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July 20, 2020

Watonwan Watershed Planning Partnership
c/o Mr. David Haler, Director
Watonwan County Land Management / SWCD
108 8th Street South, Suite 2
St. James, MN 56081

RE: 60-Day Comment Period of the Draft Watonwan River Comprehensive Watershed Management Plan

Dear Watonwan Watershed Planning Partnership:

Thank you for the notification of the 60-day comment period of the draft Watonwan River Comprehensive Watershed Management Plan (the Plan).

The Board of Water and Soil Resources (BWSR) has completed review of the Draft Plan for compliance with [Minnesota Statutes section 103B.801](#) and BWSR [One Watershed, One Plan \(1W1P\) Plan Content Requirements 2.0](#) as well as inclusion of concerns submitted by BWSR during the request for priority issues and plan expectations (September 28, 2018).

The information below is listed by Plan section; similar to how past informal review has been completed (comment spreadsheets). The comments for each section of the Plan are further organized into those items not meeting plan content requirements, those that only weakly meet plan content requirements, and recommendations for clarification or editing. Any suggestions related to formatting and language errors will be communicated in a separate email to the Steering Team and consultant.

BWSR submits the following comments:

A. EXECUTIVE SUMMARY (SECTION 1. EXECUTIVE SUMMARY)

The purpose of this section is to provide a condensed and concise, plain language summary of the contents of the overall plan. It's meant to provide an explanation of the plan and it's intended for current and future elected officials, staff, citizens, and stakeholders.

- **Not Meeting Plan Content Requirements**
 - No comments.
- **Weakly Meeting Plan Content Requirements**
 - Section 1.4 Targeted Implementation, pages 1-9 to 1-11: Per plan content requirement III.A.4, "a summary of the implementation actions and programs" is needed. Current language leans heavily towards practice installation actions and doesn't include discussion of the large number of actions related to education and outreach, inventories, project development, studies, monitoring, etc.

- Section 1.5 Roles and Responsibilities of Participating Local Governments, page 1-12: Per plan content requirement III.A.6, “an outline of responsibilities of participating local governments” is needed. The Draft Plan focuses on the roles for implementation and the committees that will be doing the implementation. It is unclear, however, who will be members of these committees. (This information is also in Section 8. Plan Administration and Coordination.)

- **Recommended Clarification and Edits**

- Section 1.4, page 1-9, first paragraph: Mention here about staffing/capacity also impacting the speed at which goals are realized, not only funding.

B. LAND AND WATER RESOURCES NARRATIVE (SECTION 3. LAND AND WATER RESOURCES NARRATIVE)

This section of the Plan should be used to help explain why issues exist in the watershed and ultimately provides the justification for the actions identified in the Plan.

- **Not Meeting Plan Content Requirements**

- Section 3.7 Water Quality and Quantity, pages 3-13 to 3-14: Per Plan Content Requirements III.B.3.c, the Land and Water Resources Narrative is to include information on 1) regulated pollutant sources and 2) permitted wastewater discharges. Narrative language, a new map, or reference to an existing Plan map should be included.
- Section 3.5 Surface Water Resources (Streams, Lakes, Wetlands, Public Waters, and Ditches), pages 3-5 to 3-7: Per Plan Content Requirements III.B.3.a and the title of this subsection, this portion of the Draft Plan is to include a discussion of wetlands, but there is no wetland information in this section. Section 3.5 could include information on percentage of wetlands lost in the area. At a minimum, the Plan could refer to Figure 4-10 that shows wetlands.

- **Weakly Meeting Plan Content Requirements**

- Section 3-12 Socioeconomic Information, pages 3-25 to 3-28: Per Plan Content Requirements III.B.8. The economic portion of this plan content requirement is not well met. It could be improved by adding “employment by industry” information for the other four counties in the Watonwan watershed; it currently only has Martin and Watonwan and is therefore incomplete. Another option would be to include average or median household income from the six counties or even the townships within the watershed; county information should be available, but unsure on township information.

- **Recommended Clarification and Edits**

- No comments.

