Freeborn County; Jesse Walters, Martin SWCD; Jill Sacket Eberhart, BWSR; Scott Salsbury, Blue Earth County; Hannah Neusch, City of Fairmont; Dan Bartosch, Jackson SWCD; Jerad Bach, Blue Earth SWCD (online); Jeremy Maul, BWSR (online).

Others Present: Daniel Olson, Fairmont Sentinel.

Public Hearing

1 – Welcome and Policy Committee Introductions

Chair Cowing called the public hearing to order. Policy Committee Introductions

2 – Overview of the Blue Earth River Comprehensive Watershed Management Plan

Rachel Olm gave overview presentation.

3 – Public Comment Period

Chair Cowing asked for public comments. No members of the public were present. Chair Cowing closed the public hearing at 9:30 am.