

## Cedar-Wapsipinicon Comprehensive Watershed Management Plan

### Response to Comments Received during 60-Day Review

Number (internal)	Commenter	Plan Page/ Plan Section	Comment	Response/Notes	Change Made (Y/N)
1	BWSR	Overall	Planning Group Name: The name "Cedar River Watershed Partnership" is also the name of the Cedar River Watershed District/Mower SWCD/MDA/Co-op partnership effort. This is confusing. Consider changing the name of the group that is referenced several times throughout this plan.	The name of the planning group has been changed to the "Cedar-Wapsipinicon Watershed Partnership."	Y
2	BWSR	Overall	Plan Name: Consider shortening the name to "Cedar-Wapsipinicon Comprehensive Watershed Management Plan" or add a hyphen to include "Wapsipinicon" to the current name since it is a separate 8-HUC from the Cedar. Also, consider changing "1 Watershed, 1 Plan" to "Comprehensive Watershed Management Plan" in the logo so it represents the plan document itself, rather than the BWSR program that supported the development of the plan.	The Plan name has been changed to the "Cedar-Wapsipinicon Comprehensive Watershed Management Plan."	Y
3	BWSR	Page xi	Add Dave Copeland, BWSR, to Planning Work Group listing on page xi. If this is added, then his name can be removed from the Advisory Committee list, as he will be included as part of the Planning Work Group.	Dave Copeland, representative from BWSR, has been added to the Planning Work Group listed on page xi.	Y
4	BWSR	Page 1-4, Section 1.5.1, page 6-2	The following phrase is in the plan: "while the implementation schedule includes projects more heavily targeted in very high and high priority areas, projects and programs are planned for all areas of the watershed, including those with little existing data and classified as low priority". This phrase effectively makes the priority areas ambiguous and inconsistent with Plan Content Requirements. Consider rewording or removing this phrase.	The text has been revised to remove the reference to "low priority areas" and instead references actions planned in areas with little data and areas targeted for specific implementation actions (a reference to the implementation table has been added).	Y
5	BWSR	Page 1-6	Under "Monitoring and Studies" the sentence reads, "The planning area has a need for the state monitoring program to better align with local implementation actions and priorities". Provide specifics or examples of how state monitoring could better align with local actions/priorities that were identified in the planning process.	The Partners hold concerns that the state agencies are not responsive to local input when designing state monitoring programs. This Plan provides an opportunity for greater coordination of monitoring goals and activities.  The text has been revised to note "The Partnership sees opportunities for greater coordination and alignment of planning area has a need for the state monitoring programs with local implementation priorities (e.g., evaluating trends at smaller watershed scales) through the implementation of this Plan to better align with local implementation actions and priorities."	Y
6	BWSR	Page 2-1, Section 2.1	The last sentence in the first paragraph uses the term "Entity" where the term "Partnership" is a more accurate description, since a legal entity is not planning to be formed from this process.	"Entity" has been changed to "Partnership."	Y
7	BWSR	Page 2-2	Consider changing the statement "...this legislation is known as One Watershed, One Plan" to "...this legislation led to the establishment of the One Watershed, One Plan program at BWSR". Also on page 2-2, consider changing the sentence, "The operating procedures in this document outline processes to achieve this vision" to "The BWSR 'One Watershed, One Plan Operating Procedures' is a policy document that outlines processes to achieve this vision".	The text has been revised to include the suggested language.	Y
8	BWSR	Page 2-4?	There was active involvement on the Advisory Committee from two members from Iowa. This should be identified by adding some narrative that discusses the flooding issue of the Cedar River downstream of the planning area and participation from the Iowans on the Advisory Committee. Consider changing the term "study area" to "planning area".	The text has been revised to reference the "planning area" instead of "study area." Iowa representatives on the Advisory Committee are now specifically noted in Section 2.5.	Y
9	BWSR	Section 3	In general, the Land and Water Resources Inventory is very long at 72 pages. Consider reviewing this section to determine if any information could be removed or moved to an Appendix. Another option would be to move this Section to the back of the plan so that the reader is able to move to the main content sooner.	The Land and Water Resources Inventory will remain as Section 3 of the Plan. The current sequence in the Plan allows the presentation of existing data that informs the content of subsequent Plan topics (e.g., issues, targeting).	N
10	BWSR	Section 3 Figures	Consider combining Figures 3-1, 3-2, and 3-3 into one map as the data reflected on these three separate maps could be well illustrated in one map.	All data presented in Figure 3-3 is included on Figure 3-1. Figure 3-3 has been removed and the subsequent figures renumbered.	Y
11	BWSR	Section 3-2	Page 3-13: Consider removing the word "and" between "Partnership" and "has" in the last sentence before Section 3.3.	The suggested change has been made.	Y
12	BWSR	Section 3.2	Consider taking the data that is being discussed in the paragraph immediately before Section 3.3 and illustrating it graphically in the form of a chart.	Bulleted data in Section 3.2 has been replaced in a bar graph format.	Y
13	BWSR	Section 3.2	Consider also representing the climate and precipitation data represented in Section 3.2 as a chart.	The data presented in the beginning of Section 3.2 will remain in its current format. Data presented in the bullets at the end of Section 3.2 has been replaced as a bar graph.	N/Y

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14	BWSR	Page 3-25	Page 3-25: The last sentence before 3.5.2 reads, "Additional data is needed to be confident in an overall assessment of the quality of water used by private well owners". If this is a data gap the plan hopes to address, either reference the specific action in the Implementation Table or reference if it is included in the Implementation Table.	Action items GWQ-6 and GWQ-7 in the Implementation Schedule (Table 7-2) address this data gap. The text has been revised to include a cross-reference to Table 7-2.	Y
15	BWSR	Page 3-37	Page 3-37, Section 3.6.4.4: The last sentence references a recommendation from SEH to install grouted riprap on a dam. Consider adding some information on whether this recommendation was followed up on and if the work was done.	The text has been revised to remove specific repair recommendations (as too detailed for this Plan).	Y
16	BWSR	Page 3-40, Section 3.7.1	<p>Page 3-40, Section 3.7.1:</p> <ul style="list-style-type: none"> <li>The cited nitrogen sensor is a Nitratax, not Nitrax.</li> <li>It is stated twice that the data is measured continuously, in the first and third sentences of the second paragraph. Consider editing.</li> <li>The DTS-12 and Nitratax probes are continuous, but not deployed year-round. Consider noting what the timeframe of deployment is.</li> <li>The MN DNR operates three listed stream gage sites, but US Geological Survey (USGS) numbers are given as identifiers of the sites. If they used to be maintained by USGS, consider noting when coverage was transferred between agencies. For the three MN DNR gage sites, it is assumed data is collected on a continuous basis and equipment is left in year round, and measures stage only. Consider the addition of timeframes and types of data collected which could also help when identifying monitoring data gaps.</li> </ul>	Text has been revised to note the "Nitratax" sensor- change Nitratax and clarify the probes referenced in the third sentence. Detail has been added noting the monitoring period for the DTS-12 and Nitratax probes extends from March through November. The stream gage information presented as bullets has been changed for a tabular format including the dates for which data is available.	Y
17	BWSR	Pages 3-40 to 3-41, Section 3.7.2	<ul style="list-style-type: none"> <li>Further describe USGS monitoring. How many samples? What time of year? What parameters, if any, other than sediment? Does it include Total Suspended Solids or Suspended Sediment Concentration? Etc.</li> <li>Consider noting that MPCA collects samples as part of their Watershed Pollutant Load Monitoring Network program.</li> <li>For the sites that the Cedar River Watershed District (CRWD) performs data collection at, is stage/flow measured along with various parameters so load of pollutants can be quantified? Also, does monitoring by CRWD happen at 10 sites or 18 sites (their 10 plus SWAG 8)?</li> <li>In the third paragraph, page 3-41, the first sentence could be broken into two sentences to help clarify.</li> <li>For Fish Index of Biological Integrity (F-IBI), if data has been collected since 2014, it should be clarified who is collecting (i.e. MPCA for x years, CRWD for x years, etc.), so the wrong impression isn't given that MPCA has been collecting F-IBI samples for many years. Also, MPCA collected F-IBI as part of monitoring in 2009, so that could be included here.</li> <li>For MPCA's Long Term Biologic Monitoring (LTBM) sites, consider stating where those sites are located and indicate when the monitoring started.</li> <li>For MPCA's Intensive Watershed Monitoring (IWM), it should be stated that the Cedar River was sampled in 2009/2010 and began again in 2019.</li> </ul>	<p>USGS water quality monitoring included 335 suspended sediment measurements between 1971-1981, all collected at the USGS gage south of Austin. The text has been revised to note this data.</p> <p>The text has been revised to note that the MPCA collects samples as part of its Watershed Pollutant Load Monitoring program.</p> <p>The CRWD monitoring does not include flow and is performed at 19 sites (10 CRWD and 9 SWAG).</p> <p>The text has been revised to note the FIBI monitoring performed by the MPCA in 2009. Figure 3-16 has been revised to include the CRWD MIBI monitoring locations as biological stations.</p> <p>Figure 3-16 has been revised to identify the MPCA Long-term Biological Monitoring (LTBM) sites at the outlets of Roberts Creek and Woodbury Creek.</p> <p>The text has been revised to note that the MPCA's Intensive Watershed Monitoring (IWM) was performed in 2009/2010 and began again in 2019.</p> <p>The text has been revised to note that FIBI monitoring was performed in 2009 and 2014 by MPCA, and subsequently by the University of Minnesota.</p>	Y
18	BWSR	Pages 3-42 to 3-58, Section 3.8	Pages 3-42 to 3-58, Section 3.8: In this section there is some back and forth on citing WRAPS and TMDL studies. If the discussion is about impairments and assessments, the TMDL should be cited. The WRAPS only summarizes the TMDL and other MPCA documents, such as the Monitoring and Assessment Report and the Stressor ID Report.	Text has been revised in Section 3.8 to clarify references to the WRAPS and TMDL studies. In some cases, references to the WRAPS remain because the WRAPS serves as a summary of the assessments described (e.g., "Appendix A of the Cedar River WRAPS includes a complete summary of the stream impairment assessment by designated use and pollutants for all assessed AUIDs in each planning subwatershed except the Wapsipinicon River). In some cases where data is more succinctly presented in the WRAPS (e.g., summary of water quality trends), Plan text has been revised to note that the WRAPS provides a summary of analyses, so as not to imply the analysis was originally documented in the WRAPS.	Y

