

Chippewa River CWMP

Response to Formal Review Comments



#	Commenter	Section	Page	Par.	Comment	Editorial	Material	Note	Change needed (Y/N)	Resolution
1	BWSR	ES		First Paragraph	As this watershed includes a small portion of the Minnesota River Basin watershed, this should be included in the opening paragraph that describes the watershed.		X		Y	Added mention of Minnesota River Basin in first sentence
2	BWSR	ES		Plan development	Add "Board" to the sentence "While the Chippewa Joint Powers...."	X			Y	Made suggested edit
3	BWSR	ES		Last paragraph	Dates should be 2024-2033	X			Y	Changed dates
4	BWSR	ES		Last paragraph	Add "and adopted by the local government partners to "it will be approved by BWSR"	X			Y	Added suggested text
5	BWSR	ES		Table 1-1	Were there any low issues outside of emerging issues? If there were, these can just be narratively listed or listed in a bullet point table. We know these are listed in p 3-8, but it would be useful to have them briefly described here.		X		N	Low priority issues narratively listed in bullet points on pg 3-8 under a heading with the same title. As they are not addressed in the plan, they are not described further.
6	BWSR	ES		Figure 1-3	This table shows that most of the watershed is in either high or medium priority. Is there a difference between the prioritization of medium and high targeted areas? Based on generally understood semantics, high priority areas would be focused on first while medium would be focused on second. Is this the consensus of the partnership? If not, this should be explained in the plan to indicate how targeting of actions within the priority areas will take place. Is it safe to say that just because an entire subwatershed is highlighted as high or medium priority, that working anywhere in each one may not be appropriate given the location of the priority resource? If so, please add this language to the plan.		X		N	See also "Where to Focus Work" on Page 5-4. This is the same map as Figure 1-3.
7	BWSR	ES			Does the partnership have a purpose, vision, or mission statement? Was this adopted from the Chippewa River Watershed Association? If so, this should be added and explained. (Requirement A-1).		X		N	Mission statement not defined but slogan included in logo.
8	BWSR	ES			What are the overriding responsibilities of the LGU partners? A simple narrative description about how the partners will implement different sections of the plan would be helpful. For example, SWCDs will be primarily involved in conservation practice implementation, counties will be involved in regulatory efforts, and all partners will be involved in education and outreach. (Requirement A-6).		X		Y	Added text to pg 1-10 on SWCD and LGU roles: "The plan will be implemented by LGU involved in plan development along with local and state partners. SWCDs will be primarily involved in conservation practice adoption, counties will work with regulatory efforts, and all partners will conduct education and outreach."
9	BWSR	LWRN	2-1	Introduction and History	In the second paragraph, there is a brief sentence on this being the homelands of the Dakota. We would encourage you to add a couple of sentences indicating that the partnership reached out to both the Upper Sioux Community and the Lower Sioux Community for input and participation in the plan. While both tribal communities appreciated the request, they were involved in other watershed partnerships that exist in areas where their current reservations lie and chose to focus on those areas as of higher importance. The Upper Sioux Community did request that efforts be made to reduce soil erosion and protect water quality during implementation.		X		Y	Text added on tribal outreach and soil erosion request: "The Upper and Lower Sioux Communities were reached out to during CRCMWP development for tribal input and participation. Both communities appreciated the outreach but were involved in other watershed partnerships and chose to focus on efforts on those. The Upper Sioux Community requested that efforts be made to reduce soil erosion and protect water quality during implementation. SWCDs will work towards minimizing soil erosion during and through implementation projects"

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10	BWSR	LWRN	2-6	Surface water resources	Last sentence of the first paragraph "future care must be taken." What must future care be taken for? Is this protection or improvement or is it more of a social goal to ensure healthy water for recreation, drinking water, and agricultural use? This is a pretty strong statement and identifying what future care must be taken for can clarify the entire purpose of the plan.	X			Y	Text added: "Future care must be taken to continue to protect good quality natural resources and continue to foster a care for the environment and conservation."
