Responses to Comments on WAGZ Comprehensive Watershed Management Plan - 60-day Review Draft

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No.	Commenter	PDF page	Section	Comment	Draft Response to Comment	Plan edit proposed?
1	MDH	--	Multiple	Protection of drinking water for public water systems: consider Drinking Water Supply Management Areas (DWSMA) as priority areas within the watershed and provide technical and educational assistance to community, and non-community, non-transient public water systems (see comment letter for more detail). This priority concern was addressed in the following ways: 1. Section 3.2 Priority Issues, subsection 3.2.1 (page 3.9) 2. Section 3.3 Spatial Prioritization of Issue Areas, subsection 3.3.2 (pages 3.21-22). 3. Table 5-2 Measurable Goals: creation of long-term goal. This long-term goal has associated 10-year goals. 4. Table 6.4 Implementation Schedule: a total of 22 groundwater quality actions.	Thank you for your input during Plan development.	No
2	MDH	--	Multiple	Protection of drinking water sources for private wells: utilize information regarding pollution sensitivity of the upper most aquifers and wells, and nitrate and arsenic results from well testing to further target areas within the watershed for implementation activities. This priority concern was addressed in the following ways: 1. Section 3.2 Priority Issues, subsection 3.2.1 (page 3.9). 2. Section 3.3 Spatial Prioritization of Issue Areas, subsection 3.3.2 (pages 3.21-22) 3. Table 5-2 Measurable Goals: creation of long-term goal. This long-term goal has associated 10-year goals. 4. Table 6.4 Implementation Schedule: a total of 22 groundwater quality actions.	Thank you for your input during Plan development.	No
3	MDH	--	Multiple	Prioritize sealing of unused and abandoned wells: this is a central practice in protecting groundwater quality. This priority concern was addressed in the following ways: 1. Table 5-2 Measurable Goals: creation of long-term goal. This long-term goal has associated 10-year goal. 2. Table 6.4 Implementation Schedule: a total of 22 groundwater quality actions.	Thank you for your input during Plan development.	No
4		--		Prioritize drinking water supply management areas impacted by nitrate: prioritize these protection areas by working with landowners on management of nitrogen from multiple sources. Use best information for establishing background levels from human-sourced and focus on trend data to better understand long-term response. This priority concern was addressed in the following ways: 1. Section 3.2 Priority Issues, subsection 3.2.1 (page 3.9). 2. Table 5-2 Measurable Goals: creation of long-term goal. This long-term goal has associated 10-year goals. 3. Table 6.4 Implementation Schedule: a total of 22 groundwater quality actions.	Thank you for your input during Plan development.	No
5	MDH	C-22	Table C-6	Table is not updated with information provided by MDH in April 2021.	The table will be updated with new data provided by MDH.	Yes
6	MDH	General	General	Continue communicating with MDH about agency specific grant opportunities for public water systems, private well owners, and LGU partners.	The Partners will continue to coordinate with MDH during implementation.	No
7	MDH	General	General	MDH priority concerns have been addressed in the draft plan, no additional recommendations at this time.	Thank you for your input during Plan development.	No
8	DNR	--	Goals	**Issue: Bacteria impairments of surface water** Aquatic recreation is an important focus of the DNR. The number of aquatic recreation impairments in the Zumbro River is a continued concern of the department. We suggest increasing the goal for the number of feedlot fixes and manure management plans to be developed in the next 10 years. The DNR believes that Goal GWQ-8 of “fixing five non-conforming feedlots and developing 20 new manure management plans” may not do enough to address bacteria loading and resultant aquatic recreation impairments	The implementation schedule will be revised to increase the number of planned feedlot fixes from 5 to 25 over 10 years. The term "non-conforming" will be removed from the goal statement to broaden the applicability, and the goal text will be changed from "address" to "improve" to allow partial improvements to be considered.	Yes

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9	DNR	--	Implementation	**Issue: Public Water Access** The population of Rochester and its surrounding communities is anticipated to increase significantly over the life of this Comprehensive Watershed Plan. The DNR would like to see site-specific plan strategies aimed at increasing public water access to meet increasing demands for aquatic recreation opportunities. A strategy could be to **"survey the condition of canoe launches from Rochester to Kellogg to identify those in need of repair and sites where new launches could be built**". Another strategy could be to "**construct fishing piers at Kalmar, Gamehaven, and Silver Creek reservoirs to improve accessibility for anglers**". The DNR is ready to work closely with partners to improve public water access throughout the watershed.	The implementation item addressing Partner support of the Zumbro Water Trail master planning effort will be revised to note that cooperative efforts may include survey, inventory, and repair/enhancement of canoe launch areas within the planning area. The Partnership defers the issue of fishing access at the Rochester area reservoirs to the City of Rochester.	Yes