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19	BWSR	Page 3-41	Page 3-41: Towards the bottom of the page, the acronym "EQUIS" is used without a description of what it is. Either describe it here or add it to the Acronym list with a definition.	EQuIS is now defined in the text and list of acronyms	Y
20	BWSR	Page 3-45, Figure 3-16:	<ul style="list-style-type: none"> <li>The red dots denote Non Point Discharge Elimination System (NPDES) discharge sites, but NPDES is not explained anywhere in the text. Consider either removing or providing more context.</li> <li>The blue dots represent USGS gages. If this is the case, why is there a blue dot southwest of Dexter, and another southwest of Adams? This appears to be inaccurate. Also, the text in 3-7 depicts the site south of Austin as maintained by the USGS, but in the figure it is denoted as a DNR/USGS station like the other DNR stations. Please clarify this.</li> <li>The yellow dots for lake monitoring around Austin seem odd because the base layer doesn't show the lakes there. Consider revising so the lakes can be viewed on the map.</li> </ul>	A description of the NPDES monitoring locations on Figure 3-16 has been added to Section 3.8. The icons on Figure 3-16 representing stream monitoring gages have been revised and the gage IDs have been added as labels. The USGS gage near Dexter (05457080) and the USGS gage on the Little Cedar River (05457778) have been removed from Figure 3-16 since they only include a handful of peak flow measurements. The lake monitoring icons appear larger on Figure 3-16 than the lakes because the lakes are small (no change made).	Y
21	BWSR	Page 3-47, Table 3-9, Figure 3-16	If possible, associate the locations used to calculate trends back to the gage sites, and then reference in Figure 3-16.	Stream gage IDs have been added to Figure 3-16 and noted in Table 3-9.	Y
22	BWSR	Page 3-52	Page 3-52, Figure 3-18: Cite what the Unsewered Community data source is and what year it was updated. It is not listed with the other sources in the "data sources" text within the figure. A few years back, MPCA changed the methodology on determining these locations, so it would be beneficial to make sure these locations are up to date.	Details of the unsewered community GIS data was confirmed with MPCA; GIS data for unsewer communities is not published. Data presented in Figure 3-18 is based on information provided by MPCA.	Y
23	BWSR	Page 3-57, Section 3.8.7	Page 3-57, Section 3.8.7: Consider adding narrative that describes how, if at all, the described models were used in the planning process.	Text has been revised to note that HSPF and SWAT modeling results have been used to estimate potential benefits from planned field practices. Cross references to Sections 6.4.3 and 6.4.4.1 have been added.	Y
24	BWSR	Page 3-63, Section 3.9.1	Page 3-63, Section 3.9.1: Cite what year this floodplain map was developed, and if you are aware of any plans for updates in the near future.	The Floodplain layer comes from MDNR Zonation analysis. The figure was also be revised to include current FEMA floodplain mapping, including recent updates for Dodge County.	Y
25	BWSR	Page 3-66, Section 3.9.2.1	Page 3-66, Section 3.9.2.1: Consider including additional information such as when the ad hoc committee was formed, if the peak flow reductions estimated by the modeling is being considered by the local planners for implementing culvert downsizing as a part of the water storage goal effort, and if not, what the basis is for not including it.	The text has been revised to note that flow rate goals for select subwatersheds were established in the 2009 CRWD Watershed Management Plan and are incorporated into this Plan as Appendix B. The text notes that these flow rate goals will be updated as part of modeling planned as part of implementation schedule.	Y
26	BWSR	Page 4-4, Section 4.2	Page 4-4, Section 4.2, first paragraph: The second sentence begins with "Barr identified"; this isn't done anywhere else in the plan. Consider restating as, "The consultant enlisted as plan writer, Barr Engineering, identified..." Or, leave Barr out all together and state, "the planning group identified..."	The text has been revised to identify the Planning Work Group as the agent.	Y
27	BWSR	Page 4-10, Section 4.3	Page 4-10, Section 4.3: The second paragraph describes a discrepancy between scoring of the Policy Committee and Advisory Committee but doesn't mention how it was resolved. Consider providing some context on how this was resolved.	The text has been revised to note that "Additional discussion with Advisory Committee and Policy Committee, in combination with the weighted average scoring, ultimately led to a consensus determination of Tier I, Tier II, and Tier III issues."	Y
28	BWSR	Page 5-1, Section 5.1	Page 5-1, Section 5.1: In the bulleted list of available information, the first bullet states, "Goals from existing..." Modeling doesn't have goals, it shows data and outputs. Consider rewording the bullet to "Information from existing..." or removing the sub-bullet s all together.	The bulleted list of goal considerations has been revised to reference "results" from modeling, as opposed to goals.	Y
29	BWSR	Page 5-2	Page 5-2: Under the "Priority Issue", "Table 5-1" should be labelled as "Table 5-2" .	The reference to Table 5-2 has been corrected.	Y
30	BWSR	Page 5-7, Table 5-2	Page 5-7, Table 5-2: Consider adding some text to clarify why Phosphorus is listed twice in the "Degraded Surface Water Quality" Priority Issue.	The table has been reorganized so phosphorus is listed once.	Y
31	BWSR	Page 5-11, Table 5-3	Page 5-11, Table 5-3: SWAT and HSPF give reductions in Total Nitrogen (TN) while the implementation tables use nitrate nitrogen. This isn't directly transferrable since nitrate is only a percentage of TN. This should be remedied in some way. For example, rows are labeled 'nitrate' in the column 'Specific issue, Pollutant or Stressor' while the remaining columns refer to nitrogen or N load reduction.	Text in Section 5.2.1 has been revised to note that "Note that while the discussion of surface water quality degradation (see Section 4.2.2) specifically references nitrate, goals are presented as total nitrogen for consistency with available modeling tools." Tables 5-2, 5-3, and 7-2 have been revised accordingly.	Y