11	BWSR	LWRN	2-8	Lakes	There is a fairly extensive discussion of streams. However, there are only a couple of sentences in the lake section. Has there been any changes to lake levels related to increased runoff as indicated in the streams? Are there anything interesting about the lakes in terms of recreation use? It just seems odd to have such a good description of streams and rivers and then be weaker on the lakes.		X		Y	Added text on lakeshore erosion and phosphorus: "The Chippewa River Watershed's lakes are important to residents for their scenery, recreational opportunities, and support of aquatic life. Several of the lakes have high phosphorus concentrations which can lead to algae blooms. Lakeshore erosion can contribute sediment and phosphorus to lakes, and can be caused by use of wake boats near shore or a lack of shoreline vegetation."
12	BWSR	LWRN	2-11	Figure 2-8	Clarify that this is groundwater uses	X			Y	This is surface and groundwater. Text added accordingly.
13	BWSR	LWRN	2-11	Groundwater resources	The plan identifies almost 10,000 registered wells. You may want to include a sentence that there are an unknown number of wells that were installed before well reporting was required and these wells are of significant concern to groundwater protection.		X		Y	Added additional text on old wells: "... but an unknown number of wells were installed prior to when registration began. These are a concern for groundwater protection, as old abandoned wells provide a connection between surface contamination directly to groundwater supplies. "
14	BWSR	LWRN	2-12	Groundwater resources	You discuss the Boannza Valley GWMA. Were there any findings of importance that should be highlighted?		X		Y	Added text on gaps listed in the GWMA Problem section
15	BWSR	LWRN	2-14	Groundwater resources	The last sentence on the first paragraph is a bit confusing. Is Pope County the only county with a geologic atlas? Do other counties not have a geologic atlas? This could be an important item to explain and maybe consider it to be a data gap.	X			Y	Sentence rephrased for clarity. Referred to the borders in the pollution sensitivity in Figure 2-9, which is because the geologic atlas is done at the county level.
16	BWSR	LWRN	2-14	Drainage Systems	It may be useful to indicate that, in addition to the public drainage systems, there is an extensive development of private drainage systems that also serve to move water across the landscape.	X			Y	Text added: "In addition to public drainage systems, there is an extensive network of private drainage systems that also move water across the landscape."
17	BWSR	LWRN	2-14	Drainage Systems	Are there any drainage authorities outside of the counties? This would be useful to clarify.		X		N	No, drainage authorities are all counties
18	BWSR	LWRN	2-15	Control Structures	Are any of the dams at risk of failing?		X		N	No known dams at risk of failure; actions in the plan prioritize dams (and other barriers) for addressing / maintaining/ removing.
19	BWSR	LWRN	2-15	Stormwater	Are any of the urban areas MS-4s?		X		Y	The Montevideo MS4 is partially in the southern tip of the watershed. Text added to clarify.
20	BWSR	LWRN	2-15	Water based recreation	It may be informative to include the recreational nature of the fishery in this section and then transition into the fishery habitat in the next section.	X			Y	Text added: "Fishing is a recreational opportunity for many watershed residents and is also a draw for tourists."

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21	BWSR	LWRN	2-18	Demographics and socioeconomics	This area could use a bit of enhancement. While the plan talks about population size and the ranked order of employment fields, there is more information related to demographics that will be useful for understanding how landowners and residents will be able to manage the local resources. What are the current and projected age of the populations? Education and income? When you talk about environmental justice, you may want to consider providing information on racial breakdowns. For more information, please see this section: Creating a Land and Water Resources Narrative in the Watershed Planning Guidebook found here: https://bwsr.state.mn.us/sites/default/files/2021-11/WP_1W1P_guidebook.pdf		X		Y	Demographics on population, education, and race estimated for the watershed and added to the text. MPCA EJ areas determined for the watershed, and text added explaining 31% of the watershed is in an MPCA 'consider for poverty issues' area.
22	BWSR	LWRN	2-19	Existing Land uses	Are there any land use changes from ag to urban/ex-urban development. It may also be useful to identify livestock use and changes as the plan earlier talks about e. coli.		X		Y	Added the number of feedlots in the watershed to the first paragraph.
23	BWSR	Issues	3-6		Figure 3-2 is critically important to understanding how this plan will relate to the implementation process. How does this tie in with figure 1-3. With a common understanding and cross referencing, the high priority definition in figure 3-2 should also correspond to the high priority locations in figure 1-3.		X		N	Yes, the definitions in Figure 3-2 match the high, medium , and low areas in Figure 1-3. Additional descriptions provided in Section 5.
