

Project: Hawk Creek - Middle Minnesota Comprehensive Watershed Management Plan

Review Responses to the 60-day Formal Review comments

Period:

Date: October 4, 2021

Item #	Comment	Context	Person/Org	Entity	Section	Page # (PDF)	Response
1	Draft of the Plan contains many typographical and format issues. Page numbers restart after page 81. Difficult to keep track of issues identified.	N/A	Jeremy Maul	BWSR	General Report	N/A	The report was proof read and grammatical/punctuation errors were addressed
2	Some issues with overall organization of the Plan -- difficult to cross reference parts of the Plan for consistency.	N/A	Jeremy Maul	BWSR	General Report	N/A	Changes have been made to section 3, section 4, and section 5 to provide more clarity and more ease in cross referencing issues/goals/implementation activities within the plan.
3	Education and Outreach identified as an issue in all of your priority areas, but implementation activities are fairly vague. Planning to accomplish more with significantly more financial resources than you have had historically. The planning team should discuss what can be done to increase the outreach and hopefully adoption of the many activities you outlined in your Plan and add it to this Plan.	We struggled as to where to put this comment as it is important throughout the Plan implementation, so we are making a general comment.	Jeremy Maul	BWSR	General Report	N/A	Education and outreach are addressed through many implementation activities in many of the goals and this has been discussed multiple times at meetings. We are satisfied with how education and outreach are addressed in the plan. ST
4	The Drainage System and Public Drainage System definitions appear to be similar and, in some parts, incorrect. The Drainage System definition states, “established and constructed by a drainage authority.” This is only true if it’s part of a public system. Consider why these definitions are important to your Plan and modify them to provide the clarity for how these terms are used throughout the Plan and how they are different from each other. Consider providing a definition for private systems and enhancing the 103E definition (Public Drainage System). In this case, it is appropriate to reference 103E in the definition; the chapter is unlikely to be removed and is a central part of the distinction between private systems and a public system.		Jeremy Maul	BWSR	Definitions	11	Added a "private drainage system" definition and added references to Chapter 103E
5	The definition for Municipal Wastewater Treatment System is inadequate.		Jeremy Maul	BWSR	Definitions	12	Enhanced definition
6	The definition for nonstructural practices still includes practices that are structural.		Jeremy Maul	BWSR	Definitions	12	Removed "vegetative"
7	Where it says, “nearly two years” should be amended to say, “over two years.”	"referred to as the 'Plan', represents nearly two years of collaborative work between six entities"	Jeremy Maul	BWSR	Executive Summary	14	Suggested change was made

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8	This is an incorrect statement as the Plan will not be eligible for implementation funds, but rather the local government units that adopt the Plan will be eligible for those funds. It does not “ensure” those funds will be received, but rather it meets minimum state requirements to be eligible for state funds.	In the third paragraph, “Approval of this Plan by BWSR and local adoption ensures that the HCMM CWMP will be eligible for state funds for the implementation of projects and programs needed to achieve the restoration and protection goals included in this Plan.”	Jeremy Maul	BWSR	Executive Summary	14	Language revised to remove "ensure" and indicate that adoption will meet minimum eligibility requirements
9	These zones are not specified in the ES anywhere. The map should focus on the planning area. If you are going to continue to use the map, the ES should contain something about the three areas.	The map and table that shows and describes the three zones is completely out of place in the Executive Summary (ES).	Jeremy Maul	BWSR	Executive Summary	15	Removed page 13 out of the Executive Summary and replace page 29 with page 13.
10	The boxes used to describe the three zones would be more useful in the Land and Water Resource Narrative where they are discussed in more detail on page 29.	See above	Jeremy Maul	BWSR	Executive Summary	15	Removed page 13 out of the Executive Summary and replace page 29 with page 13.
11	The summary of measurable goals on page 18 and 19 should reflect the measurable goals established in the Measurable Goals and Implementation sections of the Plan after incorporation of our comments (reorganization and consistency concerns) in those sections.		Jeremy Maul	BWSR	Executive Summary	20-21	The changes to the goals have been incorporated into the executive summary.
12	What actually is intended to occur is that a formal agreement will be established to determine how decision will be made for implementation.	The policy committee will effectively go away when this planning effort is completed.	Jeremy Maul	BWSR	Executive Summary	23	Language revised to indicate flexibility in transition to implementation and decision-making powers
13	This sentence should be removed as it is not necessary to meet Plan content requirements.	Regarding “Fiscal and administrative duties” -- Plan Administration, second paragraph last sentence	Jeremy Maul	BWSR	Executive Summary	23	Suggested change was made
14	Change: “... a CWMP is proposed to be developed for each designated watershed area covering the state of Minnesota, ... and to transition to statewide planning by watershed by 2025.”	First Paragraph, Second Sentence -- take out "CWMP WILL be developed... and to ENSURE statewide planning"	Jeremy Maul	BWSR	Section 1.2 One Watershed, One Plan Program	24	Suggested change was made
15	Table 2-1 indicates seven lakes. Please correct to the appropriate number in either the table or this sentence, and make sure the reference on Page 38, Section 3.3.1 is also consistent.	States six lakes in the lakes zone on the 2018 Impaired Waters list	Jeremy Maul	BWSR	Section 2 Land and Water Resources Narrative	32	Olson Lake is not in the lakes zone, made star so it is clear why it lists six instead of seven