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32	BWSR	Table 5-3, HSPF Modeling	Table 5-3: Since HSPF-SAM in-stream results are currently place holders in the Table, only field scale reduction estimates are available. Plan Content Requirements call for goals to address priority issues. Since the issues in your plan are water resource based, goals also need to be water resource based. In other words, what impact will your actions have on the water resources listed as priorities? To meet this requirement, HSPF-SAM derived goals must be completed and part of the plan prior to being submitted to the BWSR Southern Regional Committee.	Resource-specific pollutant reduction goals have been estimated using HSPF (for all areas but the Wapsipinicon River watershed) and have been incorporated into Table 5-3.	Y
33	BWSR	Page 6-1, Section 6.2	Page 6-1, Section 6.2: To emphasize targeting, consider changing this subheader to "Subwatershed Scale Targeting" and the subsequent subsection to "Field Scale Targeting" to be consistent with terms you define in Section 6.1. As it reads now, it appears this is another layer of prioritizing.	The heading of Section 6.2 has been revised to read "Subwatershed Scale Targeting."	Y
34	BWSR	Page 6-2	It is unclear that Figure 6-4 is a composite of the data represented in Figures 6-1 through 6-3. Some narrative should be added to the paragraph on page 6-2 to explain this.	Text has been added to Section 6.2 (page 6-2) noting that Figure 6-1, Figure 6-2, and Figure 6-3 were used to create a composite priority area map, presented as Figure 6-4. The text was also corrected to be consistent with the number of different priority levels (0 through 5) presented in Figure 6-4.	Y
35	BWSR	Page 6-5, Section 6.3.3	Page 6-5, Section 6.3.3: More context is needed on how the existing Cedar River Watershed District CIP will be incorporated into targeting. The number of projects remaining to be completed of the 25 in the CIP should be specified and identified, including their locations. In Figure 6-5 there are 31 sites identified as CIP sites. Consider reviewing and adjusting this Figure.	The text has been revised to remove reference to the "25" projects and simply note that the first iteration of the CRWD CIP included projects including stormwater detention, ravine stabilization, and flood risk reduction. The text notes that some of these projects have been constructed and that the annual work planning activities will include coordinating and prioritizing CRWD CIP projects relative to this Plan.	Y
36	BWSR	Page 6-18, Figure 6.6	Page 6-18, Figure 6.6: Instead of labeling project drainage area as "potentially high priority watersheds" could it be reworded to "potential project catchments"? Using the term watershed is confusing in this context, especially since in the narrative it says "subwatersheds", and the title of the subsection includes "field scale". Changing the narrative to catchment would also help.	The labels in Figure 6-6 have been revised to refer to "catchments." The text throughout Section 6 has been revised to refer to "catchments" when referring to areas tributary to specific projects or practices.	Y
37	BWSR	Section 6.4	Consider rewording Section 6.4 to simplify and shorten the section. Doing so could make it easier to follow the process. The more detailed explanation and formulas could be added as an item in the Appendix.	The text has been left as-is to provide full context and detail within the Plan.	N
38	BWSR	Page 6-10, Section 6.4.3	Page 6-10, Section 6.4.3: At the end of the second paragraph it reads, "realistic implementation budget". How is this defined? Is this is the budget currently laid out in the plan? Was there any analysis of what could happen with an above average budget? Corresponding text on page 7-25 describes your current budget as "ambitious". Is it both ambitious and realistic? Consider rewording.	The text has been revised to remove the reference to "realistic" budget and include a link to section 7.3 - Plan Implementation and Funding. During Plan development, the Partners estimated current spending on water and natural resource management activities (i.e., current capacity assessment) to determine how the planned implementation budget compares to current spending. This is described in Section 7.3 of the Plan.	Y
39	BWSR	Page 6-11, Section 6.4.5	Page 6-11, Section 6.4.5 (the paragraph after the bullets): It is noted that percent reductions may be used to show BMP reduction estimates. What will the percent reduction be based on once it's entered into the tracking spreadsheet (what is the baseline)? Will it be TMDL/WRAPS numbers? This should be specified in this section. It should also be specified that the reductions being tracked are a sum of field scale calculations and not at the resource level.	The text has been revised to clarify that the ongoing tracking of project benefits includes "field-scale" estimates of pollutant reduction, calculated based on estimates of field-scale loading from HSPF and/or SWAT. The text has also been revised to note that reductions relative to in-resource goals and relative to TMDL goals will be assessed using HSPF (or similar tool).	Y
40	BWSR	Table 7-1	Consider adding the date of the last Comprehensive Plan adoption for each LGU to Table 7-1.	Comment considered. No change to the Plan.	N
41	BWSR	Page 7-4, Section 7.1.1.1	Page 7-4, Section 7.1.1.1: The way this currently reads it appears to be specific to the Cedar River Basin, which would preclude the Wapsipinicon part of the planning area. Please review and change if necessary, and provide citations if possible for the bulleted list on page 7-4.	The text has been revised to remove specific references to the CRWD and note the activities of all of the Partners.	Y

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42	BWSR	Page 7-5, Section 7.1.2	Page 7-5, Section 7.1.2, "Monitoring and Studies": "The Partnership will review available monitoring data as part of its biennial review to assess and evaluate Plan progress and to evaluate whether programmatic changes are needed." The plan also discusses the need to coordinate with state agencies to better align monitoring with needs of the watershed, but no examples are given or state agency acknowledgement that this will take place. Better identification of gaps will allow you to be better prepared to write a monitoring plan.	The Partners hold concerns that the state agencies are not responsive to local input when designing state monitoring programs. This Plan provides an opportunity for greater coordination of monitoring goals and activities.  The text has been revised to note "The Partnership sees opportunities for greater coordination and alignment of planning area has a need for the state monitoring programs with local implementation priorities (e.g., evaluating trends at smaller watershed scales) through the implementation of this Plan to better align with local implementation actions and priorities."	Y
43	BWSR	Section 7	The plan must address how the Turtle Creek and Cedar River Watershed Districts intend to handle updates to their Rules and/or Capital Improvement Plan(s). One option would be to fully incorporate them into the Comprehensive Watershed Management Plan (CWMP). Another option would be to reference them in the CWMP but keep them as separate documents.	The CRWD and TCWD seek to maintain their respective Rules as separate documents to be updated outside of this Comprehensive Watershed Management Plan. The text of Section 7.2.1.11 (Watershed District Rules and Permit Programs) has been revised to explicitly state this intention.	Y
44	BWSR	Page 7-13, Section 7.2.1.11	Page 7-13, Section 7.2.1.11: If the two Watershed Districts in the planning area intend to adopt this plan as their own, the CWMP needs to meet the following statutory requirements per MN Statute 103D.405: The comprehensive watershed management plan should be reviewed with the watershed districts to assure these requirements are met so it can be adopted by the watershed districts.	The Plan has been revised to include an additional subsection in Section 7 entitled "Watershed District Plan Adoption." Added text in this Section describes the intention of the CRWD and TCWD to adopt this Comprehensive Watershed Management Plan as their own, consistent with MN Statute 103D.405. The section notes that the CRWD and TCWD seek to maintain their rules as separate documents outside of this Plan, and seek to maintain their own Capitol Improvement Programs, informed by the implementation schedule included in this Plan. Watershed District capital improvement programs will be coordinated with the implementation schedule presented in this Plan as part of the annual work plan process.	Y
45	BWSR	Page 7-30	Page 7-30, the first full paragraph, last sentence. Please review for accuracy. We believe you mean grants, not contracts, will be held with the fiscal agent.	The text of Section 7.4.1 has been revised to include "agreements" in place of "contracts."	Y
46	BWSR	Page 7-28, Section 7.4.1	Page 7-28, Section 7.4.1: The title should be "Fiscal Agent and Administration". Also, consider keeping the descriptions of succession for the Fiscal Agent and Day-to-Day Contact consistent.	The title of Section 7.4.1 has been revised. The text has also been revised to include the description of the fiscal agent, as defined by the MOA, followed by a note that grants obtained outside the partnership are administered by the appropriate LGU, as is current practice.	Y
47	BWSR	Section 7.4.2	One Watershed, One Plan, Plan Content Requirements, page 9, under Plan Administration and Coordination discusses "Identification and Coordination of Shared Services". The Mower SWCD currently has a conservation planner position through a grant from BWSR and an agreement with USDA-NRCS that is specific to the Cedar River Watershed. The position is funded through 2021. We suggest having some narrative about this position in the event there is an opportunity to fund the position longer term. One section that this narrative could fit in is 7.4.2, Coordination.	Section 7.4.2 has been re-titled "Coordination and Shared Services." The text has been revised to note that "...the Partners will also consider opportunities for shared services (e.g., shared staff positions) to provide mutually beneficial and efficient service to multiple Partners in pursuit of Plan goals. Such opportunities will be considered by the Plan Implementation Work Group as part of annual work planning."	Y
48	BWSR	Page 7-28	One Watershed, One Plan, Plan Content Requirements under Plan Administration and Coordination, page 9, Item I.b, references describing if the advisory committee created for plan development will continue through plan implementation, and states the plan should establish procedures for engaging state agencies. With this in mind, consider either changing "may consist of" to "will consist of" on page 7-28 in the Technical Advisory Committee description, or describe the procedures that will be used to engage state agencies.	The text has been revised to note that "The TAC may will consist of the Local Implementation Work Group (LIWG) members, contacts for the State's main water agencies and/or plan review agencies, and area stakeholders."	Y