10	DNR	--	Implementation	**Issue: Stream stability and habitat** We applaud the inclusion of strategies for addressing in-channel sediment loading and suggest an additional strategy focused on the lower Zumbro River to **"support efforts by DNR, TNC, and the Wabasha County SWCD to reduce sediment loading, restore floodplain function, and improve habitat in the lower Zumbro River**". The DNR is leading this effort and this strategy would help support future funding proposals for project implementation.	Implementation actions similar to this item are included in the implementation schedule. The lower Zumbro River will be added as a focus area to implementation item FLD-7 (floodplain reconnection). The implementation narrative will be revised to note that the Partnership plans to work with the DNR and other partners on these projects.	Yes
11	DNR	--	Table 5-3	**Table 5-3** lists a sediment reduction goal for Wells Creek of 0.9 tons/yr. Given this is a TSS impaired stream, this goal seems too low. In comparison Hay Creek, which does not have a TSS impairment, has a sediment reduction target of 6.6 tons/yr. The DNR is developing a management plan for the Wells Creek subwatershed based upon a stream stability and sediment supply study. This work estimates that 89% of the sediment load in Wells Creek is coming from the stream banks. An implementation strategy could be to "**implement stream bank and riparian restoration on Wells Creek to reduce sediment loading and improve trout habitat"**. This strategy would also be beneficial to reducing sedimentation at the mouth of Wells Creek in Lake Pepin.	The pollutant reduction goals for Wells Creek are based on HSPF-SAM model outputs. Discussion with MPCA staff noted and confirmed the low estimates of sediment loading in Wells Creek. Note that this pollutant loading reduction goal is from upland practices (versus in stream improvements). Additional detail will be added to the Plan implementation items addressing streambank improvements (ESC-5, ESC-6) noting Wells Creek and its tributaries as a focus area.	Yes
12	DNR	--	Implementation	The DNR also suggests a strategy to **"conduct stream stability and sediment supply studies in subwatersheds with high sediment loading identified by HSPF to identify where channel restoration would be most beneficial"**. Two subwatersheds to consider are Spring Creek and Trout Brook (Dumfries) which suffer from high stream bank and bluff erosion.	Implementation item ESC-10 includes a watershed analysis to identify streambank areas for priority restoration. This item will be revised to note partnership with DNR and consideration of HSPF model results.	Yes
13	DNR	--	Implementation	**Issue: Aquatic connectivity and dams** The DNR would like to work with planning partners to replace low-head dams in the City of Rochester with rock arch rapids. The existing dams are hazardous and pose drowning risk. They are also barriers to fish movement. A strategy would be to **"replace low-head dams with rock arch rapids in the Rochester Flood Control project area to improve public safety and fish passage".**	The Plan will be revised to include an implementation item to support Partner and local efforts to improve stream connectivity. Specific action on structures included in the Rochester flood control project are deferred to the City of Rochester.	Yes
14	DNR	--	Implementation	The City of Rochester is planning to remove the Silver Lake dam and replace it with a series of rock rapids designed as a kayak course. The project is currently undergoing environmental review. Removal of the dam will be costly and highly visible but does not appear in the comprehensive plan. The DNR suggests a strategy to **"explore the full range of opportunities to eliminate long-term maintenance of the dam, reduce sedimentation, allow fish passage, and improve recreational opportunities for kayaking and fishing"**.	The Plan will be revised to include an implementation item to support Partner and local efforts to improve stream connectivity. The implementation narrative will be revised to note that such projects may be implemented as capital improvements.	Yes

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15	DNR	--	Implementation	**Issue: Native plant communities and biodiversity** The Zumbro River Watershed has a high number of calcareous fens with unique plant communities including threatened and endangered species. The DNR continues to work with the City of Rochester to protect fens from development and from alteration of groundwater levels. The City may be pursuing the purchase of the Marion 30 fen and surrounding land for inclusion in a planned regional park. This creates an opportunity to develop a fen education site with great potential to reach many people. We would like to see a strategy that **"supports the purchase of the Marion 30 fen and creation of a fen educational center"**. The DNR can provide a wealth of information regarding fens and would assist in the development of educational information.	The Plan generally supports activities of this nature. This Partnership defers this particular project to the City of Rochester.	Yes
