Responses to Comments on 60-day Review Draft of Lower St. Croix Comprehensive Watershed Management Plan Approved by Policy Committee June 29 and July 27, 2020

Commentor & #	Page & Sect	Comment	Response
BLUE = Plan will be revised to address comment			**WHITE = No change to Plan**
National Park Service, Bryon Karns			
NPS 1	App A, pg 5, 14, 29	ppg 14; pg 14 ppg 1; pg 29 ppg 2: The riverine portion of the river open into Lake St. Croix at the Boomsite, with the current noticeable slower beyond the live bridge in Stillwater. The Arcola sandbar (formed from the Apple River delta) is 5 miles upstream.	Text will be revised as noted.
NPS 2	App A, Pg 29	Pg 29 ppg 1: Called the 'St. Croix National Scenic Riverway,' it's managed by the National Park Service north of the City of Stillwater and the states of Minnesota and Wisconsin south to the Mississippi River. The river is also designated as an Outstanding Resource Value Water by the State of Minnesota and Outstanding or Exceptional Resource Water by the State of Wisconsin.	Text will be revised as noted
NPS 3	App A, Pg 40	Pg 40, 2nd ppg in 7.1.2 : add Silver Carp, delete rainbow smelt	Text will be revised as noted
NPS 4	Pg 12	Material comments: same as Arcola comment above; P impairment by PCA does not include north of Taylors Falls does it? If true, perhaps misleading to call the whole reach Impaired for P?	Text will be revised as noted
NPS 5	Pg 29	St. Croix and Lake...Wild and Scenic is the designation to the entire Riverway. The River has two types of classifications - scenic and recreational. Generally the Lake and impoundments are recreational and rest considered scenic	Text will be revised as noted
NPS 6	Pg 41	ppg 4: add St. Croix Basin Team, Monitoring Subcommittee?	Section IV.A.iv. will be revised: Additional water monitoring activities and coordination are proposed in key streams and rivers in the watershed in order to 1) track progress toward meeting the Lake St. Croix nutrient TMDL; 2) better understand current conditions; and 3) track progress toward the pollutant reduction goals in this Plan. The expansion of monitoring programs will include coordination and collaboration with the St. Croix Watershed Research Station and the St. Croix Basin Team whenever possible.

NPS 7	Pg 52	1st Section: font size/type mismatch;	Edit will be made.
NPS 8	Pg 64	ensure column headings follow page as needed throughout	Edits will be made.
NPS 9	Pg 67	Table 5-1 Part C, third "B": add to "reduce impervious surface" "and no net gain of" or similar	The Implementation Action will be revised: In watersheds of trout streams promote infiltration, ~~and~~ reduction of~~e~~ impervious surfaces, and no net gain in impervious surfaces
NPS 10	Pg 99	end of first sentence (end of preceding page's paragraph) add "National Park Service"??	Section IX. B. iii "Advisory Committee" will be revised: Individuals with other stakeholder groups or partnering organizations with similar goals and performing similar work in the area may also be invited to join the Advisory Committee, or attend meetings, as warranted. These groups might include the St. Croix River Association, St. Croix Watershed Research Station, Wisconsin Department of Natural Resources, National Park Service, or others.
NPS 11	General Comment	I think this is a great resource and wonderful/useful plan. I look forward to aiding in its future promotion.	Thank you. The LSC Partnership looks forward to collaborating with the National Park Service.
MN Department of Health, John Freitag			
MDH 12	General Comment	Throughout the process MDH's input was well received and we do not have any further comments.	Thank you. The LSC Partnership looks forward to continuing its collaboration with the Department of Health
MN Department of Natural Resources, Jason Carlson			
DNR 13	Pg 70	Part C, Item 36: Add guidelines for feasibility studies on proposed carp management strategies to reduce phosphorus loading in priority lakes. -- The plan includes feasibility studies on strategies to address internal loading, including carp management (pg. 70 Part C Item 36). Consider ways to strengthen these studies to ensure that carp management strategies will be effective in candidate lakes. Specially, consider requiring studies to validate that carp are causing the internal loading issues and that the proposed management strategies will be effective	Thank you for this useful information. The Plan will be revised to include the MDNR as a support agency for the following Implementation Action: Perform alum treatment, carp management, or other methods identified in feasibility studies to reduce internal loading. The LSC Partnership will ensure that feasibility studies to address internal loads thoroughly examine the effects of possible carp

		and without unintended consequences. Impacts to native fish communities when barriers are installed, or when carp harvesting fails to remove a large enough percentage of the population (30-60%), can diminish or neutralize the effectiveness of such practices. DNR has extensive experience with carp management. We have seen difficulties with successful removal, failure to improve water quality, and significant unintended consequences. We encourage early coordination with DNR area fishery managers to help evaluate the feasibility and effectiveness of any proposed carp management strategies.	management techniques and will work with the MDNR for review of studies and carp management activities.
DNR 14	General Comment	Identify maintenance standards for current Best Management Practices (BMPs)-- The plan clearly prioritizes Minimal Impact Design Standards (MIDS) for new development and identifies retrofitting targeted BMPs through financial and technical assistance. An opportunity exists to identify maintenance standards for these BMPs by utilizing research such as the Minnesota Department of Transportation's TRS1801 paper on Standards and Procedures to Ensure Performance of Infiltration Basins.	Section IV.E. Operation and Maintenance will be revised to include the following references for BMPs maintenance: • Minnesota Department of Transportation's TRS1801 paper on Standards and Procedures to Ensure Performance of Infiltration Basins • Minnesota Stormwater Manual • BWSR guidance for implementing practices https://bwsr.state.mn.us/grants-administration-manual-implementing-practices
DNR 15	Pg 63	Identify educational approaches to reduce chloride pollution. Table 5-1 Part B. Implementation Action: Shared Services Educator--The plan identifies chloride pollution as a major water quality concern, with municipal chloride road applications as a key contributor. The University of Minnesota recently completed a chloride budget for Minnesota that identified home water softeners as another major contributor (https://www.wrc.umn.edu/chloride). An opportunity exists to incorporate education about optimal water softener operation through the technical support identified in the plan.	No change: Thank you for the information. That aspect of chloride pollution was noted during the development of the plan. It is likely to be one aspect of the chloride reduction education messaging.

DNR 16	Pg 35	Table 3-1 Item LK 2B: Enhance the protection of priority lake watersheds.--The plan identifies promoting infiltration and reduced impervious surface area in trout stream watersheds (pg. 40). Consider identifying similar protections in lake watersheds which are likely to see development by adding language to the existing item as well as the lakes priority section (pg. 35 Table 3-1 Item LK 2B).	No change: The LSC Partnership agrees that protecting lakes in developing areas is critical. We believe this issue is address through the following goals: <u>Lakes</u> 2A. Protect sensitive lakes 2B. Improve shorelines to protect and improve habitat and water quality <u>Uplands</u> 1A. Protect upland and existing riparian habitat from degradation by enforcing ordinances or higher standards. 1F. Maintain and restore quality habitat as land develops
DNR 17	Section IV, pg 49	subsection g.iii, pg 49: The plan identifies the Upper St. Croix River above Taylors Falls as having Wild and Scenic designation and could benefit from indicating that the Lower St. Croix River from Taylors Falls down to the confluence with the Mississippi River is also designated as Wild and Scenic (pg. 29, St. Croix River and Lake St. Croix section). In addition, consider acknowledging the great work carried out through the Lower St. Croix National Scenic Riverway Program administered by local cities, townships and counties by specifically identifying the program in section IV, subsection g.iii, pg. 49.	Text will be revised as noted.
DNR 18	Pg 39	Address restoration of depleted aggregate sites--Land preservation and BMP implementation are key components in this plan. Consider adding language that bolsters local ordinances and identifies depleted aggregate sites as opportune locations for restoration back to fully functioning natural landscapes using guidance such as the DNR Handbook for Reclaiming Sand and Gravel Pits in Minnesota (pg. 39).	No change: Thank you for including this issue and the reference to the DNR handbook. Local ordinance development related to natural resources is one of many tools LSC Partners will use to protect and improve resources. While this issue is not specifically addressed in this plan, an Implementation Action included in Table 5-1 under "Developed and Developing Lands" is to work with landowners and local governments to update ordinances, and promote and coordinate land acquisition, conservation easements, land protection, and wetland buffer zoning when land is developing. Strengthening ordinances and developing restoration plans for aggregate sites is likely to be a local priority.

DNR 19	Non-Identified	Increase access to waterways for non-motorized boating--While this plan is very strong in resource protection and restoration, an opportunity exists to prioritize increased public access to waterways; one such way is by adding canoe landings or enhancing existing public access points to promote non-motorized boating.	No change: While it's recognized that the recommended activity can ultimately improve stewardship of water resources, it is considered out of the scope of this Plan. Local governments may work to improve public access through various avenues.
DNR 20	Pg 75	Adopt the DNR model floodplain ordinance--Floodplain protection elements in the plan could be enhanced by adopting the DNR model floodplain ordinance and expanding the language to include the entire Lower St. Croix Watershed, giving priority to waterfowl flyway corridors (pg. 75 Table 5-1 Part D Item 56).	No change. Thank you for this idea and information. It's likely that in some areas, the model floodplain ordinance will be included in discussions about adopting MIDS (Table 5-1, Part B). It may also be used as an alternative to the innovative shoreland standards to be encouraged through item #37 in Table 5-1, Part C.
DNR 21	Pg 40 & Pg 67	Table 5-1 Part C Implementation Action: Perform Culvert Inventory: Strengthen Culvert Replacement Language--An opportunity exists to enhance the plan's culvert replacement language of "natural hydrologic conditions" by specifically identifying the DNR Geomorphic Approach to Infrastructure Design at Road-Watercourse Intersections. Additional information can be found from "Best Practices for Meeting DNR General Public Waters Work Permit GP2004-001" which provides width, length, and slope specifications (pg. 40 and pg. 67 Table 5-1 Part C Implementation Action: Perform Culvert Inventory).	Table 5-1, Part C Implementation Action will be revised: Perform culvert inventory: redesign and restore as road projects are completed to help manage to natural hydrologic conditions through use of MnDNR Geomorphic Approach to Infrastructure Design at Road-Watercourse Intersections
Valley Branch Watershed District, John Hanson			
VBWD 22	Page 12	Paragraph 1, Last Sentence; "Valley Creek" is the common name for Valley Branch Creek.	Text will be revised as noted.
VBWD 23	Page 28	Paragraph 3: Who identified the seven resources?	No change. The Advisory Committee identified the seven resource areas after considering input from stakeholder groups and collectively reviewing and categorizing their local issues and concerns.
VBWD 24		Figure 1-1. There appears to be an error along the Valley Branch Watershed District (VBWD)-South Washington Watershed District (SWWD) boundary. A significantly sized yellow area near the headwaters of Valley Creek is shown to be in SWWD. Please review the legal boundaries between VBWD and SWWD and the hydrologic boundary to that drains to Lake St. Croix.	If the appropriate GIS data are available, the map will be corrected as noted. [Upon further review: No change to plan. The legal boundaries for the watershed districts are correct in Figure 1-1. Although there is an error in the hydrologic boundary draining to Lake St. Croix in this area, the area in question is in the state-delineated HUC-8

			watershed for the St. Croix river, which was used to define the Lower St. Croix planning boundary.]
VBWD 25	Pg 33	Priority Locations. This section is vague. Please add much more detail on who decided which were priority lakes and how this was determined. The section references Table 5-1, which then references Figure 5-2 and 5-3 and Table 5-3.	As written, Section III.C. provides the basic process the Advisory Committee (AC), including local experts and state agencies, used to determine priority locations. The discussions of the AC were extensive and included monthly meetings over the course of 1.5 years. Meeting notes for AC and Steering Committee meetings are available at: https://www.lsc1w1p.org/workgroups. Section III.C. reference tables with priority locations will be revised: Table 3-1 includes the goals developed to address each issue. Measurable outputs and priority locations are shown in Table 5-1. Both Tables 3-1 and 5-1 include a column to cross reference the other table. As noted within Table 5-1, regionally significant rivers and streams and regionally significant lakes are listed in Tables 5-2 and 5-3, respectively. Section III.C. Priority Locations will be revised to include the following additional information: *Regionally significant lakes were identified through an iterative process by the Advisory Committee. For each lake in their jurisdiction, local experts assigned a priority score (A, B, C) regarding the level of impact to the lake from cropping practices, the level of impact from other agricultural practices, the level of impact from urban/suburban development, and degree to which protection strategies and sustainable development is needed for the lake.* *Due to the high number of lakes existing across the watershed, the priority levels were used to develop a manageable number of lakes where the LSC Partnership should focus efforts. Lakes scoring the highest priority level where both cropping and other agricultural best practices are needed, were identified as being regionally significant and denoted as those needing "Ag BMPs" in Table 5-3. Similarly,*

			lakes scoring the highest priority level for having urban impacts and needing sustainable development were identified as being regionally significant and denoted as those needing "Urban BMPs" in Table 5-3. *Regionally significant streams (Table 5-2) were identified as those contributing the highest amount of total phosphorus in the Lake St. Croix Total Maximum Daily Load Study (MPCA, 2012).* *The term "regionally significant" was assigned to note that the LSC Partnership will be working on these lakes as a regional collaboration. The term does not exclude individual entities from assigning significance or prioritization to these or other waterbodies in their jurisdiction.*
VBWD 26		Table 5-2: Please reference the specific document with these values. Various specific loads are listed in different MPCA documents and it's unclear what the latest values are. For example, Appendix B, Page 3, of the February 2013 Implementation Plan of the Lake St. Croix Nutrient TMDL lists a revised TMDL load reduction of 848 pounds for Brown's Creek, but Table 2 of the One Watershed One Plan lists 1,954 pounds.	Table 5-2 will be revised to include a total phosphorus load reduction for Brown's Creek of 848 lbs/yr (and a 10-year TP reduction goal of 85 lb/s) to reflect the updated reduction goal calculated in the 2013 Lake St. Croix TMDL Implementation Plan. All other pollutant load reductions in Table 5-2 will remain unchanged. They reflect load reductions in Table B-7 of the 2012 Lake St. Croix TMDL document. References to these documents will be noted in a footnote below Table 5-2.
VBWD 27		Figure 5-2 and Table 5-2: Please sync the information in the figure and table. Not all the streams are labeled on Figure 5-2 and match Table 5-2. Within VBWD, Raleigh Creek, Farney Creek, Valley Branch Watershed District's Project 1007, and MnDOT's I-94 storm sewer and Kelle's Creek are shown as streams on Figure 5-2 and not listed in Table 5-2. Which is correct? Why is Valley Creek not a regionally significant water?	Figure 5-2 will be revised with a label for Lawrence Creek and the "small streams" south of Lawrence Creek and north of Valley Branch. These streams were determined to be regionally significant because they are the streams contributing the highest total phosphorus loading to the St. Croix River according to the Lake St. Croix TMDL. This explanation will be added to Section III.C.
VBWD 28	New Section.	Please add a section to the plan that explains how regionally significant lakes were identified. The VBWD has identified lakes not shown on Figure 5-3 as high-priority basins and does not consider Clear Lake regionally significant nor a high-priority basin. (Clear Lake is landlocked, so its water quality doesn't affect the St. Croix.)	Clear Lake (lake ID: 82004500) listed in Table 5-3 is located near Square Lake in the Carnelian-Marine-St. Croix Watershed District. Figure 5-3 inadvertently included three "Clear Lakes" in Washington County. The Clear Lake located in VBWD will be removed from the figure along with a Clear Lake near the Washington/Chisago County border.

			Section III.C. Priority Locations will be revised. See response to comment #25.
VBWD 29		Tables 5-3 and 5-4: Please explain what information was used to populate Tables 5-3 and 5-4. For example, how were those lakes and the style of BMP determined? The second table in Appendix C seems to be the basis, but there are only broad terms that explain the list and not all impaired lakes are included. Why are all nutrient-impaired lakes not included? Why are lakes that are not officially listed as impaired but not meeting water quality standards not included? Why are all of the VBWD high-priority lakes not included? Why are agricultural BMPs suggested around Horseshoe Lake when there is no agricultural land there? Why are other lakes in VBWD not shown on Figure 5-4?	See response to comment #25 on how lakes were identified as regionally significant. The Horseshoe Lake listed in Table 5-3 is in Isanti County and is slated for protection strategies (as shown). Lake Jane will be added to Table 5-3 for protection strategies. Silver Lake will be added to Table 5-4 for internal load analysis. A footnote will be added to Table 5-3 noting that the overall total phosphorus (TP) reduction goal reflects those goals calculated in TMDLs, or when a TMDL was not completed, from the MPCA's Lakes of Phosphorus Sensitivity Significance dataset. Lakes in Table 5-4 were identified by LSC Partners familiar with the lakes and their needs.
VBWD 30		Figure 5-5: How were the areas identified and prioritized in Figure 5-5? VBWD has completed an inventory of the more than 1,200 wetlands within the district and has mapped restoration areas. This figure shows areas along Kelle's Creek in VBWD where there is steep topography and few wetlands.	The polygons and colors in Figure 5-5 show BWSR's Compensation Planning Framework priority catchments in the Lower St. Croix River Watershed. Information presented to the Policy Committee when considering wetland priorities by BWSR Wetland Specialists on March 25, 2019 include: *This Compensation Planning Framework map represents the catchments that were prioritized in the Lower St. Croix Watershed for wetland replacement based on twelve criteria developed with input from watershed stakeholders. In the prioritization analysis, the importance of each criteria was weighted based on the stakeholders' feedback to a survey designed to identify the relative importance of each criterion.* The Priority Location reference for #27 in Table 5-1, Part C will be revised: BWSR's Compensation Planning Framework priority catchments in the Lower St. Croix River Watershed (Figure 5-5).

