

1W1P Comments – Draft Review
October 27, 2016
Peter Nelson – Pennington SWCD

AUID MAPS/Table: Include in plan in addition to the appendix - one that covers the planning area and individual maps that cover the planning zones. There are multiple AUIDs in a management area and planning zone and it will help ID what reach we are trying to target.

Source Water Protection – Assessment Plans: There are multiple public wells in the watershed that have Assessment Plans completed by the MDH and are mapped in the plan. In addition to a map in the appendix, a table should be included in the plan that lists the public wells, aquifer sensitivity, name, ID, Assessment Plan Completed/Not Completed, and Aquifer Sensitivity could be included in the plan.

<http://www.health.state.mn.us/divs/eh/water/swp/swa/swainfo/default.cfm>

For all Non-Structural Implementation Plans Include: Conduct a Regional Hydrogeologic Assessment of Groundwater Resources

For Non-structural Implementation Plan Include: Map locations of nitrate contamination or other groundwater contamination, \$10,000, All SWCDs

Suggest starting all actions in the non-structural implementation plans with Action words

Not sure where to include in the plan but worth mentioning the need for consistent and updated Drainage System Records in the watershed.

Executive Summary: 1-7: Drainage Management System Goals and Altered Hydrology Goals are the same narrative. Should be different narrative because they are different Issues of Concern.

Key Terms 2-2: PTMApp: suggested change “solution to “tool”

Section 4.7 Measurable Goals on 4-11 and 4-12: Drainage Management System Goals and Altered Hydrology Goals are the same narrative. Should be different narrative because they are different Issues of Concern.

Table 6-1 on Page 6-2: Pennington CD 96 to Clearwater River is listed as impaired for TSS but management class is high quality

Table 6-1 Page 6-2: Unnamed ditch (Little Black River) E-coli should be E. coli and it's also listed as impaired and needs protection. If it's impaired is should be restorable or Imp. Low Quality. Same row: DO is listed as Imp. Restorable but not listed under the impairment column.

Table 6-1 Page 6-3: Black River Headwaters to Little Black River (M4 3-530) Move DO to next line in management class column.

Same Table 6-4: Resource of Concern is Browns Creek and it's listed under M4 management area. M4 is the Black River.

Table 6-2 on Page 6-5: Separate Management Areas with a line between to be consistent in table.

Table 6-2 on Page 6-5: Soil Erosion and Sedimentation the first measurable goals text is lighter than the other text

Table 6-2 page 6-12: Groundwater Protection, last measurable goal suggest spell out MDA NFMP

Table 6-3 page 6-19: M6: Restoration and Management of Rare and Declining habitat: Put in 20 acres for quantity.

Table 6-4 on page 6-24: Revised AIS and Terrestrial Non-Native Invasive Plan – Remove dash in cost of \$10,000

Table 6-4 on page 6-24: SWCDs should be plural

Table 6-4 on page 6-25: Bullet action items when there is a list

Table 6-4 on page 6-25: Action item “Develop and Implement a cost share program to financially assist property owners in sealing unused, unsealed wells on their property, including the public water suppliers in the watershed” Remove “Develop” because a cost share program already exists

Figure 6-3 page 6-29: Map is missing management area labels

Figure 6-4 page 6-30: Map is missing management area labels and management lines overlap/hard to follow. Is there a way to clean up the management area boundaries?

Section 7, 7.1, page 7-1: Last paragraph, first sentence states the lower planning zone. It’s the upper planning zone.

Page 7-2: Fit text on top of page on previous page if possible

Table 7-2 on page 7-4 and 7-5: Soil Erosion and Sedimentation Issue of Concern is duplicated in part of table 7-2. Remove duplicate prioritization statements and clean up the table.

Table 7-2 on page 7-6: Altered Hydrology, Measurable Goal that states: No new drainage from 10 yr. noncontributing areas. Change to “Educate landowners on water resource concerns as they relate to altered hydrology on private drainage systems” This would be consistent with the Measurable Goals of other Planning zones as well.

Table 7-2 page 7-8: Groundwater Protection, the table duplicates Prioritization statements and measurable goals throughout the Issue of Concern. Measurable goals that states “Develop and Implement a cost share program...” Remove develop to change to implement a cost share program...

Table 7-2 page 7-10: The first prioritization statement “Prioritize inner and outer surface water assessment areas to:” Is not a prioritization statement Identified anywhere in the plan. The measurable goals could be incorporated into another Prioritization Statement under Source Water Protection.

Table 7-2 page 7-10: Prioritization Statement Maintain a safe and adequate drinking water supply for residents in order to protect the public’s health, safety, and general welfare of the community is duplicated. Remove duplicate statement.

Table 7-4 page 7-17: Reach Assessment Classification, Prioritization and Implementation Plan: Change lead entity to RLWD if they are willing

Table 7-4 page 7-17: Conduct Stormwater Assessment add “for the City of Thief River Falls” and put in a cost of \$95,000.

Table 7-4 page 7-17: Habitat Evaluation Procedures Analysis and Hydrogeomorphic Analysis: Change lead to RLWD is willing

Figure 7-1 page 7-19: Map text is very hard to read and is small and blurry. The next two maps on 7-20 and 7-30 are clear and easy to read.

Section 8: The MOA is planning to be revised and there will likely be changes made throughout this section.

Section 8, 8.1: Add that the Planning Group will conduct quarterly meetings to discuss the plan and project implementation.

Table 8-5 on page 8-10: Channel Bed and Stream Channel Stabilization: I hope this would improve surface water quality by reducing sediment. I suggest checking the surface water quality box as well.

Table 8-5 page 8-11: Combine Stormwater Management BMPs and Stormwater Retention Basins into Stormwater Management BMPs

8.2.4 Page 8-15: Under County Ordinances, Pennington’s subsurface sewage treatment system ordinance is called “Sewage and Wastewater Treatment Ordinance”

8.2.4 Pages 8-16, 8-17, and 8-18: Punctuation after the bullet items are not consistent, most have periods while others do not and one has a semi colon.;

Page 8-30 Second paragraph, last sentence: “These Other” use lower case o in other

Page 8-34, Rainfall monitoring paragraph “The Rainfall_Monitoring/Climatology – Remove dash between rainfall and monitoring.

Page 8-34: Include an Observation Well map for the watershed

Page 8-35 and 8-36: under inventory where it lists the Issues of Concern suggested new format:

Issues of Concern: Surface Water Quality, Altered Hydrology, and Drainage Ditch Maintenance

Actions: Main Bullet (darker bullet)

LGUs:

Tools (if applicable)

Appendix B Land and Water Resources: Maps are not consistent size (buffer protection map is smaller than the rest), some have faded edges while some do not, and some maps have a larger land area included than others. Suggest making HDR maps as consistent as possible and not have faded edges.

Appendix C, C-2: Step 9. C. Formatting of last paragraph needs to be corrected and clarification of statement as well.

Appendix G, G-2 and G-3: Format top row on tables to include the “t” in comment in one word



United States Department of the Interior

U.S. Fish and Wildlife Service

RYDELL/GLACIAL RIDGE NATIONAL WILDLIFE REFUGES

17788 349th Street SE

Erskine, MN 56535

October 26, 2016

Myron Jesme
Administrator
Red Lake Watershed District
1000 Pennington Avenue South
Thief River Falls, MN 56701

Dear Mr. Jesme:

The comments below are in reference to the Draft Plan (Plan) for the Red Lake River One Watershed, One Plan Project. They include comments specific to the text itself and comments dealing with a larger idea or issue within the document.

- Key Terms, beginning pg 2-1. Recommend adding "mitigation" to the terms section as it is used multiple times in the document and could have several definitions/contexts.
- Use of "TBD". The acronym "TBD" is used 52 times in the tables beginning in Table 5-2 and ending in Table 8.2.2, but with what appear to be very different meanings. Assuming that the acronym stands for "to be determined", it is used in some cases where that seems a logical choice. However, it also appears to be a stand-in for "n/a", "unknown", and "unavailable" with no explanation as to what applies to each of those situations. In addition, some of the tables use "TBD" in both "management area" and "resource of concern". These are especially confusing when the same line items have specific "Measurable goals" attached. See Table 5-2, pg 5-6, line 1 under Altered Hydrology, as an example.

A number of the TBD's are associated with future plans but specific resource concerns and priority statements. For instance, "restore or modify natural water course morphology...", has a plan as its Measurable Goal (see pg 5-6). Although this plan, and others like it, are necessary to best focus time and finances, they do not, in themselves, get projects on the ground. Therefore, it would be more accurate to label these as interim steps on the way to the Measurable Goal, or possibly include the plans/assessments themselves in the Priority Statements and make the Measurable Goal the accomplishment of the milestones within those plans. This distinction is

crucial because in the current document, a finished report could be considered success in meeting restoration goals, even though no actual project has been completed.

Thank you for the opportunity to comment on the draft document. If you have any questions about the comments, please contact me at Laurie_Fairchild@fws.gov or 218-687-2229 x18.

Sincerely,



Laurie Fairchild

cc:
Matt Fischer
Board Conservationist
Board of Water and Soil Resources
403 4th St NW, Room 200
Bemidji, MN 56601

October 28, 2016

Myron Jesme
Administrator
Red Lake Watershed District
1000 Pennington Avenue South
Thief River Falls, MN 56701

RE: Response to submittal of draft Red Lake River One Watershed One Plan for 60-day review

Dear Red Lake River Planning Group:

Thank you for the opportunity to review and provide comments on the current draft One Watershed One Plan (1W1P) for the Red Lake River. This draft product of your local planning effort has resulted in a comprehensive watershed plan which builds on existing local plans and incorporates a variety of new information, data, and models to better target implementation of activities over the next 10 years. DNR has a strong interest seeing the health of watersheds protected and improved throughout the state. Development and implementation of plans like this 1W1P should help reduce flood damages to cities, agricultural land, and infrastructure, improve water quality, improved habitat, and ensure long term sustainability of drinking water supplies.

Below is a set of comments for each specific section of the current plan where we have suggested improvements or clarifications.

- Executive Summary – the executive summary provides a good overview of the plan, the planning process, and summaries of the key issues, priority statements, goals, and general implementation strategies. The management areas are introduced in the last paragraph on page 1-1. We suggest that the first sentence read something along the lines of:

The three planning zones were divided into management areas based on identification of priority resources. A management area is the subwatershed area upstream of the priority resource. The lower planning zone included seven management areas.....

Table 1-2 should be reviewed to ensure that the totals are consistent with the appropriate tables in the planning region sections of the report. In each bulleted item after the “surface water quality goals” in the measurable goal section, reference is made to “... that could feasibly be installed within individual subwatersheds...” This should be changed to “that could be feasibly installed within each management area”.

- Section 3.3.2. This section begins with “The greater Red Lake River Watershed characteristically has a poorly defined floodplain...” We suggest a rewording to something along the lines of:

The Red Lake River Watershed is a diverse landscape that has changed substantially since the area was settled. The watershed includes large areas where land use is almost entirely row crop agriculture with intensive artificial surface drainage and altered natural watercourses and also areas with dominated by wetlands and natural watercourses. Historically, there has been frequent flooding in areas of the watershed. This flooding can have significant negative impact on agricultural and urban infrastructure, as well as natural resources.