C. PRIORITY RESOURCES AND ISSUES (4. IDENTIFICATION AND PRIORITIES OF RESOURCE CATEGORIES, CONCERNS, AND ISSUES)

This section is to include a prioritized list of issue statements that clearly conveys the most pressing problems, risks, and opportunities facing the watershed as well as maps depicting locations of priority resources. The measurable goals, targeted actions, and overall implementation plans and programs in the Plan should relate directly to priority issues.

- **Not Meeting Plan Content Requirements**

- No comments.

- **Weakly Meeting Plan Content Requirements**

- No comments.

- **Recommended Clarification and Edits**

- Section 4.2 Issue Prioritization, pages 4-2 to 4-3, 5th paragraph: This is the first time the survey is mentioned. More could be added on when this took place, what questions it contained, and

how it was used. Later in the paragraph an “online survey” is mentioned. Is this the same survey as the kickoff survey? Consider using the same title if it is the same.

- Section 4.4 Emerging Concerns and Ongoing Issues, Extreme Weather Events, page 4-8, second paragraph: Define what constitutes a “mega-rain.”
- Section 4.4 Emerging Concerns and Ongoing Issues, Extreme Weather Events, page 4-8, third paragraph: The first sentence mentions lakes and streams may melt earlier. What about freezing over later? Is that happening as well?
- Section 4.4 Emerging Concerns and Ongoing Issues, Funding for Plan Implementation, page 4-9: Consider adding a sentence about Watershed Based Implementation Funds (WBIF); supporting them and recognizing that it is the type of funding needed for Plan implementation.

D. **MEASURABLE GOALS** (SECTION 5. MEASURABLE GOALS)

Measurable goals are the quantifiable changes in resource conditions expected upon the completion of the actions in this 10-year Plan. They should relate to the desired future condition (long-term goals) for the watershed and what percentage or amount of progress will be made during the Plan period (short-term goals).

- **Not Meeting Plan Content Requirements**

- Per Plan Content Requirements III.D., each measurable short-term goal should relate to the desired future conditions in the watershed (long-term goals). As well as explain how the pace of progress will be assessed or tracked.
 1. Example: The Plan sets out to achieve a 15% reduction in nitrogen – What will be used to determine progress towards this goal? Who will complete the determination?
This concern could be addressed via an additional narrative or an additional table.

- **Weakly Meeting Plan Content Requirements**

- Per Plan Content Requirements III.D, “[...] the majority [of goals] should be focused on a specific subwatershed, natural resource, or local government where specific outcomes will be achieved.” Depending on how the Resource Concern maps and the Targeted Implementation Table are interpreted, there is a potential for a large percentage of short-term goals in the Plan to be watershed-wide rather than targeted.
 - Example: Section 5, Resource Concern Maps, pages 5-2, 5-20, 5-25: Are these maps showing which subwatersheds implementation will occur in first? Are the maps showing where the majority of the resource concern work and funds spent will occur in this 10-year plan? In addition, what parameters or tool(s) were used to develop these maps?
- Plan language defines “long-term goal” as the desired future condition to accomplish. Of the 45 long-term goals in the Plan, 31 (69%) are no more than an extension of the short-term goal and do not adequately correlate to the desired future condition. Review each long-term goal and adjust to better align with the Plan’s definition.
 1. Example: Section 5, page 5-6, Issue SW 2.1: “Short-term – Restoration: Achieve a 10% reduction in phosphorus load in lakes identified for restoration. Long-term: Extend short-term Restoration [.....] goals.” Is a 10% reduction your desired future condition or is the desired future condition to meet water quality standards?
- Education and outreach related goals are measuring outputs (countable activities) and not outcomes (the results of the actions). How do the partners intend to measure outcomes from hosting these events and providing this information? What will the indicator (metric, benchmark) be for measuring progress towards desired future condition of the watershed? This could be addressed either here in Section 5 or in Section 7 (Implementation Programs).

