

**North Cannon River WMO 4th Gen Watershed Plan 60-Day Comment Period**

November 17, 2022 Draft

Comment Number	Page Number	Section	Commenter	Comment	Material Comments (requests for content changes)	Technical/ Grammatical Suggestions	Change made to the plan? (Yes/No)	Response
1		Section 1. Executive Summary	BWSR	Per Minnesota Rule 8410.0050, the Executive Summary must include main goals of the Plan, major actions in the Plan, and the responsibilities of local governments related to implementation of the Plan including any changes in responsibilities from the previous plan. These requirements are missing.	X		Yes	Add an "Implementation" section with table of measurable goals by priority issue and add text that describes the key implementation focuses of plan and the responsibilities of the WMO and their relationship with partners, in particular the SWCD, to implement the plan.
2		Section 1. Executive Summary	BWSR	Past accomplishments make minimal progress toward water quality improvement. Language largely includes "assist" or "advocate" without direct action steps (other than landowner technical assistance and cost-share). This Plan should incorporate a stronger leadership role for the WMO in identifying what needs to be done and following through with implementation.	X		Yes	Included in the new "Implementation" section dialogue that describes the efforts of the NCRWMO to communicate and advocate for the implementation of this plan and opportunities for local communities to participate.
3		Section 1. Executive Summary	BWSR	While not a component of the main section of the Plan (Appendix A), we recommend review of the NCRWMO Joint Powers Agreement at least once every ten years. This schedule will ensure continued commitment among the member entities and provide increased predictability for implementation.	X		No	The current JPA was recently renegotiated and there is not interest to do so more regularly to avoid risk of losing a partner during negotiations.
4		Section 2. Land and Water Resource Inventory	BWSR	Per Minnesota Rule 8410.0060 Subp. 1, the Plan must contain information and a general analysis based on existing records, plans, and publications for several components. Incorporation by reference for data that is freely-available is acceptable, provided the data is generally described in the Plan. The following components were lacking or incomplete: a. Precipitation (Subp. 1.D). There is a discussion of trends in precipitation, but no description of present-day conditions, e.g. average annual precipitation or seasonal precipitation.	X		Yes	Present day conditions will be added to the "Precipitation and Climate" section.
5		Section 2. Land and Water Resource Inventory	BWSR	Per Minnesota Rule 8410.0060 Subp. 1, the Plan must contain information and a general analysis based on existing records, plans, and publications for several components. Incorporation by reference for data that is freely-available is acceptable, provided the data is generally described in the Plan. The following components were lacking or incomplete: b. Storm water systems (Subp. 1.H). Unclear what is meant by "limited" storm water infrastructure.	X		Yes	After the word limited, add "culverts, storm sewers, and basic infrastructure instead of complex stormwater treatment systems." Will also add sentence about encouraging the use of, and partnering on, stormwater treatment as opportunities arise and infrastructure is replaced.
6		Section 2. Land and Water Resource Inventory	BWSR	Per Minnesota Rule 8410.0060 Subp. 1, the Plan must contain information and a general analysis based on existing records, plans, and publications for several components. Incorporation by reference for data that is freely-available is acceptable, provided the data is generally described in the Plan. The following components were lacking or incomplete: c. Fish and wildlife habitat (Subp. 1.J). Discussion of (terrestrial) wildlife habitat is missing, yet woodland, prairie, and riparian corridor habitat are specifically mentioned in the Tier 2 "Habitat" issue statement.	X		Yes	Additional information on terrestrial habitats including stressors will be added to the "Biological Features and Assessments" section starting on pg. 49 of the plan.

7		Section 2. Land and Water Resource Inventory	BWSR	Per Minnesota Rule 8410.0060 Subp. 1, the Plan must contain information and a general analysis based on existing records, plans, and publications for several components. Incorporation by reference for data that is freely-available is acceptable, provided the data is generally described in the Plan. The following components were lacking or incomplete: d. Priority areas for wetland preservation, enhancement, restoration and establishment (Subp. 1.M): No priority areas discussed.	X		Yes	Dialogue summarizing the priority areas for wetland restoration efforts identified in this plan will be added to the "Wetlands" section on page 30 of the plan.