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16	Not appropriate to list “registered feedlots” in this location. Consider a different location, such as Feedlots in Section 6.4 on page (second) 37.	Registered feedlots are listed as HazMats	Jeremy Maul	BWSR	Section 3.3.10 Hazardous Materials, Solid Waste and Environmental Contaminants	43	Removed reference to registered feedlot and indicated where to find info on feedlots
17	Questioning if these inventories actually exist over the entirety of the planning area or if this should actually say, “according to staff estimates” or something similar.	The first sentence says, “According to county inventories”	Jeremy Maul	BWSR	Section 3.3.14 Subsurface Sewage Treatment Systems	44	Added "and staff estimates"
18	It is counterintuitive to state what ag related practices you plan to employ in implementation of your Plan and then add a sentence saying that adoption rates are very low. If indicating that low adoption rate is a priority issue, the sentence should be reworded to express that.	Last sentence of this subsection implies that you will not be able to get the 7% adoption you are proposing to accomplish.	Jeremy Maul	BWSR	Section 3.3.15 Agricultural Practices and Runoff Management	44	Added a sentence to indicate 1) opportunity for improving water resources, and 2) need for education & outreach
19	Recommend: "Subwatersheds were then ranked by the planning partners. (Appendix C)”	Third paragraph -- delete "Figures in App C demonstrate how the..."	Jeremy Maul	BWSR	Section 3.4 PRIORITY RESOURCES	46	Suggested change was made
20	In the preview draft, stated “all of the other issues” be removed -- overstates effect of addressing altered hydrology and replace with “positively influences”. Assumed this would be removed in the other Issue Prioritization tables, but was not. Recommend it be removed from this table at this location, and that the tables be reviewed for consistency (Tables 3.4 through 3.7.)	The Rationale states that addressing altered hydrology addresses all of the other issues.	Jeremy Maul	BWSR	Section 3.5 RANKING OF ISSUES BY PRIORITY AREA Table 3-4, Tier I (High Priority), Altered Hydrology	53	Suggested change was made
21	This change was made from the preview draft in a single location but was not incorporated throughout the rest of the Plan. We again suggest the change be made throughout the Plan for the sake of consistency.	Rationale references a “tile-line hookup” which we suggested in the preview draft to change to a reference to non-conforming systems or inadequate soil treatment.	Jeremy Maul	BWSR	Section 3.5 RANKING OF ISSUES BY PRIORITY AREATable 3-4, Tier II (Medium Priority), Septic Systems Tables 3.4 through 3.7.	53-60	See #20

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22	There are flooding issues that go beyond just addressing altered hydrology. This change should be made throughout the Issue Prioritization tables in all areas where flooding has been identified	The Rationale states, “Addressed by Altered Hydrology”, which we recommend be changed to “Positively impacted by addressing Altered hydrology.”	Jeremy Maul	BWSR	Section 3.5 RANKING OF ISSUES BY PRIORITY AREA Table 3-4, Tier III (Lower Priority), Flooding Tables 3.4 through 3.7.	53-60	Suggested change was made (see comment #20)
23	Several of the established goals in section do not follow this structure. Ensure all Established Goals in section 4 have the same structure and order. Example: 4.3.1.3 High Quality Lakes and Streams on page 78. Several established goals have activity and the goals mixed up.	Refers to structure laid out at beginning of 4.3	Jeremy Maul	BWSR	4.3 Structure of this Section	67	These changes have been incorporated into the goals and implementation activities.
24	Many metrics do not adequately measure success towards established goals. Strongly recommend additional work to ensure established goals be measurable and metrics determine success. BWSR staff will be made available to work through this issue.	Throughout Section 4	Jeremy Maul	BWSR	4.3 Structure of this Section	67	Section 4.2.1.3 -- text is missing metrics. Section 4.3.1.2 -- Metrics Goal 2 not phrased as a metric 4.3.1.1 Metrics Goal 2 not phrased as a metric 4.2.1.4 Metrics not phrased as metrics 4.3.2.1 Metric for Activity D -- "Each" refers to landowner well? 4.3.2.1 Activity K -- "Each" refers to each well sealed? 4.3.2.6 Activity A -- "Each" refers to relationships? Contacts? "Each" metric may need one more word to capture specificity of activit Steering Team to work with Camilla to resolve goals, activities, measurable outputs, and metrics descriptions. Restructure section 3, 4, and 5. ST
25	There should be some reference or crosswalk to the acre-feet amount of the long-term goal. A government official should be able to answer how many short-term goals need to be met to achieve the long-term goal. Are annual water yield and run-off being used interchangeably?	The desired future condition is expressed in a drop in annual water yield in inches, but your short-term goals are expressed in acre-feet.	Jeremy Maul	BWSR	4.3.1.2 Altered Hydrology	76	Added clarifying language to the goal.