- Section 5, page 5-3, Issue SW 1.1: Part of the long-term goal is “extend annual outreach goal.” There is not an outreach goal for the short-term goal. Explain what is meant by this.
- **Recommended Clarification and Edits**
 - Section 5.1 Establishing Measurable Goals, page 5-1, first bullet: Groundwater Protection and Restoration should be flipped to Groundwater Restoration and Protection to match ‘GRAPS.’
 - Section 5.1 Establishing Measurable Goals, page 5-1, last bullet: More than “local water and resource managers” comprised the Steering Team. Consider rewording.
 - Section 5.2 Measurable Goals, page 5-1, second paragraph: In the second sentence, it mentions funding opportunities, local government capacity, and landowner willingness being important determinants of where implementation will occur. Funding was examined in detail during the planning process. How was local capacity and landowner willingness addressed during planning or how will it be addressed during implementation? Consider expanding to include more on those items.
 - Section 5.2 Measurable Goals, page 5-1, second paragraph: The second paragraph ends with “if needed.” Consider expanding on this. How will the partnership know if/when they need to fund lower priorities in low priority areas?
 - Section 5, page 5-4, Issue SW 1.2: The short-term goal is vague. Who are the partners involved in coordination? Consider providing more detail.
 - Section 5, page 5-7, Issue SW 2.2: If the issue is “management of lake levels...”, a more concrete long-term goal could be given other than continuing educational outreach efforts. Consider “Properly managing lake levels to improve the quality and sustainability of lakes in the watershed,” or similar, in order to tie into language in the second paragraph above the goals box.
 - Section 5, page 5-9, Issue SW 3.1, first paragraph after the table: The sentence “The short-term planning region reduction goals are the percent of PTMApp-calculated mass reduction to meet the WRAPS 10-year target for that parameter...” would be easier to read and understand if written in plain language and/or if the information was also shown in table form.
 - Section 5, page 5-11, Issue SW 3.1, goals box: A comment was made by BWSR on a pre-draft of the plan that goals with language “reduction in length of streams classified as impaired” should be changed to reference of number of WIDS impaired since that is what impairments are based upon. Please change in this goals box and elsewhere in the plan.
 - Section 5, page 5-12, Issue SW 3.2, Second paragraph: For easier readability, consider changing “and reaches of Butterfield Creek...” to “and one reach each of Butterfield Creek...”.
 - Section 5, page 5-12, Issue SW 3.2, Image: Is the Upper Watonwan missing its bacteria percentage reduction short-term goal?
 - Section 5, page 5-12, Issue SW 3.2, First paragraph: The first sentence has odd wording; fecal coliform and E. coli are bacteria. What water quality standards were (FC) and are (EC) set on.
 - Section 5, page 5-12, Issue SW 3.2, First paragraph: The fourth sentence is also odd since IBIs are used for aquatic life. Consider replacing with “unlike most water quality pollutants.” (Note that this is also the example used in the executive summary section.)
 - Section 5, page 5-13, Issue SW 3.2, Image: Is the Upper Watonwan missing its bacteria percentage reduction long-term goal?
 - Section 5, page 5-13, Issue SW 3.2, goals box, Short Term: The protection bullet under “reach-specific scale” reads “no increase in parameter loading...” How will this be measured; how will the partners know if/when this goal has been reached? Consider re-wording to be more measurable.