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49	BWSR	Page 7-14, Section 7.2.2	Page 7-14, Section 7.2.2: State and Federal agency responsibility descriptions is not a necessary part of the plan. However, Plan Content Requirements state: "Describe relationships with other units of government not part of the formal agreement for plan development, including the drainage authorities within the planning boundary". This section would meet requirements if there was a description of how the LGUs collaborate and work with each entity, or types of entities in general, which is not currently in the plan.	The text of Section 7.4.2 notes "The Partners will continue to coordinate with BWSR, MDA, MDH, MDNR, and MPCA as required through State-legislated programs and to accomplish the many Plan activities that identify State agencies as cooperating entities."  The text has been revised to note that "Specific opportunities for coordination with other units of government not part of the Partnership are identified in the implementation schedule (Table 7 2). The "supporting entities" field Table 7 2 notes those other governmental units or parties that the Partners will coordinate with in performing each activity."	Y
50	BWSR	page 7-24, Section 7.3	Page 7-24, Section 7.3: There is not a subsection on "Collaborative Grants" as required per the Plan Content Requirements, page 10, part c. Consider adding a subsection that discusses an intended approach to coordinated state grant applications	A "Collaborative Grants" section has been added as Section 7.3.5. That section includes the following text:  "The Partners recognize the importance of securing grant funding in completing the implementation activities identified in this Plan (see Table 7 2). The Partners will leverage this Plan in applying for competitive state and federal grants. As part of annual work planning (see Section 7.4.3), the Plan Implementation Work Group will identify planned activities suited to available grant opportunities and make recommendations for pursuit of grants to the Policy Advisory Committee."	Y
51	BWSR	Page 7-30	On Page 7-30, the last paragraph references a BBR, as the Plan Content Requirements specifies. Since there is no longer a BWSR BBR requirement, consider amending this paragraph to reference the work plan and a budget request for Watershed-Based Funds to BWSR, and cite in the paragraph that this will be in lieu of the BBR referenced in the BWSR Plan Content Requirements.	The text has been revised to note the submittal of a work plan and budget request for watershed-based funding (in replacement of the BBR requirement in the BWSR Plan Content Requirements).	Y
52	BWSR	Pages 7-27 to 7-30, Section 7.4:	For each of the three Committees (Policy Advisory, Technical Advisory, and Local Implementation Work Group), consider placing the appropriate acronym immediately after the first time the term is used then use the acronym consistently thereafter.	The text has been revised to include acronyms for the Local Implementation Work Group, Policy Advisory Committee, and Technical Advisory Committee.	Y
53	MDA	Sections 3.5.1 & 3.5.2	Township testing results are noted here, but if/how this and other current and future monitoring may be used could be further explained. Since township testing and other monitoring may support planning efforts (such as GWQ-6) and support the priority groundwater area shown in Figure 6-2, it may be beneficial to include an illustration of townships tested and to be tested as a figure in section 3 or elsewhere. (MDH monitoring is noted too and available data could be mapped as well). You may want to include the watershed portion of this map: <a href="https://www.mda.state.mn.us/sites/default/files/inline-files/combinedtmapfsht_0.pdf">https://www.mda.state.mn.us/sites/default/files/inline-files/combinedtmapfsht_0.pdf</a> This will be helpful to illustrate how current and future monitoring aligns with groundwater areas of concern, and to identify areas where future groundwater monitoring may be needed. It appears that these township testing areas correspond fairly well with the groundwater sensitive areas and karst area illustrated in Figures 3-11, 3-12, 3-13.	Areas selected for Township Testing are generally based on the data presented in Figures 3-11, 3-12, and 3-13. Township Testing areas present a more general coverage. The Partnership prefers to present the specific input data already presented in these figures. Township Testing is referenced in the Plan as providing useful data, but Township Testing results do not present a complete picture of groundwater quality within the study area.	N

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54	MDA	Section 3.5.1, Section 4.2.4, Section 6.2.2, Table 5.2, Table 7-2	<p>The plan notes that groundwater contamination is a Tier 1 issue even though there is limited information (modeling and monitoring) available. Section 4.2.4 of the plan acknowledges that groundwater monitoring is lacking, therefore Tier 1 priority is not based on monitoring data. The plan would benefit from more discussion on how and where the groundwater monitoring will occur and how these results will be used to prioritize and implement activities. For example, will Figure 6-2 be used to identify the priority areas for monitoring or modeling, or is the intent to guide implementation activities? In addition, more discussion of the gaps in surface and groundwater monitoring (Section 3.5.1) would be beneficial.</p> <p>State agency assistance in monitoring and evaluating trends is noted (Table 7-2 GWQ-6, GWQ-7, and GWQ-8), and it is acknowledged (within the notes of Table 7-2) that results these will guide future monitoring. In addition to these notes, it would be beneficial to have supporting narrative to explain the groundwater monitoring process and describe what is intended to be achieved by monitoring and establishing trends. For example, is the goal of monitoring to inform landowners of the status of their drinking water, is it to determine broader groundwater conditions, and/or will monitoring and trends guide groundwater protection priority areas and activities? MDA acknowledges the difficulty with determining this detail. As noted in the plan, the MDA is in the process of doing private well testing within several townships in the watershed, and since results are pending future monitoring and implementation activities are not yet known.</p>	<p>The inclusion of groundwater contamination as a Tier I issues is based on several factors, including lack of available data and monitoring results that identify nitrate contamination in areas across the watershed (where data is available). Text in Section 6.2.2 notes that private well data was not used as a factor in determining specific groundwater priority areas due to limited extent and existence of contamination across the watershed.</p> <p>Figure 6-2 is intended to guide implementation activities, including monitoring. Text has been added to Section 6.2.2 to note "The groundwater priority areas presented in Figure 6-2 will be used to guide future implementation, including development of a comprehensive groundwater monitoring plan (implementation item GWQ-9)."</p> <p>Activity GWQ-9 in the implementation schedule includes developing a groundwater monitoring plan. The development of the monitoring plan will consider groundwater priority areas shown in Figure 6-2 along with available data to determine areas in need of additional monitoring. This may include areas lacking data, areas already showing contamination, and/or areas more susceptible to contamination.</p>	Y
55	MDA	Table 4-4	<p>Table 4-4 notes "chemicals" as a potential groundwater contamination source, which is a broad category compared to "nitrate" and "bacteria". Is it possible to be more specific to provide chemicals of potential concern? - For example: Pesticides and agriculture; petroleum with storage tanks, etc. In addition, additional narrative would be helpful to identify what is known about chemicals in groundwater.</p>	<p>A footnote has been added to Table 4-4 noting petroleum and pesticides as examples of other chemicals included in the table.</p>	Y
56	MDA	Section 4.2	<p>Section 4.2: In some cases the priority issues cross reference other sections or figures to provide additional details of the priority issue (Ex. 'Accelerated Erosion and Sedimentation' refers to Figure 3.8; 'Excess Flooding' references Section 3.9), while others do not (Ex. 'Surface Water Quality Degradation' and 'Groundwater contamination'). Since important supporting details are elsewhere in the plan, it would be helpful for users of the plan to be able to see the supporting sections noted in the priority issues section.</p>	<p>References to applicable maps from the inventory section have been added for all issues discussed in Section 4.</p>	Y
57	MDA	Section 4.2.4, Page 5-5	<p>Section 4.2.4 (also similarly on page 5-5): notes "Private and public drinking water wells in the Cedar River watershed have shown high levels of nitrate contamination in several areas" and "through planning area" is noted. It would be beneficial through narrative or illustration to identify where these areas are located. Do these areas correspond with Fig. 6.2?</p>	<p>Text has been added to Section 6.2.2 to explicitly note the overlay of GIS layers in determining the groundwater priority areas presented in Figure 6-2. In addition, the text has been revised to note that "Though some private well data is available, it is limited in numbers and area. The available data, although limited, is generally consistent with the priority areas based on the spatial data listed above (i.e., most high-nitrate samples occur within the priority areas). Therefore, well data was not used to additionally prioritize areas."</p>	Y
58	MDA	Section 5.2.4	<p>Section 5.2.4: Thank you for noting and providing a link to the NFMP as a tool to help achieve this groundwater contamination goal for nitrate. In Table 5.2 the "Long Term Goal Rational" header could also include the Minnesota Nitrogen Fertilizer Management Plan.</p>	<p>Although they are related, the Partnership's long term goal (compliance with health standard) is not directly correlated with achieving the numeric reduction goal in the Minnesota Nitrogen Fertilizer Management Plan.</p>	N
59	MDA	Table 5-3, HSPF Modeling	<p>Table 5.3: I noticed in Table 5.3 that some subwatershed pollution reduction goals have yet to be inserted. Was this an oversight; this needs to be completed before plan approval.</p>	<p>Please see response to BWSR comment regarding resource water quality goals.</p>	Y
60	MDA	Table 5-2	<p>On Table 5-2, page 2: the 10-year nitrate goal &amp; measurable is to 'reduce fertilizer rates'. Focusing on rate may be okay in many cases, but this should be associated with a standard that addresses rate as well as other nitrogen fertilizer management guidance which would include following the U of MN nitrogen fertilizer BMPs. I realize this is just an example, but perhaps it should state "reduce nitrate load" or "proper nitrogen management". Is the goal N rate only, which implies mostly corn acres, or is this goal intended to reduce N load which could then mean other crops or cropping systems such as cover crops or rotations?</p>	<p>The 10-year goal referenced in the comment is "Reduce nitrogen loading to groundwater..." Reduction of fertilization rates and implementation of field practices are identified as avenues to achieve reduction in nitrogen loading to groundwater. The implementation table includes more detail regarding actions to achieve the 10-year goal.</p>	N