8		Section 3. Issue Assessment Prioritization and Measurable Goals	BWSR	Section 3. Issue Assessment Prioritization and Measurable Goals: Several required components outlined in MN Rule 8410.0080, Establishment of Goals, are missing, including Subp. 2, Water quantity	X		Yes	Add dialogue to the Surface Water Tier One summary that describes the general processes of how BMPs identified in the plan will help increase water storage on the land and result in no increase in net flows.
9		Section 3. Issue Assessment Prioritization and Measurable Goals	BWSR	Section 3. Issue Assessment Prioritization and Measurable Goals: Several required components outlined in MN Rule 8410.0080, Establishment of Goals, are missing, including Subp. 6, Public drainage systems	X		Yes	Addition of dialogue that states current county jurisdiction over ditches in the watershed will continue and that the WMO will coordinate with the ditch authority to communicate goals of watershed plan to identify opportunities with public drainage projects.
10		Section 3. Issue Assessment Prioritization and Measurable Goals	BWSR	Section 3. Issue Assessment Prioritization and Measurable Goals: Several required components outlined in MN Rule 8410.0080, Establishment of Goals, are missing, including Subp. 8, Wetlands.	X		Yes	Add a reference to WCA along with dialogue that wetland restoration goals in this plan are an increase to current wetland area and are not offsetting potential losses. Update language in measurable goal under surface water from "Restore 60 acres of wetland area" to "Increase wetland area in WMO by 60 acres".
11		Section 3. Issue Assessment Prioritization and Measurable Goals	BWSR	Section 3. Issue Assessment Prioritization and Measurable Goals: In addition to other requirements outlined in Section 8410.0080, Plan goals must be specific and measurable, contain sufficient detail to provide direction to the WMO, and allow for success or failure to be measured. Furthermore, a procedure must be established to evaluate progress for each goal at a minimum of every two years.	X		Yes	Dialogue will be added in the "Plan Evaluation" section that adds specificity regarding the process and information the WMO will use from the plan to track efforts and plan success.
12		Section 3. Issue Assessment Prioritization and Measurable Goals	BWSR	The Tier One priority issues of surface water quality and groundwater quality and quantity are good, but they should be targeting specific resources. The WMO is very large, and without waterbodies or groundwater recharge areas targeted for improvement, no measurable change will be made.	X		Yes	Changes will be made to the naming of the prioritization categories with the priority drainage areas being changed to priority resources. The intent of the current process is described in more detail in the dialogue the naming changes will add clarity and not change how efforts are targeted/prioritized. Specifically, dialogue will be added to clarify that Lake Bylesby and Trout Brook are high priorities and explain why the priority resources are ranked they way they are and how this connects with targeting of implementation actions.
13		Section 3. Issue Assessment Prioritization and Measurable Goals	BWSR	The Outreach and Education issue statement is also good but should include specific measurable goals such as number of events, number of landowners contacted, or other indicators drawn from activities identified in the O&E Implementation Table.	X		Yes	Quantities identified in the O&E implementation table will be summarized in section 3 under O&E's measurable goals.
14		Section 4. Policy and Regulation	BWSR	Per MN Rule 8410.0105 Subp. 6, controls or performance standards must be described in the Plan and include implementation and enforcement processes along with other requirements as described in the Rule. While NCRWMO acknowledges that it is not a permitting authority, the WMO still needs to develop standards for local municipalities to adopt and implement in order to protect water resources.	X		Yes	The entity in charge of permitting authority will be added to the header description for each land use management controls in Section 4 to make clear who has permitting authority. Additionally, dialogue will be added to clarify performance standards will meet or exceed minimum requirements as defined by the respective permitting program. As a part of the implementation plan the WMO will be assessing ordinances of partnering entities and identifying gaps and developing model ordinances to ensure no deficiencies or redundancies exist. Dialogue will be added to make sure this is communicated.