- Section 5, page 5-13, Issue SW 3.2, goals box, Long Term: The reach-specific goals are identical to the short-term goals. Can the short-term goal be more specific?
- Section 5, page 5-16, Issue SW 3.4, goals box: Where did the 500 acres and 1,000 contacts numbers originate? Was there an analysis or is this what the partners thought was a realistic number?
- Section 5, page 5-17, Issue SW 5.1, goals box: The number 7.5% is given for an implement and maintain number. Where did this originate; what type of analysis? What does it translate to in acreage? What is the current percentage/acreage of this type of cover? How will it be tracked to know if the goal is met? Is this continuous cover like perennial crops? Or cover crops?
- Section 5, page 5-22, Issue GW 1.1, goals box, first bullet of short-term goals: It reads, “discouraging or preventing land conversion...”. What type of land conversion is going to be discouraged? Maybe in some protection locations, conversion might still be a benefit if it’s to the right type of land-cover. Consider being more specific.
- Section 5, page 5-23, Issue GW 1.2, goals box, first short-term goal: How will this goal be measured? Is the current number of wells with elevated nitrate known so that a 25% reduction can be tracked?
- Section 5, page 5-24, Issue GW 2.1, goals box: The first short-term goal notes improvement of water use efficiency on 25% of irrigated acres. What is the total current acreage of irrigated acres; what number of acres does 25% equate to? How will it be known that this goal is met? How will water use efficiency be promoted and improved?
- Section 5, page 5-35, Issue LKB 1.1, goals box: The long-term goal is identical to one of the short-term goals minus the “encourage comprehensive conservation recommendations” portion. Should that read as 100 more site visits? Why is 200 enough? This is a long-term goal, so maybe the goal is to have site visits on all properties that are willing to have one?
- Section 5, page 5-36, Issue LKB 1.2, goals box: This goal reads as an activity. Is the goal to have an increase in awareness and knowledge of the plan and to identify potential implementation roadblocks and to do this you will hold 10 outreach efforts? The goal is also vague; “discuss watershed plan implementation” could be anything. Consider adding some detail.
- Section 5, page 5-39, Issue LS 2.1, second paragraph, last sentence: Cover crops is a better example than nutrient management.
- Section 5, page 5-40, Issue LS 2.2, goals box: Are the percentages in the short-term and long-term goals referring to existing IPHT systems? If more are found, will they be included? What is the estimated number of IPHT systems in the watershed?

E. **TARGETED IMPLEMENTATION SCHEDULE (SECTION 6. IMPLEMENTATION SCHEDULE)**

It is anticipated that the targeted implementation schedule will be one of the most used portions of the Plan when it comes to implementation. It should include descriptions of actions that will meet each measurable goal, targeted locations of the actions, cost and funding of the actions, timeline for implementation of the actions, what indicators will be used to measure outcomes of the actions, and identify the roles and responsible government unit(s) for the actions.

- **Not Meeting Plan Content Requirements**

- Per Plan Content Requirements III.D., “plans that do not contain sufficient measurable goals to indicate an intended pace of progress for addressing the priority issues will not be approved.” The Plan’s targeted implementation schedule section needs to provide more explanation on how activities relate to measurable goals. Activities set using PTMApp are a bit clearer, but all others are lacking this connection. Examples from non-surface water related goals:

- For the two goals for HR1.1, there are six related activities noted in the implementation activity tables. The second goal (“Complete culvert/fish barrier inventory.”) does not have activities directly relating to the completion of this inventory. Also, for the first goal (“Across the watershed, meet a 12% increase in MPCA Stream Habitat Assessment score, defined as the 10-year target in the WRW WRAPS.”) there is nothing in the associated activities that connects to a 12% increase across the watershed. Additionally, does “across the watershed” mean each SHA score will increase 12% or that on average they will increase 12%?
- For the two goals for LS 1.1, there are four related activities noted in the implementation activity tables. The first goal states that there will be stormwater management work completed in 10 communities. Are there any priority communities? Will preference be given to cities in priority planning areas or subwatershed areas? Will this goal be met if there is one BMP in one community per year? Or only if that BMP addresses peak flow rates, sediment, and nutrient loading?
- For the goal for LS 2.1, there are no related activities noted in the implementation table. Also, how was it decided that five soil health practices per planning region is the right number? What are the high priority areas per planning region? Does a map need to be referenced here?

In addition, when comparing the Advisory Committee issues/goals/actions spreadsheets to the Plan implementation table, most Resource Concerns appear to have one or more activities that were not included in the implementation table. Were these intentionally not included? If so, how was this decided?

- Surface Water – Ag Drainage: 1 activity missing
- Surface Water – Flooding: 5 activities missing
- Surface Water – Lakes: 2 activities missing
- Surface Water – Rivers and Streams: 10 activities missing
- Surface Water – Wetlands: 2 activities missing
- Groundwater: 7 activities missing
- Habitat and Recreation: 11 activities missing
- Land Stewardship: 6 activities missing

Reassess connections between goals and activities. A more involved way of doing so would be to use the original spreadsheets as the template for the implementation table. Other options include adding narrative language, a summary table, or re-wording goals so a clearer connection is evident.