24	BWSR	Goals	4-2	Altered Hydrology	The last paragraph states the partnership plans on using wetland restoration as a primary tool. It would be useful to identify other tools to ensure the partnership does not fall into a single track focus on wetland restoration when there are other potential activiteis and practices that could be considered. It may be useful to strike the last sentence because of the referenced activities in the what can be done section.		X		N	Text says 'wetland restorations as a primary route', stating wetland restorations will be a focus but not the only action. The following paragraph describes regulation and drainage management as a tool for addressing altered hydrology. The 'what can be done' section lists more example actions in addition to wetland restoration.
25	BWSR	Goals	General		How were the measurable goals for the priority issues tied to the priority locations? This is a little confusing in that the fig-1-3 map appears to be an aggregation of the of the priority issue maps. Are priority issues more important or are priority locations more important? There appears to be an inconsistency in the plan with which set of priorities the partnership will move forward. This is going to make developing a targeted work plan difficult because it opens almost the entire watershed to action depending upon which set of priorities the partnership chooses.		X		N	See "Where to Focus Work" on page 5-4 for more detail on how the comprehensive priority map was created. In addition, planning region action tables refer the focus area metric used for each action. If using specific goal prioritization, that is indicated (for example, the action host field days has a focus area that says Soil Health Priority Subwatersheds)
26	BWSR	Goals	4-7	Fecal Bacteria	Fecal bacteria is discussed in this section but is not included in the measurable goal statement. For the ten year goal, the plan should indicate why there was no reduction numbers for fecal coliform.		X		Y	Statement added about cost and difficulty in annual monitoring of bacteria levels under "Goals" paragraph.
27	BWSR	Goals	4-8	Total nitrogen in table	Why is there no long-term reduction goal for total nitrogen for the Upper Chippewa, Middle Chippewa, East Branch, and Lower Chippewa subwatersheds?		X		N	No TMDLs
28	BWSR	Goals	4-8	What can be done	Septic systems are listed as a medium priority but septic fix-ups are not included in this section. Was that intentional?		X		Y	It is noted in the text that the 'what can be done' section is examples, not a comprehensive list. Septics added as requested.

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	BWSR	Goals	4-10	Table 4-2	Consider revisiting the proposed load reductions for Hassel, Red Rock, and Long Lakes particularly if they have an impact on lakes and streams immediately downstream. Hassel - there is only a 4.5% proposed load reduction goal for this lake in the next 10 years, which is a somewhat negligible improvement. This begs the question of whether it is considered a high priority. Red Rock and Long Lakes - there is very little load reduction needed to meet the TMDL. It is unclear why partners would not pursue delisting them to achieve tangible successes in the next 10 years.		X		N	Lakes will be further prioritized during annual work planning. Process by which 10-year lake goal targets was determined is summarized in text.
30	BWSR	Goals	4-12	Table 4-2	Please add the long term load reduction goal for Stowe Lake if available.		X		N	Not available yet.
31	BWSR	Goals	4-23	Lake shoreland projects	The partnership may want to consider defining what a meaningful shoreland habitat restoration project is. The planning region targets have a number of projects, but what makes a good project? The goals may be fairly easily met but will they result in meaningful change?		X		N	SWCDs will follow best practices to maximize benefits from shoreland restoration projects
32	BWSR	Goals	4-27	What can be done	Are field days an action to implement soil health or is this a tool for moving toward one of the other listed actions. This is the one that seems not to be like the others.	X			Y	Field days help educate farmers or stakeholders on the benefits of soil health practices, and indirectly help with implementation. Deleted from example actions to avoid confusion.
33	BWSR	Goals	4-29	Background	Nearly 10,000 identified wells but there are also an unknown number of wells that are not located. These may be of even more risk than the known wells.		X		Y	Text added: "10,000 wells have been identified, but there is an unknown number of wells that are unidentified that pose a significant threat to groundwater quality."
34	BWSR	Goals	4-30	10 year goal	Clarify that the 20 well sealings and 4,000 acres of conservation practices are watershed wide and not for each subwatershed.	X			Y	Text added: '... by sealing 20 abandoned wells per year watershed wide', and 'implement recharge conservation practices watershed wide...'