15		Section 5. Implementation Program	BWSR	Overall, there is a general lack of prioritization for implementation activities. Targeting needs to be identified further in the BMP Implementation Table. The rotating focus on priority water bodies, with identical rates of implementation for each, does not adequately address resource concerns specific to each watershed. For example, if the topography of Miesville Ravine and the Trout Brook subwatershed indicates a need for water and sediment control basins and grassed waterways (p. 62), why not target those practices to those priority areas rather than distributing them evenly across the WMO? Another example is the distribution of 100 linear feet of streambank stabilization across priority resources in the implementation table. Is there an opportunity for a capital improvement project to produce greater benefit to a target resource, rather than spreading stabilization across the watershed?	X		Yes	The BMP Implementation Table will be updated to communicate the prioritization approach more clearly. The color gradients will be removed and efforts will more clearly reflect the targeting approach. To do this a larger percentage of the overall efforts for a given practice were targeted to resource areas based on priority ranking. This approach uses the priority resource ranking to target more efforts towards the highest priority resources early in the planning process and moves towards the lower ranked priority resources as the plan is implemented. Dialogue added to address comment 12 will provide clarity why adding more WASCOS than currently in the plan to Trout Brook will not be called out as a priority. Additionally there will be more dialogue added to the implementation section that describes the SWA's and how they will be used along with other resources during implementation to target specific sites within the priority resource drainage areas.
16		Section 5. Implementation Program	BWSR	Several required components outlined in MN Rule 8410.0105, Implementation Actions, are missing or incomplete, including: i. Subp. 1. C: Define the WMO's process for evaluating implementation of local water plans and procedures to address local government units failing to implement their plan.	X		Yes	Dialogue will be added to the "Local Planning" section on pg. 101 to state that the NCRWMO will evaluate compliance by local partners and follow up to gain compliance if needed.
17		Section 5. Implementation Program	BWSR	Several required components outlined in MN Rule 8410.0105, Implementation Actions, are missing or incomplete, including: ii. Subp. 1. D: Include a procedure to establish an advisory committee or other means of public and technical participation for making recommendations on a ten-year plan amendment.	X		Yes	Dialogue will be added to the " Amendments to Plan" section on page 102 that states some form of existing TC and AC will be maintained past the adoption of this plan and will be consulted as needed and for recommendations on ten-year plan amendment.
18		Section 5. Implementation Program	BWSR	Several required components outlined in MN Rule 8410.0105, Implementation Actions, are missing or incomplete, including: iii. Subp. 2: Capital Improvement Program. Potential capital improvement projects should be identified and prioritized in the plan. We appreciate the theoretical framework of Table 5.1, but the content does not meet MN Rule 8410 requirements for setting out details of contemplated capital improvements that include project need, schedule, cost, and funding source.	X		Yes	Follow-up discussions clarified early coordination meetings held between the planning team and BWSR staff to develop this agreed upon approach for the NCRWMO plan. An implementation line item will be added that identifies when NCRWMO will initiate communicate with partners to explore the opportunities listed in the CIP section.
19		Section 5. Implementation Program	BWSR	Several required components outlined in MN Rule 8410.0105, Implementation Actions, are missing or incomplete, including: iv. Subp. 3: Operation and maintenance programs.	X		Yes	A subsection will be added in section 5 that outlines the operation and maintenance responsibilities for projects implemented as a part of this plan.
20		Section 5. Implementation Program	BWSR	Several required components outlined in MN Rule 8410.0105, Implementation Actions, are missing or incomplete, including: v. Subp. 6: Regulatory program (as described in 5, above).	X		Yes	See comment 14.
21		Section 5. Implementation Program	BWSR	Several required components outlined in MN Rule 8410.0105, Implementation Actions, are missing or incomplete, including: vi. Subp. 7: Incentive programs.	X		Yes	Add more dialogue to clarify how grants will support partnership cost share dollars and allocation of funds will follow the schedule outlined in the implementation tables within this plan. Will also add text providing a brief overview of several key incentive programs such as Cost Share, MAWQCP, and low interest loans.
22		Section 5. Implementation Program	BWSR	Several required components outlined in MN Rule 8410.0105, Implementation Actions, are missing or incomplete, including: vii. Subp. 9. B: A schedule for local water plan adoption that includes language requiring local plans to be adopted not more than two years before the local comprehensive plan is due.	X		Yes	Add dialogue to the "Local Planning" section on page 101 that requires plan be adopted not more than two years before local comprehensive plan is due.

23		Section 5. Implementation Program	BWSR	Reporting on measurable outcomes should include pollution reductions as well as the outputs identified within the BMP implementation table, not just acres or linear feet.	X		Yes	Summary of pollutant reduction values from Implementation Table will be added to measurable goals for the Surface Water issue.