16	DNR	--	Implementation	**Issue: Increased precipitation and effects on infrastructure** Given that both peak and base flows are increasing, DNR is concerned that undersized culverts are vulnerable to failure and detrimental to stream health. The DNR has been coordinating with counties and municipalities throughout southeast Minnesota to ensure that new or replacement culverts and bridges are properly sized. We suggest adding a strategy to **"conduct a culvert and bridge inventory to assess impacts on channel stability, fish passage, and public safety and use the results to target replacement of structures that are improperly sized or pose public safety risks"**. The DNR has conducted similar inventories statewide and could provide guidance and training.	The Partnership has not included a comprehensive culvert assessment in the implementation schedule. The Plan will be revised to include an implementation item to meet annually with Partner public works departments to coordinate infrastructure improvements and ensure local road authorities are aware of shared goals. The Partners will also ask counties, cities, and road authorities to share their culvert and bridge inventory data; the Partners will consider these areas when planning projects.	Yes
17	DNR	--	Implementation	Issue: Climate adaptation and landscape resiliency Opportunities exist throughout the watershed to remove marginal agricultural lands from production and restore them to native conditions. We realize that counties are apprehensive about this type of land conversion. However, it may present a significant opportunity to improve landscape resiliency, water quality, and habitat. The DNR suggests a strategy such as **"conduct an inventory of marginal agricultural lands and identify those that could be targeted for native prairie, forest, or wetland restoration to improve landscape resiliency, habitat, and water quality".**	The activities included in the implementation scheule promote CREP, soil health practices, and similar conservation practices for marginal areas.	Yes
18	John Weiss	Cover	Cover	Green bridge picture in first page - it's is longer there (I'm assuming it was the one on Wabasha County Road 7 below Lake Zumbro Dam. But people still remember it and love it.	Thank you for providing feedback on the Plan.	No

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19	John Weiss	--	Issues	I would put enhanced soil health in top tier of priorities. It's a relatively new idea to me but the more I drive around the watershed and see too much exposed soil and see dirty water, the more I think it should be a key, maybe THE key because so much else would work off it. If we improve soil health, I think many other factors would follow. Also, to get this to work well, we need the buy-in of urban people, and city slickers don't see much about dirty water etc. BUT if we tell them the soils on which they depend for food are being depleted, degraded or ignored, that would be easier to grasp. Plus it's something new so those who know something about it might get on board more with this. If we write that we need cleaner water and less sediment, that's yesterday's news. We've known this for years so if it's written that this is what the big planning process came up with, they might think - ghee, I could have told you that. Why did we need all the planners etc. Farmers might get more excited too if they knew what they were doing was great for them. Finally, it could be a good metric. I'm assuming that there is a way to measure soil health and that could be something you could measure and tell people it's getting better, or worse. We can also use nitrates and water clarity.	The PWG, Advisory Committee, and Policy Committee debated the merits of soil health as a top tier issue and ultimately came to consensus on including it as a second tier issue. Despite not being included in the top tier, the Plan includes measurable goals and implementation actions addressing soil health issues and the associated benefits of improved soil health. The Plan does include an implementation item regarding correlating the water quality benefits with improved soil health (Item SLH-1).	Yes
20	John Weiss	--	General	Is this meant for the average reader? If so, we need a place that simply states the overall priorities as well as cures. I probably understand better than average reader but I was still a bit confused. I'm guessing this is more of a technical document for the experts and a more reader-friendly one will be coming out later. Or at least I hope so.	The Partners are preparing a brief, more public-facing executive summary to accompany the Plan and make it more accessible.	No
21	John Weiss	--	Implementation	One thing that caught my eye in first meeting was catch basins. There are a ton of them out there but most I've seen are in wretched shape - filled in etc. Rejuvenating them and adding more sounds like an excellent idea because they tend to be in areas not suitable for row crops and would be good watering holes for livestock (maybe wood duck habitat too). But I'm wondering if we couldn't buy easements to have them at base of tiling systems. That would probably take ag land out of production but the benefits to river and society could be great - slow the flow etc. Landowners could let them dry now and then to dig them out and get some topsoil and nutrients back.	Water and sediment control basins are identified in the Plan as one of several BMPs recommended to reduce pollutant loading in the planning area. The implementation schedule includes funding for the construction of water and sediment control basins (WASCBs) and other similar practices.	Yes