- Section 6, Implementation Schedule: Per Plan Content Requirements III.E.3, the targeted implementation schedule must include “identification of roles and the responsible government unit for the action.” The Planning Region Implementation Schedules do not clearly indicate which LGU will be taking the lead for each action. The ‘bolding’ doesn’t appear to have been completed for all actions. In addition, it is suggested that a specific lead LGU be designated for each action in order to better ensure completion and provide accountability.

- **Weakly Meeting Plan Content Requirements**

- Section 6, page 6-12, Implementation Profiles: The Implementation Schedules for the Planning Regions look different from the watershed-wide Implementation Schedule(s). The watershed-wide Implementation Schedule has Action Numbers and indicates Issue Number by Resource Concern. The Planning Area Profiles do not. It should be the same for each of the Planning Region Implementation Schedules. (For this and all planning regions.) Preference would be to

include Action Numbers and Issue Number by Resource Concern and may help address missing activities referenced in a previous comment.

- Section 6, page 6-12, Implementation Profile, Annual Budget column: The assumption is that these numbers are per year (“annual budget”), but are they per acre? Per project?
 - Example -The first row is to do 181 acres and \$1000. Is this \$1000 for the entire 181 acres? \$1000 per year for a total of \$10,000 for the entire 181 acres?
 - Section 6, page 6-12, Implementation Profile: The marks in the “Multiple Benefits” columns seem overzealous. Reconsider which benefits will actually be addressed in each of the planning areas.
 - The Timeline columns for all Implementation Schedules have a large number of actions labeled as “Ongoing”. Others only have marks in the 1st, 2nd, and 3rd biennium. The 4th and 5th have little to no marks. Consider having a discussion about what work will be or should be taking place first and edit the timeline accordingly.
 - Section 6, page 6-46, Table 6-7, Row EO-3: There is no GW 1.3.
 - Section 6, page 6-46, Table 6-7, Row EO-5: There is no LKB 2.1.
 - Section 6, page 6-46, Table 6-7, Row EO-7: There is no GW 1.3.
 - Section 6, page 6-47, Table 6-7, Row EO-13: You cannot both maintain and expand. Is this supposed to be “or?” Also, what are the current number of acres and by how much will it expand?
 - Section 6, page 6-48, Table 6-7, Row EO19: Explain whether this indicates two outreach efforts per year or two total during the 10-year Plan.
 - Section 6, page 6-48, Table 6-7, Row EO19: This action does not correlate with SW 2.1 but rather with SW 2.2.
 - Section 6, page 6-48, Table 6-7, Row EO21: There is no LKB 2.1.
 - Section 6, page 6-51, Table 6-8, Row R-14: This action seems that it will go above and beyond current activity and might need additional budget to complete.
- **Recommended Clarification and Edits**
 - Section 6: The Targeted Implementation Schedule will be an often-used portion of the Plan during the years of LGU implementation. It would be easier to use with one Implementation Schedule rather than seven separate areas to look for the information.
 - Section 6: Anytime a Table is on multiple pages, make sure the heading row is carried to each consecutive page otherwise it is difficult to read.
 - Section 6, page 6-3, Table 6-1: Why is the third column labeled “est, 10-year budget shortfall”? It reads inconsistent with the other two column headers. (Also in Executive Summary.)
 - Section 6, page 6-3, Paragraph under the table: “...was distributed among the six planning regions based on allocations specified in Table 6-2”. How were the numbers in the second column of Table 6-2 decided? That information would be helpful to include in the narrative.
 - Section 6, page 6-4, Table 6-2: Addition of a row or column for totals would make this table more comparable to Table 6-1.
 - Section 6, page 6-5, paragraph under Table 6-3: Consider inserting a definition of “most cost-effective” and state that sediment, TP and TN were used but sediment was the focus.
 - Section 6, page 6-8, text box below the map: Consider placing this information into table format (for this and all other planning regions). It would be easier to read and understand.
 - Section 6, page 6-38: There is not a table header for the table on this page.
 - Section 6, page 6-40, Table 6-5: The Unit/Unit Cost/Total 10-Year Cost columns reference “See Section 7.” Please indicate the specific page(s) to find this information.