The current description of the floodplain oversimplifies the description of the 120+ miles of the river.

Also, this section starts to use the term “natural resource concerns” in the second paragraph. Previously and throughout the rest of the report, the term “resource of concern” is used. We suggest using the term resource of concern as identified in the definitions section.

The last sentence of paragraph 2 states “Above normal precipitation in the late fall...”. This sentence is a bit confusing and basically says that when we have a lot of precipitation, there are floods. We suggest re-writing this sentence to reflect that flood often occur when fall moisture levels are high and when winter precipitation is high. We also recently completed a hydrologic assessment of the Red Lake River which documents that annual precipitation, mean annual flow, peak flows, and low flows have increased increased in the past 30 years. We can provide this information and can help further refine the sentences of this section. Please contact me to discuss.

Paragraph 3 is mostly about soils, not geomorphology and the topic sentence should reflect this emphasis.

- Section 4.7. Paragraph 1 mentioned that the WRAPs are completed, this is not an accurate statement and should be changed to reflect that the WRAPs/TMDL and 1W1P work together.

Goal paragraphs. As indicated in the executive summary comment above, these goal paragraphs use the term subwatershed. This should be changed to management area to maintain consistency and avoid confusion.

Habitat Goal Formation and Shoreland and Riparian Management Goal Formation. These sections provide a good overview of the priority resources for protection, restoration, and enhancement. We are actively developing a more refined list of priority stream and riparian habitat resources and look forward to sharing them with local partners this winter.

Regarding the buffer map, Figure 4-6. Please let me know whether you need to update the figure based on the most current buffer map information. The GIS data is available.

- Section 5. Lower Planning Zone. Paragraph 1. Suggest changing the text starting with sentence 3 to something along the lines of:

These areas provide limited habitat to terrestrial species. The lower Red Lake River and Red River riparian corridors provide diverse fish and wildlife habitats year round and important refuge for aquatic species during drought periods. The tributaries and ditches within this planning zone provide some seasonal habitat for fish. Many tributaries (natural, altered, and artificial watercourse) are unstable with large amounts of active erosion.....

Paragraph 2. The first and second sentences of this section suggests that there has been no prioritization among management areas within this planning zone. This is affirmed upon review of tables 5-1, 5-2, 5-3, and 5-4. While all this information in these tables is a step toward prioritizing implementation within this planning zone, the reader of this plan is given no indication of which management areas among the seven in this zone are the top priorities. We encourage the planning group to determine and designate which of these management areas are high, medium, and low priorities and revise this section of the plan to in order to better focus work over the next 10 years.

The associations between issues, goals, and strategies presented in Tables 5-1, 5-2, 5-3, and 5-4 and figures 5-3 and 5-4 are not clear to people who are not familiar with the planning process. We suggest that an example of how to use these tables together along with the PTMAApp be included in the text of this section. An example would help lead a reader through how these tables work together with PTMAApp to prioritize and target actions on the ground to achieve goals.

- Section 6 and 7. Our concerns about prioritization of management areas, association among tables, and the need for an example outlined in review of Section 5 immediately above apply to these sections also. Please consider making some changes to prioritize management areas within zones and providing an example of how to use these tables.
- Appendix L. This appendix includes portions of various documents that I shared with members of the planning team and consultants during the planning process. I am not certain that the materials found in this appendix are very helpful to the reader. I would be glad to review and refine the content of this appendix to provide some of the information in a constructive context. If the planning team would like this appendix condenses and refined to key information that would be useful, please let me know the deadline for submission of revised materials to be included in this appendix.

Thanks again for the opportunity to participate in the planning process and in the review of this plan. DNR staff look forward to working with you in the future to help achieve the goals and objectives identified in this plan.

Sincerely,

Henry Van Offelen
Red River Basin Coordinator
Ecological and Water Resources, MN DNR
Detroit Lakes, MN



September 30, 2016

Myron Jesme
Administrator
Red Lake Watershed District
1000 Pennington Avenue South
Thief River Falls, MN 56701

Matt Fisher
Board Conservationist
Board of Water and Soil Resources
403 4th Street NW, Room 200
Bemidji, MN 56601

RE: MDA Comments on Red Lake River Watershed 1W1P Draft Report

Dear Mr. Jesme and Mr. Fischer,

The Minnesota Department of Agriculture (MDA) appreciates the opportunity to comment on the Draft Red Lake River Watershed One Watershed One Plan (1W1P) report. The MDA is interested in the report because we participated on the Advisory Committee and understand that successful implementation of recommended activities involves coordination of State agencies with individual producers, local government agencies, organizations, and agribusinesses located in the watershed.

The MDA provided comment during the 1W1P drafting process; however a few additional suggestions came to light in our most recent review of the document. These suggestions are summarized below for your consideration.

Table 5.3

In the "structural" and "non-structural" implementation tables for each the lower, middle and upper planning zones (tables 5-3, 5-4, 6-3, 6-4, and 7-3, 7-4), the "Lead Entity" is listed. In many (most) cases, NRCS is listed. This may have been decided due to the physical presence of staff from that organization within each of these planning zones or that they regularly provide cost share to support these practices.

It is suggested that the state agencies with Minnesota statutory authority in each defined area also be incorporated into the table. For example, in the draft Yellow Medicine 1W1P (<http://www.area2.org/images/RSI%202604%20YM1W1P%20Draft.pdf>) within the Targeted Implementation Plan sect (4.1.4) there are similar tables which include reference to responsible state agencies. It is suggested that these tables be cross referenced to include all appropriate state agencies in the implementation tables for the Red Lake 1W1P document to facilitate communication between the local and state agencies.

Table 8.3

Another funding source to add under MDA would be the Minnesota Agricultural Water Quality Certification Program. Additional information can be found at: <http://www.mda.state.mn.us/awqcp>

Table F-1

MDA's Nitrogen Fertilizer Management Plan is referenced in the table. It is no longer "draft" so please remove draft and use the date of 2015. For additional information please visit: <http://www.mda.state.mn.us/nfmp>

General Comment

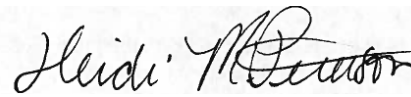
For clarity, it is suggested that consistency be applied when abbreviating the government agencies. For example, the Minnesota Department of Agriculture was referenced in the reports as MDA, MN Department of Ag., and Mn Dept. of Agriculture.

We commend the team for the extensive job they undertook to apply the preliminary comments during the draft development stage. We appreciate the opportunity to provide comments and feedback; please consider the MDA's suggestions in the development of the final 1W1P report. If you have any questions about the comments, please do not hesitate to contact us.

Sincerely,



Luke A. Stuewe
Soil Scientist



Heidi M. Peterson, Ph.D.
Impaired Waters Technical Coordinator



PROTECTING, MAINTAINING AND IMPROVING THE HEALTH OF ALL MINNESOTANS

October 26th 2016

Myron Jesme
Administrator
Red Lake Watershed District
1000 Pennington Avenue South
Thief River Falls, MN 56701

RE: MDH comments for 60 day review of draft Red Lake River One Watershed, One Plan

Dear Red Lake River Planning Group,

Thank you for the opportunity to review and provide comments on the Red Lake River One Watershed, One Plan (1W1P). We appreciate being involved in the planning and review process and commend your efforts to pilot the development of this multi-jurisdiction, watershed-based plan. The attached comments are recommended changes regarding groundwater and drinking water protection issues, prioritization statements, resources of concern, and goals.

In an attempt to make it easier to incorporate the recommended changes I used "track changes" and tried to preserve the text formatting when copying and pasting from the draft "Red Lake River 1W1P" to the "MDH comments 60 day draft review" word document. I will also include the electronic version of the "MDH comments 60 day draft review" word document so that you can copy and paste the edits into the final Red Lake River 1W1P if you choose to do so. Please contact me if you have questions.

Sincerely,

A handwritten signature in black ink that reads "Jenilynn Marchand".

Jenilynn Marchand
Principal Planner
Environmental Health Division, Source Water Protection Unit
705 5th St NW, Suite A
Bemidji, MN 56601
(218) 308-2153
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Enclosure: MDH comments 60 day draft review

MDH comments 60 day draft review of Red Lake River 1W1P Draft

Pg #	Recommended Corrections
1-4 and All Note:	<p>Issues of Concern: Change “Source Water Protection” to “Drinking Water Protection”</p> <p>*Due to confusion of source water protection being surface water AND ground water (not just surface water), I think it would be helpful to modify the issue of concern to Drinking Water Protection.</p> <p>*Please update “Drinking Water Protection” throughout the plan.</p>
1-6 and 4-7	Edit text under Issue of Concerns: Groundwater Protection and Source/Drinking Water Protection

Issue of Concern: Groundwater Protection

- ~~Maintain a safe and adequate drinking water supply for residents in order to protect the public's health, safety and general welfare of the community.~~
- ~~Participate and support the development of a county geologic atlas to better understand the geology of the area.~~
- ~~Protect Drinking Water Supply Management Areas (DWSMAs). Special consideration will be given for DWSMAs with a moderate or high vulnerability.~~
- Implement MN Department of Ag's Nitrogen Fertilizer Management Plan
- Implement strategies to conserve ground water supply quality.
- Implement strategies to conserve ground water supply quantity.
- Conduct sub-surface sewage treatment system (SSTS) inventory and upgrades.
- ~~Work collaboratively with public water suppliers to implement their Wellhead Protection Plans.~~

Issue of Concern: Source Water Protection

- ~~Maintain a safe and adequate drinking water supply for residents in order to protect the public's health, safety and general welfare of the community.~~
- ~~Protect Drinking Water Supply Management Areas (DWSMAs). Special consideration will be given for DWSMAs with a moderate or high vulnerability.~~
- ~~Partnership~~ with the East Grand Forks and Thief River Falls public water suppliers to protect and maintain a safe and adequate drinking water supply.
- ~~Reduce runoff-driven sediment and pollutant (total organic carbon, haloacetic acid, and Trihalomethanes) transport to surface waters by targeting implementation in subwatersheds with highest export.~~
- ~~Conserve surface water drinking supplies.~~
- ~~Maintain a safe and adequate drinking water supply for residents in order to protect the public's health, safety and general welfare of the community.~~
- Protect Thief River Falls Source Water Assessment Area (SWAA).
- Protect East Grand Forks Source Water Assessment Area (SWAA).
- ~~Protect surface water quality and quantity of East Grand Forks drinking water supply.~~
- ~~Conduct sub-surface sewage treatment system (SSTS) inventory and upgrades.~~
- ~~Work collaboratively with public water suppliers to implement their Wellhead Protection Plans.~~

1-8 Edit text as highlighted in red below.

Groundwater Protection and Source Water Protection Goals

Several surface and groundwater management plans (including MN Dept. of Health and Mn Dept. of Agriculture NFMP) were referenced for development of

measurable goals for protection of surface and groundwater drinking water supplies. Measurable goals in the 1W1P for these issues of concern are related to implementation of surface runoff control practices to protect surface water quality, and protection of groundwater recharge areas, and carrying out education and outreach activities relative to water conservation, well management, well sealing, septic maintenance, groundwater education, etc.