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26	The first row, which specifies the acre-feet for estimated water storage based on 0.25 inches of runoff, is confusing. Most spreadsheet etiquette is to total the entire column; however, in this table you don't include that first row in the column. It should be moved or the formatting changed so it is clear that it is not included in the total. This comment applies to Tables 4-11 through 4-14.	Table 4-11 Summary of BMPs needed to achieve storage goal for the Upper Hawk Creek Priority Area	Jeremy Maul	BWSR	4.3.1.2 Altered Hydrology	78	The goal has been moved from the first row of the table to the header for the table per discussion with BWSR. This change has been made to Tables 4-11 through 4-14.
27	The total for this table does not equate to meeting or exceeding your storage goal, you may need to change the goal for this watershed or change the number of BMPs implemented. This comment applies to tables 4-11 through 4-12.	Table 4-11 Summary of BMPs needed to achieve storage goal for the Upper Hawk Creek Priority Area	Jeremy Maul	BWSR	4.3.1.2 Altered Hydrology	78	The amount of wetland storage has been increased by 0.25 feet in Upper Hawk Creek (Table 4-11) and Beaver Creek (Table 4-12) so the total now exceeds the storage goal for the priority areas.
28	This reads like you are reporting an accomplishment rather than stating a metric. The goal is to direct private well owners to financing programs. The metric doesn't measure success for that.	Metrics, Goal 1	Jeremy Maul	BWSR	Section 4.3.2.1 Drinking Water Protection	86	These changes have been incorporated into the goals and implementation activities.
29	Doesn't refer to any specific pollutants of concern. This may reflect a need to change the goal as well as the metric for measuring success. For example, arsenic is a pollutant of concern for drinking water, but will not be addressed through BMP's.	Metrics, Goal 2	Jeremy Maul	BWSR	Section 4.3.2.1 Drinking Water Protection	86	These changes have been incorporated into the goals and implementation activities.
30	Your goal specifies education, but the metric does not measure this. You could be successful in education, but it may not be reflected by the number of sealed wells.	Metrics, Goal 3	Jeremy Maul	BWSR	Section 4.3.2.1 Drinking Water Protection	86	These changes have been incorporated into the goals and implementation activities.
31	It was difficult to go back and forth between this table and section 4 due to the failure to consistently apply the same structure to all Established Goals as identified on page 65.	Schedule vs Goals -- general comments	Jeremy Maul	BWSR	Section 5 Targeted Implementation Schedule	95	These changes have been incorporated into the goals and implementation activities.
32	Strongly recommend additional work to ensure implementation activities address established goals, are measurable, and appropriate metrics are listed to determine success. BWSR staff will be made available to work through this issue.	Many metrics listed do not adequately measure success towards the established goals. Applies to Section 4 -- interconnected.	Jeremy Maul	BWSR	Section 5 Targeted Implementation Plan Schedule	95	These changes have been incorporated into the goals and implementation activities.

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33	Reorganization and evaluation of consistency throughout the Implementation Tables and the Measurable Goals section will be critical to the understanding of the Plan meeting Plan content requirements for Prioritized, Targeted, and Measurability and determining success during implementation.		Jeremy Maul	BWSR	Section 5 Targeted Implementation Plan Schedule	95	These changes have been incorporated into the goals and implementation activities.
34	First sentence on this page should be deleted.	Not required as part of the plan content requirements and it is subject to change during implementation.	Jeremy Maul	BWSR	Section 5.3.1 Identification of Roles and Responsibilities towards Implementation	110	Suggested change was made
35	There is a typo where Table 5-9 is duplicated three times in a row.		Jeremy Maul	BWSR	Section 5.4 Accounting for Local Funds	111	Extra Table 5-9's deleted
36	Recommend removing: "Cost-share programs also provide funding for water quality benefits (e.g., well sealing, rain gardens, and septic programs)." And move the examples to the examples for structural practices.	Sentence before describes cost-share programs funding structural practices	Jeremy Maul	BWSR	Section 6.1.1 Cost-Share Programs	114	Suggested change was made
37	Watershed Based Implementation Funding does allow for purchasing easements, so the partners may have a greater role than just connecting landowners to existing programs. The steering team should discuss if there is potential to have a local easement program.	Second Paragraph, Third Sentence	Jeremy Maul	BWSR	Section 6.1.5 Permanent Protection	115	No need to change at this time.
38	The last sentence on this page lists state road bridge replacements and road improvement projects, which are not water quality or water storage projects so they should not be included as examples of projects with water quality aspects unless there is a specific water quality aspect they are going to start to incorporate as part of capital improvement projects.		Jeremy Maul	BWSR	Section 6.2 Capital Improvement Projects	116	changed "might improve" to projects that may afford the locals to partner with road authority on additional treatment options