22	John Weiss	4-5	Table 4-3 Table 4-4	It seems the total gains are really modest compared with total problem. Table 4-3 shows some very promising results in lowering so many pollutants but Table 4-4 shows barely a blip. For example, 484,000 pounds of total nitrate but only reduction of 1,380 tons. I suspect I'm misreading that table but it's really confusing.	The relatively modest pollutant load reductions estimated for the Wells Creek watershed are a function of the relatively small area tributary to planned BMPs within this watershed. The Wells Creek watershed is used in this table as an example. The table will be revised to include a different watershed with a treated area that is more representative of the overall planning area.	Yes
23	Dodge County	--	Implementation	Please add Mantorville Dam Removal to the implementation table as a capital improvement. Based on DNR's estimate, it will likely cost about $500,000 to remove the dam and construct a riffle; much, if not all, the funding could come from the DNR. I think we were just looking for a placeholder in the plan as the project would have multiple benefits	Mantorville Dam removal will be added to the implementation schedule as a capital improvement.	Yes
24	MPCA	--	Appendix C 8.7.1	Appendix C 8.7.1 states that HSPF modeling has not been performed for the Mississippi River Lake Pepin watershed, however MPCA has completed HSPF modeling for this watershed, the most recent version was completed in 2019 (See Mississippi River – Lake Pepin Tributaries: HSPF Model Scenario Report, Tetra Tech, 2019)	The text in Appendix C8.7.1 is outdated and will be corrected. The HSPF modeling referenced in MPCA's comment was made available to the Partners and used to estimate pollutant loading.	Yes

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25	MPCA	--	Table 4-2	Comments were previously submitted regarding the estimated pollutant loading values provided in Table 4-2 of the Plan. These comments were addressed and pollutant loading values in the Plan nearly match those provided in the original modeling technical reports of both the Zumbro River Watershed and Mississippi River Lake Pepin Tributary Streams. Additionally, the Root River Field to Stream Partnership provides a good real-world comparison to these modelled values; a summary of the Partnership's findings can be found here https://www.mda.state.mn.us/sites/default/files/2019-10/rootrivfieldrunoff2019.pdf. I	Thank you for providing early comments so that the Partners could address the inconsistency prior to the formal review period.	No
26	MPCA	--	Table 4-3 Section 4.2.4.1	Section 4.2.4.1 states that HSPF-SAM users can adjust the values of BMP treatment effectiveness or use the default values present in the application, however it is not specified which method was used to produce the pollutant removal values in the Plan. Furthermore, the pollutant reduction percentages currently in the Plan do not match those present in the SAM BMP Efficiency Table. For example, a comparison of values in Table 4-3 of the Plan and values in the SAM BMP Efficiency Table for the Water and Sediment Control Basin BMP (which does not remove nitrogen from the interflow or baseflow channels) are provided below (see letter). It is recommended that the default pollutant removal efficiencies be used to reflect the best available information and application of available tools. The Plan should not indicate that BMPs designed to treat surface runoff are significantly effective nitrogen removal BMPs. Please clarify whether default efficiencies or user defined efficiencies were used and explain how the pollutant reduction values were derived. MPCA staff would welcome a meeting to discuss these values.	The nitrogen removal efficiencies presented in Table 4-3 are based on the values included in Table 6-2 of the HSPF-SAM BMP reference manual - the source of the pollutant removals is noted in the footnote to Table 4-3. For the cropland water and sediment control basin BMP, Table 6-2 includes non-zero removal values for total nitrogen for the interflow and baseflow pathways. However, Appendix A.1 of the same document includes a summary table of BMP nitrogen removal efficiencies that shows 0 values for TN in interflow and baseflow from the same BMP. The HSPF-SAM analysis will be re-run using the nitrogen removal values from Appendix A.1 of the HSPF-SAM BMP reference manual as suggested by MPCA. The notes to Table 4-3 and text of Section 4.2.4.1 of the Plan will be revised to more clearly note the source of the pollutant removals.	Yes
27	MPCA	--	Section 4	HSPF modelling does provide a flow reduction efficiency for BMP practices. It would be good to utilize this information in Table 4-3, 5-3, and others to estimate the flow reduction potential for implementation and evaluate watershed storage and flow reduction goals.	The pollutant reduction estimates in the Plan are extrapolated based on model results from 4 scenarios using WASCBs and cover crops (see Section 4.2.4.1). The default flow reduction value for both BMPs is zero, resulting in an HSPF-SAM estimated flow reduction of zero. While it is anticipated that the range of BMPs implemented will result in a net flow reduction, estimates from an unknown combination of BMP implementation are likely to be inaccurate.	Yes