- 1-9 Not sure where the numbers came from for well sealing and septic upgrades. Just make sure the numbers are consistent between tables. It would be helpful for the LGU's if a total cost of all BMP projects were totaled per planning zone.
- 1-10 It would be good to insert a general statement that all of the modeling done (PTMapp) does not take groundwater into account.
- 1-10 and 4-28 Some implementation strategies were policy-related as opposed to structural or restorative in nature. For example, implementation of strategies to address source water drinking water protection issues or groundwater protection issues limited to identification of areas of risk, such as the Middle Zone given its designation by the MN Department of Health DNR as a groundwater sensitive region.

Note: MDH does not list groundwater sensitive areas- the DNR does. It is sensitive due to the sandy beach ridges. MDH lists groundwater vulnerability areas. The Crookston DWSMA is the only vulnerable DWSMA in all three planning areas and it is located in the middle planning zone.

4-25 **Groundwater Protection and Source Water Protection Goal Formation**

Several surface and groundwater management, wellhead protection, and surface water assessment plans were referenced for development of measurable goals. The ways that local governing unit staff can support these goals as part of the 1W1P will likely be limited to implementation of surface runoff practices, assisting public water suppliers with implementing wellhead protection plan activities and carrying out education and outreach activities relative to consumptive uses of water, well management, well sealing, septic maintenance, groundwater education, etc.

5-2, 6-2, 7-1 Tables 5-1, 6-2, 7-2: Please consider adding an additional resource of concern for the Red Lake River to manage turbidity, TSS, TOC, HAA5, TTHM for drinking water. Perhaps table 7-2 would be a better place?

5-8 Please update the edited groundwater protection measurable goals below:

Update Education and Outreach Program to include MNDNR and Department of Health Plan information groundwater protection, well management, well sealing, and conservation information.

Develop a wellhead protection plan and sealing program

Educate the public on how to conserve and protect groundwater resources

Participate and support the development of a county geologic atlas

Provide cost-share assistance to landowners for sealing 8-10 unused wells per year

Conduct an unused, unsealed well inventory

*Note: all 3 tables for each planning zone on 5-8, 6-12, 7-8, 7-9 are slightly different- not due to planning zone differences.

5-9, 6-13, 7-10 Please change the Source Water Protection Issue to Drinking Water Protection

5-8, 6-12, 7-9 Please move the following Groundwater Protection Prioritization Statements and corresponding (edited) goals to the new Drinking Water Protection Prioritization Statement category:

- 1) Maintain a safe and adequate drinking water supply for residents in order to protect the public's health, safety and general welfare of the community.
 - a. Provide cost-share assistance to landowners for sealing 8-10 unused wells per year
 - b. Conduct an unused, unsealed well inventory
 - ~~c. Educate the public on safe drinking water standards and how to protect our groundwater resources~~
 - ~~d.c.~~ Conduct additional monitoring as needed for drinking water protection 7-8,
- 2) Protect Drinking Water Supply Management Areas (DWSMAs). Special consideration will be given for DWSMAs with a moderate or high vulnerability.
 - a. Relocate or change the design of proposed stormwater infiltration projects to detention basins
 - ~~b.~~ Develop-Distribute education/outreach materials of proper well management and well sealing
 - ~~c.~~ Conduct an SSTS inventory
 - ~~d.~~ Develop and implement a SSTS Tracking System to include:
 - ~~e.~~ Inspection Records and Maintenance and Upgrades Educate the public on proper septic system maintenance and operation
- 3) Work collaboratively with public water suppliers to implement their Wellhead Protection Plans.
 - ~~a.~~ Participate in the development of Wellhead Protection Plans through technical assistance by participating in meetings.
 - ~~a.b.~~ Partner with public water suppliers to provide technical and educational assistance to the public as it relates to their Wellhead Protection Plans

5-9 The Source (drinking water) protection issue prioritization statements are

basically duplicates of each other. Please delete the following prioritization statement and add the following text to the “Prioritize inner and outer surface water assessment areas” goals:

Reduce run-off driven sediment and pollution (TOC, HAA5, TTHM) transport to surface waters by targeting implementation in subwatersheds with the highest export.

5-9 Please delete the duplicated prioritization statement (after above edits) that only has one goal: Maintain a safe and adequate drinking water supply for residents in order to protect the public’s health, safety and general welfare of the community.

5-18 Table 5-4 Please consider adding/editing the following non structural implementation practices:

- 1) Conduct additional monitoring as needed for drinking water protection
- 2) Conduct an unused, unsealed well inventory
- 3) Conduct a SSTS inventory and tracking system
- 4) Feasibility study for groundwater recharge, water conservation, rain and grey water irrigation alternatives.
- 5) Support and participate in county geologic atlas
- 6) Update Education and Outreach Program to include MN Buffer Initiative details and MNDNR and Department of Health Plan well management and well sealing information ~~related to source water~~
- 7) Conduct observation well monitoring and ~~develop~~ participate in well head protection plan development

5-6, 6-9, 7-2 Please edit the following Altered Hydrology prioritization statement: Promote infiltration, retention, and extended detention practices in new and existing urban developments based on current stormwater best management practices. Non-infiltration practices will be prioritized in Drinking Water Supply Management Areas (DWSMAs). Existing infiltration basins in vulnerable DWSMAs will be mitigated, if feasible.

6-18 Table 6-4 please add/edit the following non structural implementation practices:

- ~~1) Develop and implement a~~ Participate in wellhead protection plan development
- ~~1)2) Develop a county geologic atlas.~~
- ~~2)3) Inventory unused, unsealed wells~~
- ~~3)4) Seal known unused wells~~
- ~~4)5) Develop-Distribute~~ education/outreach materials of proper well management and well sealing
- ~~6) Develop and implement a cost share program to financially assist property owners in sealing unused, unsealed wells on their property, including the public water suppliers in the watershed~~
- 7) Conduct additional monitoring as needed for drinking water protection
- 8) Feasibility study for groundwater recharge, water conservation, rain and grey water irrigation alternatives.

- 7-17 Please update the following non-structural actions ([table 7-4](#)) as shown below:
- 1) Update Education and Outreach Program to include MN Buffer Initiative details, MNDNR and Department of Health Plan information related to [well management](#), [well sealing](#), AIS and SSTS
 - ~~1)2) Develop and implement a~~ Participate in wellhead protection [plan development and sealing program](#)
 - ~~2)3) Develop a~~ [geologic](#) county [geologic](#) atlas.
 - ~~3)4) Distribute~~ ~~Develop~~ education/outreach materials of proper well management and well sealing
- 8-4 Note: MDH manages the technical portion of the Drinking Water Revolving Fund and the MN Public Facilities Authority (PFA) handles the financial end. Not sure what this list is from but PCA has a similar Clean Water Revolving Fund Program that should be added. They also do the technical review and PFA does the financial. Both programs get funds from the federal government with a state match but are considered state programs. Let me know if you have questions.
- 8-10 Table 8-5 BMP alignment with resources of concern is missing Groundwater Protection BMPs
- Conservation Crop Rotation
 - Conservation Cover
 - Cover Crop
 - Critical Area Planting
 - Filter Strips
 - Raingardens
- 8-10 Table 8-5 BMP alignment with resources of concern is missing Drinking water (Source) Protection BMPs
- *Note: All surface water quality improvements should also be checked for drinking water protection.
- Channel Bed and Stream
 - Channel Stabilization
 - Well Sealing
- Note: The 1w1p could be more specific, targeted, and prioritized if Step 3 (alignment of resources of concern with prioritization statements) was more detailed. Specifically, which issue/prioritization statement addresses the most resources of concern and achieves the most multiple benefits? Table 8-5 begins to identify multiple benefits that occurs for select BMPs. Identifying multiple benefits helps to plan, prioritize, and target projects.
- 8-22 Consider including:
Reduce turbidity and TSS levels per Surface Water Quality Standards.
Reduce Total Organic Carbon (TOC) to less than 12/mg/L. Reduce five haloacetic acids (HAA5) to less than 60ug/L. Reduce Trihalomethanes (TTHM) to less than 80 ug/L

Red Lake River One Watershed One Plan - Comments

1. Figure 3-2: can the fonts be changed to black so the diagram is easier to read.
2. Table 4-9: Please add a sentence to explain the 1-5 ranking process. (Highest to Lowest)
3. Page 4-22: Please add: Browns Creek to the list under 2. Other Water Courses and Tributaries
4. Table 4-15: Make the bullets all the same size in the table.
5. Page 6-9: Drainage Systems Management: The third priority statement has an extra space after subsurface and the word drainage.
6. Page 6-13: Source Water Protection: Please add: Under Priority Statement Column: Protect surface water quality & quantity of EGF drinking water supply. Then next column: All; then next column: All; and the last column please add this statement: Educate the public, install BMPs.
7. Table 6-3: Nutrient Management Cost seems low throughout the structural implementation schedule (All three zones).
8. Table 6-3: The BMP Precision Ag Practices has been removed from some of the Management Areas; that information should be put back into Table 6-3.
9. Table 6-3: Habitat: Add the following:
Priority Statement: Restore aquatic habitat of other reaches where feasible. Management Area: All; Resource of Concern: Red Lake River; Measurable Goal: Assess in stream fish habitat at key locations/sites.
10. Page 8-7: Under Other Funding Sources – Please add a sentence: Any new grant opportunities from local, state, and federal agencies/organizations.
11. Page 8-8: Table 8-4
Farm Bill Assistance Report: Please add: NRCS
Technical Approval Authority: Please add: NRCS
12. Page 8-35: The last Bullet on the page: Conduct an abandoned well inventory. Need to add a bullet underneath stating: LGUs – Pennington SWCD, Red Lake County SWCD, and West Polk SWCD

13. Page 8-36: Under Conduct a Subsurface Treatment Systems (SSTS) Inventory. Remove the letters "LGUs" and instead behind the bullet just state: Red Lake County SWCD
14. Appendix A – Missing signature page from West Polk SWCD
15. Page C-2: Fix under Step 9: c. the last sentence there are several spaces that need to be removed.



October 21, 2016

Myron Jesme
Administrator
Red Lake Watershed District
1000 Pennington Avenue South
Thief River Falls, MN 56701

RE: Response to submittal of draft Red Lake River One Watershed, One Plan for 60-day review

Dear Red Lake River Planning Group,

Thank you for the opportunity to provide comments regarding the draft Red Lake River (RLR) One Watershed, One Plan (1W1P) under Minnesota Statutes Section 103B.101, Subd. 14. We appreciate the partners' willingness to participate in development of a multi-jurisdiction, watershed-based plan.

The RLR 1W1P is a Comprehensive Watershed Management Plan, which is an all-inclusive plan to address surface and groundwater, water quality and quantity, and land use as per the 1W1P Plan Content Requirements for Pilot Watersheds adopted by the Board of Water and Soil Resources (BWSR) September 23, 2014. Implementation actions in the plan consider a broad range of tools, including conservation practices, capital improvements, official controls, and other tools and programs necessary to achieve the goals of the plan. BWSR has the following mandatory and advisory comments on the plan:

Comments that the plan must address to meet 1W1P Plan Content Requirements for Pilot Watersheds:

- Under the Summary of Measurable Goals in the Executive Summary and in Section 4.7, for the Soil Erosion and Sedimentation Goals and Altered Hydrology Goals it says, "The results of PTMApp for x practices were reviewed and an estimate of total number of best management practices or watershed management strategies that could feasibly be installed within individual subwatersheds in the 10-year time period was set as the goal." This was the case in an earlier draft of the plan, but has since changed and the goal is not the number of practices so this information needs to be updated. There is also a similar statement under Use of PTMApp in Section 4.7 that should be removed or edited.
- Ensure that Table 1-2 is up-to-date with Tables 5-3, 6-3, and 7-3. It seems that there have been updates in those tables that have not been updated in Table 1-2. An example is Gravel Pit Reclamation. Table 1-2 shows 5 acres for the Lower Planning Zone, but Table 5-3 shows 20 acres in Management Area L1 alone.