35	BWSR	Goals	General		Within each priority issue, the high and medium issue statements are identified with the same color. It may be useful to call out which issues are high and which issues are medium by using a different color scheme for the different priorities.	X			N	Issue statement priority indicated by bracket after each issue
36	BWSR	Implement	General		Please include a discussion in the plan about the shortcomings of PTMApp. Then describe the targeting approaches to be used to identify the best projects for those PTMApp gaps, including but not limited to water storage/altering hydrology, streambank, lakeshore, terrestrial habitat, and feedlots.		X		Y	Text added on limitations and table added for targeting methods for goals not directly informed by PTMApp.
37	BWSR	Implement	5-2	Action Tables	Is there any prioritization of the subwatershed priority areas as might be found in Figure 1-3? This cross listing would be useful to identify how the partnership intends to prioritize implementation within entire chapter. Distinguishing between high and medium priority areas with regards to when focused outreach and implementation occurs would help address timing, which is a component of targeting.			X	N	Each goal in Section 4 ranks subwatersheds as high, medium, or low. Some actions refer back to these rankings for implementation. During implementation, the ranking spreadsheet will rank practices placed in high priority subwatersheds higher. See also "Where to Focus Work" on Page 5-4. This is the same map as Figure 1-3.
38	BWSR	Implement	5-4	Where to focus	The partnership is going to use a ranking sheet which is great. Can there be any more description for how this sheet may prioritize implementation? It does not need to be fully laid out but having a general understanding of the outlines will be useful for later users of the plan to understand what the original priority actions and locations were as the plan was developed.		X		N	Ranking spreadsheet intentionally vague in plan to allow for local flexibility during implementation where it will be defined as specified.

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	BWSR	Implement	General		In the output column, is the information based upon 10 year plan goals or annual outputs? There appear to be a mix of both. It will be helpful to highlight which activities are annual outputs and which ones are for the ten year plan. For example UC-1 appears to be an annual output while I imagine UC-2 is based on the ten year planning window.		X		N	Outputs are over 10 years. The output for UC-1 is to reach 11,000 tons/sediment reduction per year by the 10th year. Some education and outreach outputs are annualized to better define progress.
40	BWSR	Implement	General		For those actions that occur every year in every subwatershed (i.e. implement structural conservation practices) the plan indicates that partners intend to work in every subwatershed every year doing this activity. Is this the actual expectation? How will this activity be prioritized across subwatersheds?		X		N	Implementation of structural and soil health practices is expected in high priority subwatersheds watershed wide, because each SWCD will do this in their region. Columns do not represent annual work plan intent, and will be better specified in annual work planning efforts.
41	BWSR	Implement	General		The implementation tables include bacteria reduction activities. While this was mentioned in the previous section, there was no measurable goal for reduction. Without a reduction measurement, how will this be measured for long-term accomplishment at the mid-point or ten year review?		X		N	While there isn't a specific bacteria goal to work towards, current bacteria impairments are known. Progress towards bacteria actions will be seen in the number of projects implemented (assessed via implementation activities PRAP and midpoint evaluation) and eventual delisting of streams as impaired due to bacteria.
42	BWSR	Implement	5-19 to	Education and Outreach	There are some activities in this plan that may not be eligible for WBIF funding. The partnership should know that just because an item is in the plan does not automatically make it available for WBIF funding.		X		N	This is acknowledged by the TAC.
43	BWSR	Implement	5-20	WW-26 to WW-28	These appear to be implementation items. Should these be included in the implementation table for the appropriate section to ensure better targeting and prioritization?		X		N	WW-26- WW-28 are in the watershed wide implementation table based on extensive TAC discussion.
44	BWSR	Implement	5-21	Capital Improvement Projects	How does the partnership intend to add CIPs that may develop after the plan has been approved. Because CIPs are a large dollar project, any additional CIP added after the original plan approval would likely require an amendment. These may be considered at the mid-point review for addition or, if there a new high priority items, they can be added through the amendment process.		X		N	Pg 5-21 says 'Additional CIPs listed here may arise as new information becomes available'. TAC acknowledges adding new CIPs may require an amendment.
45	BWSR	Programs	6-2	Second paragraph	There is discussion around building a scoring sheet. As this appears to be an effort to move the discussion of prioritization into implementation, the partnership should take some time to think about how this process will work in reality. Will this be a one time scoring sheet or will it be updated during each grant cycle? Who approves the scoring sheet? Because this appears to be where the real prioritization efforts are taking place, BWSR will be very interested in this scoring sheet because it will demonstrate the partnership's efforts toward meaningful changes in the watershed.		X		N	Ranking spreadsheet intentionally vague in plan to allow for local flexibility during implementation where it will be defined as specified. Prioritization of issues, subwatersheds, and resources is included in each plan section.