28	MPCA	--	Implementation	The MPCA's priority concerns letter highlighted two key protection efforts in the planning area: protection of the watershed's lakes, and protection of baseflow especially in coldwater trout streams. The Agency would like to stress the importance of these resource concerns. Section 3.2.8 does mention the connection between groundwater resources and base flow of the region's high quality trout streams and items FWH-8 and FWH-3 in the Implementation Schedule have fairly general activities aimed at the protection of trout streams, **however the agency would like to emphasize the need for thorough and early monitoring, analysis, and planning for the protection of the quantity and quality of base flow to the planning area's trout streams.**	The Plan implementation schedule will be revised to include trout stream monitoring with the Partnership serving in a support capacity (e.g., "Seek partnerships and support state and regional efforts to monitor the flow and water quality of trout streams in the planning area").	Yes

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29	MPCA	--	Implementation	During the development of the Plan the MPCA released a memo titled "Phosphorus Effluent Limit Review: Zumbro River Watershed". This memo provides an overview of the current condition of Lake Zumbro, the applicable water quality standards, and proposed phosphorus limits for permitted facilities. Historical reductions from waste water treatment facilities upstream of Lake Zumbro have improved water quality in the lake, however, to continue to protect the lake, additional non-point reductions of phosphorus are needed. The agency acknowledges that there are many proposed project sites located upstream of Lake Zumbro that will provide overall pollutant reduction benefits and anticipates that these projects will aid in the protection of Lake Zumbro.	Thank you for your input during Plan development. The Partners will continue to coordinate with MPCA during Plan implementation.	No
30	MPCA	--	Implementation	The agency would like to emphasize that it is well documented that the most effective methods for reducing nitrate-nitrogen contamination from the agricultural landscape are source control (fine tuning nitrogen rates, split application, crediting legumes and manure) and vegetative scouring of nitrogen (growing perennial crops and/or cover crops) rather than active treatment of the contaminated water. The Plan's discussion of effective nitrogen reduction BMPs should match that in the NRS, which is a statewide general guidance developed by stakeholders and an interagency group.	The text of Section 4 will be revised to note that the proposed projects (e.g., dots on Figure 4-1 and Figure 4-2) will have varying pollutant reduction effectiveness depending upon the type of BMP implemented. Additional, programmatic strategies are included in the implementation schedule to further increase source control (including nitrogen). The implementation schedule will be revised to increase the number of fertilizer, manure, and nutrient management plans from a combined 4 per year to 10 per year (in the base funding scenario, and more in the additional funding scenario).	Yes
31	MPCA	--	Implementation	The MPCA also recommends use of the Basin Alliance for the Lower Mississippi in Minnesota (BALMM) Nitrogen Memo (https://www.pca.state.mn.us/sites/default/files/wq-b12-04.pdf) as it identifies regional gaps regarding data, tools, and understanding of nitrate pollution that the partnership could contribute to, where appropriate.	The Partners will consider this tool, as appropriate, during Plan implementation.	Yes
32	MPCA	--	Implementation	Many of the strategies in the Plan target reductions in erosion and increases in soil health, often these strategies also have greenhouse gas reduction benefits. MPCA's technical report estimates the impact of 21 different agriculture best practices on greenhouse gas emissions (https://www.pca.state.mn.us/air/agriculture-and-climate-change-minnesota). As the Partnership begins implementation and tracking of associated pollutant reductions, MPCA recommends incorporating a greenhouse gas component.	The Partners will consider incorporating climate change impacts as a potential scoring element for cost-share projects.	Yes
33	MPCA	--	Implementation	Table 6-4, column 4, 'Applicable Goals (see Table 4-1)'. The reference to Table 4-1 does not appear to be accurate.	The reference will be corrected.	Yes
35	BWSR	page xii	Acknowledgements	oAcknowledgements, page xii: Based on the current Memorandum of Agreement (MOA), the Policy Committee will approve final submittal of this Plan to BWSR for approval. The Joint Powers Agreement (JPA) that is being approved by the partnership does not establish a Joint Powers Entity (JPE) and does not give the Policy Committee the authority to adopt the plan on behalf of each local government unit. Adoption of the plan will be needed by each individual partnership board or council. We recommend either replacing "adopted" with "approved" and moving this line ahead of the BWSR approval date, or simply deleting the line.	The reference to "adopted" will be replaced with "approved."	Yes

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36	BWSR	1-2	Section 1.2	Section 1.2 Planning Boundary and Subwatersheds, page 1-2: We recommend providing the percentages of land use categories to give a better description of the planning area.	Percentage of land use will be added.	Yes