- Section 6, page 6-45, Table 6-6, Row RM-19: What is the current status of the Geologic Atlas' for the watershed? Is this action expected to be completed by the end of 2029?
- Section 6, pages 6-46 to 6-49, Table 6-7: In total, there are many outreach efforts. It might be helpful either in the plan or during work planning to make a table showing all outreach activities and where cross-purposes can be met between them.
- Section 6, page 6-48, Table 6-7, Row EO22: This action reads very confusing. Is it trying to combine two goals from the SW Surface Runoff and Flooding?

F. PLAN IMPLEMENTATION PROGRAMS (SECTION 7. IMPLEMENTATION PROGRAMS)

Implementation programs in this section are meant to support the targeted implementation schedule and describe how actions will be implemented and how coordination between watershed partners will occur.

- **Not Meeting Plan Content Requirements**

- Section 7, Education and Outreach Implementation Program, page 7-3, paragraph under bullets: Per Plan Content Requirements III.F.6, "At a minimum, include: an analysis of the need for public participation and engagement in meeting plan goals [.....]." The analysis is intended to be completed during the planning process. The current Plan language, however, implies it is yet to come.
- Section 7, Research and Monitoring Implementation Program, page 7-4, second paragraph after bullets: Per Plan Content III.F.5.b, there needs to be a description of whether or not existing monitoring programs are capable of producing an evaluation of the progress being made towards Plan goals and how the data will be used in the evaluation, including improved model calibration.
- Section 7, Capital Improvements Implementation Program, page 7-5, second paragraph in Capital Improvements Implementation Program section: Table 7-3 shows a list of existing planned projects per LGU. Per Plan Content Requirements III.F.2., there should be consideration of watershed-wide projects. That should be included here or it should be noted why it wasn't considered at this time.
- Section 7, Capital Improvements Implementation Program, pages 7-5 to 7-7: Per Plan Content Requirements III.F.2.c, the Capital Improvements program section of The Plan must "describe opportunities for permanent land protection necessary to meet the resource needs and achieve the goals for the watershed."
- Section 7, Regulatory Administration Implementation Program, page 7-8, first paragraph: "...shows areas of regulation and enforcement that are potentially duplicative within the WRW, identifying opportunity for shared services." While this is stated, additional detail is needed. (Plan Content Requirements III.F.4.)
- Section 7: Per Plan Content Requirements III.F.3, an Operation and Maintenance Implementation program description must be included in the Plan.

- **Weakly Meeting Plan Content Requirements**

- Section 7, Incentive Program, pages 7-1 to 7-2: There is a weak discussion of the criteria that will be used to select projects in the Incentive Program (Plan Content Requirements III.F.1). Expand on how projects will be selected.
- Section 7, Incentive Program, pages 7-1 to 7-2: There is a weak discussion of the action for working with landowners (Plan Content Requirements III.F.1). Expand on how work with landowners will be carried out.
- Section 7, Incentive Program, pages 7-1 to 7-2: There is weak discussion of how the Incentive Program will be implemented across the watershed to provide consistency while achieving

Plan goals (Plan Content Requirements III.F.1). Expand on how this program will be implemented consistently to achieve Plan goals.