24		Section 5. Implementation Program	BWSR	The potential partners and potential funding options should be separate columns in the implementation table.	X		Yes	Add state agencies to implementation action items where they will provide technical support and add callout under table that states this column includes both financial and technical support partners.
25		Section 5. Implementation Program	BWSR	The NCRWMO has done an excellent job considering ideas for Outreach and Education. However, the activities should include prioritization to target audiences and resource areas of concern. The O&E "menu" is a great idea with lots of opportunities, but the format is difficult to follow.	X		Yes	Add dialogue to "Outreach and Education" section on page 76 to make clear that the O&E efforts will follow the implementation targeting defined in the BMP Implementation table.
26		Section 5. Implementation Program	BWSR	The Outreach & Education table includes "Execute Surface Water [Groundwater] O&E Plan". Do these plans exist? If so, please provide references. If not, will they be created as part of this plan? Please describe.	X		Yes	Add "Dakota County's 2020 Groundwater Plan" text to Implementation Action column of table to provide clarity.
27		Section 5. Implementation Program	BWSR	The landowner survey efforts are commendable and will hopefully yield useful data. However, does a single survey development point in years 1-2 allow for adaptation and refinement of the surveys based on feedback? How will you know if you are capturing what you had intended? Would recommend revisiting the surveys to revise as needed.	X		Yes	Add clarity that this effort is to make the surveys and they will be used regularly throughout the implementation period. The surveys are intended to be living documents that are edited as needed to ensure that the data being captured is useful for the WMO and partners.
28		Section 5. Implementation Program	BWSR	The NCRWMO does great work in monitoring water resources, but the program should be clearly described to include how the monitoring measures progress with respect to implementation activities, including data analysis and sampling frequency for parameters, per MN Rule 8410.0105 Subp. 5. Trends based on water quality monitoring data should be included in the biennial self-evaluation.	X		Yes	Add additional dialogue to section that adds more details clarifying monitoring data at current stations will be reviewed regularly along with implementation tracking to connect implementation efforts to water quality improvements and water quantity no net increase.
29		Section 5. Implementation Program	BWSR	In the Data and Studies Implementation table, should the outcome of "advocating for research on effects of dam operation" be recommendations for research or identification of implementation activities rather than "improvements to lake wildlife"?	X		Yes	Correct, outcomes will be updated to state "Clearly defined recommendations for research or implementation activities that improve lake wildlife".
30		Section 5. Implementation Program	BWSR	In the Data and Studies Implementation table, the identification of culvert replacement projects could be an opportunity for doing those replacements as capital improvement projects. The NCRWMO should be prepared to add such activities to its implementation program.	X		Yes	Add "culvert replacements" to list of potential capital improvement projects on page 92 at the end of the third paragraph.
31		Section 5. Implementation Program	BWSR	We recommend developing a plan evaluation template to be included in this draft plan that provides clarity of the metrics that the WMO will use for self-evaluation. BWSR staff can provide templates from other watersheds for reference.	X		Yes	Add dialogue that staff will coordinate with BWSR to ensure biennial evaluation forms meet requirements.
32			MPCA	Primary pollutant reduction estimates are provided within the Best Management Plan (BMP) Implementation Table, however, these reductions are not compiled nor related to achieving the Measurable Goals provided in the Surface Water Priority Issue Table. The MPCA staff recommend the total pollutant reduction estimates be calculated and used to determine the level of progress made toward the watershed restoration and protection strategy (WRAPS) and total maximum daily load (TMDL) goals listed in the Surface Water Priority Issue Table.	X		Yes	Summarize modeled pollutant reduction values to add to the measurable goals and compare to reductions identified in WRAPS and TMDLs.