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61	MDA	Section 5.2.4	<p>Section 5.2.4: states “groundwater contamination goals are generally applicable throughout the planning area. Specific activities to address groundwater contamination in the implementation schedule (see Table 7-2) are targeted to specific geographic areas and/or audiences where the most benefit is anticipated.” This section would benefit from more discussion as to how this relates to Figure 6.2., and the itemized area(s) identified under “Target or Focus Area” header for each groundwater goal in Table 7-2 (GWQ goals 1-4 are in ‘priority areas’; GWQ 5-10 ‘watershed wide’, and GWQ 11-16 are variable).</p>	<p>The text of Section 5.2.4 has been revised to include a reference to the discussion of groundwater priority areas included in Section 6.2.2. Groundwater quality action items GWQ-1 through GWQ-4 in Table 7-2 are listed under the category of “projects and project support.” Thus, these activities are targeted to specific spatial areas (i.e., groundwater priority areas presented in Figure 6-2). Implementation activities GWQ-5 through GWQ-10 are listed under the category of “monitoring and studies” and are applicable over a broader area. Some groundwater activities listed under “monitoring and studies” will likely become more targeted following completion of the groundwater monitoring plan identified in activity GWQ-9.</p>	Y
62	MDA	Section 6.2	<p>Section 6.2: Figure 6.4 is very helpful in illustrating priority implementation areas as well as Figure 6.5 identifying priority implementation sites. However, section 6.2 should provide more detailed discussion (here or elsewhere with cross-referencing) regarding how these figures was arrived. It would be helpful to clarify:</p> <ul style="list-style-type: none"> <li>• Are all tier 1 issues given equal weight (Is Figure 6.4 an overlay of Figures 6.1, 6.2, &amp; 6.3?)</li> <li>• Will Figure 6-4 be the sole map used when identifying priority projects or is multiple benefit only one of the priorities so that Figures 6-1, 6-2, or 6-3 may be used as stand-alone maps to identify priority areas. (Ex. How to rank a project if a project that meets the groundwater protection goal is located in a high priority area (Figure 6-2), but is not priority in the other tier 1 areas (low priority on Figure 6-4)?)</li> <li>• are some watersheds given a higher ranking based on specific modeling results?</li> <li>• why are there 2 high, moderate and lows shown?</li> <li>• There are four tier 1 issues but five priority areas are shown (assuming the blue ‘low priority’ is meant to state “water”). Does this correspond to the first five bulleted items under Section 6.2 combined resulting in the ranking shown?</li> </ul> <p>In addition to clarifying for the reader, providing more detail here will be beneficial to Cedar River 1W1P partners so they have a mutually agreeable ‘playbook’ for prioritizing projects. Anticipating more demand for funding than available dollars, it would be ideal for the plan to outline a process and priority for selecting implementation projects. This will insure that priority projects are funded equitably with Cedar River 1W1P partner agreement.</p>	<ul style="list-style-type: none"> <li>- Text has been added to Section 6.2 clarifying that Figure 6-4 is a composite of Figure 6-1, 6-2, and 6-3. Surface water quality is attributed more weight in the spatial prioritization due to the presence of three TMDL-related layers</li> <li>- Figure 6-4 is referenced for prioritizing and siting field projects with multiple benefits. Other implementation activities related to specific Tier 1 issues (e.g., groundwater contamination, excessive flooding) may be targeted according to other targeting methods (as identified in Table 7-2).</li> <li>- Modeling results are incorporated into watershed-level targeting (e.g., HSPF estimates of runoff were used identify priority subwatersheds in Figure 6-3) as well as field scale targeting (e.g., SWAT modeling identifies potential project locations).</li> <li>- Priority area labels have been revised to indicate Level 0 through Level 5, removing references to two “low,” two “medium,” and two “high” levels.</li> <li>- The five solid bullets listed under Section 6.2 correspond to the five datasets used in determining level 0 through level 5 priority areas. The blue indicates level 0; the colors will be revised to avoid confusion with surface waters.</li> <li>- Additional text has been added to Section 7.4.3 (now Section 7.4.4) describing the prioritization of individual projects during work planning.</li> </ul>	Y
63	MDA	Section 6.2.2	<p>Section 6.2.2: This section would benefit from more discussion (here or elsewhere with cross-referencing) regarding how all the bullet items were evaluated to arrive at the priority area shown in Figure 6-2. Figures 6-1 and 6-3 are surface water related and are supported by monitoring and/or modeling results, therefore have associated numbers to identify priority areas. Groundwater contamination priorities are a combination of soils, hydrology and geology information, so it should be discussed how this combined information was evaluated to arrive at a high/very high and moderate vulnerability ranking.</p>	<p>The data sources presented in the bulleted list in Section 6.2.2 were reviewed by the Planning Work Group and Advisory Committee in various iterations during Plan development. Ultimately, the Planning Work Group, with Minnesota Department of Health input, selected the groundwater priority areas presented in Figure 6-2. The Planning Work Group acknowledges that groundwater priority areas may be reviewed based on the outcome of implementation activities designed to fill data gaps.</p>	N
64	MDA	Table 7-2	<p>Table 7.2: Thank you for noting the Minnesota Agricultural Water Quality Certification Program (MAWQCP) in Table 7.2 GWQ-13 as an education and outreach effort. Since several Cedar 1W1P partners are already involved with MAWQCP in the watershed, it may be beneficial to note MAWQCP in the BMP implementation section of the table as well as working with ag. partners section (e.g. as a ‘Supporting Entity’ or in the notes for items such as; SWQ-1, SWQ-2, SWQ-3 SWQ-10, SWQ-13, GWQ) . (This could correspond with the Cedar River Watershed Partnership activities as discussed below). In the watershed there are currently over 20,000 acres that are certified or in the process of being certified.</p>	<p>The MDA is noted as a supporting entity in several implementation activities and has been added to additional relevant activities.</p>	Y