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39	Recommend: “The routine Operation and Maintenance of any Best Management Practices (BMPs) are critical in ensuring the life of the practice This will be the responsibility of the landowner (unless an alternative agreement is made), where the BMP practice was installed using cost share assistance funds of any kind.”	First sentence	Jeremy Maul	BWSR	Section 6.3 OPERATION AND MAINTENANCE	117	Suggested change was made
40	Recommend: “Operation and Maintenance plans must be prepared before construction and must include the expected activities, timing of activities, and inspection schedule.”	Change "should" to "must" in second paragraph, third sentence	Jeremy Maul	BWSR	Section 6.3 Operations and Maintenance	117	Suggested change was made
41	The last sentence incorrectly references Section 0.	"Additionally, each county’s drainage management program addresses the on-going Operation and Maintenance needs of the public drainage system as described in Section 0."	Jeremy Maul	BWSR	Section 6.3 Operations and Maintenance	117	Correct reference inputted
42	Recommend: “The Planning Partnership does not intend to develop or enforce any of its own regulations.” The planning partnership may develop policies to better address implementation activities to meet Plan priorities.	Delete "or policies" from 2nd to last sentence	Jeremy Maul	BWSR	Section 6.4 REGULATION AND ENFORCEMENT	117	Suggested change was made
43	Recommend: “The potential for greater SSTS upgrade through universal inspection requirement at property transfer was discussed, but ultimately Chippewa County determined it prefers to have the financial sector drive inspection requirements at times of property transfer.”	Take out "rejected. Currently" and add "determined it"	Jeremy Maul	BWSR	Section 6.4.1 County Regulations	118	Suggested change was made
44	Shouldn’t Renville County be listed as well since the statute lists them? There should be more added to the narrative to express why this regulation is important for the planning effort in reaching its goals (this likely applies to all the regulatory programs listed in this section.)	Section on Minnesota River Management District lists Chippewa County as administrator	Jeremy Maul	BWSR	Section 6.4.1 County Regulations		Added Renville under Minnesota River Management District.
45	In the green box in the middle of the page there is again a reference to Section 0.	Reference to Section 4.3.1.2 Altered Hydrology then to Section 0 Monitoring and Data Collection	Jeremy Maul	BWSR	Section 6.6.3 Additional Data Collection	124	Correct reference inputted

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46	The Counties and SWCDs are anticipated to sign a Joint Powers Agreement (JPA) that will create a Hawk Creek – Middle Minnesota Watershed Joint Powers Entity (HCMMW JPE).	Remove the "Prior to... (CWMP)" (First sentence of paragraph)	Jeremy Maul	BWSR	Section 7.1 Decision-Making and Staffing	125	Suggested change was made
47	Recommend that the second paragraph be stricken and the first sentence of the 5th paragraph “Through the JPA” be stricken as they are not part of the plan content requirements and are subject to change as the JPE is developed and implemented.	2nd Para talks about JPE having 'no land use or taxing authority	Jeremy Maul	BWSR	Section 7.1 Decision-Making and Staffing	125	Suggested change was made
48	While not expressly required in plan content, it is not advisable to completely remove the advisory committee from Plan implementation. For many of the review agencies this is their main method of involvement during implementation, and we recommend considering a way to keep advisory members involved. It should be something discussed with the advisory committee membership.	States in 5th paragraph there will be no on-going role of the advisory committee.	Jeremy Maul	BWSR	Section 7.1 Decision-Making and Staffing	125	Continuing an additional committee when it's not a plan content requirement isn't a priority of this plan. Advisory Committee members that are are also plan review authorities will have an ongoing role in implementation. This is stated in section 7.2. The review agency partners can be included at the Steering Team level, like many other planning areas currently function. ST
49	This should be stricken as it is not part of the plan content requirements and is subject to change.	Second paragraph	Jeremy Maul	BWSR	Section 7.3.1 Local Funding	127	Suggested change was made
50	Where it says, “Joint Power Board,” it should be changed to “Joint Powers Entity.”	First paragraph second sentence	Jeremy Maul	BWSR	Section 7.4 WORK PLANNING	129	Suggested change was made
51	Appendix D - issue with memo page numbers		Jeremy Maul	BWSR			Fixed page numbers
52	Appendix F - none of SWCD Resolutions included		Jeremy Maul	BWSR			Other Waters Resolutions are now included. ST
53	Suggest changing “suffered from” to “impacted by”. Suffered I think is too strong and ignores the economic aspects of farming	"as well as many impaired waters that have suffered from intensive row crop agriculture"	Aicam Laacouri	MDoA	Executive Summary	14	Suggested change was made
54	I would give a number to the pie charts and refer to them in the corresponding paragraphs.	Actions section	Aicam Laacouri	MDoA	Executive Summary	22	We removed two of these pie charts to align with the new structure of the goals section. The excutive summary does not have any figure or table labels because these are referred to later in the document
55	At the end of the paragraph you can add the following text about BMP siting: “For optimal siting (spatial and economic considerations), the MDA highly recommend the use of PTMapp and ACPF programs.	First listed action, Incentivized Agricultural BMPs	Aicam Laacouri	MDoA		22	Suggested change was made
56	Replace “BMPS” with “BMPs” to stay consistent with the rest of the document (change in text and in the pie chart).	First listed action, Incentivized Agricultural BMPs	Aicam Laacouri	MDoA		22	Suggested change was made

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57	Add the PTMapp and ACPF are highly recommended for siting BMPs to get the most economical and environmental benefits	End of paragraph	Aicam Laacouri	MDoA	Section 3.3.15 Agricultural Practices and Runoff Management	45	Suggested change was made
58	Add the MDA AgBMP loan program.	Probably end of paragraph too	Aicam Laacouri	MDoA	Section 6.1.2 Low-Interest Loans	114	Suggested change was made
59	Multiple benefits of Implementation activities – The implementation of the activities referenced in this plan have many intertwined and overlapping benefits within the watershed. However, the plan would benefit from further detailing the interconnected nature of benefits from specific projects. There are references to multiple benefits and interrelated resources related to altered hydrology in Sections 3 and 5.3. Prioritization efforts may be further enhanced by defining these relationships, and opportunities that provide multiple benefits are more important than ever. Examples include habitat and biodiversity opportunities in riparian vegetative restorations/naturalization on streams that also incorporate strategies for floodplain connectivity and habitat continuity; or soil health improvements associated with changes to ag land management that also increase soil water retention and reduce downstream peak flows.		Ethan Jenzen	MNDNR	General Report	N/A	Added language throughout sections 3, 4, and 5 to clarify multiple benefits