33			MPCA	The ranking strategy used in the Plan does not appear to lead to targeted implementation as intended. The Resource Ranking and Drainage Area Ranking ultimately neutralize each other and do not aid in targeting within the watershed. The implementation table does not target practices to where they are needed, rather it cycles all activities through all subwatersheds over the 10-year planning period. We recommend using Hydrological Simulation Program - Fortran (HSPF) model outputs, the prioritization utilized in the Cannon River Comprehensive Watershed Management Plan (e.g.: Figure 3-16 Prioritized Targeted Implementation Areas for Trout Brook Drainage Area within the Tier One Stream Area: Total Sediment Delivered (tons/acre/year)) or another tool to determine where practices are most needed, and outreach can be more targeted and meaningful.	X		Yes	Addressed via comment 12
34			MPCA	Several reports have noted the perched culvert at the crossing of Miesville Trail and Trout Brook, we recommend the NCRWMO act to resolve this.	X		Yes	Add as implementation action

35			MPCA	The MPCA recommends that the Plan's actions support continued monitoring of the water resources within its boundaries, especially Pine Creek, the springs in Trout Brook Subwatershed, and consider the addition of occasional sampling in Mud Creek as a protection priority.	X		No	The value of monitoring is noted and dialogue to address a previous comment will be added that connects future planned monitoring to assessing plan progress.
36			MPCA	Chub Lake is classified as a Wild Rice water body and was studied in the 2019 Paleolimnological Study of Phosphorus-Impaired Lakes in the Cannon River Watershed. This information should be used to inform restoration/rehabilitation expectations for Chub Lake in the Adaptive Management Plan.	X		Yes	Dialogue added to reference this study for use in implementation efforts
37			MPCA	To ensure the protection of these sensitive resources, the MPCA staff recommend adding a list of groundwater dependent ecosystems to the Groundwater Priority Issue section.	X		Yes	List of GW dependent ecosystems will be added to the plan dialogue.
38			MPCA	Climate change is discussed briefly in the Land and Water Resource Inventory, including anticipated increased precipitation during the winter and spring seasons, reduced lake ice coverage, and their impacts. How will the NCRWMO address these changes and prioritize BMP implementation to reduce the negative impacts?	X		Yes	Add more dialogue that makes connection between expected outcomes from implementing this plan (i.e. increased water storage) with addressing anticipated impacts resulting from climate change (i.e. more intense precipitation events).
39	12	NCRWMO Background	Metropolitan Cou	We commend the NCRWMO for their past accomplishments and look forward to seeing the steps NCRWMO take to continue to strengthen their leadership role in water quality problem identification and implementation.			N/A	Noted and appreciated.
40	60	Issue Assessment Prioritization and Measurable Goals	Metropolitan Cou	The two ranking priorities are confusing and reduce the overall importance of the resources the Plan has identified as priorities. We understand it is hard to balance priority waters for the community with where the organization can make the most impact, but we recommend prioritizing the drainage area rankings over the resource rankings. A narrative explaining why certain waters are lower on the priority rankings should be sufficient to answer community questions about why culturally important water bodies are lower on the priority list.	X		Yes	Addressed via comment 12
41	79	BMP Implementation Table	Metropolitan Cou	The implementation schedule in the table is confusing and appears to identify a rotation, not a prioritization for each subwatershed. We would like to see targeting performed to identify actions based on the needs of each subwatershed.	X		Yes	Addressed via comment 15
42		Section 1.0 Issue Assessment Prioritization and Measurable Goals	DNR	The prioritization contains two separate rankings. Although the rationale for two priority rankings is outlined in the plan, the resulting two lists appear to contradict each other. We suggest limiting the priority ranking to the resource ranking only, to strengthen the targeting and give order to importance of projects.	X		Yes	Addressed via comment 12
43		Section 5. Implementation Program	DNR	BMP Table. There are many great best management practices (BMP's) listed along with reduction goals by action. As laid out, the implementation schedule is more of an even rotation of sub-watersheds, instead of need based. Defining more precise locations for the BMP's and targeting of sub-watersheds by resource needs would provide for clearer prioritization.	X		Yes	Addressed via comment 15
44		Section 5. Implementation Program	DNR	Implementation Table - Actions. The implementation table contains stream and shoreline protection and restoration of 400 linear feet. There is potential to increase the number of targeted feet, especially as a form of protection on trout streams. Over a period of ten years, 400 feet of shoreline protection and restoration is easily achievable. As an example, Trout Brook through Miesville Ravine is an incised stream and provides large opportunities for more bank protection and restorations. Also on Trout Brook, a fish passage barrier has been identified as a possible stream improvement project. The crossing of Trout Brook at Miesville Trail has a 2.5 foot drop, causing a wide scour pool immediately downstream (seen in Figure 2-16 in the management plan). Designing a stream crossing for fish passage while maintaining sediment balance is important. This can be achieved by but not limited to: <ul style="list-style-type: none"> <li>• Matching culvert width to bankfull stream width</li> <li>• Setting culverts to same slope as the stream</li> <li>• Creating offset culvert(s) for flood flows</li> <li>• Aligning culverts with the stream channel</li> <li>• Burying culverts to allow for a natural substrate</li> </ul>	X		No	Efforts will not be increased in the implementation table but stream and shoreline restorations are identified in the CIP section and opportunities will be pursued throughout the planning process to achieve more than 400 linear feet of restoraton.