46	BWSR	Programs	6-2	Cost share last paragraph	Replace should with must in the last sentence "Projects using state funding from BWSR should (change to must)"		X		Y	Should changed to 'must'
47	BWSR	Programs	6-2 to 6-3		There is no mention of project development. While there is a mention of engineering assistance, is project development part of education or is it a stand alone component unto itself.		X		Y	Project Development has its own budget line in Table 5-1. Added 'development' to first sentence.



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48	BWSR	Programs	6-4	Education and Outreach	There are several items in the implementation table section on outreach and education that do not appear to be included here. It is useful to cross reference the two sections to ensure there is concurrence between the two.		X		Y	The implementation schedules are the final list of all plan actions in the Education and Outreach Program. Sentence added at the end of the first paragraph. "For a full list of actions funded by the Education and Outreach Program, see "Education and Outreach" on Table 5-9 through 5-20."
49	BWSR	Programs	6-5 to 6-6		Funding for baseline water quality monitoring is not eligible for BWSR WBIF. Not an action comment just a clarification.			X	N	Funding comment noted.
50	BWSR	Programs	6-5	Water Monitoring	It is unclear if current baseline monitoring provides the ability to assess trends in the priority resources. Please describe this in the plan and identify any monitoring gaps. If monitoring does not cover the priority waters, explain why.		X		Y	Added to text: "Not every lake or stream has monitoring. Progress in resource conditions without water quality monitoring will also be evaluated through modeling."
51	BWSR	Programs	6-8	Regulations and Local Controls	The first sentence in the second paragraph indicates an action on the part of counties. The partnership may want to reach out to the appropriate county departments to ensure they are in agreement with this specific language. We are not sure that counties will actively notify each other of ordinance changes as required in the plan.	X			Y	Language revised: "...are encouraged to meet and discuss ordinances..."
52	BWSR	Admin	7-2	Table 7-1	Who makes financial decisions? There is no indication of who will actually notify the fiscal agent of when funds should be encumbered or paid. This is a curious omission.		X		Y	Text added "Process for implementation will follow details defined in the Joint Powers Board Agreement, policies, and contracts for services."
53	BWSR	Admin	7-2	First paragraph	The first sentence indicates that the TAC will provide training to joint powers agreement employees. We are not sure what this means. Does the JPB expect to hire employees? Will the TAC provide training to new employees of signees of the joint powers agreement? Clarifying the intent behind this comment would be useful.	X			N	Discussed in TAC meeting and language will remain as is.
54	BWSR	Admin	7-5	Table 7-2	The table indicates that there are \$0 available for CIPs. This does not seem to be an accurate representation. Page 5-21 offers a potential commitment to funding CIPs. It may make sense to strip a percentage of funds from the "Projects, Practices, and Support" line to apply to CIPs.		X		N	Correct, this is baseline funds as specified in caption.
55	BWSR	Admin	7-10	Plan amendments	The way the first paragraph is written, it sounds like the partnership can make plan amendments on their own. We would recommend that discussions around the plan should be routed to BWSR first before the partnership makes any decisions on their own. An unapproved amendment could create serious challenges for grant reconciliation.		X		Y	"Upon request, BWSR will decide if a plan amendment is required" rephrased to "Proposed plan amendments will be reviewed by BWSR to decide if an amendment is required."
56	BWSR	Admin	7-10	Mid-Point Evaluation	Under this section, please list likely items the partnership will commit to evaluate at the 5 year evaluation, particularly issues with insufficient data during plan development that address priority issues and resources, such as but not limited to locations of PTMApp priority resource points, eColi data and strategies, water storage/altered hydrology strategies, identification of CIPs, refining targeting approaches that are not covered by PTMApp, staffing/technical assistance and engineering bottlenecks, coordination of projects with drainage and road authorities, and the social science of conservation to understand the barriers to voluntary conservation, to name a few.		X		Y	Added to paragraph: "During the mid-point evaluation, the Partnership will evaluate PTMApp priority resource points, new e. coli data and bacteria strategies, projects for water storage and addressing altered hydrology, any new CIPs, staffing and technical assistance, coordination of drainage and road projects, and the barriers to voluntary conservation practices."