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60	MNDNR as lead entity in acquisition project – Table 5.1 and Activiies #18 and #19 references the acquisition of a water level control structure in the Eagle Lake watershed in Kandiyohi County, with DNR as a lead entity. While DNR supports active management of PW Basin #34-540 to improve water quality both internally and for downstream receiving waters, the lead role for an acquisition project should be delegated to a local government entity or organization. As such, please list DNR as a supporting partner, but not the lead entity. In addition, please reference this structure as “the PW Basin #34-540 outlet structure” in Activities #18 and #19 to avoid confusion.		Ethan Jenzen	MNDNR	Section 5 Targeted Implementation Plan Schedule	97	These changes have been incorporated into the goals and implementation activities.
61	The plan’s peak flow reduction goals and related implementation activities, including increased water storage in the watershed, will help address cumulative impacts of hydrologic changes and provide protection of downstream water resources in the watershed. These impacts are especially prominent in erosive, down-cutting ravines and direct tributaries to the Minnesota River, such as lower Hawk Creek and Beaver Creek which have steep slopes, geomorphic landscape position, and erodible soils. It is great to see this plan include specific goals to work with drainage authorities and landowners on developing multipurpose drainage management approaches, installing practices to reduce erosion, increasing storage within the drainage systems, improving water quality and reducing long term maintenance. These goals will help improve hydrology, not simply offset other forces.		Ethan Jenzen	MNDNR	General Report	N/A	No change needed

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62	Activity #28 involves working with local landowners to install at least one stream stabilization practice per year to reduce erosion. Section 4.3.1.4 also identifies soil erosion from stream channels as a priority issue. Stream restoration projects typically work more effectively to address underlying issues with the channel shape, slope, incision, and/or sinuosity for a channel’s given valley than streambank stabilization projects. Due to the highly altered nature of the HC-MM watershed, the majority of the rivers and streams are in disequilibrium. Guidance is available from the Legacy Evaluation Program (https://www.dnr.state.mn.us/legacy/restoration-evaluation.html) when prioritizing and targeting stream and river restoration efforts. DNR hydrologists and watershed specialists are committed to and will make every effort to collaborate and provide technical assistance with subwatersheds and reaches in need of geomorphic assessments and restoration planning.	Change "streambank stabilization" to "stream restoration"	Ethan Jenzen	MNDNR	Section 4.3.1.4: Agircultral Practices, Soil Erosion and Runoff Management	81	Changed "stabilization" to "Stream restoration"
63	It is great to see soil health principles and increased education/outreach efforts to address altered hydrology featured throughout the plan. These efforts can be used as a foundation for future efforts and expanded to outline the multiple benefits on a watershed scale.		Ethan Jenzen	MNDNR	General Report	N/A	No change needed
64	Natural riparian, shoreland and floodplain area provide multiple ecological and hydrologic benefits – slowing flow velocity and attenuating nutrients to providing critical corridors for both aquatic and terrestrial species. The plan should cite these multiple benefits where applicable.		Ethan Jenzen	MNDNR	General Report	N/A	Language added indicating multiple benefits and commented examples
65	Floodplain resources and connectivity are referenced in Plan Sections 3.3.7 and 3.5 as portion of identification of high quality resources and issues prioritization – we would suggest including additional references to increasing floodplain connectivity and benefits in Section 4.3.3.2 (Floodplain Management) related to desired long term goals.		Ethan Jenzen	MNDNR	Section 4.3.3.2: Floodplain Mangement	92	Suggested change was made

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66	An important strategy to enhance climate change resiliency is to protect native floodplain forests and grasslands. We suggest adding a reference to this strategy in Section 4.3.3.2. Protecting and restoring floodplains provides more room for rivers to accommodate large floods and keep downstream farms and communities safe.		Ethan Jenzen	MNDNR	Section 4.3.3.2: Floodplain Mangement	92	Suggested change was made
67	Riparian habitat- The issue “degraded riparian zone” in Section 3.3.13 should be written as “loss and degradation of aquatic and riparian habitat.” This may seem like a minor detail, however riparian applies to the border/streambank, while aquatic refers to the streambed and fish habitat. Both issues are discussed in this section, and this clarification is important to address both elements of riparian areas. DNR Area Staff can often help with local stream projects, or assist with applying for grants to do the work, provided there is an application toward fish habitat. Including “aquatic habitat” within the framework of issues makes the connection more direct. The Minnesota Guide for Stream Connectivity and Aquatic Organism Passage through Culverts (https://files.dnr.state.mn.us/waters/publications/culvert-stream-connectivity.pdf) can help project managers, resource professionals, and engineers to design and implement projects suitable for connectivity.		Ethan Jenzen	MNDNR	Section 3.3.13: Wildlife Habitat	43	Suggested change was made