			Proposed revisions to the key in Figure 5-5 to add clarity are found in responses to comment #110.
VBWD 31		Table 5-1, Items 9 and 20, Groundwater Quality: Item 8 discusses groundwater and Item 9 discusses lakes in Chisago County affected by non-compliant septic systems; but, streams affected by non-compliant septic systems are not listed in the table. Please update the table to address septic systems that are not meeting treatment standards for streams, such as Kelle's Creek and Valley Creek. In VBWD, Kelle's Creek is impaired for bacteria and the MPCA's study found that septic systems are a significant reason for the impairment. VBWD-collected data on Valley Creek show the creek is not meeting water quality standards for bacteria.	No change. The plan identifies SSTS upgrades for total phosphorus reductions rather than addressing bacteria. During the plan development process, the Advisory Committee discussed bacteria impairments and decided that bacteria pollution would often be addressed as a secondary benefit when addressing nutrients and could be a local priority, where appropriate.
VBWD 32		Table 5-1, Item 10: Groundwater quality can also be affected when wells flood. Please consider changing the measurable output description to include raising casings of wells that are discovered to be at risk of flooding.	Measurable Output in #10, Table 5-1 will be revised: Properly seal or floodproof 100% of known or discovered abandoned wells or wells at risk of flooding.
VBWD 33		Table 5-1, Item 16: Is this item limited to upstream communities or just communities adjacent to the river (and not Lake St. Croix or inland resources)? Perhaps the title of the item ("St. Croix River Chlorides") could just be "Chlorides." Please consider outputs that will quantitatively measure the positive effects on water quality, as training does not necessarily lead to measurable improvements. For example, retrofitting snowplows and calculating the reduction in chloride use might be appropriate.	No change. As stated, the priority location for chloride reduction through MPCA's Smart Salting Training is "basin wide," meaning cities throughout the basin are included in the priority location. As noted in Section V.A. on page 56, the left-most column of Table 5-1 is a cross reference to the issue and goal from Table 3-1 along with a very brief description of the issue being addressed. For this item (#16), the action is related to goal #1D from the St. Croix River and Lake St. Croix (STC) section of Table 3-1. (1D. Improve or stabilize the concentration trends in the St. Croix River for chlorides). While the LSC Partners agree there may be more impactful projects or programs to reduce chlorides, training winter maintenance staff has shown to be an effective mechanism and is the most likely action for implementation in this watershed, given the costs of other actions. This item does not preclude individual entities from implementing additional chloride reducing projects or programs.

VBWD 34		Table 5-1, Item 21: The measurable output does not estimate the water quality benefit. Please consider a measurable output based on TSS, phosphorus, and another appropriate parameter.	No change. The water quality benefits of lake shoreline projects vary considerably depending on size of the project and the amount of erosion prevented, among other parameters. Further, shoreline restorations are often installed with habitat improvements as the main benefit rather than water quality improvements.
VBWD 35		Table 5-1, Item 24: It appears only lakes listed in Table 5-3 and Table 5-4 are eligible for this. This highlights the importance of explaining why those lakes are included in the tables, but others are not. There are several waters in VBWD that might benefit from easement or acquisition. Please consider applying this item to more waters than listed in Tables 5-3 and 5-4 and basing the measureable output on a water quality parameter rather than a number of easements or acquisitions.	No change. Please see responses to comments #25 regarding how and why certain lakes were included as regionally significant. As a reminder, this plan does not preclude individual entities from prioritizing their waterbodies and implementing their watershed plans. Regarding measurable output: while sustainable development, easements and acquisitions have water quality benefits, those are difficult to quantify without knowing the size, location, position in the landscape, etc. Further, these measures often have significant ancillary benefits including improved and protected habitats for flora and fauna.
VBWD 36		Table 5-1, Item 27: This references red, yellow, and green areas. Please include a figure that shows these areas.	As previously noted, the Priority Location reference for #27 in Table 5-1, Part C will be revised to reference Figure 5-5. Proposed revisions to the key in Figure 5-5 to add clarity are found in responses to comment #110.
VBWD 37		Table 5-1, Item 29: Please consider revising the measurable outcome so that the wetland bank is also USCOE-approved.	Table 5-1, Item 29 will be revised: #29: Create and maintain 2 new BWSR and USACOE approved wetland banks within the basin
VBWD 38		Table 5-1, Item 35: How and why were these lakes identified while others are not listed?	No change. Chisago County and Chisago Chain of Lakes Lake Improvement District staff advocated for this outcome as a significant issue and priority in their area. There were no other entities and no evidence presented to include additional lakes.
VBWD 39		Table 5-1, Item 36: How and why were the lakes listed in Table 5-4 determined? What do A and B in the table mean?	The lakes listed in Table 5-4 are those identified by local staff as needing an analysis of internal loading. Local staff relied on their knowledge of the lakes and past data or studies indicating the internal loading might be a significant source of pollutants. Those listed with "A" were deemed a higher priority than those listed with "B." A reference with that information will be added as a footnote to the table.

VBWD 40		Table 5-1, Items 51 and 52. Please explain the water quality issue that these items intend to address. Other organizations, such as VBWD, also have lake outlet systems to operate.	No change. The priority location for Item 52 is basin wide. Thus, VBWD lakes would be included. For Item 51 (managing channel and weir system in lakes with anthropogenic water level variation), since Chisago County is adopting this plan as their county water plan, it is important that this action be included. Assuming the VBWD will continue to implement its own watershed plan, rather than adopt this plan, the local outlet operations can remain a local priority in the VBWD plan and do not need to be included here.
VBWD 41		Table 5-1, Item 54: Text appears to be cut off in some columns.	Edits will be made.
VBWD 42		Table 5-2, Item 55: Could this item (and associated budget) also apply to tributaries that have historically been monitored? If not, why?	No change. This action was specifically intended to address areas where data are lacking such that more robust watershed analysis and targeting of best practices can be developed.
VBWD 43		Table 5-3: Who determined the load reductions? How were they determined and vetted?	Table 5-3 will be revised to include a footnote with the following information: Overall total phosphorus (TP) reduction goal as listed in total maximum daily load studies, when available, or from MPCA's Lakes of Phosphorus Sensitivity Significance dataset.
VBWD 44		Table 5-1: The plan is silent on PFAS-contamination in groundwater (and surface water). Please explain and add to the table.	The plan will be revised to include additional information (similar to italicized text below) on the entities and processes already addressing PFAS under "groundwater management" in Section IV.G.iii. *Emerging contaminants, including PFAS, is a primary issue addressed Washington County's Groundwater Plan. There is widespread PFAS contamination in the southern half of Washington County, present in both the Lower St Croix, and the East Mississippi watershed areas. This contamination results from four sources located in Washington County. Due to the local nature of the issue (only in Washington County) this plan does not specifically address existing PFAS contamination. In addition to being featured in the county's*

			Groundwater Plan, as a result of the 3M Settlement reached in 2018, the state is leading an effort to develop a Conceptual Drinking Water Supply Plan for PFAS-affected communities in both Washington and Ramsey Counties. Later stages of that work may include projects related to recharge, water conservation, and recreation. Further, please note that PFAS contamination is discussed in the Land and Water Resources Inventory (Appendix A). To help address groundwater contamination, Table 5-1 includes the Implementation Action: "Coordinate with State agencies and officials to identify and report hazardous waste generators." It's assumed that facilities generating PFAS (either currently or historically) would be included as a waste generator.
VBWD 45		Figure 5-3: Who determined the lakes shown in VBWD to be regionally significant? How? Why is Clear Lake considered regionally significant? Why are other lakes that VBWD considers high-priority not shown?	No change. Please see response to comments #25 and #28.
VBWD 46		Figure 5-4: Why aren't all impaired lakes in VBWD shown?	No change. Figure 5-4 shows the lakes listed in Table 5-4. As noted in a previous response, the lakes listed in Table 5-4 are those identified by local staff as needing an analysis of internal loading. Local staff relied on their knowledge of the lakes and past data or studies indicating the internal loading might be a significant source of pollutants.
VBWD 47		Page 91, Middle of Page: This sentence regarding Figure 7-1 seems random. Will only sites shown on Figure 7-1 be eligible for the Steering Committee to consider? VBWD has conducted more detailed inventories of gully erosion sites and prioritized them for stabilization. Please consider that they will be eligible rather than only the broad areas shown on Figure 7-1. (Also, it's Lake DeMontreville rather than DeMontreville Lake.)	As requested by BWSR, additional information on existing SWA's and inventories will be included in the Plan. Additional explanation will also be added including: these SWA's and inventories are noted in the plan because projects and programs identified therein may be priorities for implementation and funding. As noted throughout the process laid out in Section VII, new SWA's and other targeting and prioritizing analyses will be completed so that high priority projects are identified for implementation. The label for Lake DeMontreville will be revised in Figure 7-1.

VBWD 48	Pg 95	Please consider listing and linking the Valley Branch Watershed District 2015–2025 Watershed Management Plan.	The Plan will be revised to include a reference to the VBWD plan in Section VIII Local Implementation Programs.
VBWD 49	Appendix A	Section 5.7, Second Paragraph: I believe this describes the Valley Branch Watershed District rather than the Valley Creek watershed.	The text will be revised as noted.
VBWD 50	Appendix A	Section 5.7, Third Paragraph: To avoid confusing readers, I suggest the sentence be revised to say, "Surface waters in the Valley Branch Watershed District…."	The text will be revised as noted.
VBWD 51	Appendix A, Pg 28	Second Paragraph, Last Sentence: Please revise to "Of these, Lake Jane has the most outstanding water quality."	The text will be revised as noted.
VBWD 52	Appendix A, Pg 28	Third Paragraph, First Sentence: Please revise to "Lake Elmo is the largest and deepest lake in the Valley Branch Watershed District…."	The text will be revised as noted.
VBWD 53		Table 5-1: Th e plan focuses on water quality. However, flooding can cause water quality problems. The plan includes a few items related to flooding. Please consider more.	While the impact to flooded properties around landlocked basins is considered a local issue, the potential impact to the St. Croix River and Lake St. Croix is a watershed wide issue if/when landlocked basins with degraded water quality are discharged to the River. Table 5-1, Part B: Implementation on Developed and Developing Lands will be revised to include a new implementation action and associated costs with a proposed priority level of "B" meaning it would be eligible for WBIFs. Addition to Table 5-1, Part B: *Implementation Action (B): Before installing outlet directing discharge of a eutrophic natural waterbody to St. Croix River, perform analysis and implement measures so waterbody meets*

			state standards for nutrients (e.g., alum treatment, treatment of water within conveyance system, etc.) *(Est. $100,000/analysis + $250,000/implementation; assumes 50% cost share from USACE for analyses as stable external funds)* *Priority Location: Eutrophic natural landlocked basins to be discharged to St. Croix River* *Measurable Output: Perform analysis and implement measures to meet state standards for nutrients on 3 waterbodies*
Metropolitan Council, Jen Kostrzewski			
MCES 54	Exec Summ	The Executive Summary is a well written high-level overview of the Plan that can also function as a standalone document. The Plan elements are adequately explained so that a reader is able to understand their intent without referring to the rest of the document.	Thank you – that's great to hear!
MCES 55	Exec Summ	The Executive Summary should be explicit as to which entities participated in the planning process. They should be clearly listed in the second paragraph of the introduction.	The Executive Summary will be revised to include a list of the LSC Partners.
MCES 56	Exec Summ	The Executive Summary could benefit by including an Overall Priority Waterbodies Map, perhaps an amalgam of the maps that are deeper in the Plan (Figures 5-2 and 5-3). Admittingly, this will leave out the nuances of priority groundwater and wetlands, but that can be covered more in depth in Section 5.	No change. For the reason you stated, a single map labeled as the priority waters and showing priority rivers/streams, lakes, wetlands, and sensitive groundwater areas would have too many overlapping layers to be useful. That is why the LSC Partnership created the interactive map so that layers could be turned off and on according to the user's need.
MCES 57	General Comment	Over the course of the Plan development process, many handouts were created to communicate the contents of the Plan. These could help support the sharing of Plan content – in addition to the Executive Summary. Please consider adding them as an appendix to the Plan.	No change to Plan. Thank you for this idea. Once the Plan is adopted, the LSC Partnership (or single entities within the Partnership) may choose to develop such a document for use with the public and various stakeholder groups. Where ever the Plan "lives" on their respective websites, a fact sheet or summary documents could be posted there as well.
MCES 58	Issues, Goals, and Imple	The input process to develop the Issues, Goals, and Implementation Activities was very robust. As mentioned earlier, the Council was impressed to see the amount of effort that created this part of the Plan. The surveys, conversations, and extensive use of the TAC created locally driven, creative, and important goals and activities to protect and	Thank you. The LSC Partnership appreciates the Met Council's active role on the Advisory Committee and looks forward to continued collaboration.

	mentation Activities	improve the water quality and quantity within the watershed. Of note, the Council is looking forward to the utilization of the shared services positions within the watershed. These positions will help create an avenue to improve implementation in agricultural, urban, and developing lands within the watershed. This is an inventive way to address many shared issues across the area.	
MCES 59	Issues, Goals, and Implementation Activities	Many of the measurable goals in this Section involve significant planning and organizational work after the completion of the One Watershed, One Plan process. This work includes installing/implementing urban and agricultural Best Management Practices, implementing smart irrigation practices, completing subwatershed analyses, work with LGUs on ordinance updates, AIS-related activities, promotion of land stewardship activities, and an education and outreach plan, discussion and implementation of watershed monitoring, establishing shared services positions for an agronomist, and education/outreach, and working to promote ordinances about Minimal Impact Design Standards (MIDS) implementation. The LSC Partners and LSC Partnership should carefully evaluate their internal capacity and future coordination abilities at the annual work plan creation to ensure they are able to successfully oversee and execute this work.	No change. The LSC Partners, as individual entities, have a good track record of implementing robust and effective programs, monitoring, outreach, etc. These activities will be augmented and improved through new and strengthened collaborations among the Partners. Partners are committed to annual work planning and ongoing discussions to appropriately implement the Plan. Section VII.A. Work Planning includes "staff capacity" as one of many considerations for annual work plan development.
MCES 60	Plan Administration and Collaboration	The Council applauds the LSC Partnership's embrace of collaboration and adaptive management to administer and implement this Plan. The Council agrees whole-heartedly with the statement in the Plan, "Coordination and communication are especially critical to avoid duplication of efforts or to develop a common language for outreach and education programs." Please continue to count on our agency to be a resource to the LSC Partnership over the next 10 years and beyond. Additionally, Council staff see great value in the evaluation and tracking of the implementation activities to show the effectiveness and impact of this Plan on the water resources within the Lower St. Croix.	Thank you.
MCES 61	Pg 97	Within the first paragraph on page 97: please clarify which entities signed the JPC agreement. As of now the Plan states, "Most or all" of the entities signed. Please clarify.	No change. During Plan development, the final list of Lower St. Croix Partners (Joint Powers Collaboration signatories) is not known and therefore, cannot be included in the plan. Further, the list of members may change over the life of the Plan.