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65	MDA	Section 7.3.4	I believe the second paragraph under this section is referring to the Cedar River Watershed Partnership? If so, this is a unique and innovative project that involves many of the Cedar River 1W1P partners, so could be further highlighted and promoted in the plan. Here is some additional text that could be added (from a consensus document developed by the partners): “The Cedar River Watershed Partnership is a diverse partnership including Environmental Initiative, Central Farm Service, Mower County Soil and Water Conservation District, Land O’ Lakes SUSTAIN, Hormel Foods and the Minnesota Department of Agriculture that is collaborating in the Cedar River Watershed to help farmers address water quality problems while improving farm profitability. The partnership engages with farmers, provides information and resources on improved farming strategies, and works with them to address water quality risks through achieving certification in the Minnesota Agricultural Water Quality Certification Program.” You also may want to parlay these program activities into implementation actions in the plan. This could include implementation items such as; SWQ-2, SWQ-10, SWQ-13 and perhaps others. This could be stand-alone identification of the Cedar River Watershed Partnership, or since the goal is reaching certification through the Minnesota Agricultural Water Quality Certification Program, perhaps this could be cross referenced.	Additional detail regarding the Cedar River Watershed Partnership has been added to Section 7.1.3 and Section 7.4.3.	Y
66	MDA	Table 7-2, GWQ-3	Table 7.2: GWQ -3 - Consider rewording this goal. “Implement practices to reduce or limit nitrate movement into groundwater” to “Implement nitrogen management practices to prevent and mitigate nitrate movement into groundwater.” The existing narrative could be understood to mean that nitrate is address once it is in the ground versus overall nitrogen management, although the given examples (e.g., nutrient management, cover crops, saturated buffers, two-stage ditches, wetland restoration) probably help clarify.	Comment is noted.	N
67	MDA	Section 7.2.2.2, Figure 6-2	As of June 24, 2019, Minnesota now has a Groundwater Protection Rule which 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. Though the Groundwater Protection Rule was completed at the end of this 1W1P process, you may still consider including information on the Groundwater Protection Rule in the plan since it will have impact in the watershed. Beginning in 2020 fertilizer application will be the prohibited in vulnerable areas of the watershed, as defined by the MDA vulnerable area map here: <a href="https://mnap.maps.arcgis.com/apps/webappviewer/index.html?id=47a342afe6654640b935c8e76023da92">https://mnap.maps.arcgis.com/apps/webappviewer/index.html?id=47a342afe6654640b935c8e76023da92</a> . Since nitrate in groundwater is a priority, and it appears that some of these areas correspond with the priority nitrate areas shown in Figure 6.2, you may want to include this in the plan. (We realize this may be a little late in the process to include; adding narrative under MDA at 7.2.2.2 may be a good option.) The Minnesota Department of Agriculture (MDA) will oversee implementation of the rule. Beginning in 2020, use of nitrogen fertilizer in the fall and on frozen soils will be restricted in areas of the state with vulnerable groundwater, such as areas with coarse textured soil, shallow bedrock, or karst geology, and in public wellhead areas – known as Drinking Water Supply Management Areas (DWSMAs) – with elevated nitrate levels.	Additional text noting the development of this rule is included in Section 7.2.2.2. The Partnership will consider the ramifications of this rule in future Plan updates.	Y
68	MDH	Page 3-25	Page 3-25: correct the reference for the Pollution Sensitivity of Wells from MDNR to MDH	The references have been changed to MDH.	Y
69	MDH	Page 3-26	Page 3-26: it would be helpful to explain why the karst features “disappear” at the Freeborn County boundary.	The text has been revised to note that Karst feature datasets vary by county. Karst features within Mower County are presented in detail in Figure 3-13. Karst features throughout the planning area are generally shown in Figure 3-11.	Y
70	MDH	Table 7-2, GWQ-9	Table 7-2, GWQ-9: consider moving this activity earlier in the schedule. The groundwater monitoring plan can be instrumental in the establishment of baseline conditions, long-term trends in quality and quantity, and effectiveness of program implementation. At this time, there is no known date for GRAPS to be completed and should not hold up this activity.	This action has been moved up to the 2020-2021 biennium.	Y
71	MDH	Section 7	Consider inviting municipalities to future Advisory Committee meetings. This will identify the unique needs of public water suppliers based on wellhead protection plan assessments of geologic/hydrogeologic conditions and identification of issues, problems and opportunities based on available resources and capabilities.	The Partnership will consider inviting municipalities to future Advisory Committee meetings, when applicable.	N
72	MDH	Table 7-2	Include non-municipal public water suppliers in implementation activities. Many of these systems lack authority and resources to manage drinking water quality issues. MDH is in the process of creating Wellhead Protection Action Plans for these systems.	Implementation will consider non-municipal public water supplies and Wellhead Protection Action Plans developed by MDH.	N

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73	MDH	??	Using existing geologic, hydrogeologic, and soils information, you could make a stronger connection between surface and groundwater interactions, specifically identification of where local and regional recharge and discharge is occurring. Knowing this information would be beneficial for: o Targeting BMPs that provide mutual benefit to both surface water and groundwater. o Making a stronger connection between flooding and stormwater activities that have an impact on groundwater quality and quantity.	Acknowledged. This data will be considered in developing the groundwater monitoring plan (implementation activity GWQ-9).	N
74	MDH	Figure 3-24, Figure 6-2	There appears to be an important correlation between the floodplain map (Figure 3-24) and the groundwater priority areas map (Figure 6-2). In addition to the geophysical connection of surface-groundwater systems there is a need to protect wells in flood prone areas.	Noted. This relationship will be considered in future Plan updates and revisions to priority areas.	N
75	MDNR (Reinartz)	Not specified	Reference to the USACE Climate Hydrology Assessment Tool. Figure 1 shows a trend line of annual instantaneous peaks for the USGS gauge at Austin for the period 1910 to 2014. The hydrologic time series of these peaks show an increasing trend. The trend line has a p-value of 0.14, which indicates that the trend is not significant at the 0.05 level of significance and that it may be an artifact of the variability of flows. Therefore, this tool indicates that there has been no change in flood risk as measured by the annual maximum flood, for the record (1910 -14, 1945 – 2014).	Noted. The USACE Climate Hydrology Assessment Tool will considered in future planning efforts.	N
76	MDNR (Reinartz)	Not specified	I think that the goal of 0.25 inch of storage over the watershed area is doable, mainly if it includes increased organic matter which could increase storage in the soil profile. Jim's gssha model included the effect of increasing organic matter in the soil mapping table by expanding the field capacity at a higher rate than permanent wilting point for various increases in organic matter.	Noted. The Partnership will assess progress towards the Plan goal during implementation, with consideration for the GSSHA model and other available tools.	N
77	MDNR (Reinartz)	Not specified	Salam is modeling the Dobbins Creek in more detail and looking at changes in land use/land cover effects on flood peaks downstream. Preliminary results of a best-case scenario for changing from row crop to perennials – indicates that this is doable. But the reductions are mostly relative to the fallow condition when the ground is barren relative to a case where cover crops or perennials cover the ground. But 0.25-inch storage from soil health and surface storage may be difficult to reduce a 2016 magnitude discharge by 20 %. Increased storage may need to be more significant than 9,600 acre-ft. I need to look at Jim's model again to see what the alternatives he modeled. The 30% & 100% soil health was cumulative with BMPs, which attained reductions shown in the following figure for peak flow.	Noted. The Plan acknowledges the disconnect between runoff volume reduction goals and peak flow reduction goals. The Partnership will assess progress towards the Plan goal during implementation, with consideration for the GSSHA model and other available tools.	N
78	MDNR (Reinartz)	Not specified	• I'm not sure how one would extrapolate GSSHA results on this 30 square mile area to the entire 590 square mile watershed. I think it would be just as easy to model the rest of the basin – which gssha can do.	Noted.	N
79	MDNR (Reinartz)	Not specified	• Table 5-1 indicates the range of corresponding areas and depths that would be required to provide the stated storage value expressed in inches over the watershed. So they would not include soil health as modeled in Jim S, gssha model. But the increased organic matter would reduce the storage footprint needed to reach the specified goal. One can model the physical storage locations and account for no-till or perennial by increasing organic matter and relating that to increased hydraulic conductivity. The NRCS Soil Characteristics calculator ( <a href="https://hrsl.ba.ars.usda.gov/soilwater/Index.htm">https://hrsl.ba.ars.usda.gov/soilwater/Index.htm</a> ) and equations based on Hudson (Hudson 1994) do this. So, it's an added piece of information besides the storage areas and their corresponding footprint.	Table 5-1 is included to provide a simple comparison of volume to runoff depth. The Partnership acknowledges that soil health practices will play a significant role in achieving volume reduction within the planning area.	N
80	MDNR (Reinartz)	Not specified	• IMO, storage of 0.25 inches, which is 2.1% of runoff does not relate to the 20% reduction in peak discharges in the realm of the 2016 flood magnitude of 11,300 cfs which is 2,260 cfs. It's difficult to relate these two. One is an annual runoff volume expressed in acre-feet, and the other is a reduction in a flood flow rate expressed in cfs. Increased storage would have some effect, but it would be variable from one event to the other conditioned on the antecedent moisture state. So, one would have to model each event. One could get a significant annual volume reduction but not necessarily a considerable peak flow reduction. The latter occurs rapidly and overwhelmingly, whereas the annual volume occurs during rainfall hiatus, and thus, there is a more extended opportunity to reduce volume gradually.	Noted. The Plan acknowledges the disconnect between runoff volume reduction goals and peak flow reduction goals. The Partnership will assess progress towards the Plan goal during implementation.	N