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- In Table 4-14, change the date for the "The DNR will take combined public water data..." action to Spring 2016 and move that action up above the June 22nd date. Change the date for the "The DNR Commissioner will approve..." action to July 12, 2016 and move that action up above the August 25th date.
- Multiple edits are needed in Tables 5-1, 5-2, 6-1, 6-2, 7-1, and 7-2, and specific items have been identified as comments in a PDF version of the plan provided separately to the RLR Planning Group. Issues include management class in table x-1 not matching alignment with prioritization statement in table x-2, incorrect or missing management areas for some ROCs in table x-1, discrepancies between impairment column and management class in table x-1, issues with descriptions in table x-1, clarification on which planning zone some ROCs belong in, repeated goals or small edits to goals in table x-2, and formatting.
- At the beginning of each of Sections 5.3, 6.3, and 7.3 there is a table that shows the assumed pricing that was applied to generate cost estimates. These tables should have table numbers. Edits are needed in these tables and specific items have been identified as comments in a PDF version of the plan provided separately to the RLR Planning Group. Issues include repeat practices, discrepancies between units in this table and table x-3, and discrepancies between costs in this table and table x-3.
- Multiple edits are needed in Tables 5-3, 5-4, 6-3, 6-4, 7-3, and 7-4, and specific items have been identified as comments in a PDF version of the plan provided separately to the RLR Planning Group. Issues include duplicate BMPs showing up under multiple strategies for a single management area in table x-3, water and sediment control basin costs need to be updated in table x-3, incorrect units and questionable totals in table x-3, impoundments could go under storage strategy in table x-3, years in table x-4, identification of specific lead entity in tables x-3 and x-4, removal of duplicate actions in table x-4, and clarification needed on actions and costs in table x-4.
- At the beginning of Sections 6 and 7, in the second paragraph there are incorrect table numbers referenced. Table x-2 should be changed to x-1 and the first use of table x-3 should be changed to x-2. Also, in the fourth paragraph of Section 6, the reference to Table 6-4 should be bolded.
- In the first paragraph under Section 7.1 it refers to the "Lower" Planning Zone. This should be "Upper".
- The second sentence under Section 7.2 should be edited to read, "The first two columns show the alignment of prioritization statements, listed from high to low priority, with each of the 1W1P issues of concern for the Upper Planning Zone."
- The RLR Planning Group needs to reassess the Memorandum of Agreement (MOA) and make necessary modifications to take the partnership from a planning phase into an implementation phase. This updated MOA should include detailed information on plan administration and coordination including decision making and staffing. Sections 8.1 and 8.1.1

should be updated to include a summary of this updated MOA and the updated MOA should be included as an appendix.

- Plan organization under Section 8.1.3 is confusing. It goes from Local Funding to Watershed District Funding. WD funding is local funding. The information for the WD funding is good, but plan should contain something similar for SWCDs and counties. Throughout the section, some funding sources are described while others are not. Should include information on all funding sources for consistency. The Federal Funding portion should be re-written. The first paragraph still appears to be in note format. Some of these are actually FSA funded programs, but FSA isn't mentioned. Some of these funding sources are for projects while others are for services (contribution agreements). Some items are repeated more than once. The Other Funding Sources portion is similar and should also be re-written. Some of the sources are shown as an acronym while others are not. Perhaps these could be grouped by type. Also, the formatting in Section 8.1.3 needs to be reviewed.
- The Five-Year Evaluation portion under Section 8.1.5 should include a mention of the WRAPS and the RRBC phosphorus reduction plan which will be completed after this plan is adopted. This plan will need to be assessed at the 5-year evaluation to see if changes are needed based on that information. Also, there should be mention here about evaluating the results of completed inventory/study work listed in the non-structural implementation plans and using that information to further refine goals and actions.
- The Reporting portion under Section 8.1.5 should include some information on a plan to collaboratively report watershed based outcomes.
- In Section 8.2.2, recommend describing how the project team process is used for these capital improvement projects. That would help with meeting the plan content requirements for describing opportunities for enabling large-scale multi-purpose projects on a watershed basis and for engaging drainage authorities in implementation of the watershed plan which is currently missing. Also, Table 8-6 only includes two distributed detention sites, but there were three in the implementation plans, one in each planning zone.
- In Section 8.2.3, there is a sentence that reads, "The location and authority for public ditches within the planning area are listed in Appendix K." Appendix K includes more than just ditches so it should say public ditches and other water management facilities. Also, responsible authorities in Appendix K expands beyond the RLR Planning Group partners to include cities, DNR, USFWS, Red Lake Indian Reservation, USCOE, Ottertail Power Co, and private landowners. Section 8.2.3 should include a mention of these other responsible authorities. This will show that the RLR Planning Group partners don't have control over all water management facilities in the planning area, and indicate other potential partners for the planning group. The Appendix K title should also be changed.
- Changes are needed in the Riparian Buffer Program portion of Section 8.2.4 to reflect changes that were made to the law in the 2016 Legislative session. Under SWCD Roles and Responsibilities, item B should be changed to read, "In consultation with local water

management authorities, must develop..." Item D should be changed to read, "Must notify the county or watershed district with jurisdiction and BWSR when it..." The County and WD roles are exactly the same so instead of repeating the information it could be combined under one header, "Counties and Watershed Districts Roles and Responsibilities". Under that header, item A should be changed to read, "Must incorporate the SWCD summary of watercourses recommendations into its comprehensive local water management plan by July 1, 2018." Item B should be changed to read, "If electing jurisdiction to enforce the buffer requirement as identified on the Buffer Protection Map, must provide..." Item C should be changed to read, "Elect to accept jurisdiction and identify the ordinance, rule, or other official controls to carry out the compliance provisions of section 103F.48 and section 103B.101, subdivision 12a, by notice to BWSR prior to March 31, 2017 (Subd. 7(b)). May adopt..."

- In Section 8.2.4, the information listed under the Comprehensive or land use plans portion is not related to comprehensive or land use plans. A previous draft of the plan contained the following paragraph, "Polk County has county wide planning and zoning and participates in cooperative joint zoning with those Townships that want to retain local control of township specific issues. Pennington and Red Lake Counties currently do not have county wide planning and zoning. LGU's will coordinate with adjacent counties to achieve similar planning and zoning rules and regulations." In the earlier draft it was in an incorrect location and now appears to have been deleted altogether. That paragraph should be inserted here as a starting point for the Comprehensive and land use plans portion. The plan should go on to describe potential opportunities to achieve the goals of this plan through planning and zoning and potential conflicts between the plan and existing land use plans. Also, it would be good to include which townships and cities have planning and zoning in the planning area.
- Page numbers need to be edited in Appendices J and K.

This concludes the comments that must be addressed by the RLR Planning Group before BWSR can approve the plan.

The following comments are advisory in nature and do not need to be addressed by the RLR Planning Group in order for the plan to be approved by BWSR.

Comments that the plan should consider addressing:

- Recommend making all maps 11x17 in the plan so they are more useful for the reader. Also, recommend providing very clear and descriptive titles for all tables and figures in the plan so they are able to stand on their own.
- In the second paragraph under Planning Boundaries in the Executive Summary, recommend editing the first sentence to read, "The size, physical makeup, and diverse land use of the planning area..."
- There is a statement in the Executive Summary under The Planning Process that says, "In general, surface waters that either had been defined as having poor water quality or those that had adequate water quality data were considered resources of concern." This makes it sound like

resources of concern were based solely on water quality. That was a main factor, but there were other considerations and being this is a comprehensive plan that should be mentioned. Also, having "adequate water quality data" shouldn't by itself indicate a resource of concern unless the data is showing there is a concern. This should be clarified.

- A summary of estimated implementation costs by planning zone should be included in the Executive Summary.
- Outline of Responsibilities of Participating Local and Regional Governments section in the Executive Summary should be expanded to include more of a summary from Sections 8.1, 8.1.1, and 8.1.2. Copy Table 8-1 and include it in the Executive Summary.
- In Section 4.3, to better set-up the rest of the plan it would be good to go into more detail on why each of the nine issues of concern were selected and what specifically are the causes or reasons this is an issue in this planning area. Encourage summarizing by planning zones as the background of these issues is different in each zone. Also, Table 4-1 doesn't include source water protection, but it is included in Table 4-2, and wetland management was high on Table 4-1, but not included in Table 4-2. Those should be explained.
- In Section 4.8, the second paragraph contains the following statement, "The management strategies and BMPs considered in this plan are listed in Table 4-16." Table 4-16 does not include all of the BMPs that were considered and included in the plan. It should be clarified that Table 4-16 only includes BMPs that were assessed with PTMApp and that there are other BMPs in the plan that PTMApp does not have the capability to assess.
- At the beginning of each of Sections 5, 6, and 7, in the second paragraph it says, "...users should reference Table 5-1 (6-1 or 7-1) to understand relevant issues established for each resource of concern in the planning zone..." Those tables (x-1) are specific to water quality issues and this statement should be adjusted to reflect that. It could be as easy as changing it to, "...to understand relevant water quality issues..."
- The Groundwater Protection goals read more like action items than goals. Recommend re-wording to sound more like goal statements. Make sure implementation sections have actions that correspond with these goals. For example, there is a goal in Table 5-2 to seal 8-10 wells per year, but Table 5-3 only includes 36 well sealings. Also, recommend adding a goal related to the LGUs gaining a better understanding of groundwater issues.
- Recommend including a cost total at the end of Tables 5-3, 5-4, 6-3, 6-4, 7-3, and 7-4. In tables x-3 a cost total for each management area would also be good.
- State agencies can be listed as lead entity in Tables 5-3, 5-4, 6-3, 6-4, 7-3, 7-4 if and where applicable. Recommend reviewing these tables and editing lead entity as needed.
- Recommend moving Figures 5-2, 6-2, 7-2 to the beginning of their respective sections.
- In Table 6-2, "Educate landowners on water resource concerns as they relate to altered hydrology and private drainage systems." is listed as the goal for the "Protect disconnected, non-contributing drainage areas..." prioritization statement. The other 2 planning zones had a goal of "No new drainage from 10-yr non-contributing areas" related to this prioritization statement. Recommend using that goal for the middle planning zone also.