MCES 62		The Advisory Committee should meet at least once per year at a minimum and more as needed. This will allow state agencies and the Metropolitan Council to provide updates with changing agency plans/priorities that may have an impact on the work in the Lower St. Croix.	Section IX. B. iii Advisory Committee will be revised: The LSC Partnership will seek the input from an Advisory Committee through at least one meeting per year and otherwise ~~on an~~ as needed ~~basis~~ during plan implementation.
MCES 63	Appendicies for County Plans	It was clear by the end of Plan engagement and development that Isanti and Chisago counties had chosen to adopt the Plan as their respective County Water Plans. It was also clear that the county priorities would not necessarily be fully represented by this Plan. The LSC Partners advised to have these local priorities, goals, outcomes, and activities included in the Plan as appendices. This resolutions mentioned in the Plan (on page 95) and reiterated at the beginning of Appendix D (page 12). However, Council staff think this approach may need to change based on whether or not language in the Appendices is considered eligible for future funding such as Watershed Based Funding. Clearer expectations, and, perhaps additional direction from the Board of Water Resources is needed on how language in the appendices is treated compared to language in the main text of the plan. For example, language in the Appendices is not eligible for funding, Isanti and Chisago counties may need to reevaluate this approach and consider a way to better integrate their water plan needs into the main text of the Plan.	Thank you for this insight. The plan will be revised, if needed, depending on BWSR input.
MN Pollution Control Agency, Eric Alms			
PCA 64	General Comment	We would like to thank the advisory and policy committees for considering the items listed in the original list of priority issues that the MPCA provided on February 5, 2018. The various TMLDs and WRAPS reports within the Lower St. Croix watershed, and the goals and strategies listed therein, were taken into consideration when determining the prioritization, geographic targeting, and measurement of goals listed in the draft plan.	Thank you.
PCA 65		The MPCA is committed to continue to work with the policy committee, advisory committee, and Lower St. Croix partners as a supporting agency during the implementation phases of the plan.	Thank you. The LSC Partnership appreciates the MPCA's active role on the Advisory Committee and looks forward to continued collaboration.
Washington County, Maureen Hoffman			

WASH CO 66	Pg 16	With regards to the strategy on page 16 to "contract or hire an agronomist", the county would like to suggest that the LSC 1W1P consider partnering with MN Extension for this service, to the greatest extent possible.	No change. The Plan language of "contracting with an agronomist" does not preclude contracting with the MN Extension for this work. Assistance from the MN Extension, whether through contractual agreements or other avenues will certainly be considered during annual work planning, as noted in Section IV.C.i. page 44.
WASH CO 67	Appendix C	The county supports the process outlined in Appendix C, which indicates that a minor plan amendment process is not required when adjusting the project criteria.	Thank you.
Interested Stakeholder, Robert Tipping			
RES 68	Pg 6	Committee Relationships/State Review Agencies and Met Council; I do not see review from DNR groundwater technical groups - Ecological and Water Resources Division) (County Groundwater Atlas; Groundwater Technical Analysis workgroup) included	No change. The MnDNR was an active participant on the Advisory Committee during Plan development. MnDNR experts from various technical groups or sections were likely consulted, when appropriate, by the MnDNR Advisory Committee member.
RES 69	Pg 7	Advisory Committee Members/Agency staff; see comment above	No change. See response above.
RES 70	Pg 12	paragraph 3: consider including groundwater use by volume/category here rather than its own separate paragraph	No change. The paragraph on groundwater is extensive. For readability it should remain separate.
RES 71	Pg 12	paragraph 5: groundwater role in lake water clarity – several of the lakes mentioned are connected by buried bedrock valleys that have significant groundwater throughflow	The paragraph on lakes will be revised: Lakes are abundant throughout much of the watershed and range from small pristine lakes with little or no development, to large lakes important for recreation and ringed with developed shoreland. The more significant lakes in the Lower St. Croix River Watershed include Big Marine, Big Carnelian, the Chisago Lakes Chain, Coon, Elmo, Forest, Goose, Little Carnelian, Rush, Rock, and Square located in the central and southern parts of the watershed. Most of these lakes are linked through a chain of small connector waterways and several are connected by buried bedrock valleys with significant groundwater flowing through them. Small impoundments are also a part of the Sunrise River System. These lakes and impoundments contribute to the

			biological communities of the adjacent tributaries. Not surprisingly, many of these lakes are impaired for high nutrients due to non-point source pollution (runoff) from agricultural and developed lands
RES 72	Pg 13	paragraph 3: spring sources along St. Croix corridor are primarily confined aquifers not well-connected to surface water systems within the watershed	No change. Thank you for the information. The text is accurate as written.
RES 73	Pg 13	paragraph 5: areas most vulnerable are identified by stable isotope evaporative signatures in groundwater. This includes the Chisago Lakes area. Vertical gradients enhanced by high capacity pumping see https://files.dnr.state.mn.us/waters/groundwater_section/mapping/cga/c22_chisago/pdf_files/plate07.pdf, figure 5	No change. Thank you for the information. The text is accurate as written.
RES 74	Pg 17	paragraph 2: what water monitoring data will be collected?;	No change. Existing and future monitoring is discussed in Section IV.A.iv. and in Table 5-1 Part D
RES 75	Pg 17	paragraph 2: “as As”;	Edit will be made.
RES 76	Pg 19	paragraph 2; are examples of method applications available? otherwise difficult to evaluate whether they apply to surface water only	No change. Section VII. B. includes additional details on the methods for prioritizing and targeting specific projects.
RES 77	pg 19	paragraph 4: Additional Collaboration; Groundwater resource projects benefit from hydrogeologist participation	No change. Thank you, we will keep that in mind.
RES 78	Pg 23	sidebar; include groundwater use (MGY or whatever is readily available), broken out by use category	Sidebar “LSC by the Numbers” will be revised to include: Million gallons per year (MGY) groundwater used for consumption: 3,700

RES 79	Pg 26	Table 2-1: “MN Department of Natural Sources”;	Edit will be made.
RES 80	Pg 27	paragraph 1: additional information from Chisago and Washington County CGA part B's not fully represented in GRAPs. For example, stable isotope data identifying strong surface water signatures in groundwater for specific locations in both counties. These data highlight the close connection between groundwater and surface water in these areas, see https://files.dnr.state.mn.us/waters/groundwater_section/mapping/cga/c22_chisago/pdf_files/plate07.pdf, figure 4, https://files.dnr.state.mn.us/waters/groundwater_section/mapping/cga/c39_washington/washington_report.pdf, figure 20	No change. Thank you for the information. Updated information will be used in future resource decision making, as available and appropriate.
RES 81	Pg 27	Bottom of page: suggest replace “in local water resources” with “local surface and groundwater	No change. The term “water resources” is broad and includes both surface and groundwater. Concerns with groundwater is also called out specifically in a separate bullet in that section.
RES 82	pg 28	Table 2-2/Groundwater: “Further, groundwater consumption on the rise with 50% increase in pumping for consumption since 1990” This change is not accounted for in Appendix B watershed storage analysis	No change. The water storage analysis was completed by the MnDNR and was reviewed by and received input from various MnDNR staff, and possibly different departments. We believe it to be a complete and accurate account of water storage needs.
RES 83	Pg 28	Table 2-2/Rivers and streams: “Some streams run through deep ravines, offering cool environments and harboring trout” cool temperatures are a function of groundwater discharge as the ravines cut through different aquifers and aquitards	The text in Table 2-2, under Rivers and Streams will be revised: Some streams run through deep ravines with springs and seeps, offering cool environments and harboring trout.
RES 84	Pg 29	Table 2-2/Lakes: water clarity also a function of groundwater throughput; “[P]ressures from new development” - impacted, in part by groundwater use and changing climate	No change. The statement is intentionally broad. There are many ways in which development impacts lakes and water quality.
RES 85	Page 29	Table 2-2/Wetlands: impacted, in part by groundwater use and changing climate	No change. As written, the passage includes “disappearing recharge areas” as a threat and acknowledges this list of threats is not an exhaustive list. These threats to wetlands are also articulated in Table 2-3.

RES 86	Pg 31	Table 2-3, Groundwater (3), Lakes (4), Wetlands (3): Quite a bit of data are available, particularly with regard to groundwater chemistry and hydrogeologic setting (aquifers, aquitards and hydraulic head) What is lacking for planning purposes is an watershed-scale, integrated surfacewater-groundwater model;	No change. Table 2-3, Groundwater #3 includes "Data are lacking to fully understand groundwater resources." This would include the need for a groundwater-surface water model.
RES 87		Table 3-1, Rivers & Streams (1) Goal (1B); Maintaining natural reproducing trout populations is a function of baseflow to streams	No change. Groundwater and hydrology are included as issues and goals in Table 3-1.
RES 88	Pg 34	Table 3-1, Rivers & Streams (3), Goal (3A); high capacity pumping and changes in precipitation due to climate change are two important factors to consider with regard to altered hydrology. Groundwater residence time determines aquifer buffering capacity on baseflow quantity and temperature;	No change. Groundwater consumption is addressed in Table 5-1, Parts A & B with an implementation action to contact highest groundwater consumers and provide cost share or technical assistance to install smart irrigation technologies. Climate change and opportunities to mitigate the effects are discussed in Section IV.F. and in various implementation actions in Table 5-1.
RES 89	Pg 35	Table 3-1, Lakes (4) Goal (4A), Wetlands (3) Goal (3A-E): integrated surface water groundwater model that uses hydrogeologic data (aquifer, aquitard properties [thickness, extent, permeability], hydraulic head) provides better estimates of watershed hydrologic budget/watershed storage. Data exist and are being used to construct groundwater flow models/surface water-groundwater models). Water budget estimates will improve management decisions with regard to lakes, streams, wetlands	No change. Thank you for the information. We look forward to using updated data and analysis as they are available.
RES 90	Pg 45	Education and Outreach: Groundwater conditions through time and their connection to surface water quantity and quality are best illustrated using water chemistry mapping and three-dimensional block diagrams. Such site-specific (not generic) diagrams can be completed where County Atlas Parts A and B mapping have been completed. This is something GRAPs is looking to address	No change. Thank you for the information. We look forward to updated and geographically specific education and outreach as they are available.
RES 91	Pg 53	Groundwater Management: DNR staff experience with Groundwater Management Areas (GWMAs) provide possible workflow for shared services and data analysis at watershed scales where budget and staffing are limited by political boundaries. Washington County is a good example of incorporating groundwater investigations and geologic mapping into a comprehensive surface and groundwater management plan	Thank you for this information. We look forward to collaborating with MnDNR staff on groundwater issues.

MN Board of Water and Soil Resources, Dan Fabian			
BWSR 92		Overall, we believe the planning process and Draft Plan were very well done. We particularly want to acknowledge all the time and effort that local government staff and elected/appointed officials spent working on this Plan. We also want to acknowledge the thoughtful facilitation of meetings, well-written plan components, and responsiveness of the consulting team and local government staff to our comments throughout the process.	Thank you.
BWSR 93		One general concern that BWSR Staff had in reviewing this plan was the tone that the Plan is primarily focused on WBIF, at least when it comes to implementation. For example, there is significant thought put into page 87 E. Prioritizing Watershed Based Implementation Funds. But there is very little on the prioritization of activities for other funding sources (local and other) for implementing the Plan. This apparent singular focus on WBIF may adversely impact the plans ability to access funds other than WBIF.	No change. Table 5-1 includes far greater implementation actions and associated costs than are slated to receive Watershed Based Implementation Funds (WBIF). Further, Section VI discusses multiple funding sources that can and will be used to implement this plan over the next 10 years including funds generated from the implementing entities (local governments), State funds outside of WBIFs, Federal funds, and funds from organizations, non-profits, and other partners.
BWSR 94		We appreciate the thorough stakeholder process used to gather input, maps showing priority locations, use of BWSR's Compensation Planning Framework for prioritizing wetland restoration, and thorough discussion and actions related to drinking water issues, climate change, and monitoring/data collection.	Thank you.
BWSR 95	Cover	Please place the Legacy logo on the front cover of the document.	Edit will be made.
BWSR 96	Table of Contents	Adding page numbers for the figures and tables would be helpful. Include pages numbers on the bottom of pages that include maps.	Page numbers will be added to the table of contents. Will work to add page numbers to maps.
BWSR 97	Executive Summary	In the Executive Summary, to make plan use easier for those stakeholders who will only be reading the executive summary, we suggest including page numbers behind figure and table references throughout this section because they are not immediately following the text reference. For example, on page twelve, it would read, "…also lies in the watershed (Figure 1-1, page 20)".	References will be added.

BWSR 98	Executive Summary, Pg 16	Table 1-1: Consider including "prioritization and analysis" activities in this table. The reasoning for not including it is not clear. It is proposed to spend 25% of WBIFs on these activities and priority locations and timing are somewhat identified in Table 3-1-D.	No change. As noted in the text above Table 1-1, implementation activities and their associated costs in Table 5-1, Part D (Prioritization and Analysis) were not assigned a prioritization level. Table 1-1 lists total costs only for those activities listed as high priorities (denoted by "A" in Table 5-1, Parts A, B and C). As noted in the text above Table 1-1, activities related to prioritization and analysis will be identified for implementation during annual work planning.
BWSR 99	Executive Summary, Pg 18 & 98	Steering Committee: Please add a note in the table that BWSR staff will be invited to the Steering Committee meetings.	Text will be revised as noted.
BWSR 100	Executive Summary, Pg 18	Table 1-2: Recommend revising so it states that the "Advisory Committee meets annually or more often if needed." It is important to involve agencies at least annually to continue the collaboration that was developed during plan development, avoid duplication of efforts and take advantage of agency expertise and knowledge of state programs.	Text will be revised as noted.
BWSR 101	Executive Summary, Pg 19	"Gate Keeper Criteria 3": Please clarify that the "outside" project is for the same resource as the completed prioritization analysis and where it would need to rank (i.e. top 10%)	Section VII.B. will be revised (asterisk statement this will not be included in the Executive Summary so the summary remains succinct): 3. An analysis is complete and/or data are gathered to target and prioritize specific projects where they will have most benefit using the analyses components below*; or the project is outside an area with a completed prioritization but has a similar cost benefit as a previously analyzed project and benefits the same water resource as the completed analysis**. **It is acknowledged it will take many years to conduct analyses like SWAs across the entire LSC Watershed. During that time, a low cost, high ranking voluntary project may be identified with a large benefit to water quality. Local staff experience is that there are often high value, voluntary water quality improvement projects outside of an area with a SWA. In these cases, a model is used to estimate the pollutant load reduction and staff work with

			the landowner to develop a project plan and cost estimate. The clause in this gatekeeper criteria allows the project to be evaluated along with other projects from areas where SWAs have been completed.
BWSR 102	Executive Summary, Pg 19	Local Implementation: Please list all the entities that will be replacing their existing plan by adopting this plan including Pine County/SWCD, Washington CD, Isanti SWCD, Chisago SWCD, etc.	Text will be revised as noted.
BWSR 103	Section III, Pg 34	Table 3-1: Suggest reviewing the column "Related Outputs & Priority Locations, Table 5-1" for additional related implementation actions from Table 5-1 that are related priority location items. For example, Table 5-1 Item 37 would probably also apply to Table 3-1 R&S 2A and LK 2B.	We will review and update Table 3-1 as needed.
BWSR 104	Section IV, Pg 49	Drainage Authorities: in the last paragraph second sentence suggest revising the term Conservation Drainage Management" to "Multipurpose Drainage Management Practices".	Text will be revised as noted.
BWSR 105	Section IV, Pg 50	Local Implementation of Buffer Law: We suggest the following edit to the paragraph. o Minnesota's Buffer Law (~~more formally known as Buffer and Soil Loss Legislation~~, Minnesota Statute ~~2014~~, section ~~103B.101~~ 103F.48) requires a 50-foot average width, 30-foot minimum width, perennial vegetated buffer along public waters (lakes, rivers and streams) and a 16.5-foot perennial vegetated buffer along public ditches. The Law also allows for alternative practices that provide a comparable water quality benefit as a full width buffer, where applicable. These buffers and alternative practices help filter out phosphorus, nitrogen and sediment, stabilize banks, reduce erosion, and provide other environmental benefits. ~~The local water management authority charged with enforcing the buffer law may be a watershed district, metropolitan water management organization, or a county~~. Soil and water conservation districts (SWCDs) are charged with determining compliance and assisting landowners with implementation of the required buffers. Counties or Watershed Districts can elect enforcement responsibilities for the Buffer Law. Otherwise enforcement defaults to BWSR. All the counties in the LSC-Watershed	Text will be revised as noted.