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68	High Quality resources within the watershed are called out as a Tier 1 priority from protection/preservation, however, there is little mention of the Minnesota River fishery as a recreation opportunity or a priority resource for protection against degradation. The Minnesota River Valley through the HC-MM planning area is a tremendous resource for anglers, hunters, paddlers, camping, and outdoor recreationists. It includes both private and public parcels, opportunities for ecotourism, scenic drives, and tours of historical landmarks. There are sensitive animal and plant communities found here, as well as rock outcrops within rare prairies, and boulder dominated rapids in steep tributaries to the Minnesota River, such as Birch Coulee Creek (as noted in Section 6.4.1). Fishing, paddling and other outdoor activities are popular, but opportunities decrease due to dramatic flow alterations, and this fishery should be referenced in opportunities for recreation enhancement. Please ensure that this area is referenced in the final plan in regards to recreation opportunities and enhancement, including protection of the fisheries.		Ethan Jenzen	MNDNR	Section 4.3.1: Tier I - (High Priority) Issues	66	We agree these are high quality resources and priority concerns, goals, and activities will benefit these resources. Add suggested language to the LWRI. Steering Team decided that fisheries will not be added as a priority resource as it's too broad of a resource to list as a priority. ST

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69	Plan Section 4.3.2.4 and Activities #53 and #54 describe increasing recreational (outdoor recreation in general) opportunities within the watershed through property acquisition and expanding public property access through the Walk-In Access program within the watershed, and lists DNR as a lead entities for these activities. DNR would consider public land acquisition and/or enrollment of land in the Walk-In Access programs a means to increase outdoor recreation, as long as those parcels align with partner priorities and meet DNR Strategic Land Asset Management (SLAM) goals. Along these lines, we suggest changing the Activity #53 and Section 4.3.2.4 language to “Work with partner agencies to pursue additional public recreational land acquisition opportunities that fit strategic goals”. This suggested change will more clearly state that proposed acquisitions must fit within existing prioritization frameworks and meet state and regional goals in order to move forward.		Ethan Jenzen	MNDNR	Section 4.3.2.4: Recreation	88	Steering Team adjusted goal after considering this comment
70	We are pleased to see specific and realistic goals set for reduction measures in water quality parameters in both lakes and streams, and specific strategies and measures proposed for shallow lakes. This will provide excellent potential for improvement in impaired basins.		Ethan Jenzen	MNDNR	General Report	N/A	No change needed
71	Plan Section 4.3.2.5 identifies addition monitoring needs in the Eagle Lake subwatershed. The Eagle Lake Improvement Association (ELIA) has historically collected water quality monitoring information in several tributaries to the lake. Please contact the ELIA to collaborate in use and analysis of the historic data, as it may be of assistance in reaching goals set in Section 4.3.2.5.		Amanda Strommer	MDH	Section 4.3.2.5: Monitoring and Data Collection	89	Listed as partner in implementation table.
72	Section 3.5 Ranking Of Issues By Priority Area, Table 3-6 Issues Prioritization for The Beaver Creek HUC 10 (page 55): Spell out that ERA is the Emergency Response Area.		Amanda Strommer	MDH	Section 3.5: Ranking of Issues by Priority Area	56	Suggested change was made

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73	Section 5-Targeted Implementation Schedule, Table 5-2: MDH recommends combining Activity 36 and 37 into one activity. Suggested wording could be to “Make information available to private well users about local drinking water quality and well testing. Host a well testing clinic or provide resources to well users to have their water tested for: <ul style="list-style-type: none">▪ Coliform Bacteria (every year)▪ Nitrate (every other year)▪ Arsenic (at least once)▪ Lead (at least once)▪ Manganese (at least once)”		Amanda Strommer	MDH	Section 5: Targeted Implementation Schedule	99	These changes have been incorporated into the goals and implementation activities.
74	MDH recommends editing the goal for activities 36-39 which states to “Direct private well owners to financing programs for well water improvements.” Possible wording could be to “Direct private well owners to programs for well water testing and improvements.”		Amanda Strommer	MDH	Section 5: Targeted Implementation Schedule	99	Steering Team to work with Camilla to resolve goals, activities, measurable outputs, and metrics descriptions. Restructure section 3, 4, and 5. ST
75	In terms of drinking water testing recommend replacing all references to fecal coliform bacteria to coliform bacteria or total coliform bacteria.		Amanda Strommer	MDH	General Report	N/A	Suggested change was made

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76	We appreciate that education and outreach have been mentioned several times throughout the report including Goals for Tier II Medium Priority Issues in Executive Summary and Section 3.3.16 Section 3.3.16 summarizes some of the education and outreach work completed during development of the WRAPS, but could go further to suggest ways to increase engagement with the public. These ideas could be included in the education and outreach section and potentially guide future work in this area. Below is a list of options generated by the local WRAPS working group. These ideas could be included in Section 3.3.16 or elsewhere in the document to prioritize and target education and outreach in the watershed in an effort to achieve One Watershed, One Plan (1W1P) goals.	Education and outreach ideas taken directly from the WRAPS reports: oPeer-to-peer interactions (farmer forums, field days, conservation tours) oTarget leadership/elected officials, school curriculum, coffee shop visits oStrategically target audiences (e.g. canning crops) oTarget topics: nutrient management, soil health, drainage water management, cover crops, tools for farmers to estimate their fields' impact/results of practice adoption oEducate producers on financial benefits (less fertilizer purchase) of application timing and scavenging cover crops and on proper application/requirements oEducate on economics of managed grazing (increase forage capacity), cost share for exclusion practices oEducation and outreach: demo and benefits of reducing ditch clean-outs, peer-to-peer, watershed tours, school curriculum, AIS oRegulations/zoning: improved/enforced shoreland ordinance/easement, targeted no development areas oEducation: residential practices, stormwater management, road/sidewalk salt	Mike Weckwerth	MPCA	3.3.16 Education and Outreach (Social Based Challenges)	45	Education and outreach are addressed through many implementation activities in many of the goals and this has been discussed multiple times at meetings. The Steering Team is satisfied with how education and outreach are addressed in the plan. Furthermore, the education and outreach activities included in this plan overlap with numerous activities from the WRAPS.
77	Inconsistent capitalization in list of tables and figures. Sometimes all words are capitalized and sometimes only some words.		Mike Weckwerth	MPCA	List of Tables and Figures	8 & 9	Suggested change was made -- may revisit after final edits made
78	There are multiple instances of grammar and punctuation errors throughout the report. We ask that a final proof read is completed.		Mike Weckwerth		General Report		The report was proof read and grammatical/punctuation errors were addressed