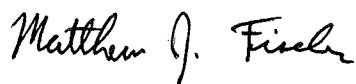
- During the reassessment of the MOA and in Section 8.1.1 under Identification and Coordination of Shared Services (Staffing), highly recommend the RLR Planning Group consider the inclusion of a watershed-based coordinator.
- In Section 8.1.2, recommend removing the first two sentences. Then go on to describe the relationships with cities, townships, and federal and state agencies, as well as the Red River Watershed Management Board and the Red River Valley Conservation Service Area. This would also be a good place to describe the 1998 Mediation Agreement and the project team process.
- In Section 8.1.3, the first sentence under Local Funding should be edited to say, "Funding for programs and projects will be pursued through a variety of sources as shown in Table 8-2 and Table 8-3." and should be included as an intro to the Funding section along with tables prior to the Local Funding information. The second sentence includes a mix of programs and funding sources. Remove the programs and just include local funding sources (fee for services, permit fees, taxing authorities, county appropriation to SWCDs, etc.).
- Table 8-3 should also include local funding sources. Also, the primary assistance type for Ag BMP Loan Program and Sustainable Ag Demo grants should be changed to Loan/Financial.
- In Section 8.1.3, highly recommend the creation of Water Management Districts for the entire planning area, which would probably make sense to organize by management areas. It would be easier to set them up now than to amend the plan if they are desired at a later date.
- In Section 8.1.3, recommend including the Red River Watershed Management Board under local funding.
- In the first paragraph under Section 8.1.5 the following 2 sentences could be removed as the information is covered under Section 8.1.1., "The planning group will continue to meet after the adoption of the Red Lake River 1W1P. One member of the planning group will be responsible for organizing and hosting the quarterly meetings on a rotating annual basis." Also, the information related to Biennial Evaluation could be removed as an annual work plan and evaluation was chosen.
- The second half of the paragraph under Section 8.1.7 should be edited to indicate whether these are existing agreements or proposed new agreements. Also, there are some duplicate items in the list. This information should correspond to the shared services identified in Section 8.1.1.
- Table 8-5 might be better suited for Section 4.8, or repeated in each of Sections 5.3, 6.3, and 7.3. Embracing the concept of multiple benefits is a guiding principle of the 1W1P program and this table does a good job of showing the multiple benefits of these BMPs. Therefore, it is recommended to use this table earlier in the plan to highlight the multiple benefits.
- Floodplain is a separate program and therefore to be consistent with the formatting in this section should be in a larger font and bolded. The first sentence should be moved down a line so that it is underneath the program header. Also, in the first sentence, "pursuit" should be change to "pursuant".
- Table 8-7 includes programs that are not described in Section 8.2.4, such as household hazardous waste, ditch law, solid waste program, soil loss, and others. Recommend including a brief description of each of those programs in this section.
- Under the Inventory portion of Section 8.2.5, there is a bullet for, "Conduct a culvert inventory that includes location and sizing. Plan the installation for SWI's and Buffers based on inventory

results." How are these related? Would "Plan for systematic culvert replacement based on inventory results." be more applicable than installation of SWIs and buffers? The next bullet below is, "Update County Drainage records including benefited areas". The LGUs listed include the RLWD and the SWCDs, but no counties. Recommend including counties.

- In Table 8-9, there are website links listed in the Newsletters and Reports row. These should be moved down into the Websites, social media row. Also, there was a row in an earlier draft for "Field Days/Tours/Demonstration Workshops" that I believe was accidentally deleted. Recommend adding it back in.
- Recommend moving acronyms to Section 2.
- Consider adding the DNR Watershed Health Assessment Framework Context Reports and/or the NRCS Rapid Watershed Assessments for both the Red Lake River and Grand Marais Creek watersheds to Appendix B to provide more detailed information to support the actions in the plan. Also, page numbers should be added for Appendix B.

We commend the RLR Planning Group partners for your participation as a pilot in developing the 1W1P program and for your collaborative effort in bringing this together. The state's main water management agencies have committed to the 1W1P approach and we look forward to continuing to work with you on future implementation. If you have any questions about this letter, please feel free to contact Matt Fischer at 218-755-2683 or Brian Dwight at 218-755-2679.

Sincerely,



Matt Fischer
Board Conservationist



Brian Dwight
Clean Water Specialist

cc: Ryan Hughes, BWSR (via email)
Doug Thomas, BWSR (via email)
Melissa Lewis, BWSR (via email)
Julie Westerlund, BWSR (via email)
David Johnson, BWSR (via email)
Brett Arne, BWSR (via email)
Rob Sip, MDA (via email)
Luke Stuewe, MDA (via email)
Barbara Weisman, MDNR (via email)
Nathan Kestner, MDNR (via email)
Henry Van Offelen, MDNR (via email)
Jenilynn Marchand, MDH (via email)
Juline Holleran, MPCA (via email)
Denise Oakes, MPCA (via email)

Commenter	Comment #	Comment Letter Page #	Comment	Plan Change Made (Y/N)	Comment Response/Action
BWSR	1	1	Under the Summary of Measurable Goals in the Executive Summary and in Section 4.7, for the Soil Erosion and Sedimentation Goals and Altered Hydrology Goals it says, "The results of PTMApp for x practices were reviewed and an estimate of total number of best management practices or watershed management strategies that could feasibly be installed within individual subwatersheds in the 10-year time period was set as the goal." This was the case in an earlier draft of the plan, but has since changed and the goal is not the number of practices so this information needs to be updated. There is also a similar statement under Use of PTMApp in Section 4.7 that should be removed or edited.	Y	Statement has been modified to reflect that the referenced approach of identifying practices was used to support the development of goals.
BWSR	2	1	Ensure that Table 1-2 is up-to-date with Tables 5-3, 6-3, and 7-3. It seems that there have been updates in those tables that have not been updated in Table 1-2. An example is Gravel Pit Reclamation . Table 1-2 shows 5 acres for the Lower Planning Zone, but Table 5-3 shows 20 acres in Management Area L1 alone.	Y	Edits made as recommended.
BWSR	3	2	In Table 4-14, change the date for the "The DNR will take combined public water data ..." action to Spring 2016 and move that action up above the June 22nd date. Change the date for the "The DNR Commissioner will approve ..." action to July 12, 2016 and move that action up above the August 25th date.	Y	Edits made as recommended.
BWSR	4	2	Multiple edits are needed in Tables 5-1, 5-2, 6-1, 6-2, 7-1, and 7-2, and specific items have been identified as comments in a PDF version of the plan provided separately to the RLR Planning Group. Issues include management class in table x-1 not matching alignment with prioritization statement in table x-2, incorrect or missing management areas for some ROCs in table x-1, discrepancies between impairment column and management class in table x-1, issues with descriptions in table x-1, clarification on which planning zone some ROCs belong in, repeated goals or small edits to goals in table x-2, and formatting.	Y	Specific edits are referenced in the pdf document that was provided with comments.
BWSR	5	2	At the beginning of each of Sections 5.3, 6.3, and 7.3 there is a table that shows the assumed pricing that was applied to generate cost estimates. These tables should have table numbers. Edits are needed in these tables and specific items have been identified as comments in a PDF version of the plan provided separately to the RLR Planning Group. Issues include repeat practices, discrepancies between units in this table and table x-3, and discrepancies between costs in this table and table x-3.	Y	Specific edits are referenced in the pdf document that was provided with comments.
BWSR	6	2	Multiple edits are needed in Tables 5-3, 5-4, 6-3, 6-4, 7-3, and 7-4, and specific items have been identified as comments in a PDF version of the plan provided separately to the RLR Planning Group. Issues include duplicate BMPs showing up under multiple strategies for a single management area in table x-3, water and sediment control basin costs need to be updated in table x-3, incorrect units and questionable totals in table x-3, impoundments could go under storage strategy in table x-3, years in table x-4, identification of specific lead entity in tables x-3 and x-4, removal of duplicate actions in table x-4, and clarification needed on actions and costs in table x-4.	Y	Specific edits are referenced in the pdf document that was provided with comments.
BWSR	7	2	At the beginning of Sections 6 and 7, in the second paragraph there are incorrect table numbers referenced. Table x-2 should be changed to x-1 and the first use of table x-3 should be changed to x-2. Also, in the fourth paragraph of Section 6, the reference to Table 6-4 should be balded.	Y	Edits made as recommended.
BWSR	8	2	In the first paragraph under Section 7.1 it refers to the "Lower" Planning Zone. This should be "Upper".	Y	Edits made as recommended.
BWSR	9	2	The second sentence under Section 7.2 should be edited to read, "The first two columns show the alignment of prioritization statements, listed from high to low priority, with each of the 1W1P issues of concern for the Upper Planning Zone."	Y	Edits made as recommended.
BWSR	10	2	The RLR Planning Group needs to reassess the Memorandum of Agreement (MOA) and make necessary modifications to take the partnership from a planning phase into an implementation phase. This updated MOA should include detailed information on plan administration and coordination including decision making and staffing. Sections 8.1 and 8.1.1 should be updated to include a summary of this updated MOA and the updated MOA should be included as an appendix.	Y	Edits made as recommended.
BWSR	11	3	Plan organization under Section 8.1.3 is confusing. It goes from Local Funding to Watershed District Funding. WD funding is local funding. The information for the WD funding is good, but plan should contain something similar for SWCDs and counties. Throughout the section, some funding sources are described while others are not. Should include information on all funding sources for consistency. The Federal Funding portion should be re-written. The first paragraph still appears to be in note format. Some of these are actually FSA funded programs, but FSA isn't mentioned. Some of these funding sources are for projects while others are for services (contribution agreements). Some items are repeated more than once. The Other Funding Sources portion is similar and should also be re-written. Some of the sources are shown as an acronym while others are not. Perhaps these could be grouped by type. Also, the formatting in Section 8.1.3 needs to be reviewed.	Y	Edits made as recommended.