		have elected to enforce the Buffer Law. The compliance deadline for public waters was November 1, 2017 and November 1, 2018 for public ditches. As of July 2019, approximately 98% of parcels adjacent to Minnesota waters are compliant with the Buffer Law, with SWCDs reporting encouraging progress in their work with landowners around the state (MN Board of Water and Soil Resources. (2019). Minnesota Buffer Law. https://bwsr.state.mn.us/minnesota-buffer-law.	
BWSR 106	Section IV, Pg 51	Flooding and Floodplain Management: Suggest revising the storage language so it is clear that the 10-year plan goal is 0.16 inches or 7,900 acre-feet (consistent with the language on page 47). Otherwise try to clarify that the 0.48 inches or total 23,600 acre-ft is the long range 30-yr goal.	Section IV. G. iii. will be revised: Due to continued extreme weather fueled by a warmer climate, precipitation amounts are predicted to continue to increase in the coming decades~~. Calculations and~~ A~~a~~nalysis by the MnDNR calculated the 2018 to 2050 water storage goal would equal 0.48 inches over the entire watershed or a total of 23,600 acre-feet of storage. Based on this calculation, this plan includes a 10-year water storage goal of 0.16 inches or 7,900 acre-feet across the entire watershed ~~helped the Lower St. Croix Partnership adopt a water storage goal of 0.48 inches over the entire watershed or a total of 23,600 acre-feet. These figures are based on increasing precipitation amounts predicted from 2018 – 2050.~~ This Plan includes multiple activities that will help reach this water storage goals including the adoption of stormwater infiltration requirements (MIDS), wetland creation and restoration, and improved soil health. (See Section IV.G. for additional information on water storage goals.)
BWSR 107	Section V, Pg 57	Other Definitions: “Direct drainage and direct catchments”, It would be helpful to have some explanation as to why the terms don’t apply to the Sunrise River Watershed.	As stated in Section I.C. Priority Locations, the “Sunrise River Watershed” was identified as a significant priority location “due to its size and land use, it is identified as the highest contributor of total phosphorus in Lake St. Croix.” The definition in Section V.A. will be revised: Direct drainage and direct catchments: The stream, river, or land area that drains directly to the St. Croix River or Lake St. Croix and that is downstream of a pollutant-mitigating feature such lake, impoundment, pond, or large wetland. (Does not apply in Sunrise River Watershed due to the significant pollution contributions from

			the entire subwatershed and the complex nature of wetlands, impoundments, and connected drainage areas throughout the subwatershed)
BWSR 108	Pg 65	Table 5-1, Part B: Correct the table references under the year columns.	Edit will be made.
BWSR 109	Pg 68	Table 5-1, Part C: Please revise the first Implementation Action, about drainage, so it states "multipurpose drainage management practices" rather than "conservation drainage management practices" as this is the more accepted term now and is consistent with BWSR grant program.	Text will be revised as noted.
BWSR 110	Pg 68	Table 5-1, Part C, Item 27: It is unclear if the partnership wanted "green" areas (low priority) and "yellow" areas (medium priority) from Figure 5-5 as a priority location. The language in the table says "highest" priority which would be just "red areas". Please clarify.	The key in Figure 5-5 will be revised: **High Priority Areas for Wetland Restoration (all colors)** **(All red, yellow, and green areas are high priority for this Plan; colors denote BWSR priority level)**
BWSR 111	Pg 69	Table 5-1, Part C, Item 34; Isanti County mentioned in Appendix "E" that they also have concerns about Phragmites spread in the headwaters of the Sunrise River. Confer with county staff to see if they would like it presented here instead of the appendix.	After consulting Isanti County, Table 5-1, Part C (Item 34) will be revised: Priority Location: In order of priority 1. Chisago Lakes LID 2. Carlos Avery WMA 3. Elsewhere in Chisago Co and Isanti Co. 4. Headwaters of North Branch and West Branch of Sunrise River. Measurable Output: Reduce the size and number of invasive phragmites locations as reported on EddMaps by 50% or 45 infestation areas. Stabilize and eradicate those small infestations less than 1,000-2,000 sq ft through rapid response plans, where available.

BWSR 112	pg 70	Table 5-1, Part C, Item 36 : Revise outputs so it says, "1 study implemented" for each time period to clarify that this is an implementation action and not the development of a study.	Text will be revised as noted.
BWSR 113	Pg 78	Table 5-3: BWSR will assume that lakes with a 10-year TP reduction goal of "0" means that these lakes are not a priority for restoration activities.	"Zero" was 5% of the overall TP goal rounded to the nearest whole number. The figures will be revised to show actual (two decimal) calculations of 5% of the overall TP goal.
BWSR 114	Section IV, Pg 87	Prioritization of WBIFs: Second paragraph, second sentence change "could be allocated" to "will be allocated". This would be consistent with the PC's decision when the issue was presented to them.	Consistent with language in the Executive Summary (pg 16), and with intent of the language, the text will be revised: The Lower St. Croix Partnership will allocate WBIFs across different program areas in order to leverage other funding sources, and to advance progress in multiple areas through a variety of actions. In general, WBIFs are expected to be allocated across program areas with a distribution similar to:~~WBIFs could be allocated across program areas with a distribution such as~~: **70% Implementation** • 25% shared services • 45% best management practices~~, and~~ restoration and protection activities **25% Prioritization and Analysis** **5% Administration**
BWSR 115	Section IIV, Pg 89	Work Planning: The last sentence of the second paragraph mentions that the Partners may pursue "block grant requests". What are these and who provides them? Please clarify.	The sentence will be revised: The LSC Partners may also pursue ~~block grant requests and other~~ funding from other sources including state, federal, or other funds based on the work plan to accomplish the Plan Implementation Table (Table 5-1).
BWSR 116	Section IIV, Pg 89	The graphic at the top of page 90 indicates that the PC will approve annual work plans and agreements which may or may not be technically correct depending on if they form a JPC or a JPE. Consider modifying this to indicate that the approval is in accordance with the partnership's implementation agreement.	The following footnote will be added to the graphic for the listed Policy Committee responsibilities. "Final Policy Committee responsibilities will be in accordance with the LSC Partnership implementation agreement."

BWSR 117	Pg 91	**Minimum components of targeting and prioritizing analysis: Suggest only doing the cost benefit analysis for ranking projects only based on the total project costs/pound total phosphorus removed. Or provide the reasoning for also considering the amount of WBIF/pound of total phosphorus removed.	The text will be revised to include the explanation: ✓ Cost benefit analysis completed based on amount of WBIFs/pound total phosphorus removed and total project cost/pound total phosphorus removed, both annualized for 30 years. (The first calculation would be important if a project includes significant funding partners. For instance, in the case of some very large projects, such as urban retrofits, a private entity or local government may contribute significant funds. In those cases, the cost benefit to state taxpayers contributing to WBIFs would be much lower than the cost benefit of the total project.)
BWSR 118	Pg 91	Pg 91 and Figure 7-1: Regarding completed and future SWA's and similar: We suggest including a table listing the existing SWA's (and completed implementation/feasibility studies) that are being adopted into the plan with a brief description of each and including links to the individual documents. Refer to our February 12, 2020, Pre-60-Day Draft curtesy comments for additional information and reasoning regarding this suggestion.	This information will be added to the Plan to the extent available.
BWSR 119	Pg 91	Page 91 and Figure 7-1: The plan should also include a review and approval process for formally adopting the new implementation SWA's/feasibility studies into the plan. For example, the TAC could review a completed SWA against the established criteria, and forward a recommendation to the Policy Committee for approval and adoption into the Plan.	The Plan will be revised to include this process: If a revision to the Plan is proposed by a stakeholder but does not require a Plan amendment (such as the addition of completed subwatershed analyses), the proposed revision will be considered by the Policy Committee after review and comment, or review and recommendation by the Steering Committee. Approved revisions will be incorporated into the Plan and distributed to Plan holders as noted below.
BWSR 120	Pg 92	Regarding changes to the criteria: Please revise the last sentence to read something like; "Changes to the criteria and matrix will be incorporated into the Plan as explained in Section IX.E". This will help keep the discussion/process on updates, changes and amendments to the plan in one location.	Text will be revised as noted.
BWSR 121	Pg 93	Figure 7-1: Is the Rush Lake and Rush Creek one SWA covering that entire area shown on the map? Same question for Chisago Lakes Chain of Lakes? If they are compilations of several individual studies, we suggest showing the individual studies watersheds to be consistent.	The information will added to the Plan to the extent available.

BWSR 122	Pg 95	First Paragraph: Clarify which specific partners are expected to adopt this plan to replace their existing plan for the areas of their jurisdiction within the boundaries of the LSC-CWMP. (It is our understanding that Pine, Chisago and Isanti Counties and SWCDs, as well as the Washington Conservation District intend to adopt and replace the existing plan for that part of the jurisdiction in the Lower St. Croix watershed).	Text will be revised as noted.
BWSR 123	Pg 95	First Paragraph: Change the titles of Appendix "D" and "E" so they are not referred to as "County Water Plans". Something simple like Chisago County Local Priorities and Isanti County Local Priorities are probably sufficient. The county water plan will cease to exist for those areas of the County that are replaced by the LSC-CWMP. Refer also to comments on Appendix-'D" and "E".	Text will be revised as noted for Appendix D. Appendix E will be removed from the plan at Isanti County's request.
BWSR 124	Pg 100	C. Adaptive Management: Suggest adding the following to the last sentence of the first paragraph; (…determine the effectiveness of completed projects in making progress toward goals).	Text will be revised as noted.
BWSR 125	Pg 100	C. Adaptive Management: Remove the word "Minor" from the last sentence of the second paragraph. There is no statute allowing a "minor" amendment to a Comprehensive Watershed Management Plan developed under Minnesota Statutes §103B.801.	Text will be revised as noted.
BWSR 126	Pg 100 - 103	D. Evaluation and Reporting: You acknowledge the importance of accountability to watershed residents and stakeholders (not just the policy committee) but this section does not say how you will do that. We would like to see some information about how you will continue stakeholder engagement, started during the planning process, to keep communicating about the groups progress towards goals.	The Plan will be revised to include the following as options for continued stakeholder engagement. Actual engagement activities will vary by year and among LSC Partners. Options for on-going stakeholder engagement and progress reporting to the public: 1. LSC Partnership website including • LSC Comprehensive Plan and plan amendments • Annual accomplishment reports • Policy Committee meeting information including calendar/schedule, agendas and minutes • Link to LSC Interactive Map • Photos and updates • Project factsheets • Links to websites of partners

			2. Reports on LSC Partnership activities and progress included with existing and future education and outreach efforts including events and publications 3. Five-year "check-in" stakeholder event with participants/invitees of initial and follow up stakeholder events held during the planning process
BWSR 127	Pg 100 - 103	Table 9-1: suggest including an "X" for Year 10 under 5-year Evaluation, which would coincide with the required 10-yr plan update. BWSR's One Watershed, One Plan Operating Procedures indicate the possibility of a plan amendment at ten years (rather than a full plan update) if the plan is well-maintained over time.	Table will be revised as noted.
BWSR 128	Page 102	Third paragraph starting "Partners are…": The Version-1 plan content requirement for collaboratively reviewing and submitting to BWSR's Level I was dropped in Version-2 of the plan content requirements. It has not been determined if or how the BWSR PRAP Program will apply to the 1W1P program. We would be open to removal of this and related paragraphs if you desired to do so.	The paragraph will be deleted to allow for greater flexibility and consistency with future BWSR performance review procedures.
BWSR 129	Pg 102	Fourth paragraph discussing grant funding reporting requirements isn't needed as it does not add to the reporting of the annual accomplishments in implementing the plan.	The paragraph will be deleted.
BWSR 130	Pg 103	Five-Year Evaluation: Currently BWSR Level II PRAP are typically done at approximately 10-yr intervals. We are currently in the process of determining roles and expectations for the five-year evaluations, which may not look at things like partner relationships. Suggest removing the last sentence.	The text will be revised as noted.
BWSR 131	Pg 103-104	Plan Updates and Amendments: Consider revising this title to just "Plan Amendments".	Text will be revised as noted.
BWSR 132	Pg 103-104	First paragraph, last sentence, please make the correction that the Plan will expire 10-yrs from the date of BWSR approval.	Text will be revised as noted.

BWSR 133	Pg 103-104	Remove language referring to “minor” or “major” amendments.	Text will be revised as noted.
BWSR 134	Pg 103-104	Add to the second paragraph language indicating that once the Partnership has determined that changes to the plan are needed they will consult with their BWSR Representative, as early as possible in the process, to determine if the change will require an amendment and if so what the review and approval procedures will be.	Text will be revised as noted.
BWSR 135	Pg 103-104	Identify the internal process roles of the planning team, steering committee, advisory committee and policy committee in decisions about changing the plan? Also identify public input and outreach needed to accomplish plan changes. The minimum public input would probably be included/determined when working with the BWSR Representative to determine the review and approval procedures based on current BWSR guidance and governing statutes.	Section IX.B.i (Decision Making, Staffing and Collaboration; Policy Committee) will be revised: The Policy Committee will establish bylaws to describe the functions and operations of all committee(s) and will have the power to modify the bylaws. The Policy Committee will meet, at least quarterly, to review past progress and future planned activities and shall consider recommendations from the Steering Committee on budgets, staffing, administration, work plans, grant applications, proposed plan amendments or changes to the plan, etc. The Policy Committee will develop recommendations on these items for consideration by the governing boards of all LSC Partners and will carry out the collective will of the governing boards. With support from the governing boards, the Policy Committee will take appropriate actions including approval of grant applications, grant agreements, payment of invoices, and professional contracts for plan administration (including fiscal agent and day-to-day contact). The Policy Committee will carry out the plan amendment procedure as noted in Section IX.E. Policy Committee members will keep their respective governing entities regularly informed on the implementation of the Plan and will coordinate, as needed, with their local staff serving on the Steering Committee. Regarding public input, see revisions proposed for page 104 below.

BWSR 136	Pg 103-104	The plan amendment or change process needs to address how amendments that are only related to one entity (e.g., an appendix specific to one county) will be handled.	It is our understanding that proposed revisions to Appendix D: Chisago County Local Priorities is the only instance when a plan amendment may be needed for a single entity. Section IX.E. will be updated to include the following text: A process will be included in the bylaws of the Joint Powers Collaboration to address instances of proposed amendments to Appendix D: Chisago County Local Priorities.

BWSR 137	Pg 103-104	Revise the third paragraph language describing the list of items not requiring a plan amendment to read something like "The following plan changes do not require an amendment to the plan:" Then make the following revisions to the bulleted list items.
		* Revise first bullet item to read something like: "Minor differences in estimated costs between the Annual Work Plan and the cost for activities listed in Implementation Table 5-1.
		§ Delete the second bullet item in the list. Adding and removing activities from Implementation Table 5-1 would likely require a plan amendment.
		§ Revise the third bullet to read something like "Alteration of the timeline for planned activities within the Implementation Table 5-1, as needed to accommodate development of the annual work plan and the biennial work plan update."
		§ To the fourth bullet we suggest adding test to include newly adopted SWA's and feasibility studies as changes that would not require a plan amendment.
		§ Delete the fifth bullet on revising priority project locations. Revising priority project locations identified in the plan would likely require a plan amendment.
		§ Note the seventh bullet will need to be consistent with the implementation agreement and by-laws.
		§ Delete the eighth bullet as changes to the existing goals and policies would likely require a plan amendment.
			The paragraph in Section IX.E. will be revised:
			
			In recognizing the need to maintain flexibility during implementation, the following plan changes do not require an amendment to the Plan. ~~a Plan amendment is not required for the following situations~~:
			
			• ~~Revising of estimated cost for activities listed in Implementation Table (Table 5-1)~~Differences in estimated costs between activity costs listed in the annual work plan and the estimated activity cost included in Table 5-1.
			