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57	BWSR	Admin		Organizational structure	The PCR has a section on the organizational structure that is to be included in the plan. While much of this organizational discussion is contained in other sections of the plan, a brief summary in this area regarding the proposed organizational structure would meet the minimum content requirements without any additional questioning.		X		Y	See Page 7-1. "The Chippewa River CWMP will be implemented through this Joint Powers Agreement." A "Formal Agreement" header will be added to avoid potential confusion.
58	DNR	Admin	7-7		DNR provides technical assistance to County Assessor's to administer the Wetland Tax Exemption Program by providing the Public Water Inventory Map. Please change "financial" to "technical" in Table 7-3.	X			Y	Financial edited to Technical as recommended
59	DNR			References	The DNR Evaluation of Hydrologic Change (EHC) for the Chippewa River Watershed was finalized in July 2023. Please remove "draft" from the title and update the date. The EHC report is cited in Section 4, page 4-2. The link in this section is correct and directs the reader to the final version of the report.	X			Y	The word 'draft' is removed from the title and date is updated
60	DNR			Appendix	The Groundwater Restoration and Protection Strategies (GRAPS) report was a collaborative effort by MDH, MDA, MPCA, DNR, and BWSR completed in November 2022. Please consider adding the report to the Appendix.		X		Y	The GRAPS is referenced as in progress. This is replaced with the following and GRAPS is added to the references. <i>"Further information on groundwater in the Chippewa River Watershed</i> became available with the MDH Groundwater Restoration and Protection Strategies Report (GRAPS) which was published in late 2022. The GRAPS identifies known contaminants, contaminated sites, and strategies to address risks to groundwater.' Document not added to Appendix for brevity and as adding one technical reference instead of all (such as the WRAPS) would be challenging to defend.
61	Amelia, Villard, and Leven Lakes Association				This is a great short- and long-term plan and will do wonders in achieving the Chippewa River Watershed goals. We are considered a low priority area; however, Lake Leven is considered an impaired lake. If possible, we would like to follow any progress that is done to improve water quality in Lake Leven's inlet and outlets. The East Chippewa River headwaters starts North of, then flows in Lake Leven's inlet and outlets. The East Chippewa River headwaters starts North of, then flows South into Lake Leven. Our main concern is the high phosphorus levels coming in and out of Lake Leven.			X	N	Tentative meeting with Pope SWCD planned for August. The midpoint assessment will be done 2029/2030 and will provide an estimate of Chippewa River Watershed total phosphorus reduction due to plan implementation.
62	MDA	Admin	7-Jul	Table 7-3	Next to MDA, please add soil health financial assistance program grant	X			Y	Soil Health Financial Assistance Grant added to Table 7-3
63	MDH	LWRN	2-14		the Groundwater Restoration and Protection Strategies (GRAPS) report was completed in November 2022. Consider adding the report to the list of references at the end of the plan.	X			Y	The GRAPS is referenced as in progress. This is replaced with the following and GRAPS is added to the references. <i>"Further information on groundwater in the Chippewa River Watershed</i> became available with the MDH Groundwater Restoration and Protection Strategies Report (GRAPS) which was published in late 2022. The GRAPS identifies known contaminants, contaminated sites, and strategies to address risks to groundwater.'