Commenter	Comment #	Comment Letter Page #	Comment	Plan Change Made (Y/N)	Comment Response/Action
BWSR	12	3	The Five-Year Evaluation portion under Section 8.1.5 should include a mention of the WRAPS and the RRBC phosphorus reduction plan which will be completed after this plan is adopted. This plan will need to be assessed at the 5-year evaluation to see if changes are needed based on that information. Also, there should be mention here about evaluating the results of completed inventory/study work listed in the non-structural implementation plans and using that information to further refine goals and actions.	Y	Edits made as recommended.
BWSR	13	3	The Reporting portion under Section 8.1.5 should include some information on a plan to collaboratively report watershed based outcomes.	Y	Edits made as recommended.
BWSR	14	3	In Section 8.2.2, recommend describing how the project team process is used for these capital improvement projects. That would help with meeting the plan content requirements for describing opportunities for enabling large-scale multi-purpose projects on a watershed basis and for engaging drainage authorities in implementation of the watershed plan which is currently missing. Also, Table 8-6 only includes two distributed detention sites, but there were three in the implementation plans, one in each planning zone.	Y	There are potential sites located in each planning zone (3), but only (2) sites identified in the CIP. The correlation between the tables is not intended to be direct. Table organization was intended to allow for flexibility in developing up to 2 project sites in the RLR, in any planning zone.
BWSR	15	3	In Section 8.2.3, there is a sentence that reads, "The location and authority for public ditches within the planning area are listed in Appendix K." Appendix K includes more than just ditches so it should say public ditches and other water management facilities. Also, responsible authorities in Appendix K expands beyond the RLR Planning Group partners to include cities, DNR, USFWS, Red Lake Indian Reservation, USCOE, Ottertail Power Co, and private landowners. Section 8.2.3 should include a mention of these other responsible authorities. This will show that the RLR Planning Group partners don't have control over all water management facilities in the planning area, and indicate other potential partners for the planning group. The Appendix K title should also be changed.	Y	Edits made as recommended.
BWSR	16	3	Changes are needed in the Riparian Buffer Program portion of Section 8.2.4 to reflect changes that were made to the law in the 2016 Legislative session. Under SWCD Roles and Responsibilities, item B should be changed to read, "In consultation with local water management authorities, must develop ..." Item D should be changed to read, "Must notify the county or watershed district with jurisdiction and BWSR when it..." The County and WD roles are exactly the same so instead of repeating the information it could be combined under one header, "Counties and Watershed Districts Roles and Responsibilities". Under that header, item A should be changed to read, "Must incorporate the SWCD summary of watercourses recommendations into its comprehensive local water management plan by July 1, 2018." Item B should be changed to read, "If electing jurisdiction to enforce the buffer requirement as identified on the Buffer Protection Map, must provide ..." Item C should be changed to read, "Elect to accept jurisdiction and identify the ordinance, rule, or other official controls to carry out the compliance provisions of section 103F.48 and section 103B.101, subdivision 12a, by notice to BWSR prior to March 31, 2017 (Subd. 7(b)). May adopt ..."	Y	Edits made as recommended.
BWSR	17	4	In Section 8.2.4, the information listed under the Comprehensive or land use plans portion is not related to comprehensive or land use plans. A previous draft of the plan contained the following paragraph, "Polk County has county wide planning and zoning and participates in cooperative joint zoning with those Townships that want to retain local control of township specific issues. Pennington and Red Lake Counties currently do not have county wide planning and zoning. LGU's will coordinate with adjacent counties to achieve similar planning and zoning rules and regulations." In the earlier draft it was in an incorrect location and now appears to have been deleted altogether. That paragraph should be inserted here as a starting point for the Comprehensive and land use plans portion. The plan should go on to describe potential opportunities to achieve the goals of this plan through planning and zoning and potential conflicts between the plan and existing land use plans. Also, it would be good to include which townships and cities have planning and zoning in the planning area.	Y	Edits made as recommended.
BWSR	18	4	Page numbers need to be edited in Appendices J and K.	Y	Edits made as recommended.
BWSR	19	4	Recommend making all maps 11x17 in the plan so they are more useful for the reader. Also, recommend providing very clear and descriptive titles for all tables and figures in the plan so they are able to stand on their own.	N	Comment noted. Almost all figures are 11x17.
BWSR	20	4	In the second paragraph under Planning Boundaries in the Executive Summary, recommend editing the first sentence to read, "The size, physical makeup, and diverse land use of the planning area ..."	Y	Edits made as recommended.
BWSR	21	4	There is a statement in the Executive Summary under The Planning Process that says, "In general, surface waters that either had been defined as having poor water quality or those that had adequate water quality data were considered resources of concern." This makes it sound like resources of concern were based solely on water quality. That was a main factor, but there were other considerations and being this is a comprehensive plan that should be mentioned. Also, having "adequate water quality data" shouldn't by itself indicate a resource of concern unless the data is showing there is a concern. This should be clarified.	Y	Sentence was clarified to address concern.
BWSR	22	5	A summary of estimated implementation costs by planning zone should be included in the Executive Summary.	Y	Edits made as recommended.

Commenter	Comment #	Comment Letter Page #	Comment	Plan Change Made (Y/N)	Comment Response/Action
BWSR	23	5	Outline of Responsibilities of Participating Local and Regional Governments section in the Executive Summary should be expanded to include more of a summary from Sections 8.1, 8.1.1, and 8.1.2. Copy Table 8-1 and include it in the Executive Summary.	N	Executive summary is intended to be as concise as possible. Suggested information is available for plan reviewers in Section 8.
BWSR	24	5	In Section 4.3, to better set-up the rest of the plan it would be good to go into more detail on why each of the nine issues of concern were selected and what specifically are the causes or reasons this is an issue in this planning area. Encourage summarizing by planning zones as the background of these issues is different in each zone. Also, Table 4-1 doesn't include source water protection, but it is included in Table 4-2, and wetland management was high on Table 4-1, but not included in Table 4-2. Those should be explained.	Yes/No	The detail suggested in this comment was not included in the editing process. Comment noted. Source water was clarified in Table 4-1.
BWSR	25	5	In Section 4.8, the second paragraph contains the following statement, "The management strategies and BMPs considered in this plan are listed in Table 4-16." Table 4-16 does not include all of the BMPs that were considered and included in the plan. It should be clarified that Table 4-16 only includes BMPs that were assessed with PTMAApp and that there are other BMPs in the plan that PTMAApp does not have the capability to assess.	Yes	Sentence was clarified to address concern.
BWSR	26	5	At the beginning of each of Sections 5, 6, and 7, in the second paragraph it says, "...users should reference Table 5-1 (6-1 or 7-1) to understand relevant issues established for each resource of concern in the planning zone ..." Those tables (x-1) are specific to water quality issues and this statement should be adjusted to reflect that. It could be as easy as changing it to, "...to understand relevant water quality issues..."	N	Comment noted.
BWSR	27	5	The Groundwater Protection goals read more like action items than goals. Recommend rewording to sound more like goal statements. Make sure implementation sections have actions that correspond with these goals. For example, there is a goal in Table 5-2 to seal 8-10 wells per year, but Table 5-3 only includes 36 well sealings. Also, recommend adding a goal related to the LGUs gaining a better understanding of groundwater issues.	N	Goals were taken verbatim from other sources such as MDH and LGUs. Tables are not explicitly developed to be cross-referenced and directly correlated. Some numbers cross between zones and are estimates only.
BWSR	28	5	Recommend including a cost total at the end of Tables 5-3, 5-4, 6-3, 6-4, 7-3, and 7-4. In tables x-3 a cost total for each management area would also be good.	Y	Edits made as recommended.
BWSR	29	5	State agencies can be listed as lead entity in Tables 5-3, 5-4, 6-3, 6-4, 7-3, 7-4 if and where applicable. Recommend reviewing these tables and editing lead entity as needed.	Y	Edits made as recommended.
BWSR	30	5	Recommend moving Figures 5-2, 6-2, 7-2 to the beginning of their respective sections.	N	Comment noted.
BWSR	31	5	In Table 6-2, "Educate landowners on water resource concerns as they relate to altered hydrology and private drainage systems." is listed as the goal for the "Protect disconnected, non-contributing drainage areas ..." prioritization statement. The other 2 planning zones had a goal of "No new drainage from 10-yr non-contributing areas" related to this prioritization statement. Recommend using that goal for the middle planning zone also.	Yes	Edits made as recommended.
BWSR	32	6	During the reassessment of the MOA and in Section 8.1.1 under Identification and Coordination of Shared Services (Staffing), highly recommend the RLR Planning Group consider the inclusion of a watershed-based coordinator.	Y	Comment noted.
BWSR	33	6	In Section 8.1.2, recommend removing the first two sentences. Then go on to describe the relationships with cities, townships, and federal and state agencies, as well as the Red River Watershed Management Board and the Red River Valley Conservation Service Area. This would also be a good place to describe the 1998 Mediation Agreement and the project team process.	N	Project team process is addressed in Section 8.2.2.
BWSR	34	6	In Section 8.1.3, the first sentence under Local Funding should be edited to say, "Funding for programs and projects will be pursued through a variety of sources as shown in Table 8-2 and Table 8-3." and should be included as an intra to the Funding section along with tables prior to the Local Funding information. The second sentence includes a mix of programs and funding sources. Remove the programs and just include local funding sources (fee for services, permit fees, taxing authorities, county appropriation to SWCDs, etc.).	Y	Edits made as recommended.
BWSR	35	6	Table 8-3 should also include local funding sources. Also, the primary assistance type for Ag BMP Loan Program and Sustainable Ag Demo grants should be changed to Loan/Financial.	Y	Edits made as recommended.
BWSR	36	6	In Section 8.1.3, highly recommend the creation of Water Management Districts for the entire planning area, which would probably make sense to organize by management areas. It would be easier to set them up now than to amend the plan if they are desired at a later date.	N	Comment noted.
BWSR	37	6	In Section 8.1.3, recommend including the Red River Watershed Management Board under local funding.	Y	Edits made as recommended.
BWSR	38	6	In the first paragraph under Section 8.1.5 the following 2 sentences could be removed as the information is covered under Section 8.1.1., "The planning group will continue to meet after the adoption of the Red Lake River 1W1P. One member of the planning group will be responsible for organizing and hosting the quarterly meetings on a rotating annual basis." Also, the information related to Biennial Evaluation could be removed as an annual work plan and evaluation was chosen.	N	Comment noted.
BWSR	39	6	The second half of the paragraph under Section 8.1.7 should be edited to indicate whether these are existing agreements or proposed new agreements. Also, there are some duplicate items in the list. This information should correspond to the shared services identified in Section 8.1.1.	Y	Edits made as recommended.

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BWSR	40	6	Table 8-5 might be better suited for Section 4.8, or repeated in each of Sections 5.3, 6.3, and 7.3. Embracing the concept of multiple benefits is a guiding principle of the 1W1P program and this table does a good job of showing the multiple benefits of these BMPs. Therefore, it is recommended to use this table earlier in the plan to highlight the multiple benefits.	N	Comment noted.
BWSR	41	6	Floodplain is a separate program and therefore to be consistent with the formatting in this section should be in a larger font and bolded. The first sentence should be moved down a line so that it is underneath the program header. Also, in the first sentence, "pursuit" should be change to "pursuant".	Y	Edits made as recommended.
BWSR	42	6	Table 8-7 includes programs that are not described in Section 8.2.4, such as household hazardous waste, ditch law, solid waste program, soil loss, and others. Recommend including a brief description of each of those programs in this section.	N	Comment noted.
BWSR	43	6	Under the Inventory portion of Section 8.2.5, there is a bullet for, "Conduct a culvert inventory that includes location and sizing. Plan the installation for SWI's and Buffers based on inventory results." How are these related? Would "Plan for systematic culvert replacement based on inventory results." be more applicable than installation of SWIs and buffers? The next bullet below is, "Update County Drainage records including benefited areas". The LGUs listed include the RLWD and the SWCDs, but no counties. Recommend including counties.	Y	Edits made as recommended.
BWSR	44	7	In Table 8-9, there are website links listed in the Newsletters and Reports row. These should be moved down into the Websites, social media row. Also, there was a row in an earlier draft for "Field Days/Tours/Demonstration Workshops" that I believe was accidentally deleted. Recommend adding it back in.	Y	Edits made as recommended.
BWSR	45	7	Recommend moving acronyms to Section 2.	Y	Edits made as recommended.
BWSR	46	7	Consider adding the DNR Watershed Health Assessment Framework Context Reports and/or the NRCS Rapid Watershed Assessments for both the Red Lake River and Grand Marais Creek watersheds to Appendix B to provide more detailed information to support the actions in the plan. Also, page numbers should be added for Appendix B.	N	Comment noted.
MDA	47	1	Table 5.3 In the "structural" and "non-structural" implementation tables for each the lower, middle and upper planning zones (tables 5-3, 5-4, 6-3, 6-4, and 7-3, 7-4), the "Lead Entity" is listed. In many (most) cases, NRCS is listed. This may have been decided due to the physical presence of staff from that organization within each of these planning zones or that they regularly provide cost share to support these practices. It is suggested that the state agencies with Minnesota statutory authority in each defined area also be incorporated into the table. For example, in the draft Yellow Medicine 1W1P (http://www.area2.org/images/RSI%202604%20YM1W1P%20Draft.pdf) within the Targeted Implementation Plan sect (4.1.4) there are similar tables which include reference to responsible state agencies. It is suggested that these tables be cross referenced to include all appropriate state agencies in the implementation tables for the Red Lake 1W1P document to facilitate communication between the local and state agencies.	Yes/No	A future update of the plan could include this recommendation. Leads were updated in Tables x-4.
MDA	48	1	Table 8.3 Another funding source to add under MDA would be the Minnesota Agricultural Water Quality Certification Program. Additional information can be found at: http://www.mda.state.mn.us/awqcp	Y	Edits made as recommended.
MDA	49	1	Table F-1 MDA's Nitrogen Fertilizer Management Plan is referenced in the table. It is no longer "draft" so please remove draft and use the date of 2015. For additional information please visit: http://www.mda.state.mn.us/nfmp	Y	Edits made as recommended.
MDA	50	2	General Comment For clarity, it is suggested that consistency be applied when abbreviating the government agencies. For example, the Minnesota Department of Agriculture was referenced in the reports as MDA, MN Department of Ag., and Mn Dept. of Agriculture.	N	Comment noted. Need specific locations cited to make these changes.
RLC SWCD	51	1	Figure 3-2: can the fonts be changed to black so the diagram is easier to read.	N	Graphic is a jpeg and cannot be edited.
RLC SWCD	52	1	Table 4-9: Please add a sentence to explain the 1-5 ranking process. (Highest to Lowest)	Y	Edits made as recommended.
RLC SWCD	53	1	Page 4-22: Please add: Browns Creek to the list under 2. Other Water Courses and Tributaries	Y	Edits made as recommended.
RLC SWCD	54	1	Table 4-15: Make the bullets all the same size in the table.	Y	Edits made as recommended.
RLC SWCD	55	1	Page 6-9: Drainage Systems Management: The third priority statement has an extra space after subsurface and the word drainage.	Y	Edits made as recommended.