			• ~~Adding or removing activities from the Implementation Table, provided that:~~
			  ○ ~~The activity is consistent with Plan goals, and~~
			  ○ ~~The action is performed through the annual work plan~~
			
			• ~~Altering the timeline for planned activities within the Implementation Table~~Alternation of the implementation timeline included in Table 5-1, as needed to accommodate development of the annual work plan and biennial budget request
			
			• Including new or updated monitoring data, subwatershed analyses, feasibility studies, model results, targeting process or scoring (Section VII. B.), subwatershed analysis protocol, or other technical information
			
			• ~~Revising proposed priority project locations presented in Table 5-1 in response to modeling results, mapping,~~

			~~subwatershed analyses, site visits, feasibility studies, or other technical evaluations~~ • Formatting or reorganizing the Plan • Revising a procedure meant to streamline administration of the Plan as consistent with the LSC Partnership implementation agreement and bylaws • ~~Clarifying existing Plan goals or policies~~ •
BWSR 138	pg 104	second paragraph starting "Such changes…". Delete the first sentence and revise the second one to read "…the LSC Partnership will coordinate with BWSR staff to determine the need and process for a Plan amendment ~~and whether a minor or major amendment process should be followed~~.	Paragraph will be revised: ~~Such changes will be performed through annual work plans and the biennial work plan update~~. If it is unclear whether a proposed revision to the Plan requires an amendment, the LSC Partnership will coordinate with BWSR staff to determine the need and process for a Plan amendment ~~and whether a minor or major amendment process should be followed~~. The LSC Partnership will also work with BSWR to identify an appropriate public input process for the amendment based on current BWSR guidance and governing statutes.
BWSR 139	Pg 104	third paragraph which begins "Draft plan amendments…", revise the first sentence to read "Draft Plan amendments and changes not requiring an amendment presented to the Policy…"	No change. Changes to the Plan not requiring an official amendment will be relayed to the Policy Committee but may not necessarily include the formal process outlined for actual amendments.
BWSR 140	Pg 104	fourth paragraph starting "If the Policy…" should be deleted, including the four bulleted items and replaced with the following information. "If the Policy Committee, in coordination with BWSR, determine that a Plan amendment is needed, the LSC Partnership will submit the proposed amendment to the all cities, townships, counties, watershed organizations, and SWCDs within the Plan boundary and applicable state review agencies (BWSR, MDA, MDH, MnDNR, and MPCA) and follow the review process as determined by BWSR".	Text will be revised as noted.
BWSR 141	Pg 104	"For future reference" the amendment procedure should be further supported by procedures laid out in the implementation agreement and the bylaws of the partnership.	No change. Thank you – all agreements and requirements will be followed regarding plan amendments

BWSR 142	Pg 104	Page 104 in the last paragraph clarify that replacement pages will also be distributed to all plan holders for approved plan changes not requiring a plan amendment.	Text will be revised as noted.
Chisago County, Susanna Wilson Witkowski			
CHIS 143	pg 61	Part A: SSTS – please change the 10-year Stable External Funding amount to $240,000 and $24,000 per year (rather than $120,000 or $12,000 per year) - as other STSS/19 and 20 on page 65 were combined into this section.	Text will be revised as noted.
CHIS 144	pg 76	#65: Please change the 10-year Estimated Local Funds and Stable External Funding to amounts to $120,000 ($12,000 per year).	Text will be revised for Chisago County.
MN Department of Agriculture, Margaret Wagner			
MDA 145		One important action includes hiring or contracting with an agricultural conservationist and agronomist, this is mentioned throughout the plan and the MDA is supportive of the concept.	Thank you.
MDA 146		The term agricultural conservationist is a term that may not be widely recognized and does not have a clear definition. It would be better to use a term that is understood in the agricultural community.	No change. The term included in the plan offers flexibility for this position and its work. This term defines a general *role* and will not necessarily be the actual title of the position.
MDA 147		It is unclear if the shared service is one position or two as it is referred to as "agricultural conservationist and agronomist"	No change. Annual working planning will determine if this is one or more positions or contractors working full or part time. Position(s) may also change over time. As written, plan allows for flexibility.
MDA 148		According to this plan, the main responsibility of this position will be working one-on-one with agricultural landowners in developing and implementing comprehensive natural resource management plans. It would be beneficial to clarify the wording that this is not only planning, but that the focus is on engaging local farmers and agricultural landowners, demonstrating practices they can implement, connecting	Because that is part of the intent of the position, Section IV.C.i. will be revised to include this wording when describing the work of the agricultural conservationist: Engagement with farmers and the agricultural community will be an important part of the work of this position in order to build relationships and trust. This position will work to demonstrate

		agronomic advice with federal, state and local programming and funding for implementation.	practices that work for their particular area and will connect agronomic advice with federal, state and local programming and funding.
MDA 149		Overall, we see value in working with an agronomist or crop adviser as a trusted resource for farmers. The plan would benefit from clarification on how this position will provide agronomic services to farmers and inform nutrient management decision-making that protects water resources.	No change. That level of detail will be developed during annual work planning and/or during further development of the position description.
MDA 150		We believe programs like the Nutrient Management Initiative is a first step to allow farmers to try a new practice while minimizing economic risk. The MDA promotes this program statewide and would be interested in working with partners to increase participation in your watershed.	No change. Thank you. The LSC Partnership looks forward to collaborating with MDA on this program.
MDA 151		Please consider the Minnesota Agriculture Water Quality Certification Program (MAWQCP) as a way for farmers and agricultural landowners to take the lead in implementing conservation practices that protect our water. There are currently 21 certified producers farming 153 parcels/fields within the lower St Croix totaling 6,093 acres. Another eight producers have been assessed totaling 5,190 acres.	No change. Thank you for the information. This program, among others, will be promoted, as applicable.
MDA 152	Pg 38	Consider specifically noting MAWQCP in the discussion about implementation programs for agricultural lands on page 38 or mention it in Table 5-1 Part A: Implementation for Agricultural Lands. (We realize there is SWCD staff that works on MAWQCP)	No change. We agree this is an important program but because there are several different agricultural programs, the Plan should not specify only one.
MDA 153	Pg 86	Additionally, certified farmers and landowners are eligible for small grants (up to $5,000) for conservation practices. This is could be listed under state funding resources for implementation on page 86.	Section VI.B. will be revised to include the Minnesota Department of Agriculture as a state department offering grants and will list the MAWQCP certification as a small grant program.
MDA 154		As part of the Township Testing Program, the MDA worked with local partners to test private wells in two townships in Washington County. Results indicate elevated nitrate in groundwater in both Cottage Grove (city) and Denmark township (this may be beneficial even though some of the wells tested are outside of the watershed). Please consider referencing these results in this Plan, including the final maps provided by the MDA, and /or discussing how to implement the Nitrogen Fertilizer Management Plan in key these areas of the watershed.	No change. The LSC interactive map includes Washington County well nitrate testing from 2012-2013. Table 5-1, Part A #1: The measurable output = Install BMPs on 2,200 acres that improve soil health and/or reduce nitrogen and pesticide pollution to groundwater. The priority location includes where well testing shows ≥ 5 mg/L nitrate (also shown in Figure 5-1).

			The Nitrogen Fertilizer Management Plan will be one of many programs promoted and implemented in the LSC Watershed where appropriate.
MDA 155		The state's new Groundwater Protection Rule (GPR) became effective June 24, 2019. The GPR will reduce the risk of nitrate from fertilizer impacting groundwater in areas of the state where soils are prone to leaching and where drinking water supplies are threatened. Nitrate is one of the most common contaminants in Minnesota's groundwater; elevated nitrate levels in drinking water can pose serious health concerns for humans. Beginning in 2020, the GPR will prohibit fall application of nitrogen fertilizer on agricultural fields in vulnerable areas. The MDA developed a map to show where these vulnerable areas are located; some areas are included in the watershed. See: https://www.mda.state.mn.us/chemicals/fertilizers/nutrient-mgmt/nitrogenplan/mitigation/wrpr/wrprpart1/vulnerableareamap You may wish to reference this somewhere in the plan.	No change to Plan. Information about this new program for groundwater protection will be added to Section IV.G.iii. (Regulation and Enforcement; County, State, and Local Regulations for Groundwater Management). The GIS information may be added to the LSC Interactive Map, as appropriate.
MDA 156	Pg 61	Table 5-1 Part A on page 61 mentions "Promote testing of private wells, provide test kits, host well testing clinics/screenings, promote best practices to private well owners." • If the contaminant of concern is nitrate or another agricultural chemical, please consider the MDA as a partner for this work. Since 1991, the MDA has worked with local partners to host local nitrate testing clinics, providing quick and reliable nitrate analysis for private well owners and irrigators.	MN Department of Agriculture will be added to the list of support agencies for this item.
MDA 157	Pg 61	Table 5-1 Part A on page 61 mentions "Training to local staff on topics related to drainage management, wetland management, and related areas"--Consider adding MDA and the U of M as a partner for training related to agricultural best management practices and the effectiveness of conservation practices.	MN Department of Agriculture and the University of Minnesota will be added to the list of support agencies for this item.
MDA 158	Pg 61	Table 5-1 Part A on page 61 mentions "Training to local staff on topics related to drainage management, wetland management, and related areas"--Please consider how to leverage information from Clean Water Fund research and on-farm demonstrations projects related to agricultural drainage and supported by the MDA.	No change. Thank you for the information. These items will be considered during annual working planning.

MDA 159	Pg 61	Table 5-1 Part A on page 61 mentions “Training to local staff on topics related to drainage management, wetland management, and related areas”-The Ag BMP Handbook may be good to reference in the plan: https://www.mda.state.mn.us/protecting/cleanwaterfund/research/handbookupdate	No change. Thank you for the information. The handbook will be one of multiple resources used by the LSC Partners and/or the agriculture conservationist and agronomist.
MDA 160		Implementation for Prioritization and Analysis (Table 5-1 Part D) is not a clear term, consider using Prioritization and Analysis activities or providing more clarification in the document.	No change. The terminology is consistent with the headings for Parts A, B, and C of Table 5-1.
Comfort Lake – Forest Lake Watershed District, Jon Spence, President			
CLFL WD 161	Macro view comment	Macro View Comments: The first, a macro view, looks at how well the Lower St. Croix (LSC) One Watershed One Plan (1W1P or Plan) conforms to the intent of the statute supporting the Clean Water Fund (CWF). Specifically, the statute’s goal is to significantly improve water quality (WQ) in the high priority water resources by implementing high impact, measurable WQ projects/programs, with high cost efficiency and increased speed across a larger base of local government units (LGUs). The Board of Water and Soil Resources’ (BWSR) Prioritized, Targeted and Measurable (PTM) framework is the primary driver to ensure compliance to these expectations.	Thank you for thorough and thoughtful review of the draft Plan, and the supporting documents and information submitted with your comments.
CLFL WD 162	Macro view comment	The [plan] goals result in a 200-year time period to achieve the lake goals (20, 10-year periods) and 90 years (9, 10-year periods) to achieve the river/streams reduction goals. Probably not the reduction speed the state is expecting. In addition, the total goal of 65,249 pounds is short of the Lake St. Croix Total Maximum. Daily Load (TMDL) goal of 82,000 pounds. Note that this goal reduction of 82,000 pounds is only for Lake St. Croix to achieve state standards. Additional reductions will be needed to bring each waterbody of concern in the watershed to their own goal standards. These long times to achieve target pollutant reduction goals come directly from the best management practice (BMP) objectives in the “implementation plan” Table 5-1 (pp 59-76). The pollutant reduction goals consist of numbers of BMPs with an estimated pollutant reduction per BMP (e.g. pounds of P per BMP). For example, Table 5-1 Part A, #2, Rivers and Streams: “reduce total phosphorus by 3,300 lbs/year (install approximately 220 BMPs @ estimated 15 lbs/BMP) and reduce TSS, bacteria, and nitrogen as secondary benefit.” In a way, this strategy	No change. The LSC Partners understand the PTM process and benefits of determining and implementing the best practices or projects in the best places at the best time. While BWSR guidelines required that EACH priority waterbody be assigned a pollutant reduction goal within the plan, it is likely that many high priority waterbodies will realize greater pollution reduction than listed in the plan. This is likely to happen through development of additional subwatershed analyses where a high degree of voluntary implementation and/or additional partnerships or leveraged funds “tip the scales” toward a greater likelihood of success in these areas. As noted in your comment, the plan cannot be overly prescriptive or narrowly focused in its implementation due to the voluntary nature of most implementation, staff capacity, and availability of additional funding.

		encourages, or at least gives permission, to do a lot of small projects spread across the watershed. This is not supportive of the PTM strategy of finding the high impact pollution sources/projects. If PTM is followed, the process should generate fewer but larger, more cost efficient projects with greater impact on the rate of pollution reduction, thus reducing the time to achieve reduction goals. The Pareto Principal (statistics), CLFLWD and other statewide experience shows that if 100 projects could be done in a subwatershed, approximately 20% of the projects (i.e. 20) would deliver 80% of the phosphorus reduction goal. Any dollars spent on the other 80 projects would be cost inefficient and would waste valuable budget. We understand that BMP objectives are difficult to set at the start of a new plan, and that "number of BMPs" as a less than optimum strategy, is just a start. Hopefully, the LSC partners and the project selection process, will ensure that the due diligence of PTM will be followed to generate high impact, cost efficient projects during the annual work planning process rather than allowing the belief "that every project is a good project" to dictate project selection. Desktop analyses alone, while a helpful component of the targeting process, is not sufficient (normally) to identify the high impact, most cost efficient projects. Limited modeling calibrated by on-the-ground diagnostic monitoring should also be used.	The LSC Partnership, as stated by Advisory and Policy Committee members, is committed to implementing large, cost effective, high impact projects as opportunities arise.
CLFL WD 163	Section VII B	We recommend that the PTM [Prioritize, Target, Measure] process (3-point summary below) be formally incorporated into section VII.B: Targeting and Prioritizing Specific Projects as a sidebar similar to the SWA sidebar in that section. • Define the pollution reduction goal (from TMDL or other study). • Conduct the necessary analysis by subwatershed using diagnostic monitoring in combination with other analytical steps (not just desktop analysis) required to identify the major sources of pollution. • Develop the appropriate project solution that delivers a high impact, cost efficient solution.	The beginning of Section VII.B. will be revised to include the following: Implementation of projects and programs in the LSC Watershed will be prioritized, targeted, and measurable to ensure that investments are being spent on the best activities to address priority issues in priority locations. The PTM process (prioritized-targeted-measurable) includes the following steps: 1. Define the pollution reduction goal 2. Conduct necessary analyses to determine identify major sources of pollution

			3. Identify high impact, cost effective projects or programs to address the pollution source. During annual work plan development, the Steering Committee will meet to review and discuss possible projects and programs for use of Watershed Based Implementation Funds (WBIFs) in the next fiscal year. Each LSC Partner will bring information and analyses related to their proposed project, "set" of projects (such as projects identified in a subwatershed analysis), or program. Only activities that meet all of the following "gatekeeper criteria" will be further reviewed for WBIFs.
CLFL WD 164	Appendix C	The scoring and ranking chart in Appendix C provides the second half of the process for selecting projects to be funded. Here are some observations/recommendations to help ensure that the scoring ranking process does in fact select the best project requests per CWF expectations: 1. If the goal is to fund the highest impact projects (via PTM process) two criteria seem to be missing: A. Targeting: Describe the method(s) used to identify and target the root cause (most critical) pollution source(s) or threat(s). I.e. has the PTM due diligence been done? B. Project Impact: What is the pollution reduction goal (TMDL or other study) for this water resource? What portion of the reduction goal will this project(s) achieve (list pounds and percent)? I.e. Is this project "significant" for the water resource or "just another BMP?"	No change. Targeting projects by determining the pollution sources and solutions is a component of gatekeeper criteria #3 found in Section VII.B. (below). Projects will not be eligible for WBIFs if all three gatekeeper criteria are not met. Gatekeeper Criteria #3: An analysis is complete and/or data are gathered to target and prioritize specific projects where they will have most benefit using the analyses components below**; or the project is outside an area with a completed prioritization but has a similar cost benefit as a previously analyzed project. The project impact information noted in the comment is the basic information that will result from the analysis discussed in gatekeeper criteria #3. This information will be furnished and evaluated discussions among Steering Committee members during annual work planning. It may be added to the targeting criteria and scoring matrix in the future.
CLFL WD 165	Appendix C	2. There doesn't appear to be any method or guidelines for LSC partners to submit their project input data on each of the criteria in the ranking and scoring table. Without some guidelines or checking questions, the quality and scope of the input will vary greatly, making it difficult to achieve the input consistency required to adequately score and rank the project requests. While many of the Criteria are "black or white," and	No change. It is recognized that methods or guidelines for responding to questions in the scoring matrix may be needed. However, these may be more appropriate and robust after or during the first round of annual work planning and can be developed by the LSC Partnership during plan implementation.

		don't need much clarification, the others do, and consistency and depth of input are important	
CLFLWD 166	Appendix C	It is recommended that the reviewing of project requests and the scoring and ranking of those requests be done by an impartial person or team, such as an engineering firm or one or two retired BWSR staff familiar with evaluating grant requests. Since the LSC is allocated clean water funds each year, it is important that a simple, "informal sharing" of resources does not occur through the scoring and ranking system. This would defeat the CWF/State goals to significantly improve water quality in the high priority water resources by implementing high impact, measurable WQ projects/programs, with high cost efficiency and increased speed across a larger base of LGUs. PTM is the primary driver to ensure conformance to these expectations.	No change. The LSC Partners have a good working relationship and should be able to fairly evaluate and discuss potential projects and programs across the LSC Watershed. If this situation changes, outside assistance can be sought.
CLFLWD 167	Appendix C	Section: B. Targeting and Prioritizing Specific. Bottom of p 91. We recommend that guidelines (e.g. project size, merits, opportunities, etc.) for non-pollutant reduction projects (e.g. habitat restoration, land protection, wetlands, etc.) be developed to provide consistency of project input and to make it easier for the Steering Committee to review, discuss, and decide	No change. Thank you for this idea. Similar to the response to comment #163, additional detail and specifications can be added to targeting process as it is implemented in the first year or two of Plan implementation.
CLFLWD 168	Pg 12	Paragraph #4:B. Land and Water Resources in Lower St. Croix River Watershed: They provide extensive habitat and attract recreational tourists seeking opportunities for paddling, boating, fishing, and swimming. Four Minnesota state parks (Wild River, Interstate, William O'Brien, and Afton) and numerous natural areas and public lands dot the St. Croix River shoreline in the Lower St. Croix ~~this~~ watershed.	Text will be revised as noted.
CLFLWD 169		Table 5-3. Regionally Significant Lakes for Pollutant Reductions and Protections, p 78 While it is important to have gatekeeper criteria, such as table 5-3, it is discouraging to have virtually none of the water resources within Comfort Lake-Forest Lake Watershed District (CLFLWD) boundaries ranked high enough to participate in the LSC effort. We have a few miles of the upper Sunrise River north of Forest Lake; and Forest	Forest Lake will be added to the list of regionally significant lakes. See response to comment #171.