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81	MDNR (Reinartz)	Not specified	It seems to me that any given drainage project should incorporate increased storage to offset or mitigate any adverse flood peak or volume effects due to the project. So, this would require some analysis on the part of the project sponsors.	Noted. The Plan acknowledges the benefit of working with drainage project proposers to incorporate Plan goals into drainage improvements (see Section 7.2.1.9).	N
82	MDNR (Reinartz)	Not specified	Page 6-10. Agree, that the summation of pollutant reduction may not reflect the cumulative pollutant reduction achieved further downstream, just as the summation of flood reduction of each reservoir/lake/pond would not reflect the cumulative flow reduction further downstream. Many factors are involved relative to the reach from each BMP to the index station. Incremental local flow can dampen and storage effect and perhaps the same with pollutants. Therefore, modeling would be needed to arrive at the cumulative effects for flow or pollutant loadings. I think Jim S, gssha model did that.	Noted. The Plan implementation schedule includes the use of hydrologic and other models/tools to evaluate progress towards volume reduction and peak flow reduction goals.	N
83	MDNR (Reinartz)	Not specified	SWAT is capable of doing pollutant loading in addition to sediment loading. HSPF is capable of doing sediment loading in addition to pollutant loading. So, why is SWAT invoked for sediment and not HSPF? Why is HSPF invoked for pollutant loading and not SWAT? How would the results of these two models compare in each of these categories? How do SWAT, HSPF, and the SWMM models compare in Hydrology?	SWAT modeling was used as the basis for watershed sediment loading in part due to its use in the WRAPS document. HPSF estimates of sediment loading are used in establishing in-resource goals presented in Table 5-3. Sediment loading rates from SWAT are larger than the in-resource loads returned by HSPF.	N
84	MDNR (Reinartz)	Not specified	It would appear that Section 3.8.1.1 should be Section 3.8.1.	The heading number has been corrected.	Y
85	MDNR (Official)	Not specified	Rare features were covered only briefly in the draft plan yet they contribute to the overall health, habitat, diversity and environmental quality in the Cedar River watershed. Because of the sensitivity of these resources, each may require extra protective consideration. These known rare features also contribute directly to local economies in the form of recreation, hunting, fishing, wildlife viewing, tourism, paddling and camping. A few of the rare species in the watershed include, Blanding's turtle, wood turtle, redfin shiner, least darter, and Ozark minnow. The DNR has additional information available for the species of concern, along with a complete list of rare and natural features and communities found in the Cedar River Watershed.	Rare species, features, and sites of biodiversity significance are described in Section 3.10 of the Plan. Threats to wildlife and habitat was identified in the Plan as a Tier III issue. The Plan implementation schedule (Table 7-2) identifies several activities with primary and secondary benefits for wildlife and habitat. The MDNR is identified as a supporting entity for these activities.	N
86	MDNR (Official)	Not specified	While many of the plan's proposed implementation projects would directly or indirectly protect these rare natural features, the plan could be strengthened by specifically recognizing "protection of specific rare and natural features" as an important, additional ecological outcome that benefits the health of the watershed. DNR staff are available to help local partners learn more about these unique features and maintain them as implementation projects are carried out.	Rare species, features, and sites of biodiversity significance are described in Section 3.10 of the Plan. Threats to wildlife and habitat was identified in the Plan as a Tier III issue. The Plan implementation schedule (Table 7-2) identifies several activities with primary and secondary benefits for wildlife and habitat. The MDNR is identified as a supporting entity for these activities.	N
87	MDNR (Official)	Not specified	Aggregate and mineral resources: DNR supports effective planning efforts for local communities and governments for the development and access to natural resources as a means of sustaining affordable infrastructure maintenance and improvement opportunities across the watershed.  While local planning and zoning dictates land use within each county, the Department encourages access to natural resources and sustainable development. Aggregate and mineral resources within the Cedar River Watershed play a large role in local economies. The DNR wants to convey the importance of access to these natural resources, but in a way that is protective of natural and rare resources in the area as well as surface and groundwater resources. This topic is not mentioned in the plan.	Activity FWH-6 in the Plan implementation schedule (Table 7-2) addresses local zoning relative to natural features.	N
88	MDNR (Official)	Not specified	Restoring altered hydrology: The natural hydrologic functions of streams, rivers and lakes in the Cedar River Watershed have been altered due to actions such as straightening stream channels, ditching, tiling, draining wetlands or depressional areas, and adding impervious surfaces. These changes in the landscape and water management play a large role in water quality impairments that impact the watershed as a whole. The net increase in flows leaving the watershed, more extensive flooding events, decreased aquatic habitat and species diversity, and increased nutrient and sediment loads can all be attributed to altered hydrology. This major concern should be addressed as part of this watershed plan by improving land use and water management practices targeted to reduce these impacts.	Noted. The Partnership acknowledges that soil health practices, land use management, and other practices directly or indirectly promoted through the implementation of this Plan will contribute to restoring altered hydrology.	N

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89	MDNR (Official)	Not specified	DNR hydrologists and watershed specialists are committed to 1W1P and will make every effort to assist priority sediment-impaired reaches in need of geomorphology assessments. Geomorphic survey involves collecting empirical data and can be conducted by the DNR on a subwatershed scale. Unstable channels often have improper dimensions, pattern, and/or profile. Simply reducing the annual watershed discharge in degraded channels will not result in immediate improvements. It often takes many years for an unstable stream to begin to stabilize through natural processes. Stream restoration projects designed to restore or mimic natural stream channel processes can reduce flooding, improve water quality, stabilize stream banks, restore fish and wildlife habitat, and add water recreation opportunities.	The Partnership has identified the MDNR as a supporting entity in many of the implementation activities included in Table 7-2. Partners will cooperate with and leverage MDNR staff, as applicable, during Plan implementation.	N
90	MDNR (Official)	Not specified	Ramsey Mill Pond and Austin Mill Pond dam structures have 'significant' hazard classifications and descriptions included in the draft plan. However, there was no mention of future restoration actions that would likely include a partial removal restoration that will allow some pool to remain but allow for fish passage. DNR sponsored funding for these project involves a state wide priority ranking for these projects using various criteria. This would include the plan design, contributed funding, ecological benefits and other criteria which will increase prioritization and ranking for funding. We would be happy to assist you with developing project applications for both of these dams.	The text has been revised to remove existing references to specific recommendations for dam repair. The Partners will seek MDNR assistance with such projects if they are pursued in the future.	N
91	MPCA	Not specified	It is worth noting that the title of the Plan includes four specific stream or river names, which are all within the planning area for the 1W1P, and are part of the Upper Cedar HUC-8 (07080201). The Wapsipinicon River, which has a distinct HUC-8 (07080102) is also part of the planning area, but not directly included in the Plan title.	The Plan title has been revised to include Wapsipinicon in the title.	Y
92	MPCA	Not specified	A GSSHA model scenario was developed for Dobbins Creek by the Minnesota Department of Natural Resources, with support of the CRWD. The MPCA supports the development of a work group to assess broader utilization of the GSSHA modeling data and information.	Implementation activity FLD-10 includes establishing a work group to leverage knowledge from the GSSHA modeling for watershed-wide modeling.	N
93	MPCA	Not specified	The Plan should clarify several points: - When using 2016 as a reference year, is that the 2016 water year or calendar year? - How will assessment towards this goal be done, when using the hydrograph for the applicable timeframe? - How should the variation in peak flow changes be addressed, when the antecedent moisture condition in the soils can be quite variable?	- The reference to 2016 is not in reference to the hydrologic year or calendar year, but a reference to the study (Iowa Silver Jackets for the USACE) in which the 100-year event was estimated based on more recent hydrologic conditions. The 100-year flow based on the 2016 study is approximately 17,000 cfs. - As a long-term goal, numerical assessment towards this goal is not a requirement of Plan implementation per the BWSR Plan Content Requirements. Assessment towards this goal will be performed using hydrologic modeling (to simulate the 100-year event following improvements) and observational data. - Antecedent moisture conditions will be considered as a input variable in future modeling efforts.	N
94	MPCA	Not specified	It is suggested that the Ditch and Stream Strategies of the CRW WRAPS (Section 3.3) be used for more detail and/or referenced.	Section 4.2.1 (discussion of accelerated erosion issues) has been revised to reference Section 3.3. of the Cedar River WRAPS as discussing ditch and stream strategies. This information will be considered when targeting those projects (and is noted in the "notes" column of the implementation table).	Y
95	MPCA	Not specified	The matter of working with private landowners who manage a private ditch system (i.e., non-103E systems) should also be incorporated into the Plan.	The Partnership will offer technical and financial assistance for private ditch construction. The Partnership will also seek opportunities to increase storage within the watershed, including in public (103E) and private ditch systems. The text of Section 7.2.1.9 (Drainage Management) has been revised to reflect this.	Y
96	MPCA	Not specified	The MPCA recommends that some Plan content be included that integrates some of these good elements [wetland information] together. That could be done for targeting wetland restorations within 103E, constructed wetlands (see Table 15 of the WRAPS) and the proactive development of wetland banking within the watershed.	Wetland management issues are addressed through several Plan implementation items (FLD-1, FWH-5). The Partnership may consider documenting a more comprehensive wetland management approach in a future Plan update.	N
97	MPCA	Table 5-3	At the subwatershed scale, specific 10-year numeric goals are pending the results for additional modeling. It will be imperative to complete those specific numeric goals before the Plan is finalized.	Please see response to BWSR comment regarding resource water quality goals.	Y