- Section 7, Education and Outreach Implementation Program, page 7-3, paragraph under bullets: The third sentence says action funded by EO program will be evaluated through surveys. This is a great way to track educational event success. However, more specifics should be given to avoid confusion. Will every education and outreach action be evaluated via survey? Is the completion of these surveys listed as an action in the targeted implementation table? Who will be developing and disseminating the surveys?
- Section 7, Education and Outreach Implementation Program, page 7-3, paragraph under bullets: The fifth sentence mentions consolidating educational activity on a monthly basis. Who will be doing this? Is it listed as an activity in the targeted implementation table?
- Section 7, Research and Monitoring Implementation Program, page 7-4, second paragraph after bullets: There is weak discussion of whether or not new data collection is needed. The Plan reads that there is a need to find funding so data can be collected and analyzed to refine implementation, but detail on how this will be done is lacking. (Per Plan Content III.F.5.c) Who will do the analysis of the data? Is this an activity in the implementation schedule? What direction will the data provide?
- Section 7, Research and Monitoring Implementation Program, page 7-4, third paragraph after bullets: IWM is conducted every 10, not every two years, as currently written in the Plan.
- Section 7, Capital Improvements Implementation Program, page 7-5: There is weak discussion of opportunities for enabling large-scale, multipurpose projects on a watershed scale. (Per Plan Content Requirement III.F.2.a.)
- Section 7, Capital Improvements Implementation Program, page 7-5: There is weak discussion of opportunities for engaging drainage authorities and drainage inspectors in implementation of the Plan. (Per Plan Content Requirement III.F.2.a.)
- Section 7, Capital Improvements Implementation Program, page 7-5: There is weak discussion of the local procedures for ensuring future drainage projects are consistent with the goals of the Plan. (Per Plan Content Requirement III.F.2.a.)
- Section 7, Regulatory Administration Implementation Program: Per Plan Content Requirements III.F4.:
 - Feedlots, page 7-8: Are the county ordinances the same across the watershed? Is there an opportunity and/or desire to coordinate?
 - Subsurface Sewage Treatment Systems, page 7-9: Are the county ordinances and triggers the same across the watershed? Is there an opportunity and/or desire to coordinate?
 - Agricultural Soil Erosion, page 7-10: Do any of the six counties have an ordinance? Is there an opportunity and/or desire to coordinate?
- Section 7, Regulatory Administration Implementation Program, Land Use, page 7-10: There is weak discussion on the opportunities and potential conflicts in achieving the Plan goals through these comprehensive land use plans.
- **Recommended Clarification and Edits**
 - Section 7, Education and Outreach Implementation Program, page 7-3, third paragraph under bullets: The first sentence seems out of place. This may fit better in the previous paragraph or possibly on its own if you could list some examples of "organized efforts to streamline public engagement".

- Section 7, Education and Outreach Implementation Program, page 7-3, third paragraph under bullets: Another sentence at the end of the paragraph talking about intent to use that same approach in future efforts would be helpful. Or to give a description about what was found through that previous effort.
- Section 7, Research and Monitoring Implementation Program, page 7-4, third paragraph after bullets: For the WPLMN, can a list of how many sites exist be noted, and maybe a reference to a map that shows their locations?
- Section 7, Research and Monitoring Implementation Program, page 7-4, third paragraph after bullets: For the CS/LMP programs, it is noted that “two such sites” exist in the watershed. Can more information be given on where and for how long they’ve been collecting data?
- Section 7, Research and Monitoring Implementation Program, page 7-4, fourth paragraph after bullets: SWAG grants are to assist with the WPLMN. Look to MPCA for confirmation.
- Section 7, Research and Monitoring Implementation Program, page 7-4, second paragraph after bullets: Consider discussing that finding the funding for this is difficult and there will be a need to rely heavily on state agency partners.
- Section 7, Research and Monitoring Implementation Program, page 7-5, Table 7-2: This table is vague. Unless more detail can be given, for example, who will be doing these activities, the table may not be needed.
- Section 7, Regulatory Administration Implementation Program, Buffer and Soil Loss Legislation, page 7-8: There is no mention of the “Other Waters” and potential coordination.
- Section 7, Regulatory Administration Implementation Program, Land Use, page 7-10: Are there four plans or five plans?

G. PLAN ADMINISTRATION AND COORDINATION (SECTION 8. PLAN ADMINISTRATION AND COORDINATION)

This section discusses the type of organizational structure(s) that will be used to administer implementation programs and how the partnership will carry out the Plan.