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RLC SWCD	56	1	Page 6-13: Source Water Protection: Please add: Under Priority Statement Column: Protect surface water quality & quantity of EGF drinking water supply. Then next column: All; then next column: All; and the last column please add this statement: Educate the public, install BMPs.	Y	Edits made as recommended.
RLC SWCD	57	1	Table 6-3: Nutrient Management Cost seems low throughout the structural implementation schedule (All three zones).	Y	Edits made as recommended.
RLC SWCD	58	1	Table 6-3: The BMP Precision Ag Practices has been removed from some of the Management Areas; that information should be put back into Table 6-3.	Y	Edits made as recommended.
RLC SWCD	59	1	Table 6-3: Habitat: Add the following: Priority Statement: Restore aquatic habitat of other reaches where feasible. Management Area: All; Resource of Concern: Red Lake River; Measurable Goal: Assess in stream fish habitat at key locations/sites.	N	This information and intent is already contained within the Habitat section of the table to a reasonable extent, and does not fit with the prioritization purpose of the table.
RLC SWCD	60	1	Page 8-7: Under Other Funding Sources – Please add a sentence: Any new grant opportunities from local, state, and federal agencies/organizations.	Y	Edits made as recommended.
RLC SWCD	61	1	Page 8-8: Table 8-4 Farm Bill Assistance Report: Please add: NRCS Technical Approval Authority: Please add: NRCS	Y	Edits made as recommended.
RLC SWCD	62	1	Page 8-35: The last Bullet on the page: Conduct an abandoned well inventory. Need to add a bullet underneath stating: LGUs – Pennington SWCD, Red Lake County SWCD, and West Polk SWCD	Y	Edits made as recommended.
RLC SWCD	63	2	Page 8-36: Under Conduct a Subsurface Treatment Systems (SSTS) Inventory. Remove the letters “LGUs” and instead behind the bullet just state: Red Lake County SWCD	Y	Edits made as recommended.
RLC SWCD	64	2	Appendix A – Missing signature page from West Polk SWCD	Y	Edit made as recommended.
RLC SWCD	65	2	Page C-2: Fix under Step 9: c. the last sentence there are several spaces that need to be removed.	Y	Edits made as recommended.
Penn. SWCD	66	1	AUID MAPS/Table: Include in plan in addition to the appendix - one that covers the planning area and individual maps that cover the planning zones. There are multiple AUIDs in a management area and planning zone and it will help ID what reach we are trying to target.	Y	AUID #s were added to the maps in Chp 5-7.
Penn. SWCD	67	1	Source Water Protection – Assessment Plans: There are multiple public wells in the watershed that have Assessment Plans completed by the MDH and are mapped in the plan. In addition to a map in the appendix, a table should be included in the plan that lists the public wells, aquifer sensitivity, name, ID, Assessment Plan Completed/Not Completed, and Aquifer Sensitivity could be included in the plan. http://www.health.state.mn.us/divs/eh/water/swp/swa/swainfo/default.cfm	N	The MDH map included in the appendix shows the location of these types of wells. A future update of the plan could include this information in a table.
Penn. SWCD	68	1	For all Non-Structural Implementation Plans Include: Conduct a Regional Hydrogeologic Assessment of Groundwater Resources	Y	Edit made as recommended.
Penn. SWCD	69	1	For Non-structural Implementation Plan Include: Map locations of nitrate contamination or other groundwater contamination, \$10,000, All SWCDs	Y	Edit made as recommended.
Penn. SWCD	70	1	Suggest starting all actions in the non-structural implementation plans with Action words	N	A future update of the plan could include this recommendation.
Penn. SWCD	71	1	Not sure where to include in the plan but worth mentioning the need for consistent and updated Drainage System Records in the watershed.	N	A future update of the plan could include this recommendation.
Penn. SWCD	72	1	Executive Summary: 1-7: Drainage Management System Goals and Altered Hydrology Goals are the same narrative. Should be different narrative because they are different Issues of Concern.	N	Narrative is similar due to similarities in the issues.
Penn. SWCD	73	1	Key Terms 2-2: PTMApp: suggested change “solution to “tool”	Y	Edit made as recommended.
Penn. SWCD	74	1	Section 4.7 Measurable Goals on 4-11 and 4-12: Drainage Management System Goals and Altered Hydrology Goals are the same narrative. Should be different narrative because they are different Issues of Concern.	N	Narrative is similar due to similarities in the issues.
Penn. SWCD	75	1	Table 6-1 on Page 6-2: Pennington CD 96 to Clearwater River is listed as impaired for TSS but management class is high quality	Y	Edit made as recommended.
Penn. SWCD	76	1	Table 6-1 Page 6-2: Unnamed ditch (Little Black River) E-coli should be E. coli and it’s also listed as impaired and needs protection. If it’s impaired is should be restorable or Imp. Low Quality. Same row: DO is listed as Imp. Restorable but not listed under the impairment column.	Y	Edit made as recommended.
Penn. SWCD	77	1	Table 6-1 Page 6-3: Black River Headwaters to Little Black River (M4 3-530) Move DO to next line in management class column.	Y	Edit made as recommended.
Penn. SWCD	78	1	Same Table 6-4: Resource of Concern is Browns Creek and it’s listed under M4 management area. M4 is the Black River.	Y	Edit made as recommended.
Penn. SWCD	79	1	Table 6-2 on Page 6-5: Separate Management Areas with a line between to be consistent in table.	N	Resource applies to both areas; table was not edited.
Penn. SWCD	80	2	Table 6-2 on Page 6-5: Soil Erosion and Sedimentation the first measurable goals text is lighter than the other text	Y	Edit made as recommended.
Penn. SWCD	81	2	Table 6-2 page 6-12: Groundwater Protection, last measurable goal suggest spell out MDA NFMP	Y	Edit made as recommended.
Penn. SWCD	82	2	Table 6-3 page 6-19: M6: Restoration and Management of Rare and Declining habitat: Put in 20 acres for quantity.	Y	Edit made as recommended.
Penn. SWCD	83	2	Table 6-4 on page 6-24: Revised AIS and Terrestrial Non-Native Invasive Plan – Remove dash in cost of \$10,000	Y	Edit made as recommended.
Penn. SWCD	84	2	Table 6-4 on page 6-24: SWCDs should be plural	Y	Edit made as recommended.
Penn. SWCD	85	2	Table 6-4 on page 6-25: Bullet action items when there is a list	N	A future update of the plan could include this recommendation.