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79	HSPF-SAM Hydrological Simulation; MASWCD – Soil and Watershed Conservation District. Some acronyms (DU, ERA, TNC) are not defined in the text of the document. HCMWW JPE not listed.		Mike Weckwerth	MPCA	Acronyms	10	Added definition for HSPF-SAM. HCMM and JPE are included in Acronym list separately. ERA and DU spelled out in text, TNC removed.
80	confusing to state this stretch of Minnesota River has drainage area of 17,000 sq. miles – entire basin is about 17,000 sq. mi.	Minnesota River Zone text box	Mike Weckwerth	MPCA	Executive Summary	15	Removed this language
81	Should Swan Lake be included in the table? Identified as priority resource but it doesn’t get much discussion in the Plan.	The results of this final prioritization exercise are summarized in the following table:	Mike Weckwerth	MPCA	Executive Summary	19	Added Swan Lake to the table
82	Are 40 manure and 80 nutrient management plans an annual or 10-yr goal?	Goals for Tier I High Priority Issues Ag Practices (Last Box)	Mike Weckwerth	MPCA	Executive Summary	20	All goals are 10-year goals. They have been revised based on recommendations from BWSR
83	Are these annual or 10-yr goals? Perhaps make a statement leading into the goals such as: Unless otherwise stated the timeline for the goals listed is the 10-yr implementation of the Plan.	Goals for Tier II Medium Priority Issues	Mike Weckwerth	MPCA	Executive Summary	21	The preceding paragraph states: "Goals are a guide for what quantifiable changes the Plan can accomplish in its 10-year timeframe and are based on calculations linked to water quality improvements." indicating these are 10 year goals
84	why different font color and ellipsis for HCMM?	Tier I Pie Chart (2nd Pie Chart)	Mike Weckwerth	MPCA	Executive Summary	22	The color selection is meant to reference the corresponding category in the actual pie chart. No change made in response to this comment.
85	HCMMW – Why add the W to HCMM?	HCMM led Projects paragraph	Mike Weckwerth	MPCA	Executive Summary	22	W refers to watershed.
86	Inconsistent wording in bulleted text. For example, “This voluntary program and planning effort based on the most current information available...” Should this read “This voluntary program and planning effort is based ...”?	Develop 1W1P following guidelines = bulleted list	Mike Weckwerth	MPCA	1.1 Purpose and Scope	24	Suggested change was made
87	Would make more sense to refer to the HCMM planning area rather than HCMM Watershed. This shows up in other places in the document as well.	Discusses zones in the text but refers to watershed throughout?	Mike Weckwerth	MPCA	2.1 Planning Area Zones	30	All references to HCMM watershed were changed to HCMM Planning Area
88	What is meant by, “The runoff...are compounded”? Please clarify.	These subwatersheds ... discharge directly to the MN River. As a result, THE RUNOFF from agricultural land use activities in each of these subwatersheds ARE COMPOUNDED at the river and must be treated separately ...	Mike Weckwerth	MPCA	2.1.2 Agricultural Zone Geographic Setting	33	Grammar issue fixed