45			MDA	The issues and areas of concern (sub watersheds) are well documented; however, an adequate ranking of priority areas is missing. For instance, in the implementation schedule, the identified sub watersheds rotate through priority ranking. The planned outcomes such as acres of cover crops are evenly distributed amongst the sub watersheds rather than targeted.	X		Yes	Addressed via comment 15
46			MDA	Below are specific examples of areas in the plan which reference MDA programs and resource concerns, which could be used to inform prioritization. <ul style="list-style-type: none"> <li>The Groundwater Protection Rule (GPR) is identified in this plan, but it could be expanded upon. The plan does mention that the GPR was amended and is no longer township based, but states that practices identified through the GPR could be disseminated to landowners in the North Cannon Watershed. This is correct, however a plan for how to disseminate that information is not shown. It should also be noted that those practices were developed for use in the Hastings Drinking Water Supply Management Area, which makes them applicable to this watershed due to the proximity and similarity in geology.</li> </ul>	X		No	Information related to the GPR will be communicated to the public following the Outreach and Education implementation actions listed in the plan.
47			MDA	Below are specific examples of areas in the plan which reference MDA programs and resource concerns, which could be used to inform prioritization. <ul style="list-style-type: none"> <li>The GPR also identifies areas statewide as being vulnerable to groundwater contamination. It is noted in the plan that the GPR restricts applications of nitrogen in the fall. A map identifying these vulnerable areas could be added to the plan, which could in turn be used for prioritization. <ul style="list-style-type: none"> <li>Vulnerable Groundwater Area Map</li> </ul> </li> </ul>	X		Yes	Add Groundwater Vulnerability Map to plan document and reference in text.
48			MDA	Below are specific examples of areas in the plan which reference MDA programs and resource concerns, which could be used to inform prioritization. <ul style="list-style-type: none"> <li>The plan notes that the MDA has township testing programs for nitrates and pesticides available to landowners. Language in the plan suggests this is an ongoing project, however it has been completed in Dakota County. The final reports from those programs could be referenced in this plan, which could also be used for prioritization. <ul style="list-style-type: none"> <li>Private Well Pesticide Sampling Project</li> <li>Township Testing Program</li> </ul> </li> </ul>	X		Yes	Update dialogue to reference completed township testing reports.
49			MDA	Other programs which could be considered to add or give more detail include: the Minnesota Agricultural Water Quality Certification Program (MAWQCP), and the Nutrient Management Initiative (NMI).	X		Yes	Add dialogue to provide more detail on the MAWQCP and NMI.
50	9	Acronyms	MNDOT	MNDOT is listed in the acronym table, but the acronym does not appear to be used anywhere within the document. As such, we suggest that it may be removed entirely from the table.		X	Yes	Remove MNDOT from Acronyms List
51	36		MNDOT	This page contains the statement: "Due to the lack of urban areas in the Watershed, stormwater infrastructure such as treatment ponds and underground stormwater pipes is limited." MNDOT notes that it owns and operates a not insignificant number of culverts and storm sewers throughout the Trunk Highways that cross the watershed, such as MN 3, MN 20, MN 50, US 52, MN 56, and US 61. MndOT is willing to share information regarding its assets upon request. While not as intense of a network as may be found in more urbanized areas, MndOT recognizes its systems play a role. For the purposes of this plan, no changes are necessary. In order to obtain this information, you may contact either the MS4 Engineer or the MS4 Asset Management Specialist		X	Yes	Reference to this infrastructure was added to the dialogue.