		Lake, Bone Lake and School Lake are listed as candidates for "internal loading analysis."	
CLFL WD 170		The entire Watershed District is rated "low" for wetlands. However, our recent 10-year plan development interaction with our DNR and Washington County groundwater and wetland partners, including review of associated data layers on the LSC online interactive map, indicates several high priority wetland, habitat and groundwater protection opportunities within our boundaries. Does this mean that these opportunities would not qualify for inclusion under the LSC effort?	No change. Assuming your comment refers to Table 5-1, Part C Item #27 with corresponding Figure 5-5, please see the response to comment #110.
CLFL WD 171		None of our lakes, including the impaired ones (all of which ultimately flow to the Sunrise River), are included. It is especially surprising that Forest Lake was not included as an important regional lake for phosphorus sensitivity and protection because Forest Lake: • Along with the Comfort Lake-Forest Lake Watershed District as a whole, comprises the headwaters of the Sunrise River • Is listed in the DNR listing of phosphorus sensitive lakes (highest) • Is the largest lake in Washington County • Is the most used lake, recreationally, in Washington County • Has the most boat launch parking spots in Washington County • Shoreline residents pay the most lake property taxes in Washington County • A recent metropolitan growth study indicated that the City of Forest Lake is projected to have the highest growth in Washington County. Therefore, there is a need to be more aggressive in protecting these lakes, wetlands and high priority groundwater areas. • Has a small watershed for its size and meets the requirements of "nearly impaired", a State-wide Nonpoint Funding Priority, with some "impaired" readings during the summer and would be difficult to restore if it did become impaired "officially."	Forest Lake will be added to the list of regionally significant lakes (Table 5-3 and Figure 5-3). Forest Lake will be listed in Table 5-3 for both agricultural and urban BMPs for an overall total phosphorus (TP) load reduction of 72 pounds/year and a 10-year TP reduction goal of 4 pounds/year.

		We would like to re-petition the LSC to add Forest Lake to its regionally significant lakes list.	
CLFL WD 172		Targeting and prioritizing specific projects (fifth check mark item at top of page), p 91 Change "both annualized for 30 years" to "both to be annualized over the engineering accepted life of the specific project type (10 or 25 years) based on the guidelines in the BWSR Grants Administration Manual." Using anything other than the accepted project life distorts the cost benefit analysis.	Section VII.B. will be revised as follows (including changes to address comment #117 above): Gatekeeper Criteria: 1. The proposed projects or program is located in a priority location for the specific activity as listed in the Implementation Table (Table 5-1). 2. The activity is listed as a high or medium priority for Watershed Based Implementation Funds (assigned an "A" or "B" in the Implementation Table (Table 5-1) 3. An analysis is complete and/or data are gathered to target and prioritize specific projects where they will have most benefit using the analyses components below*; or the project is outside an area with a completed prioritization but has a similar cost benefit as a previously analyzed project and benefits the same water resource as the completed analysis. ** *Minimum components of targeting and prioritizing analyses (e.g., SWA (see sidebar), diagnostic study, feasibility study): ✓ Spatial analysis that includes pollutant delivery evaluation to the targeted waterbody ✓ Desktop analysis that includes historical aerial photo review ✓ Water quality modeling or monitoring for load reduction analysis ✓ Field evaluation for BMP feasibility and potential ✓ Cost benefit analysis completed in two ways. First, based on amount of WBIFs/pound total phosphorus removed, and second based on the total project cost/pound total phosphorus removed, both annualized for the anticipated life of the project based

			on accepted standards (The first calculation would be important if a project includes significant funding partners. For instance, in the case of some very large projects, such as urban retrofits, a private entity or local government may contribute significant funds. In those cases, the cost benefit to state taxpayers contributing to WBIFs would be much lower than the cost benefit of the total project.)~~both annualized for 30 years~~
CLFL WD 173		P 14 Measurable Outcomes. The draft plan states that the phosphorus reduction goals of 1,360 pounds and 3,825 pounds are "annual" goals. Tables 5-2 and 5-3 seem to indicate these are 10-year plan "total" goals, not annual goals for each of the 10 years. Is this correct?	The Executive Summary (Section I.C.) will be revised: Measurable outcomes will be realized in priority locations across the watershed with quantifiable implementation and change measured in a variety of ways including annual pollution reduction goals of 1,360 pounds total phosphorus in regionally significant lakes; and ~~3,825~~4,250 pounds total phosphorus in key subwatersheds draining to the St. Croix River (Table 5-1) by the end of 10-year period. [Revision to pounds of total phosphorus in key subwatersheds made for consistency with Table 5-2.] Table 5-2 will be revised to indicate the total 10-year goal is an annual TP reduction. (Table 5-3 already indicates the 10-year goal is an annual reduction.)
CLFL WD 174		LGU Lead Roles for Target Priority Water Resources Table 5-2, 5-3, 5-4 (pp 77-79) We recommend that another column (Lead LGU) be added to each of the tables to designate the lead LGU for each of the priority water resources. The LSC partners are composed of WDs, SWCDs, Counties and WMOs. For most of the priority water resources there is a 2-3 partner geographic overlap for that resource. It is important that the autonomy of the partners be maintained. Since the LSC is a Watershed Plan and since the WDs have the most information and understanding of water resources in their district, WDs should be	No change. While watershed districts may typically lead projects in their jurisdictions, there is no reason to prematurely assign a lead agency where there are overlapping jurisdictions. Rather, it is expected and more appropriate that the local entities work collaboratively to assign lead roles and supporting roles as projects and programs arise for implementation.

		assigned the lead role for those high priority resources in their district. Other high priority resources, outside watershed districts and water management organizations, could be assigned to SWCDs or Counties as appropriate. *(See statement of autonomy of local entity plans in Section F, page 19 of Draft LSC Plan.)*	
CLFL WD 175	Pg 13	**Page 13, paragraph #2** **B. Land and Water Resources in Lower St. Croix River Watershed** The watershed's numerous rivers, streams, and ditches directly connect the land to the St. Croix River. Rock, Rush, and Goose Creeks drain the northern portion of the watershed. These creeks are impaired for bacteria (E. coli) and are also considered sources of nutrient pollution (including total phosphorus) to the St. Croix River and Lake St. Croix. At 385 square miles, the Sunrise River Watershed makes up a significant portion of the whole LSC Watershed and includes the 24,000 acre *Carlos Avery Wildlife Management Area, with 23 actively managed pools. Numerous water quality impairments exist in the Sunrise River Watershed, and it is considered the highest contributor of nutrient pollution to Lake St. Croix, mainly due to its size (MPCA, 2012). Many other streams enter the St. Croix River and Lake St. Croix throughout the southern portion of the watershed including the cold water sensitive Browns Creek, Valley Creek, and Trout Brook. paragraph #2: COMMENTS * The state owned, DNR managed, Carlos Avery is not mentioned in the report, but is sited in the Chisago County, Army Corps report as an export of excessive Phosphorous from the Kost Dam area east of Stacy. In addition, there are a significant number of acres, (*80,000 in one report) which spans the same 4 county area designated as Audubon Important Bird Areas. (Counties are northern Anoka, Chisago, Isanti and Washington.)	Text will be revised as noted.
CLFL WD 176	pg 13	**Page 13, paragraph #2 B. Land and Water Resources in Lower St. Croix River Watershed** paragraph #2: A chart should be created indicating how much land (acres) are in each county –area within the LSC Watershed only – and those public lands that are outside the control of the LSC Watershed District collaboration. If these areas are indicated to be contributors of excess nutrients, then the framework is in place for joint collaborative projects.	Land area in the LSC Watershed for each county will be added to paragraph 2 in Section I. B. Executive Summary, Land and Water Resources in the Lower St. Croix Watershed. The plan will not be revised to include data on the amount of public land in each jurisdiction. As noted at the February 24, 2020 Policy Committee meeting, conservation practices or programs are sometimes implemented on public lands through local programs

		Reference to the 2013 Chisago County Sunrise River report should be made in the Appendix and used to inform activities within the LSC Watershed District. Only the MPCA 2012 TMDL Report is referenced in the draft.	and/or in partnership with local entities. Thus, there is no reason to specify public land acreage in the plan.
CLFL WD 177	pg 13	paragraph #4 B. Land and Water Resources in Lower St. Croix River Watershed-- *Before western settlement, the river valley was dominated by hardwood forests and mixed savannah with large white pine stands in the far northern portion of the watershed. The area produced an estimated 15 billion board feet of timber between 1839-1916. Today land cover in the watershed is a mix of agriculture, developed areas, and open land and water including: *25 percent forest/shrubland, 22 percent grassland/hayfields/pastures, 19 percent wetland, 17 percent row crops, 10 percent developed/mining, and 7 percent open water.* *COMMENT: It is important to provide the excess nutrient contribution data from each of these land uses as it explains the goal statement in the succeeding sections of the Plan. You have already introduced the fact that excess Phosphorous is the critical limiting factor degrading the Lower reach of the St. Croix, and the biggest load is coming from the Sunrise River sub-watershed. There is a need to incorporate the already identified sources of contribution into the Plan's implementation schedule. There have been 16 prior studies done on the Lower St Croix and Sunrise River watersheds. We need to show the State that we are building on existing data and not duplicating studies that already exist. It will save time and money by not repeating the assessment step (SWA or SWAT) already clearly accomplished and laid out in these studies. In addition, the headwaters of the Sunrise River main stem is identified differently in every study. The MPCA study identifies it as the northern part of Washington County; the Sunrise River report identifies it as Southern Chisago County; and the attached Addendum A identifies it as starting in Forest Lake. Understanding the actual headwaters of the main stem of the Sunrise River is critical. The most recent update of the DNR Public Waters Inventory shows Forest Lake's connection to the Sunrise River to be man made alterations (ditches). The true headwaters location is unknown at this time, but should be identified as a priority step in the LSC Plan.	No change. The plan's implementation schedule incorporates actions to address existing conditions in the watershed based on past studies and analyses, existing plans, and local expert knowledge of resources and needs. The LSC Partnership is committed to continue using and expanding on existing data and information to target and prioritize implementation. The identification of the exact location of the Sunrise River headwaters is not imperative to successful implementation in that area.

CLFL WD 178	Pg 14	paragraph 1: Identifying and Prioritizing Issues, Goals, Measurable Outcomes, and Locations: *After laying the foundations for working together, the LSC Partners worked diligently to gather input from agencies, various stakeholders, and among their own organizations in order to identify issues facing natural resources across the watershed. Issues were prioritized through a series of discussions and a review of current conditions and existing data in seven resource areas: groundwater, lakes, rivers and streams, wetlands, uplands, St. Croix River and Lake St. Croix, and social capacity (Table 2-2). Desired future conditions were developed for each resource area in order to discover shared values and to envision attributes the group will strive to attain, regardless of time frame (Table 2-2). Section II provides a full description of the process used to identify and prioritize resource areas and issues, including the robust stakeholder engagement process.* paragraph 1: *COMMENTS: Missing from this process is a thorough review of the existing studies, particularly the 2013 Chisago County/Army Corps study of the Sunrise River basin. Both the Chisago County report and the MPCA TMDL study concluded Phosphorous was the priority-limiting nutrient in the Lower St. Croix. The 2013 Chisago County study in particular gave very targeted recommendations supported by extensive fieldwork and a variety of 'what if' simulations for different approaches. There is no mention of using this scientific, detailed study to assist in focusing the activities of the Lower St. Croix Watershed Group. The MPCA study is mentioned, but the Implementation charts do not show evidence that the information was used to inform the LSC activities for the next 10 years. Talking with local shareholders is important, and providing their local observational information is important, but for quality public water projects that will accomplish clean water in the shortest amount of time, the implementation plans have to be laser focused. The scientific studies of the water conditions in the Lower St. Croix have concluded that Phosphorous and Sediment reduction are the priority issues to solve and control in order to bring the St. Croix to a healthy condition. The work done in these subwatersheds also improves the condition of the local streams and lakes, while stopping the largest exports of future pollution to the St. Croix. However, time and money limit how many projects can be done each year, so prioritizing those subwatersheds into tiers allows	No change. The existing studies helped guide the discussions of the Advisory Committee during plan development and will be used as guidance into the future. However, some of the studies are outdated. Updated data and information has been gathered through more intensive and localized SWAs (Figure 7-1). Additional SWAs developed through this Plan's implementation will further determine the best opportunities for phosphorus reductions and targeted BMPs. Further, while phosphorus is a very important pollutant to address, there are several other water quality impairments and issues that can and should be addressed in a collaborative approach laid out in the plan including (e.g., AIS, nitrates, chlorides, groundwater contaminants). Overall ecosystem management is also an important component of healthy watersheds including flood mitigation, wetland creation and restoration, upland and riparian preservation, etc. This plan lays out a holistic and comprehensive approach to watershed management.

		the highest contributing sources to be addressed first. By using the prior studies' targeted conclusions, supplemented – when needed – by very targeted field diagnostic studies, to assist in the formation of prioritized tiers, we can make significant improvements in a very short period of time. As Phosphorous has been named in study after study as the pollutant of greatest concern, all projects in the implementation plan should be targeting phosphorous removal. Both local money and grant dollars will be needed, and while local funds are mentioned, it is clear this plan is heavily weighted toward using Clean Water grant dollars as the primary - and potentially only - source of funding.	
CLFL WD 179	Pg 15	D. Implementation Programs, Priority Activities, and Costs--*Although a variety of funding sources will be used to implement this Plan, including existing local funds, and state and federal funding, use of the Board of Water and Soil Resources (BWSR's) Watershed Based Implementation Funds (WBIFs) allocated to the LSC Watershed is a primary driver for collaboration and the development of this Plan. The LSC Partnership prioritized the use of WBIFs for a variety of programs that will have the greatest impact on the priority water resources in the watershed.* *In general, WBIFs are expected to be allocated across program areas with a distribution similar to:* • *70% Implementation (approximately 25% shared services + 45% BMPs & restoration activities)* • *25% Prioritization and Analysis* • *5% Administration* COMMENTS: There has been no financial analysis to determine what is the level of existing local funding. A chart showing each LGU Area, (minus State and Federal managed lands), Population, and Tax Capacity is critical in determining what each LGU is capable of providing toward the LSC effort. (All data is for only that portion of each LGU within the Lower St. Croix Watershed Boundary.) Comments in the above red area [comment directly preceding this comment] also relate to this section. The existing chart on funding sources is inaccurate as Clean Water Fund 'capacity money' for SWCDs has not been included. This has been a significant source of stable revenue for the past six or more years for SWCDs and should be included.	Table 5-1 includes local funding expected to be spent for every single line item. The beginning of Section V.A. includes a description of estimated local funds AND existing stable external funds. "Capacity funding" to soil and water conservation districts (SWCDs) from the Clean Water Fund (CWF) was included in the existing stable external funds in Table 5-1. Section VI.B. State Funding Sources will be revised to include a brief description of the capacity funding to SWCDs from the CWF.