64	MDH				Please check the links to agency websites on Pages 2-18, 3-10, and 3-14.. They link to 'page not found' websites.	X			Y	Links repaired

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65	MPCA	LWRN			On page 2-8 in the third paragraph, it states that “nearly half of the 64 sampled lakes with adequate data were meeting water quality standards for phosphorus concentration.” There were 40 impaired lakes in the Chippewa River Watershed as of the 2022 impaired waters list. Subtracting 40 impaired lakes from the 64 sampled leaves 24, which is a little over one third. Consider changing “nearly half” to “over a third.”	X			Y	Nearly half changed to 'over a third' as recommended
66	MPCA	LWRN	2-10		Lake Reno is shown as impaired. Lake Reno was delisted as of the 2022 Impaired Waters List. This is the only instance in the report where Lake Reno is incorrectly listed as impaired. Consider fixing the map.	X			Y	Map revised accordingly
67	MPCA	Goals	4-6		in the first paragraph, it states that 39 lakes were impaired due to excess phosphorus. There were 40 lakes impaired due to excess phosphorus in the Chippewa River Watershed as of the 2022 Impaired Waters List. Consider changing 39 to 40.	X			Y	39 changed to 40 as recommended
68	MPCA	Programs	6-6		in the first paragraph, it states that “The MPCA has 78 intensive watershed monitoring sites in the Chippewa River Watershed.” The number of intensive watershed monitoring sites is not actually a fixed number as it changes every 10 years depending on funding, staff availability and local partner interest. Consider changing 78 to “numerous.”	X			Y	Changed to 'numerous' as recommended
69	Norway Games Lakes Improvement Association				The plan speaks in details about CD 27 and 29 and the impairment that continues to flow into Norway Lake. It does state this situation as a priority to rectify. This is a positive part of the report.			X	N	Thank you for your comment
70	Norway Games Lakes Improvement Association				The plan does speak about communicating this situation and forming an awareness team to work on a solution . This is a positive part of the report .			X	N	Thank you for your comment
71	Norway Games Lakes Improvement Association				The plan fails to set any time lines or working groups to allocate funds for projects such as setting ponds or wetland restoration downstream just before entering Norway Lake. This a negative part of the report. We suggest that a specific working group for CD27 and CD29 is mandated in the plan.		X		N	Actions that would address Norway Lake including settling ponds or wetland restoration fall under the 'subwatershed treatment' description in the CIP table for the Headwaters of Shakopee Creek and Norway Lake Chain Project. Action SC-11 is on wetland restorations in the Shakopee Creek Planning Region, with first work in high priority regions in the Hydrology goal (pg 4-4).
72	Norway Games Lakes Improvement Association				The plan fails to identify any reference to ensure that landowners with property common to CD27 & CD29 shorelines are compliant with Minnesota Statute 103F.48 . Runoff is identified as a significant issue. Not listing this as an action item in the plan is negative. Why would the report not mention this as a possible situation to explore? This is a significant concern. A copy of the statute is attached to this email. Adding a section to the plan for some public entity to verify compliance to this statute and take action to rectify any shortcoming would be very positive.		X		N	Action WW-5 is for feasibility studies to develop recommendations related to CD27 and CD29. Evaluation of runoff as an issue would occur during those specific projects, this CWMP does not go that into detail on each potential project being implemented. Enforcement of MS 103F is discussed in Section 6 and will be a component of implementation. Actions WW-25 and WW-29 deal with enforcing existing ordinances, which includes buffers.
73	Norway Games Lakes Improvement Association				When the public hearing is scheduled it is essential that the community is made aware of this. We would like to see the meeting notice posted via multiple channels. For example New print, Radio and USPS mailing or social media methods.			X	N	Comment noted with thanks



#	Commenter	Section	Page	Par.	Comment	Editorial	Material	Note	Change needed (Y/N)	Resolution
74	Norway Games Lakes Improvement Association				For a plan to be successful time lines with trackable goals need to be part of it. With regards to CD27 and CD29 there are no timelines or trackable goals noted . This is a negative observation of the plan.		X		N	Addressing CD27 and CD29 is part of a larger action on lake feasibility studies, WW-5. The trackable output is the number of lake studies completed (3). The timeline is in blue, and is 2024-2033 because the Partnership expects to begin work on this action this year and continue through the years. CD27 and CD29 are also mentioned in the CIP table, the start date of 2024 is listed by this project is not yet developed enough to have an estimated end date.
75	Stearns	LWRN			pdf page 19, document page 2-1. This is describing the land and water resources narrative says, "across portions of eight counties" this should say "across portions of nine counties."	X			Y	Eight changed to nine as recommended
76	Stearns	Admin			on pdf page 128, document page 7-3. Heading – Collaboration with others, consider adding "local government units."	X			Y	Changed to Local Government Units Collaboration with Others
77	Stearns	Appendix			Appendix on pdf page 4, Joint Powers Agreement the following table is a breakdown of counties within the Chippewa River Watershed, states "Stearns, 18 acres, 0% of the watershed." This should be corrected to "Stearns, 81 acres," and/or this should be clarified elsewhere in the CWMP.	X			Y	Typo resolved with thanks
78	Pope SWCD	6			WCA LGU needs to be changed from Pope SWCD to Pope County within the plan.	X			Y	Change made as recommended