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89	map is confusing as it shows lakes area in context of discussion of Ag area. Suggest to maybe highlight the Ag area.	Figure 2-2	Mike Weckwerth	MPCA	2.1.2 Agricultural Zone Geographic Setting	34	No change made. This map shows the entire planning area and the HUC-10 subwatersheds within it.
90	reference to “eyeball method” with no explanation of what this means.	Table 3-3 Comprehensive Watershed Priority Scheme 3 rows down under Criteria for Identifying Priority Areas	Mike Weckwerth	MPCA	3.4 Priority Resources	50	Removed this language as it did not accurately describe the analysis that was done.
91	Why is Swan Lake a priority resource?	One additional resource was identified (during exercise) as a high priority resource for this planning effort: Swan Lake (Sibley County: Little Rock Creek Watershed).	Mike Weckwerth	MPCA	3.5 RANKING OF ISSUES BY PRIORITY AREA	52	Indicated that this was informed by the MNDNR's notification letter
92	HSPF-SAM and BATHTUB don’t allow for targeting of practices except for maybe at the subwatershed scale. RUSLE2, site visits and evaluations, and local knowledge could be used to target practices but these are referenced in the context of setting goals not targeting. PTMapp seems like a logical tool to use for targeting practices.		Mike Weckwerth	MPCA	Section 4 Establishment of Measurable Goals	61	Added PTMapp as a tool for targeting practices and revised wording because HSPF-SAM and BATHTUB do not target practices
93	Direct drainage, NE Trib, NW Trib, Swan Lake for Willmar all have reduction goals for concentration but the load goals do not change from existing loads.	Table 4-2 Existing and Goals	Mike Weckwerth	MPCA	section 4 Establishment of Measurable Goals	63	Removed all goals with no reduction and removed blue shading to improve clarity on goals
94	How are the suitable acres determined? What are the criteria? HSPF-SAM doesn’t specify where in a subwatershed practices should be placed.	Impaired Streams and Impaired Lakes Implementation Activities – “HSPF-SAM identified Ag BMPs on suitable acres.”	Mike Weckwerth	MPCA	Section 4.3.1.1 Impaired Lakes and Stream	69	This is described in the memo in Appendix D -- provided reference
95	are these identified or shown on a map somewhere?	Priority Area Drainage Area codes - second column of Table 4-5	Mike Weckwerth	MPCA	Section 4.3.1.1 Impaired Lakes and Stream	70	Referred to Appendix D, where these maps are located
96	Upper Hawk Creek Sediment, Phosphorus, Total N all have exact same reductions for the priority drainage areas.	Table 4-5	Mike Weckwerth	MPCA	Section 4.3.1.1 Impaired Lakes and Stream	70	Fixed these reductions and switched nitrogen and phosphorus labels, as they were incorrectly placed
97	Metrics bounce between past tense and future tense.	Metrics list at bottom of page	Mike Weckwerth	MPCA	Section 4.3.1.4 Agricultural Practices, Soil Erosion and Runoff Management	83	These changes have been incorporated into the goals and implementation activities in section 5 and the metrics sections have been removed from section 4

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98	Clean Water Partnership offers zero percent interest loans for upgrading septs.		Mike Weckwerth	MPCA	Section 4.3.2.2 Septic Systems	88	Added CWP to cost share section (Add CWP under Acronyms). No need to be more descriptive as cost share programs can change.
99	How will flow rating curves be developed? Flow and WQ stations require a great deal of time, effort, and resources. MPCA can offer technical assistance and support but we do not have the regional staff to take a lead role on monitoring at these sites.		Mike Weckwerth	MPCA	Section 4.3.2.5 Monitoring and Data Collection	90	Steering Team to work with MPCA as needed. ST
100	Why is “Impaired Lakes and Streams...” italicized?	Goal 2 under Justification	Mike Weckwerth	MPCA	Section 4.3.2.5 Monitoring and Data Collection	90	Not consistent with rest of goals section - just capitalize (no italics)
101	Inconsistent use of commas and \$ in cost projections.	Table 5-1	Mike Weckwerth	MPCA			Suggested change was made
102	· There are columns marked with “X” or “0” and some left blank. Is there a legend to signify what each means?		Mike Weckwerth	MPCA	Implementation Tables	97-103	Removed O's so only X's in table.
103	· Should Minnesota Department of Agriculture be listed as a Supporting Partner when an Implementation Activity is related to agricultural practices? Sometimes they are listed, other times not.		Mike Weckwerth	MPCA	Implementation Tables	97-103	These changes have been incorporated into the goals and implementation activities.
104	· As a “Metric” for the Measurable Output, please define what “Each” is in reference to, for numerous Implementation Activities?		Mike Weckwerth	MPCA	Implementation Tables	97-103	These changes have been incorporated into the goals and implementation activities.
105	· According to the BWSR’s One Watershed, One Plan Guidebook, State and Federal agencies will have a supporting role, and the Local Government Unit will serve as the Lead. Suggest moving agencies to the Supporting Partners column as budget constraints will not allow to serve as a Lead role.		Mike Weckwerth	MPCA	Implementation Tables	97-103	These changes have been incorporated into the goals and implementation activities.
106	Lines 55, 56, and 57 – MPCA can partner to assist with monitoring efforts but cannot lead this activity. The cost to install and maintain multiple flow stations seems to be under estimated. To contract with DNR to measure flows at one station can cost between \$8,000 – 10,000 per year.		Mike Weckwerth	MPCA	Implementation Tables	101	These changes have been incorporated into the goals and implementation activities.
107	Why is HCMM a different font color?	Figure 5-2	Mike Weckwerth	MPCA		108	No change needed. This is referring to the respective color in the pie chart
108	Reference to Section “0” in Priority Issues and Priority Areas		Mike Weckwerth	MPCA		109	Correct reference inputted

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109	Error in beginning of last paragraph “Table 5-9Table 5-9Table5-9”		Mike Weckwerth	MPCA		111	Suggested change was made
110	Reference to Section “0” Monitoring and Data Collection		Mike Weckwerth	MPCA		124	Correct reference inputted
111	Refer to WRAPS as updates not as Cycle 2. Note the schedules shown for WRAPS updates are tentative and subject to change.		Mike Weckwerth	MPCA		131	Suggested change was made
112	I consider HCWP to be an LGU (in reference to the section towards the end of the plan that describes HCWP as a non-governmental entity and is listed with the likes of Pheasants Forever, Ducks Unlimited, etc.)	When I was establishing the HCWP JPA in 2012, I talked with MCIT, local county financial departments, and several CPA firms who all said we were considered an LGU and were subject to follow certain state statutes that LGUs are required to adhere to (e.g. being required to have an annual audit performed).	Heidi Rauenhorst	Hawk Creek Watershed Project	Implementation Tables	97-103	This change was made.