CLFL WD 180	Pg 16	D. Implementation Programs, Priority Activities, and Costs--Priority Activities slated for funding from WBIFs include: • ~~Sharing services to increase engagement with landowners by hiring or contracting with an agricultural conservationist and agronomist~~ REMOVE, as there isn't enough money for this. (Given the fact the LSC group wants to use grant dollars to fund the plan, we would receive greater benefit by contracting with an experienced grant writing person or firm to source and apply for supplemental grant dollars. This position would pay for itself.)	No change. As stated in Section IV.C. Shared Services, current local capacity for implementing conservation varies widely across the watershed. Sharing services to improve capacity is regarded by almost all LSC Partners as one of the most impactful activities of the plan. Additional staff capacity will allow for considerably more landowner engagement, conservation planning, and technical assistance needed to realize actual changes on the land.
CLFL WD 181	Pg 16	D. Implementation Programs, Priority Activities, and Costs--Priority Activities slated for funding from WBIFs include: 1• Sharing services to improve social capacity and increase education and engagement programs by expanding the East Metro Water Resources Education Program (EMWREP) This is important, however this will work only if the local LGUs are assured the materials will be under their entity's name when used for projects in their communities. This cannot be used as a means to promote Washington Conservation Service or the EMWREP. Building public awareness is important and it is also important to attribute the local community entity as the lead agency accomplishing the work in their communities.	No change. We agree. EMWREP is a partnership among multiple entities, is always introduced as a shared education program at events, meetings, or other venues and is labeled as a partnership in newspaper articles. EMWREP outreach such as flyers or mailings, list the local EMWREP partners and include their logos. Some EMWREP materials are developed to be intentionally generic so they can be used everywhere (ie. Blue Thumb Guide to Yard Care or 40 Native Plants brochure), others are created to be customizable. For example, the Adopt-a-Drain materials all look the same and have a blank space at the bottom for local partners to insert their logos and contact information.
CLFL WD 182	Pg 16	D. Implementation Programs, Priority Activities, and Costs--Priority Activities slated for funding from WBIFs include: 2• Sharing services to provide education and ordinance development on Minimal Impact Design Standards. This is a very important step in stopping the degradation of water bodies, but we don't see this as a service that needs to be shared. The collaborating entities have agreed to work like a watershed, where standards and rules are designed to protect water assets from degradation. All LGU entities responsible for land use and permitting activities must adopt and implement the watershed district's consistent standards and rules. The LSC engineer firm should be used to formulate these land use BMP standards. Once developed, each community would adopt and use the same standard to control land alteration activities. So, only one ordinance standard template is needed for land use rules that include stormwater BMPs,	No change. We agree this is a very important tool in the toolbox for improving water quality. That is why the LSC Partners include it as a high priority for a shared service. Many LSC Partners do not have the staff capacity nor experience with educating about and advocating for MIDS. Further, this task would be a fraction of staff position within each LSC partner's jurisdiction. It is more efficient to have one staff person or contractor fulfill the role of "MIDS expert" to educate and advocate for MIDS across varies jurisdictions. Ordinances requiring MIDS is the goal and the starting point for conversations with local land use authorities, particularly those outside of watershed districts. It is likely that the full MIDS requirements may not be desired by some entities, and thus requirements are likely to vary among entities.

		shoreline, buffer, and impact zone protection areas (buffers) around water resources, throughout the LSC.	
CLFL WD 183		**D.** Implementation Programs, Priority Activities, and Costs--Priority Activities slated for funding from WBIFs include: **3**• Conduct subwatershed diagnostic analyses based on exisiting studies to identify highest Phosphorous loading sources in targeted areas identified in the Chisago County Sunrise River Report (2014). and other prioritization methods to target best management practices (BMPs) within priority subwatersheds • ~~Providing financial and technical assistance for installing, implementing, or retrofitting targeted BMPs~~ **REMOVE:** Save for future funding rounds. • Providing financial assistance to upgrade SSTS REMOVE: Counties are already doing this, and septic systems are not identified as a high source of Phosphorous. • Providing education, financial, and technical assistance for restoring shorelines along priority lakes. **REMOVE for NOW**. This is important, but only if the rules are consistent on what constitutes natural shorelines. The 2017 addition of turf grass as an acceptable border material under the Buffer Law has complicated this program and makes it harder to promote native plant species for these critical buffer areas. • Improving ditch maintenance practices to reduce impacts on water resources • ~~Providing cost share for land restoration or easement establishment in critical habitat areas~~ **REMOVE** • Restore or create wetlands HIGHEST PRIORITY identified in the Sunrise River report and the practice that will provide the most impactful reductions in Phosphorous and sediment loading. (2013)	No change. The list of priority activities for WBIFs was developed after careful consideration by the Advisory Committee and approved by the Policy Committee. The LSC Partners agree that not all activities can be accomplished everywhere. The priority activities are already a short list compared to all activities listed in Table 5-1. Annual work planning will further refine the list of activities after assessment of existing needs and gaps.
CLFL WD 184	Pg 16	**D.** Implementation Programs, Priority Activities, and Costs--Priority Activities slated for funding from WBIFs include:	No change. Many lake associations and watersheds are realizing that the 15 - 20 year improvement in water quality and clarity gained by an alum treatment is worth the expense, even while external sources are being addressed. Sometimes it doesn't make

		• ~~Study and address internal loading in priority lakes~~ REMOVE All external inputs must be corrected before addressing internal loading. Also, all "lakes" must be categorized according to the DNR Public Waters Inventory and MPCA deep or shallow water lakes. Many "lakes" are actually wetlands, so we need to understand what we are dealing with first.	sense to wait until ALL external sources are "turned off" to enjoy improved water quality.
CLFL WD 185	Overall COMMENT	**D.** Implementation Programs, Priority Activities, and Costs--Priority Activities slated for funding from WBIFs include: [After comments on "D" above] Four (4) targeted implementation focuses will remain. The remaining 7 REMOVED items can be included in the separate plans of participating entities, if those issues are important to those entities.	No change. See responses above. Annual work planning will further refine the list of activities after assessment of existing needs and gaps. The activities slated for implementation by the LSC Partnership and/or use of WBIFs, does not preclude individual entities from implementing these or other priorities.
CLFL WD 186	Pg 17	Table 1-2. E. Plan Administration and Targeted Implementation -- LSC Partnership Committees and Functions Committee Membership Function Policy Committee (PC) -Meets quarterly, or as needed. COMMENT: The decision made at the Policy Committee was to work toward quarterly meetings, knowing that meeting more often would most likely be needed during the operational start-up period.	Text will be revised as noted.
CLFL WD 187	Pg 19	E. Plan Administration and Targeted Implementation--Gatekeeper Criteria: (This list is overly broad and will change if the Targeted pollutant and prioritized subwatershed areas from prior studies are used. The list will only include those already prioritized subwatersheds from those studies. The general list provided in Tables 5.1-5.4 can be used for local projects.) 1. The proposed projects or program is located in a priority location the SUNRISE RIVER WATERSHED for the specific activity as listed in the Implementation Table ~~(Table 5-1)~~. (Revise table to match priority projects from the Sunrise River Watershed Study.) 2. The activity is listed as a high or medium priority for watershed-based funds (assigned an "A" or "B" in the Implementation Table ~~(Table 5-1)~~	No change. The gatekeeper criteria, targeting and prioritizing process, and priority locations were developed after lengthy and numerous discussions among LSC Partners during the Plan development process. The Plan reflects the agreement of the vast majority of LSC Partners on how to proceed with plan implementation.

		3. An analysis is complete and/or data are gathered to target and prioritize specific projects where they will have most benefit using specific analyses components; or the project is outside an area with a completed prioritization but has a similar cost/benefit as a previously analyzed project. Examples of analyses used to target and prioritize projects include a subwatershed analysis (SWA), diagnostic study, feasibility study, etc. (SWA is only needed in areas not already analyzed in prior studies. In localized projects, the project list is determined by the local entity and becomes part of their plan.) These analyses will include spatial and desktop analysis (including historical aerial photo review, water quality modeling or monitoring for pollution reduction analysis, field evaluation, and cost benefit analysis. When appropriate, proposed projects that meet the gatekeeper criteria will be scored using the targeting criteria and scoring matrix (Appendix C).	
CLFL WD 188	Pg 19	F. Local Implementation Programs--*This Lower St. Croix Comprehensive Watershed Management Plan can serve as a comprehensive plan, local water management plan, or watershed management plan developed or amended, approved, and adopted according to MN Statutes chapters 103B, 103C or 103D. This Plan is expected to be adopted by some counties and soil and water conservation districts as their sole water plan for areas within the LSC Watershed. This is the case for Chisago and Isanti Counties. Since this Plan does not cover all local priorities and planned activities for Chisago and Isanti Counties, additional content is provided in appendices. See Appendix D for the 2020 –2030 Chisago County Water Plan, and Appendix E for the Isanti County Water Plan Summary Document.* *For other organizations, such as watershed districts (WD) and watershed management organizations (WMO), this Plan will augment, but not replace their current and future watershed management plans. In these cases, their plans, along with their prioritized and targeted projects and programs, and their capital improvement programs, remain in effect. Similarly, this Plan will not replace the Washington County Groundwater Plan.*	No change. This plan will be used as the county water plan for Pine, Istanti, and Chisago Counties, and by the Pine, Isanti, Chisago, and Washington soil and water conservation districts. The One Watershed One Plan approach was developed by the Minnesota Board of Water and Soil Resources after extensive input and development by the Local Government Water Round Table.

		COMMENT: As this plan will not serve as the Comprehensive plan for the majority of entities in this collaboration, we question why so much time was devoted to the development of a plan that can substitute for those two County entity plans. It has complicated the process of developing a highly focused watershed plan for water issues across the entirety of the Lower St. Croix, with the time needed for the contrasting diverse and many faceted needs of County Plans and Soil and Water Conservation county-wide plans. Perhaps a better approach would be to prepare a separate County-wide plan template for use by County wide entities, and a separate watershed plan that is narrowly focused on specific water issues only. The watershed wide focused plan can then supplement the county plans and provide the consistency of approach needed to resolve Huc8 level water issues under the PTM process.	
CLFL WD 189	Pg 23	II. Identification and Prioritization of Resource Areas and Issues--The chart on this page "LSC Watershed by the numbers." Would be helpful to have the total acres listed by county with the total amount of acres in state and federal ownership listed separately.	Land area in the LSC Watershed for each county will be added to paragraph 2 in Section I. B. Executive Summary, Land and Water Resources in the Lower St. Croix Watershed.
CLFL WD 190	Pg25	B. Agency and Stakeholder Input--*During the Lower St. Croix planning process, LSC Partners collected input from more than 730 stakeholders, including 440 farmers and 160 community leaders at cities, townships and community organizations. This represents a large amount of input from a broad cross section of stakeholders in a watershed with approximately 176,000 people.* *COMMENT: An explanation is warranted on how the additional surveys were completed, as the number for outreach in Table 2.1 on page 26, is only 171.	No change. The number of participants and survey responses from the stakeholder input events, agricultural community input, and online stakeholder survey in Table 2-1 totals 730.
CLFL WD 191	Pg 27	C. TMDLs, WRAPS, and GRAPS--*The LSC Watershed has a wealth of studies on its groundwater and surface water resources including nine Total Maximum Daily Load studies (TMDLs), four Watershed Restoration and Protection Strategies (WRAPS), and the Lower St. Croix Groundwater Restoration and Protection Strategy (GRAPS). These documents were used by the plan writers to help develop the Land and Water Resource Inventory (Appendix A) and to understand the conditions in the watershed, the sources of pollution (issues) affecting various resources, and the goals and strategies that should be considered for inclusion in*	The 2013 "Watershed Study Report for the Sunrise River Watershed, MN" authored by Chisago County, Minnesota Pollution Control Agency, and the U.S. Army Corps of Engineers will be added to the list of resources in Section II.C. The results of the study were used by local experts on the Advisory Committee when identifying issues, setting goals, and determining priority locations. The report will also be added as a reference in Section X. and Section I.A. Priority Locations will be revised:

		the Plan. These documents are well known to resource managers with the participating local entities on the Advisory Committee. As such, Advisory Committee members were asked to refer to these studies when identifying priority resources and concerns. *COMMENT: No mention is made of using the 2013 Chisago County/ Army Corps of Engineers Sunrise River Report to help set Priorities, even though the Sunrise River is identified as the primary source of Phosphorus loading in the LSC Huc8 watershed. This report is a very detailed SWAT review of the Sunrise River subwatershed with multiple analyses by project type to determine the most effective course of action. Why was this not used to inform the LSC Plan?	Some of the more significant priority locations where the bulk of the implementation will be focused include: • Sunrise River Watershed - due to its size and land use, it is identified as the highest contributor of total phosphorus in Lake St. Croix (Chisago County, MPCA, ACOE; 2019) • Subwatersheds of tributaries draining directly to the St. Croix River (downstream of lakes, impoundments, or large wetland complexes)
CLFL WD 192	Pg 34	Table 3-1: Issues and Goals by resource Area with Reference to related Outputs and Priority Locations--Again, it seems strange not to have Sunrise River, the major tributary river in the LSC and the highest nutrient source to the St. Croix, not specifically listed in this table.	No change. The issues and goals were not developed with specific resources in mind, but rather a broader look at issues impacting the entire basin. They were developed after extensive discussions by the Advisory Committee and approved by the Policy Committee.
CLFL WD 193	Section IV. Pg 38-41	Agricultural Lands— Comment: We do not agree with hiring an agronomist at this time, but rather leveraging the services of the UofM Extension and Outreach Program. As runoff from row crop farms is the primary cause of pollution, we recommend a very targeted program of buffers on these farms and enhanced enforcement of statutory maintenance of public ditches by Counties and SWCDs. Too many rural ditches have been allowed to deteriorate causing harm to downstream waters. It's a tough subject, but we have to admit to the problem in order to clean up this high contribution source. The existing research (particularly the 2013 Sunrise River Report and St. Croix Watershed Research Station SWAT model fact sheet) identifies agricultural land as contributing 76 percent of the current Phosphorous load to the St Croix River. Just as WDs were created to address flooding and water quality issues, SWCDs were created to address agricultural conservation/erosion issues; and so there must be some basic, existing agricultural capacity available. Or, if an agricultural person is truly needed, the SWCD partners could consider pooling a small amount of their Clean Water Fund "capacity" money to support a shared staff person. Not having to build organization staff frees more budget for project implementation.	No change. Section IV.C.i. Shared Services for Agricultural Lands states that the work of an agricultural conservationist and agronomist may be performed or augmented by U of M Extension staff. The LSC Partnership will always seek collaboration with others when viable, sensible, or cost effective. The LSC Partnership agrees that runoff from agricultural areas and altered waterways is a significant source of pollution to the St. Croix River. However, agricultural best practices are almost entirely installed on a voluntary basis and often only with technical and financial support to the landowner. Hence, the need for additional staff capacity to engage with agricultural landowners and provide technical and programmatic assistance. Further, ditch maintenance and management are included in Table 5-1 as implementation activities with priority locations and measurable outputs.

CLFL WD 194	Section IV. Pg 38-41	Developed and Developing Lands --COMMENT: While all of these outreach programs are important, there is simply not enough money available to do all of this. The LSC Watershed District should set the standards for BMP runoff and Minimal Impact Designs in this area and rely on the communities and LGUs to adopt these standards in their ordinances and to be responsible for the implementation and permitting.	No change. There is no single governing "LSC Watershed District." Annual work planning will help prioritize areas where the greatest need and opportunity exists for the various implementation actions.
CLFL WD 195	Section IV. Pg 38-41	Ecosystem Services --COMMENT: These programs will largely rest with LGUs as they are diverse and general. The LSC should assist with technical support as possible with limited resources.	No change. Some implementation actions in Table 5-1, Part C are identified as being a high priority for the LSC Partnership to implement collaboratively. Other actions may be a priority of local entities and implemented outside of the LSC Partnership.
CLFL WD 196	Pg 44-45	C. Shared Services: *Perhaps one of the most important and impactful features of the Lower St. Croix Partnership is the decision to share services across the watershed. From the beginning of their time working together, it was apparent that local capacity for implementing conservation varied widely across the watershed with significantly more staff capacity in Washington County organizations compared to organizations in the northern counties of Chisago, Anoka, Isanti, and Pine. This variation stems directly from the variation in tax capacity of the entities and the lack of taxing authority of soil and water conservation districts (SWCDs).* COMMENTS: We agree the variation in tax capacities is important, and why we suggest that information pertaining to each entity's population and tax capacity be added to the report. It is important to know the capacity for local funding and local responsibility for aspects of the LSC plan and implementation standards. We do not understand the statement on why the lack of taxing authority for soil and water conservation districts (SWCDs) impacts local capacity for projects and programs. By statute, SWCDs are dependent on the counties for raising taxes. One of the most adamant declarations by counties involved in this LSC collaborative plan was to not add another layer of government and taxing authority with the move to planning on a Huc8 major watershed basis. If this statement is meant as an attempt to justify taxing authority for SWCDs, then it runs counter to the proposition stated at the beginning of this process: 'no new layers of	No change. The tax capacity of a particular entity is not directly related to the amount of funding allocated to natural resources and water resources within that jurisdiction and is irrelevant in this plan. Further, funding from counties to SWCDs is allocated at the county's discretion with no specific level of funding year over year. Additionally, there is absolutely no basis for the comment regarding SWCDS attempting to justify direct taxing authority for their organizations.

		government entities and no new taxing authority.' We would oppose this move as a duplication of county responsibility to maintain judicial ditches and runoff from agricultural fields, and other water related activities under their statutory authority - either directly or through contract with the SWCD within their jurisdiction. It would also duplicate the counties authority to authorize taxes necessary to fund the SWCD annual budget.	
CLFLWD 197	Pg 48	G. Regulation and Enforcement--*There are 60 municipalities and townships located completely or partially within the boundaries of the watershed. There are six counties and associated soil and water conservation districts within the watershed, Additionally, there are seven watershed organizations… All of these government units have some form of regulation impacting water resources. In some cases, local governments are enforcing State standards and rules, and/or cooperating with State and regional agencies to enforce regulations.* COMMENT: Watershed Districts are granted the statutory authority to provide rules and permitting for stormwater management within their boundaries. Once provided, the LGUs within each District's boundaries must comply with those standards. It is our belief this system could work for the LSC, if a watershed district entity is formed for the LSC Huc8 area. This would force compliance with specific and consistent best management practices. Without consistent land alteration control in place, spending money to clean up waterbodies is pointless. Rigorous control of best management practices is the only way to stop future pollution loading. Working with local governments to all voluntarily comply is a good aspiration, but not a good long-term strategy in preventing future damage to water bodies, or in protecting the money spent on cleanup projects in areas without consistent regulatory control. This is a high priority issue for us.	No change. Creating a watershed district for the LSC is a non-starter and was never part of the conversation nor intent of the LSC Partners, not the Steering Committee members, nor the Policy Committee members.
CLFLWD 198	Pg 50	Local Implementation of Buffer Law--*Minnesota's Buffer Law (more formally known as Buffer and Soil Loss Legislation, Minnesota Statute 2014, section 103B.101) requires a 50-foot perennial vegetated buffer along public waters (lakes, rivers and streams), and a 16.5-foot perennial vegetated buffer along public ditches…… As of July 2019, approximately 98% of parcels adjacent to Minnesota waters are compliant with the Buffer Law….*	No change. The source for data is listed in the Plan. The plan writers do not have data to the contrary. However, if this is the case in the CLFLWD, some of the implementation actions in the plan may help address the issue including Table 5-1, Part C Item #37.