37	BWSR	1-6	Section 1.6.1	Section 1.6.1 Implementation Costs, Figure 1-1, page 1-6: This figure is difficult to decipher as a pie graph. Consider presenting in a different format such as a table for clarity.	The graph will be replaced or supplemented with a table for clarity.	Yes
38	BWSR	2-1	Section 2.1	Section 2.1 Purpose and Scope, page 2-1: The third paragraph states the Plan was developed under a JPA. It was an MOA that developed the framework to plan together for this group. The JPA was developed later during the planning with a focus towards plan implementation.	Text will be revised to clarify the between the MOA and the JPA.	Yes
39	BWSR	3-21	Section 3.3.1	Section 3.3.1 Priority Areas for Surface Water Quality, page 3-21: The second paragraph discusses “opportunity projects”. There should be some additional language included here to reference that other funding sources beyond Watershed Based Implementation Funding (WBIF) would be utilized or pursued for many of these projects. Or you could simply remove this paragraph as later sections (6.0) of the Plan cover this in more detail.	This paragraph and similar references to "opportunity projects" will be eliminated (see response to comment 50).	Yes
40	BWSR	--	Table 5-2	Table 5-2: It appears some of the 10-year Goal Measures contain a reference to the associated item from the Implementation Schedule, but most do not. There also appears to be some inconsistencies with how these measures are stated in the Implementation Schedule. Please update and/or provide more detail for this column or simply provide the reference to avoid confusion between Tables 5-2 and 6-4.	The goals table and implementation schedule were developed through an iterative process. During that process, cross-references was not completed for all items. This column will be completed to provide consistent references in the final Plan.	Yes
41	BWSR	--	Table 5-2	Table 5-2: Some of the 10-year Goal Measures appear to be missing a numeric goal (listed as “XXXX acres” or “XXXX projects” as an example). Was this an oversight or do you intend to establish these values by further study?	In many cases the goals were developed ahead of the implementation schedule. Some goals were not updated following finalization of the implementation schedule. These goals will be updated in the final Plan to reflect numbers consistent with the implementation schedule.	Yes
42	BWSR	--	Table 5-2	Table 5-2: Many of the goals have 10-year Goal Measures including “ongoing technical assistance/communication”. This may be better described within the narrative instead of included as a goal measure as it would be difficult to measure.	The narrative of the goals section will be revised to note that the Partners intend to leverage their existing relationships and expertise to contiue to provide technical services for a range of activities during implementation of the Plan.	Yes
43	BWSR	--	Table 5-2	Table 5-2: Goal GWQ-6 has a 10-year Goal Measure with targeted outreach near sinkholes and Decorah Edge features. Since this has a specific audience/priority area, could it be made more measurable? As an example, “10 mailings targeting property owners near sinkholes and Decorah Edge features”.	The referenced goal will be revised to add a target quantity.	Yes
44	BWSR	--	Table 5-2	Table 5-2: Goal ESC-3 calls from 10 streambank projects covering 5,000 feet. Was DNR consulted on this goal? Based on previous projects, couldn’t measurability be estimated regarding the amount of sediment to be reduced by these projects? Also, you may want to add “up to” to either the number of projects or linear feet to provide some flexibility in achieving this goal.	Goal ESC-3 will be updated to include a numerical estimate of sediment reduction derived from the associated implementation items, which will be revised to include "up to" the planned quantity.	Yes

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45	BWSR	--	Table 5-2	Table 5-2: Goal LR-4 has a 10-year Goal Measure of "net change in flow rate from individual developments". How will the partnership be able to measure this? There does not appear to be a corresponding item in the implementation schedule to accomplish this.	This goal is intended to be achieved through the consistent aplication of stormwater standards to permitted development and redevelopment activity. Measurement will be considered as compliance with applicable performance standards (and not monitoring). The text will be revised to reflect this.	Yes
46	BWSR	--	Table 5-2	Table 5-2: For Goal ESC-4, we recommend placing the "TBD" with a reference to the item from the implementation schedule that would establish the baseline adoption of these practices.	Goal ESC-4 will be cross-referenced to the appropriate implementation item that provides a baseline estimate.	Yes
47	BWSR	--	Table 5-3	Table 5-3: Long-term goals for Phosphorus, Total Suspended Solids, and Nitrate are listed as a percentage while 10-year goals are provided as load reductions. How do they compare? Can you also provide the load reduction for the long-term goals to indicate the pace of progress intended over the 10 years in comparison to the long-term goal?	The percent pollutant reductions noted in the long-term goals will also be presented as mass reductions. Note that the long term goals based on the Minnesota nutrient reduction strategy are not specific to the planning area, so a direct correlation may be not be appropriate.	Yes