**Cedar-Wapsipinicon Comprehensive Watershed Management Plan**

**Response to Comments Received during 60-Day Review**

Number (internal)	Commenter	Plan Page/ Plan Section	Comment	Response/Notes	Change Made (Y/N)
98	MPCA	Section 3.8	Section 3.8 correctly covers nitrogen as an important pollutant and stressor for aquatic life. Increasing stream nitrate-N trends are identified for the Cedar River at Lansing and Cedar River south of Austin. Some additional usage and referencing of the nitrogen sections of the WRAPS is suggested.	Additional references to Section 2.4 of the WRAPS (addressing nitrogen and its sources) have been added to the inventory and issue sections of the Plan.	Y
99	MPCA	Table 6-2	For the BMP group called "buffers and filter strips" the table includes an average total nitrogen reduction of 53% that may be realized from riparian buffers (filter strips) for fields and pasture areas. This needs to be revised and/or clarified, as this value is for total nitrogen delivered via surface runoff. In this situation, most of the nitrogen is reaching surface water resources via subsurface tiles, that are unaffected by riparian buffers.	The values in Table 6-2 are taken directly from Table 5-1 in the SAM documentation. It is possible that some values within the table may not be applicable for individual projects/locations within the planning area. However, the values included in Table 6-2 are provided for planning purposes. When estimating pollutant load reduction benefits for individual projects, the Partnership will consider the applicability of pollutant reduction estimates on a case-by-case basis.	N
100	MPCA	Section 3.8.5	While the content notes "feedlots that are not properly managed" as pollutant sources, it may be best to quality this by noting that feedlot proximity to surface waters can also be important, and that manure application methods beyond the feedlot site itself are a very important factor for pollutant transport associated with animal agriculture.	The additional detail has been incorporated to the text of Section 3.8.5 discussing feedlots.	Y
101	MPCA	Section 7.2.1.7	Section 7.2.1.7 covers the Minnesota feedlot rules and programs. It is suggested that Freeborn, Mower, and Steele Counties be clarified as delegated partners with the MPCA. In Dodge County, the MPCA administers Minn. Rules 7020, while Dodge County is responsible for enforcing their local county zoning ordinances.	The text has been revised to identify Freeborn County, Mower County, and Steele County as delegated partners to the MPCA and to note that MN Rules 7020 is administered by the MPCA in Dodge County.	Y
102	MPCA	Section 3.8.6.2	This summary of the E. coli impairment of the Wapsipinicon watershed can be added to Section 3.8.6.2, as this will be part of the upcoming TMDL:  According to 2015 and 2016 data, 14 of the 15 (93%) E. coli samples were above the standard of 126 organisms per milliliter (org/mL) during the months of June through August. Bacteria loads exceed the standard during very high to high flow regimes indicating the strong likelihood E. coli are from runoff-drive sources.	This information will be added to the Plan once the TMDL is complete.	N
103	MPCA	Implementation SWQ-1	The Otter Creek subwatershed is listed as a moderate to low priority project area. Because of the higher quality aquatic biota, and the protection focus that has been included for this watershed, we suggest it be prioritized as moderate at a minimum.	The areas of the Otter Creek subwatershed including Otter Creek and its tributaries are included in Level 2 and Level 3 priority areas (both within the former "moderate" category).	N
104	MPCA	Implementation SWQ-4	Animal waste management systems are included for assistance and the planned number of projects is one per year....Since the type of feedlot project will affect the overall rate that projects are completed in the CRW, this target number could be adjusted upward to address the overall need. Also the MPCA should be added as a supporting entity.	The MPCA has been added as a supporting entity. Historically, there has not been a significant need for this type of project. The Partnership feels the planned implementation is appropriate.	Y
105	MPCA	Implementation SWQ-8, SWQ-9	The development of a water quality plan is called for....A second recommendation is to incorporate a review of the watershed-wide monitoring plan every few years.	The MPCA's recommendations for consideration in developing a comprehensive monitoring plan (implementation item SWQ-8) are noted and will be considered in Plan implementation. Long-term and existing monitoring sites are presented in Figure 3-16 and will be considered when developing the monitoring plan. The PIWG will review the watershed-wide monitoring Plan periodically as part of local work planning.	N
106	MPCA	Implementation SWQ-11, SWQ-13	The MPCA has a manure management plan (MMP) planner that can be used for no direct cost to the farmer or farm consultant. A targeted approach for MMP development is suggested that takes into account feedlot size, location, and local information. The MPCA would also recommend that as an MMP is developed, it involve calibration of manure application equipment at the facility.	Thank you for noting the MMP planner as a resource; the MMP planner has been referenced in the notes of implementation item SWQ-12. Implementation item SWQ-12 does take a targeted approach to MMPs, as they will be focused in areas with bacterial impairments. The Partnership anticipates that MMP development will include equipment calibration, when appropriate.	Y
107	MPCA	Implementation GWQ-4, GWQ-5	Is the financial assistance [for SSTS upgrades] to be used in the form of an incentive payment, grant, or loan? Are the approximately 20 systems per year in the CRW an increase in the routine work that the Counties are already doing? For connecting groups of homes to a centralized sanitary sewer and treatment system, would the funds be used in planning and design phases, or just for the actual work of connecting the systems?	Funding for upgrades is assumed to be provided as a cost-share grant for planning purposes. The estimate number in the Plan represents the additional systems that can be funded through cost-share of these funds. The estimated cost for connecting unsewered communities is total cost, including planning, engineering and design, and construction.	N

**Cedar-Wapsipinicon Comprehensive Watershed Management Plan**

**Response to Comments Received during 60-Day Review**

Number (internal)	Commenter	Plan Page/ Plan Section	Comment	Response/Notes	Change Made (Y/N)
108	MPCA	Implementation GWQ-9	This item deals with developing a comprehensive strategy for groundwater monitoring and assessment. It is scheduled for 2024-2025....it is suggested that this work be moved up in the schedule.	This item has been moved to the 2020-2021 biennium.	Y
109	MPCA	Implementation FLD-6	This item covers refining the H&H modeling to obtain water storage and flow rate reduction goals. It is scheduled for 2024-2025....Moving this work up in the schedule, by the thoughtful use of existing data and information, will help improve water storage implementation results.	The PIWG will look for opportunities to advance "Monitoring and Study" activities, including FLD-6, as budgets allow.	N
110	MPCA	Implementation SLH-2	Soil health assessments in focus areas....Several other supporting entities to consider including here would be Riverland Community and Technical College and the Minnesota Office for Soil Health.	The suggested additional organizations have been added to the supporting entity category (RCTC, MOSH).	Y
112	MPCA	General	The MPCA recommends developing plain language definitions for key words and concepts used through the document.	The recommendation is noted.	N
113	MPCA	Page x	WRAPS is a Watershed Restoration and Protection Strategy	The list of acronyms has been corrected.	Y
114	MPCA	Page 3-7	Suggest revising this sentence: "This watershed land drains natural and through improved drains about 65,920 acres." This watershed has a high percentage of channelized streams and drainage ditches. A statement reflecting the highly altered watercourses would help the reader understand the issues facing this watershed.	The text has been revised to note the highly altered nature of the watershed.	Y
115	MPCA	Page 3-25	For nitrate concentrations in wells, change micrograms per liter to milligrams per liter. Also, was 5 mg/L used as some threshold value in the analysis?	The units have been corrected. The 5 mg/L threshold was used by MDH during planning discussions and data presentation.	Y
116	MPCA	Page 3-30	A description of public water courses and statutory reference is provided. Suggest changing the second sentence under the bullet to something like "This definition can include drainage ditches that are either privately managed or publically administered drainage ditches (MS 103E),	The suggest text has been added.	Y
117	MPCA	Page 3-32	Suggest revising the statement: "Generally the counties maintain jurisdiction over the ditches," as Table 3-6 includes both county and watershed district jurisdiction for 103E systems. Secondly, it is recommended that 103E.015 be highlighted with some content from the statute, as opposed to just citing the statute. The reason for this suggestion is that 103E.015 include environmental considerations, including multipurpose drainage system management elements for flow mitigation, wetlands, water quality, and other factors which are key issues identified in the Plan.	The text has been revised to remove the reference to counties generally serving as the ditch authority. The text has also been revised to note that MS 103E include those environmental considerations noted in the comment.	Y
118	MPCA	Page 3-33	Table 3-6 provides a listing of 23 publically-administered agricultural drainage systems in the CRW. There are 17 of those systems within the Turtle Creek Watershed District. This is important because of the funding opportunities for those systems, using BWSR's multipurpose drainage management program.	The comment is noted.	N
119	MPCA	References	Additional references that could be included in the Plan...[list included in comment]	Applicable references from the comment letter have been added to the References section of the Plan, where omitted.	Y