		COMMENT: We have not seen this high compliance rate in our watershed district, especially around lakes and rivers. In fact, we see more degradation occurring as single home property changes hands and new residents conduct altering projects on nights and weekends.	
CLFL WD 199	Pg 52	Minimal Impact Design Standards (MIDS)--*In June of 2013 the MPCA incorporated Minimal Impact Design Standards (MIDS) into the Minnesota Stormwater Manual. The plan includes a goal to implement MIDS in up to 20 communities…….* COMMENT: We believe this program is so critical to the success of cleaning up our waters, that we recommend changing this goal to full implementation in the LSC communities that have standards below MIDS within the first three years.	No change. This activity, as listed in Table 5-1, Part B, is included as a high priority. Outreach to communities is slated to begin through EMWREP and local staff in the first two years of plan implementation. It will take this amount of time to build relationships and trust and to educate about MIDS before the more detailed work on actual ordinance development and adoption can begin in years 3 and 4.
CLFL WD 200	Pg 55-57	IMPLEMENTATION SCHEDULE--Implementing Entities (Imp Entity): *These are entities responsible for leading each activity within their jurisdiction and are limited to members of the LSC Partnership. The lead entities assume responsibility to implement the activity with assistance from supporting agencies, as needed. <u>The agreements that establish the organizational arrangement may assign more specific lead entities for some activities. ("COs" = all counties)</u>* COMMENT: We are particularly concerned with the vagueness of the last sentence underlined above. As one of only seven watersheds in the LSC collaboration group, the Counties and SWCDs often outvote us at Policy Committee meetings. We are concerned that projects in our Watershed Comprehensive plan that are also listed as 'priority areas' – either A or B status in the LSC Plan- may be reassigned to an SWCD entity who desires that project. We would like to see a more declarative statement in the Plan that will not allow this to happen; by specifically noting on the Implementation Schedule and priority resource tables the LGU responsible for a priority project or water asset. Those projects that are within a watershed's boundary will be assigned to that Watershed District. Overall, we think the implementation schedule is not prioritized and targeted enough on specific meaningful projects in already identified and assessed subwatersheds. These identified projects and subwatersheds will produce the highest reductions in phosphorous and	No change. The Policy Committee discussed several options for voting mechanisms over two meetings during plan development. The plan reflects their decision on that matter. The 10-year plan should not be overly prescriptive in assigning lead roles for implementation actions in Table 5-1. Annual work planning will include in-depth discussions about projects, programs, roles, responsibilities, collaboration, and funding sources with the goal of the implementing the best projects in the most efficient and effective manner.

		sediment loading to the St. Croix River, specifically the Sunrise River Watershed.	
CLFL WD 201	Pg 98	IX. Plan Administration and Collaboration--i. Policy Committee *As described above, a Policy Committee will be established as the governing body of the LSC Partnership with all partnering entities (JPC signatories), except Chisago County, having one voting representative on the committee. Chisago County will have 3 representatives on the committee and will have 3 votes. The Policy Committee will establish bylaws to describe the functions and operations of all committee(s) and will have the power to modify the bylaws. The Policy Committee will meet, at least quarterly, or as needed, to review past progress and future planned activities and shall consider recommendations from the Steering Committee on budgets, staffing, administration, work plans, grant applications, etc.* COMMENT: As stated in earlier comments, it is important to understand how much area is under direct control of the counties as the weighted voting of the decision making committee is determined on that basis. That is why state and federal lands must be removed from the total acreage of the county. BWSR funds are also calculated on that basis, removing public lands from the basis. Also, as mentioned before, add the red type in paragraph to stay consistent with the Policy Committee motion establishing the number of meetings.	The text will be revised as noted as tracked changes in comment. The plan will not include a listing of total acreage with state and federal lands removed as that information is not imperative to the determination of projects nor the allocation of funding. Voting power on the LSC Policy Committee was not calculated using specific numbers for each partnering entity's acreage, but in a general sense so as to maintain voting balance throughout the basin. The distinction between publicly-held land and privately-held land had no bearing on the number of votes allocated to each partner.
CLFL WD 202	Overall comment	It would be easier on the reader to combine all narrative pages and place all maps and charts in the back of the report, except for the several in the Executive Summary.	No change. Preferences vary on plan layout.
CLFL WD 203	Overall comment	NOTE: Another detailed existing study, not referenced in the Appendix, is the 2014 MPCA Sunrise River WRAPS report that provided further detailed guidance on project development in the Sunrise River Watershed.	No change. Sunrise River Watershed Restoration and Protection Strategies (MPCA, 2014(ii)) is listed with other reference documents in section 5.2 Appendix A: Land and Water Resource Inventory.

Comments and Draft Responses on Appendix D: Chisago County Water Plan/Local Priorities and Appendix E: Isanti County Water Plan/Local Priorities
(Responses prepared by Chisago County and Isanti County staff)

Commenttor & #	Page & Sect	Comment	Draft Responses by County Staff
BLUE = Plan will be revised to address comment			**WHITE = No change to Plan recommended**
BWSR 1	Appendix D	Although local priorities are welcome to be included in a Comprehensive Watershed Management Plan (CWMP) developed through the One Watershed One Plan Program, please note that per Minnesota Statutes 103B.101 subd. 14, the CWMP will **replace** the existing county water plan and SWCD comprehensive plan for the part of their jurisdictions that are in the Lower St. Croix planning boundary. Therefore, it is confusing to reference and link to your County Water Plan in this Appendix.	Chisago County will remove titles, references and links to the the county water plan and develop a new title for Appendix D such as, "Chisago County Appendix to the Lower St. Croix River CWMP."
BWSR 2	Appendix D	We highly recommend adding language to the Lower St. Croix (LSC) CWMP in the main body (page 95) and in Appendix D to make this clear. Example language is below. "Per Minnesota Statutes 103B.101 subd. 14, the Lower St. Croix River Comprehensive Watershed Management Plan (CWMP) will replace Chisago County's Water Plan and Soil and Water Conservation District's Comprehensive Plan for parts of the jurisdiction that is in the Lower St. Croix planning boundary. Local adoption of the LSC CWMP is required within 120 days of BWSR Board approval".	Chisago County will recommend to the Steering Committee to include the recommended language, listed in the comment, on page 95 of the LSC CWMP and in the revised Appendix D.
BWSR 3	Appendix D	Remove titles, references, and links to the county water plan. Maybe just call it the "Chisago County Appendix to the Lower St. Croix River CWMP".	Chisago County will remove titles, references and links to the county water plan and develop a new title for Appendix D such as, "Chisago County Appendix to the Lower St. Croix River CWMP."
BWSR 4	Appendix D	If the County needs to create a guide for their water planning task force with County planning history and more details about costs/efforts and specific tasks to guide the development of their annual work plans please consider including that in a separate document unless there is a specific need to have it in the appendix of the LSC CWMP. Keeping most of this content in a separate document would also allow the County to make	In revising Appendix D, the county may include some of the planning history to provide context. However, the county will remove the costs/efforts, specific tasks and the majority of the planning history and incorporate them into a guidance document or a strategic plan for the county.

		changes without triggering a need for an amendment for the overall CWMP.	
BWSR 5	Appendix D	The information in the appendices should be limited to items that aren't already included in the LSC CWMP. We want to avoid duplication of items. What you could include in the Appendix would be activities that are a local priority and clearly not already included in the Lower St. Croix CWP. Recommend listing these items in a concise table in the appendix.	Yes, the county will remove any duplicative items that may be included in the LSC CWMP and list them in a table in the revised Appendix D.
BWSR 6	Appendix D, Pg 3	Acknowledgements could be removed.	Yes, the county will remove the acknowledgements on page 3 in the revised Appendix D.
BWSR 7	Appendix D, Pg 4-8	Most of the executive summary is already covered in the LSC CWMP's Land and Water Resources Narrative so could be deleted from the Appendix. Except that you might want to keep Figure 2 in the appendix as it is a good reference showing just how much of the County is in the LSC watershed.	Yes, the county will remove the executive summary on pages 4 - 8 from the revised Appendix D, except Figure 4.
BWSR 8	Appendix D, Pg 8-11	The history of county water planning could be included in a local website or separate document.	Yes, the county remove the county water planning history on pages 8 - 11 from the revised Appendix D and include the information in a separate county specific document.
BWSR 9	Appendix D, Pg 13	This page will likely need to be revised as a result of responding to these comments. Clarify in the 4th paragraph that the Goals and Objectives that are not included in the LSC CWMP are still considered important local priorities for the County, so they are included in the appendix because the County is committed to working to accomplish them over the next 10-years.	Yes, the county will revise page 13 and clarify paragraph 4 as recommended in the revised Appendix D.
BWSR 10	Appendix D, Pg 14	Recommend removing these priorities as they seem to already be included in the LSC CWP	Yes, the county will remove the priorities on page 14 from the revised Appendix D.
BWSR 11	Appendix D, Pg 15-16	Not sure how this funding fits in with funding listed in Table 5-1. If this is a local exercise of allocating County funding, we recommend you create a separate document that can be easily updated that is not included in this plan. If you do include it, you will need to clarify how it works with budget items listed in Tale 5-1. Table 3 needs to cover the entire 10-yrs of the LSC-CWMP. It is understood that the estimates for the later years are less precise. They can be amended if needed in the future, when better data is available. For Table 3 to be truly useful it would need to identify the assumed funding sources that make up the	The county will either remove Table 3 along with Figures 4 and 5 from the revised Appendix D and include them in a separate guidance document or strategic plan. Or, the county will revise Appendix D and clarify in a new table the county sources of funding and needed funding amounts for each objective.

		budget numbers. We are also concerned about the statement in the second sentence of the first paragraph that it is "not a commitment by Chisago County". It would be better for the appendix to identify what the County is committed to accomplish of their local priorities identified in this appendix. One other observation/question is that Table 3 calls for the County to spend about $1.3 million per year on "Land Use Practices". Is that a realistic number? Has the County historically spent that much each of the last 5-yrs?	
BWSR 12	Appendix D, Pg 18-37	See above comment about not including items that are duplicative of what is already in the LSC CWMP. It seems that ~20 items from this appendix may be duplicative with Table 5-1. Recommend listing the remaining ~30 items in a table that only includes the overall objective unless an additional level of detail is needed in this plan for business needs (e.g. for grant applications, etc.). For example, you could include "Support improved security of city water supply wells and Wellhead Protection Areas" in a table but not the details of a-d. Another option would be removing this entire appendix and just have a local document (e.g. annual work plan, etc.) to meet your business needs.	The county will revise Appendix D and include in a new table objectives without the a-e list and that are not duplicative to Table 5-1 in the LSC CWMP.
BWSR 13	Appendix D	Objective Items a-e, Item a: Refer to our previous comment on Table 3 needing to cover the entire 10-yrs of the LSC-CWMP.	The county will revise Appendix D to include the entire 10 years for the LSC CWMP.
BWSR 14	Appendix D	Objective Items a-e, Item a: Refer to our previous comment on Table 3 needing to cover the entire 10-yrs of the LSC-CWMP.	The intention of item b on pages 18 - 37 is to identify who the lead agency would be for the objective and identify agencies that the county would partner with to complete the objectives listed.
BWSR 15	Appendix D	Objective Items a-e, Item c: Refer to our previous comment on Table 3 to identify the source of the estimated budget needs. This item also needs to identify the expected source of the funds. At a minimum identify what the County is assumed to be providing and the expected sources for the remaining needed funds.	The county will revise Appendix D and clarify in a new table the county sources of funding and needed funding amounts for each objective.
BWSR 16	Appendix D,Pg 36	We are concerned about the item on page 36 that states, "Administer and coordinate the Chisago County Local Water Management Plan Appendix". That seems like you will still have a County Water Plan and County Water Planning Process. This	The county will revise Appendix D and Objective 1 on page 26 to include the suggested wording.

		concern is somewhat semantics and we expect the County to continue staff and fund its implementation of county water planning activities but again, we don't want to mislead folks that there is still a County Water Plan since it is being replaced with the LSC-CWMP. We suggest revising Objective 1 to read something like "Administer and coordinate Chisago County's portion of the LSC-CWMP including Appendix-D"	
BWSR 17	Appendix D, Pg 38	Page 38 and throughout appendix - remove references and links to the county water plan and its' components. The LSC CWMP will be replacing your County Water Plan.	Yes, the county will remove references and links to the county water plan in the revised Appendix D to reduce any confusion and provide clarification that the county water plan will be replaced by the LSC CWMP, if approved by the Chisago County Board of Commissioners.
BWSR 18	Appendix E	Although local priorities are welcome to be included in a Comprehensive Watershed Management Plan (CWMP) developed through the One Watershed One Plan Program, please note that per Minnesota Statutes 103B.101 subd. 14, the CWMP will replace the existing County Water plan and SWCD comprehensive plan for the parts of their jurisdictions that are in the LSC planning boundary. Therefore, it is confusing to reference their County Water Plan in this Appendix.	Appendix E will be removed from the document. The majority of the language is already talked about in some fashion throughout the remainder of the text. In the event priorities change in 5 years for our Natural Environment Lakes and additional water quality information or data becomes available to evaluate a need to put efforts towards restoration or protection strategies on them; we will address it at that time.
BWSR 19	Appendix E	We highly recommend adding language to the Lower St. Croix (LSC) CWMP in the main body (page 95) and in Appendix D to make this clear. Example language is below. "Per Minnesota Statutes 103B.101 subd. 14, the Lower St. Croix Comprehensive Watershed Management Plan (CWMP) will replace Isanti County's Water Plan and Soil and Water Conservation District's Comprehensive Plan for parts of the jurisdiction that is in the Lower St. Croix planning boundary. Local adoption of the LSC CWMP is required within 120 days of BWSR Board approval."	
BWSR 20	Appendix E	Remove titles, references, and links to the county water plan or "this plan" or the "implementation table" or "implementation plan" or action items (in reference to the county plan).	
BWSR 21	Appendix E	Revise references that speak of the 1W1P process or plan in future tense	

BWSR 22	Appendix E	The information in the appendices should be limited to items that aren't already included in the LSC CWMP. You could also revise the LSC CWMP to include items in lieu of listing them in the appendix. We want to avoid duplication of items.	
BWSR 23	Appendix E	Implementation Plan Summary – recommend removing most/all of these items as they are already covered in the LSC CWP	
BWSR 24	Appendix E	Table 1 – clarify why these lakes/wetlands are listed in the appendix as a priority (e.g. potential ordinance development)	
BWSR 25	Appendix E	Delete section on the Rum River Watershed.	
BWSR 26	Appendix E	If phragmites infestations are a concern for Isanti County, then consider incorporating Isanti County as a priority location in Table 5-1, Line 34 and modify the measurable outputs as necessary	