48	BWSR	--	Table 5-3	Table 5-3: There are no field-scale goal values for the 10-year goals in the Mississippi River – Lake Pepin (MRLP) subwatersheds like there are for the Zumbro River subwatersheds. Would these now be available with the terrain analysis BMP exercise that was recently completed in these subwatersheds?	The field-scale pollutant reduction estimates were developed prior to the completion of terrain analysis for the Mississippi River-Lake Pepin area. Field scale estimates will be added for total phosphorus, total nitrogen, and sediment.	Yes
49	BWSR	6-4	Section 6.1.1.1	Section 6.1.1.1 Cost-Share Field Practices, page 6-4: The outline for policies and processes states that the WAGZ will consider adopting cost-share policies. We recommend changing this to "will adopt" as a local policy will be necessary for the utilization of WBIF.	The text will be revised to state "will adopt." The Partnership is in the process of developing this policy.	Yes
50	BWSR	6-4	Section 6.1.1.1	Section 6.1.1.1 Cost-Share Field Practices, page 6-4: At the top of this page there is discussion on opportunity projects. Consider rewording this for clarification to talk about the project ranking spreadsheet that is being developed by the partnership. The "opportunity project" term is a little confusing. Maybe clarify by differentiating between projects identified in the terrain analysis exercise and those that are identified within targeted areas.	The term "opportunity project" was intended to differentiate from previously identified projects (i.e., dots on Figure 4-1 and Figure 4-2) and other projects. With the development of individual project scoring criteria by the Partnership, there is no need to distinguish between these projects. The text will be revised to eliminate the term "opportunity project".	Yes
51	BWSR	6-1	Section 6.1	Section 6 Targeted Implementation Program, page 6-1: The second paragraph references the JPA for detail on the distribution of program funding. If you are referring to subagreements, reimbursement by the fiscal agent, etc., this is likely to be detailed by the local implementation policy and would not be found within the JPA.	The text will be revised to remove the reference to the JPA for funding distribution information.	Yes
52	BWSR	6-3	Section 6.1.1.1	Section 6.1.1.1 Cost-Share Field Practices, page 6-3: Language in the second paragraph about Lake Zumbro seems out of place here. This may be better located towards the end of Section 5 with narrative about the intended pace of progress towards measurable goals.	The referenced language regarding projects upstream of Lake Zumbro was added to this section in response to a previous comment by the MPCA regarding implementation focus on Lake Zumbro. The statement will be moved to Section 5..	Yes
53	BWSR	6-4	Section 6.1.1.1	Section 6.1.1.1 Cost-Share Field Practices, page 6-4: The Policy Advisory Committee is not defined until Section 6.4 of the Plan so the reader doesn't know who this committee is at this point. Portions of Section 6.1.1.1 that address project scoring/ranking, local policies, workflow, etc. may fit better later in Section 6.4, potentially under Work Planning.	A cross reference to the Policy Advisory Committee introduction in Section 6.4 will be added, or the text will be moved entirely and referenced from Section 6.1.1.1.	Yes

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No.	Commenter	PDF page	Section	Comment	Draft Response to Comment	Plan edit proposed?
54	BWSR	6-4	Section 6.1.1.1	Section 6.1.1.1 Cost-Share Field Practices, page 6-4: The outline of policies and processes in this section simply refers to "WAGZ" a few times. You should clarify if this is referring to the PAC or another committee.	The text will be revised to note the Policy Advisory Committee (PAC) and/or Plan Implementation Work Grop (PIWG), as needed.	Yes
55	BWSR	--	Table 6-4	Table 6-4: There should be an explanation for the red text showing the higher funding levels and outputs, either at the beginning of the table or as a footnote.	A note will be added at the beginning of the implementation schedule explaining the different funding levels and outputs.	Yes
56	BWSR	--	Table 6-4	Table 6-4, Items ADM-2 and ADM-3: The Measurable Outputs seem to be copied from ADM-1 and don't fit these actions.	The measurable outputs for these implementation items will be revised to more accurately reflect the activitiy.	Yes
57	BWSR	--	Table 6-4	Table 6-4, Item FLD-1: The Target/Focus Area for this action is referencing "Figure A-X". Is this intended to be Figure C-26? Or will you be utilizing the Surface Water Priority Areas map?	The figure reference is outdated from a previous draft and will be updated to reference Figure C-26 (Floodplains).	Yes