- **Not Meeting Plan Content Requirements**

- Section 8, Plan Administration and Coordination, Decision-Making and Staffing, page 8-6: Per Plan Content Requirements III.G.1.b, the Plan should describe if the advisory committee(s) created for plan development will continue through plan implementation. If not, alternative methods should be described. This section should also discuss opportunities to coordinate with federal partners to convene Local Working Groups.
- Section 8, Plan Administration and Coordination, Decision-Making and Staffing, page 8-6: Per Plan Content Requirements III.G.1.c., more information needs to be included on current staff capacity to implement the Plan, if an increase in capacity may be needed, and potential for shared services between LGUs.
- Section 8, Plan Administration and Coordination, Assessment and Evaluation, page 8-8: Per Plan Content Requirements III.G.5.b, a partnership assessment is required. There should be a description of the methods for assessing the partnership with regards to decision-making and staffing, collaboration with other units of government, and funding. The frequency of this assessment should also be included.

- **Weakly Meeting Plan Content Requirements**

- Section 8, Table 8-2, pages 8-3 to 8-4: The MPCA is listed twice. They should not be listed in the “Federal” section of the table. Including the Section 319 program associated with EPA is enough. The WRAPS is not a federal program. It is funded by state Clean Water Funds.

- Section 8, Table 8-2, pages 8-3, FSA: The CREP program is not only an FSA program, but is tied with BWSR. Consider using CRP for FSA and RIM for BWSR.
- Section 8, Table 8-2, pages 8-3 to 8-4: Remove research and monitoring funding from BWSR.
- Section 8, Plan Administration and Coordination, Decision-Making and Staffing, page 8-6: Explain who will be members of each committee. Only the implementation Technical Committee has this described.
- Section 8, Plan Administration and Coordination, Five-Year Evaluation, page 8-8: The WRAPS Cycle 2 is tentatively scheduled for monitoring in 2023/2024. This section / paragraph should include mention of that.
- Section 8, Plan Administration and Coordination, Reporting, page 8-8: Go into more detail about the annual State of the Watershed Report and include information on how it will be used to provide accountability to stakeholders (LGU boards, cities, agencies, citizens, etc.) in the watershed (Plan Content Requirements III.G.5.d.).
- Section 8, Plan Administration and Coordination, Formal Agreements, page 8-9: Consider putting more detail into this section about GBERBA (LGU members, HUC 8s involved) as well as information about how the group intends to incorporate watershed based implementation funding into their current system. (Plan Content Requirements III.G.7.)
- Section 8, Plan Administration and Coordination, Formal Agreements, page 8-9: Appendix O is missing. At the least, include a copy of the current GBERBA joint powers agreement. If this changes by 90-day final plan submission, be sure to update the appendix accordingly.
- **Recommended Clarification and Edits**
 - Section 8, Funding, page 8-5, first paragraph, last sentence: Capacity is given as an example. Suggest not using something that's future is unknown at the time of Plan writing. Consider NRBG and/or State Cost Share or Conservation Delivery as an example instead.
 - Section 8, Funding, page 8-5: In previous comments from the Steering Team, it was requested that the funding paragraphs explain what each is, but not go into the detail about what each isn't (what it excludes). These sentences add confusing language and should be deleted as previously requested.
 - Section 8, Funding, Other, page 8-5: Consider adding mention of non-profits that work with water quality and/or sustainable agriculture as possible sources of funding.
 - Section 8: For the implementation of the Plan, GBERBA's use of the term "Policy Committee" will likely be continued and the language of the Plan should reflect this. It is mentioned as Board and as Committee in different areas of the Plan.
 - Section 8, Plan Administration and Coordination, Reporting, page 8-8, Table 8-4: Are these examples only for the WRCWMP? Needs more explanation. And doesn't need to cover anything outside the responsibilities of the partnership, not as separate entities.
 - Section 8, Plan Administration and Coordination, Reporting, page 8-8, Table 8-4: The first row notes "annual report". Is this for grants? Or for the partnership?

The Partnership is commended for your efforts in development of the Watonwan River Comprehensive Watershed Management Plan. We look forward to working with you to bring this draft to finalization.

Sincerely,



Jill Sackett Eberhart
Board Conservationist

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