58	BWSR	--	Table 6-4	Table 6-4, Item SWQ-1: A significant portion of the plan area comprises the Level 1 priority area for surface water quality. What was the rationale to lump the Level 1 and 2 areas in this table while separating the Level 3 areas? It's also noted that the increased funding level (red text) shows a greater increase in number of projects in the Level 3 areas compared to the Level 1 and 2 areas. This should be explained within the narrative of the Plan.	Level 1 and 2 areas are grouped together in the implementation schedule because, while Level 1 areas are a priority, the Partners recognize that feasibility and landowner cooperation may limit project opportunities. Including level 2 areas ensures that opportunites for good projecs can still be funded. Level 1 and level 2 are also distinguished within the Partner project ranking framework, with higher scores (and thus greater priority) going to Level 1 project sites. Within the "additional funding" scenario, Level 3 areas receive additional funding on the assumption that the base funding scenario will address most identified opportunities in Level 1 and Level 2 areas. Note that multi-benefit projects may rise to top priority within the Partner project ranking framework by addressing multiple Plan issues (e.g., groundwater benefits in addition to surface water quality benefits). The text of the implementation section will be revised to provide additional explanation.	Yes
59	BWSR	--	Table 6-4	Table 6-4, Item ESC-2: This action needs further description. What will the partnership do once they have reviewed waters that are not subject to the Buffer Law? Will they be prioritized for implementation of buffers or alternative practices and/or be enrolled in an easement program?	This item will be removed from the implementation schedule.	Yes
60	BWSR	6-17	Section 6.3	Section 6.3 Plan Implementation Costs and Funding, Figures 6-1 and 6-2, page 6-17: Both figures are difficult to read due to the very small pie slices. Consider a different format to display this such as a bar graph or table.	The figures will be replaced or supplemented with a table for clarity.	Yes
61	BWSR	6-18	Section 6.3	Section 6.3 Plan Implementation Costs and Funding, Table 6-3, page 6-18: As a reminder, WBIF cannot pay for monitoring/studies/modeling. There may be a few activities from the implementation schedule that you are including in this category that could be eligible (for example, targeting tools that help direct implementation). Also, we have generally seen a larger amount of funding from WBIF going towards Administration. No changes are required but this does seem a little low.	The estimated cost for Plan administration will be increased to approximately $60K per year based on input from BWSR and recent 1W1P experience.	Yes

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62	BWSR	6-19	Section 6.3.2	Section 6.3.2 State Funding, page 6-19: The Targeted Watershed Demonstration Grant Program no longer exists, and the Accelerated Implementation Grants have not been available for the last few years. Consider replacing them with other grant programs such as WBIF and Clean Water Fund Projects & Practices that are more likely to be utilized by the partnership.	The outdated grant program references will be updated with the recommended funding sources.	Yes
63	BWSR	6-20	Section 6.3.5	Section 6.3.5 Collaborative Grants, page 6-20: The two committees mentioned here aren't defined until Section 6.4. You may want to consider moving some of this language to Section 6.4.4 and simply referring to that section here.	The text will be revised to move the relevant language to section 6.4.4 and reference from Section 6.3.5, as appropriate.	Yes
64	BWSR	6-23	Section 6.4.4	Section 6.4.4 Work Planning, page 6-23: The last paragraph on this page states that the annual work plan will be approved by each board or council in the partnership. Is this what is intended? Approval of the work plan seems like it should be handled by the PAC. Presenting the work plan to the individual boards and council as an informational item might be more appropriate.	The text will be revised to note that the work plan is approved by the PAC.	Yes
65	MDA	C-25	Appendix C	Township testing has been done in several areas of the Zumbro River watershed and this information can be incorporated in the plan. In the appendices on page C-25 Rice and Steele counties were left out. The final overview and plans are now complete for these two counties. Please reference both Rice and Steele counties TTP in the plan.	The text describing township testing will be revised to note that testing has been performed in Steele and Rice Counties and reference available data.	Yes
66	MDA	C-26	Table C-7	Table C-7 on page C-26 in the appendices needs to have the Steele county TTP results put in the table. They are now complete, and you can reference the link below. The total number of wells that are referenced in the plan will also have to be adjusted when you include the Rice and Steele County TTP data.	The table will be updated to reflect the updated data for Steele and Rice Counties.	Yes
67	MDA	--	General	Some of this watershed is irrigated, therefore irrigation water management BMPs (for water and nitrogen management) may be of interest. See: https://www.mda.state.mn.us/node/1313	The Partners will consider opportunities to incorporate or promote irrigation water managmenet BMPs during Plan implementaiton.	No
68	MDA	--	Table 4-1	Table 4-1 BMP summarizes suitability by agro-ecoregions in the planning area. It is unclear why Nutrient and Manure Management 590 NRCS practice is not included in this BMP list. This is a suitable practice for all soil types. Nutrient Management is the first line item in table 4-3.	Practice 590 will be added to the BMP list in Table 4-1.	Yes
69	MDA	--	Section 6.3.4	Under other funding sources (6.3.4) the University of Minnesota and the Forever Green Program could be listed.	The text wil be revised to include these as examples of external funding sources.	Yes