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Penn. SWCD	86	2	Table 6-4 on page 6-25: Action item "Develop and Implement a cost share program to financially assist property owners in sealing unused, unsealed wells on their property, including the public water suppliers in the watershed" Remove "Develop" because a cost share program already exists	Y	Edit made as recommended.
Penn. SWCD	87	2	Figure 6-3 page 6-29: Map is missing management area labels	N	See legend for management area labels.
Penn. SWCD	88	2	Figure 6-4 page 6-30: Map is missing management area labels and management lines overlap/hard to follow. Is there a way to clean up the management area boundaries?	N	A future update of the plan could include this recommendation.
Penn. SWCD	89	2	Section 7, 7.1, page 7-1: Last paragraph, first sentence states the lower planning zone. It's the upper planning zone.	Y	Edit made as recommended.
Penn. SWCD	90	2	Page 7-2: Fit text on top of page on previous page if possible	N	A future update of the plan could include this recommendation.
Penn. SWCD	91	2	Table 7-2 on page 7-4 and 7-5: Soil Erosion and Sedimentation Issue of Concern is duplicated in part of table 7-2. Remove duplicate prioritization statements and clean up the table.	Y	Edit made as recommended.
Penn. SWCD	92	2	Table 7-2 on page 7-6: Altered Hydrology, Measurable Goal that states: No new drainage from 10 yr. noncontributing areas. Change to "Educate landowners on water resource concerns as they relate to altered hydrology on private drainage systems" This would be consistent with the Measurable Goals of other Planning zones as well.	Y	Edit made as recommended.
Penn. SWCD	93	2	Table 7-2 page 7-8: Groundwater Protection, the table duplicates Prioritization statements and measurable goals throughout the Issue of Concern. Measurable goals that states "Develop and Implement a cost share program..." Remove develop to change to implement a cost share program...	N	Table is organized with similarities as ID. However, each statement corresponds to differing portions of Mgmt areas, affected resources, and types of strategies, ie. wells versus surface water actions.
Penn. SWCD	94	2	Table 7-2 page 7-10: The first prioritization statement "Prioritize inner and outer surface water assessment areas to:" Is not a prioritization statement Identified anywhere in the plan. The measurable goals could be incorporated into another Prioritization Statement under Source Water Protection.	N	Per MDH. A future update of the plan could include this recommendation.
Penn. SWCD	95	2	Table 7-2 page 7-10: Prioritization Statement Maintain a safe and adequate drinking water supply for residents in order to protect the public's health, safety, and general welfare of the community is duplicated. Remove duplicate statement.	N	Table is organized with similarities as ID. However, each statement corresponds to differing portions of Mgmt areas, affected resources, and types of strategies, ie. wells versus surface water actions.
Penn. SWCD	96	2	Table 7-4 page 7-17: Reach Assessment Classification, Prioritization and Implementation Plan: Change lead entity to RLWD if they are willing	Y	Edit made as recommended.
Penn. SWCD	97	3	Table 7-4 page 7-17: Conduct Stormwater Assessment add "for the City of Thief River Falls" and put in a cost of \$95,000.	Y	Edit made as recommended.
Penn. SWCD	98	3	Figure 7-1 page 7-19: Map text is very hard to read and is small and blurry. The next two maps on 7-20 and 7-30 are clear and easy to read.	N	A future update of the plan could include this recommendation.
Penn. SWCD	99	3	Section 8: The MOA is planning to be revised and there will likely be changes made throughout this section.	Y	Edits made as recommended.
Penn. SWCD	100	3	Section 8, 8.1: Add that the Planning Group will conduct quarterly meetings to discuss the plan and project implementation.	N	Addressed under Committees section.
Penn. SWCD	101	3	Table 8-5 on page 8-10: Channel Bed and Stream Channel Stabilization: I hope this would improve surface water quality by reducing sediment. I suggest checking the surface water quality box as well.	Y	Edit made as recommended.
Penn. SWCD	102	3	Table 8-5 page 8-11: Combine Stormwater Management BMPs and Stormwater Retention Basins into Stormwater Management BMPs	N	Basins are dual purpose, both FDR and WQ.
Penn. SWCD	103	3	8.2.4 Page 8-15: Under County Ordinances, Pennington's subsurface sewage treatment system ordinance is called "Sewage and Wastewater Treatment Ordinance"	Y	Edit made as recommended.
Penn. SWCD	104	3	8.2.4 Pages 8-16, 8-17, and 8-18: Punctuation after the bullet items are not consistent, most have periods while others do not and one has a semi colon.;	Y	Edit made as recommended.
Penn. SWCD	105	3	Page 8-30 Second paragraph, last sentence: "These Other" use lower case o in other	Y	Edit made as recommended.
Penn. SWCD	106	3	Page 8-34, Rainfall monitoring paragraph "The Rainfall_Monitoring/Climatology – Remove dash between rainfall and monitoring.	Y	Edit made as recommended.
Penn. SWCD	107	3	Page 8-34: Include an Observation Well map for the watershed	N	A future update of the plan could include this recommendation.
Penn. SWCD	108	3	Page 8-35 and 8-36: under inventory where it lists the Issues of Concern suggested new format: Issues of Concern: Surface Water Quality, Altered Hydrology, and Drainage Ditch Maintenance Actions: Main Bullet (darker bullet) LGUs: Tools (if applicable)	N	A future update of the plan could include this recommendation.
Penn. SWCD	109	3	Appendix B Land and Water Resources: Maps are not consistent size (buffer protection map is smaller than the rest), some have faded edges while some do not, and some maps have a larger land area included than others. Suggest making HDR maps as consistent as possible and not have faded edges.	N	A future update of the plan could include this recommendation.
Penn. SWCD	110	3	Appendix C, C-2: Step 9. C. Formatting of last paragraph needs to be corrected and clarification of statement as well.	Y	Edit made as recommended.
Penn. SWCD	111	3	Appendix G, G-2 and G-3: Format top row on tables to include the "t" in comment in one word	Y	Edit made as recommended.

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MDH	112	1	PG#1-4 and All Issues of Concern: Change "Source Water Protection" to "Drinking Water Protection" *Due to confusion of source water protection being surface water AND ground water (not just surface water), I think it would be helpful to modify the issue of concern to Drinking Water Protection. *Please update "Drinking Water Protection" throughout the plan.	N	Comment noted. Word selection, definitions, terminology and table organization was evaluated throughout the planning process in an effort to minimize confusion. Given the complexities in making this change throughout the plan, it was decided not to incorporate this comment at this time. Future updates of the plan may consider incorporation of this language.
MDH	113	1	Pg # 1-6 and 4-7 Edit text under Issue of Concerns: Groundwater Protection and Source/Drinking Water Protection	N	Comment noted. Word selection, definitions, terminology and table organization was evaluated throughout the planning process in an effort to minimize confusion. Given the complexities in making this change throughout the plan, it was decided not to incorporate this comment at this time. Future updates of the plan may consider incorporation of this language.
			Issue of Concern: Groundwater Protection		
			<ul style="list-style-type: none"> • Maintain a safe and adequate drinking water supply for residents in order to protect the public's health, safety and general welfare of the community. • Participate and support the development of a county geologic atlas to better understand the geology of the area. • Protect Drinking Water Supply Management Areas (DWSMAs). Special consideration will be given for DWSMAs with a moderate or high vulnerability. • Implement MN Department of Ag's Nitrogen Fertilizer Management Plan • Implement strategies to conserve ground water supply quality. • Implement strategies to conserve ground water supply quantity. • Conduct sub-surface sewage treatment system (SSTS) inventory and upgrades. • Work collaboratively with public water suppliers to implement their Wellhead Protection Plans. • Groundwater appropriations do not adversely impact fish habitat, fens other groundwater dependent surface water features, or other groundwater dependent biological communities. 		
			Issue of Concern: Source Water Protection		
			<ul style="list-style-type: none"> • Maintain a safe and adequate drinking water supply for residents in order to protect the public's health, safety and general welfare of the community. • Protect Drinking Water Supply Management Areas (DWSMAs). Special consideration will be given for DWSMAs with a moderate or high vulnerability. • Partnership with the East Grand Forks and Thief River Falls public water suppliers to protect and maintain a safe and adequate drinking water supply. • Reduce runoff driven sediment and pollutant (total organic carbon, haloacetic acids, and Trihalomethanes) transport to surface waters by targeting implementation in subwatersheds with highest export. • Conserve surface water drinking supplies. • Maintain a safe and adequate drinking water supply for residents in order to protect the public's health, safety and general welfare of the community. • Protect Thief River Falls Source Water Assessment Area (SWAA). • Protect East Grand Forks Source Water Assessment Area (SWAA). • Protect surface water quality and quantity of East Grand Forks drinking water supply. • Conduct sub-surface sewage treatment system (SSTS) inventory and upgrades. • Work collaboratively with public water suppliers to implement their Wellhead Protection Plans. 		
MDH	114	1	Pg# 1-8 Edit text as highlighted in red below. Groundwater Protection and Source Water Protection Goals Several surface and groundwater management plans (including MN Dept. of Health and Mn Dept. of Agriculture NFMP) were referenced for development of measurable goals for protection of surface and groundwater drinking water supplies. Measurable goals in the 1W1P for these issues of concern are related to implementation of surface runoff control practices to protect surface water quality, and protection of groundwater recharge areas, and carrying out education and outreach activities relative to water conservation, well management, well sealing, septic maintenance, groundwater education, etc.	Y	Edit made as recommended.
MDH	115	2	Pg# 1-9 Not sure where the numbers came from for well sealing and septic upgrades. Just make sure the numbers are consistent between tables. It would be helpful for the LGU's if a total cost of all BMP projects were totaled per planning zone.	N	Tables are not all directly linked and dependant. Comment noted.
MDH	116	2	pg# 1-10 It would be good to insert a general statement that all of the modeling done (PTMapp) does not take groundwater into account.	Y	Edit made as recommended.

Commenter	Comment #	Comment Letter Page #	Comment	Plan Change Made (Y/N)	Comment Response/Action
MDH	117	2	pg# 1-10 and 4-28 Some implementation strategies were policy-related as opposed to structural or restorative in nature. For example, implementation of strategies to address source water drinking water protection issues or groundwater protection issues limited to identification of areas of risk, such as the Middle Zone given its designation by the MN Department of Health DNR as a groundwater sensitive region.	Y	Edit made as recommended.
MDH	118	2	MDH does not list groundwater sensitive areas- the DNR does. It is sensitive due to the sandy beach ridges. MDH lists groundwater vulnerability areas. The Crookston DWSMA is the only vulnerable DWSMA in all three planning areas and it is located in the middle planning zone.	Y	Edit made as recommended.
MDH	119	2	pg# 4-25 Groundwater Protection and Source Water Protection Goal Formation Several surface and groundwater management, wellhead protection, and surface water assessment plans were referenced for development of measurable goals. The ways that local governing unit staff can support these goals as part of the 1W1P will likely be limited to implementation of surface runoff practices, assisting public water suppliers with implementing wellhead protection plan activities and carrying out education and outreach activities relative to consumptive uses of water, well management, well sealing, septic maintenance, groundwater education, etc .	Y	Edit made as recommended.
MDH	120	2	Tables 5-1, 6-2, 7-2: Please consider adding an additional resource of concern for the Red Lake River to manage turbidity, TSS, TOC, HAAS, TTHM for drinking water. Perhaps table 7-2 would be a better place?	N	Comment noted.
MDH	121	2	5-8 Please update the edited groundwater protection measurable goals below: Update Education and Outreach Program to include MNDNR and Department of Health Plan information groundwater protection, well management, well sealing, and conservation information. Develop a wellhead protection plan and sealing program Educate the public on how to conserve and protect groundwater resources Participate and support the development of a county geologic atlas Provide cost-share assistance to landowners for sealing 8-10 unused wells per year Conduct an unused, unsealed well inventory	Yes/No	Edits were made to existing action items as suggested, but additional items were not added to the local plan action items at this time - comments noted.
MDH	122	3	*Note: all 3 tables for each planning zone on 5-8, 6-12, 7-8, 7-9 are slightly different- not due to planning zone differences.	N	Comment noted.
MDH	123	3	5-9, 6-13, 7-10 Please change the Source Water Protection Issue to Drinking Water Protection	N	See comment response #112.
MDH	124	3	5-8, 6-12, 7-9 Please move the following Groundwater Protection Prioritization Statements and corresponding (edited) goals to the new Drinking Water Protection Prioritization Statement category: 1) Maintain a safe and adequate drinking water supply for residents in order to protect the public's health, safety and general welfare of the community. a. Provide cost-share assistance to landowners for sealing 8-10 unused wells per year b. Conduct an unused, unsealed well inventory e. Educate the public on safe drinking water standards and how to protect our groundwater resources- e.c. Conduct additional monitoring as needed for drinking water protection 7-8, 2) Protect Drinking Water Supply Management Areas (DWSMAs). Special consideration will be given for DWSMAs with a moderate or high vulnerability. a. Relocate or change the design of proposed stormwater infiltration projects to detention basins b. Develop Distribute education/outreach materials of proper well management and well sealing c. Conduct an SSTS inventory d. Develop and implement a SSTS Tracking System to include: e. Inspection Records and Maintenance and Upgrades Educate the public on proper septic system maintenance and operation 3) Work collaboratively with public water suppliers to implement their Wellhead Protection Plans. a. Participate in the development of Wellhead Protection Plans through technical assistance by participating in meetings. a.b. Partner with public water suppliers to provide Partner with public water suppliers to provide technical and educational assistance to the public as it relates to their Wellhead Protection Plans	No	See comment response #112.
MDH	125	3	5-9 The Source (drinking water) protection issue prioritization statements are basically duplicates of each other. Please delete the following prioritization statement and add the following text to the "Prioritize inner and outer surface water assessment areas" goals: Reduce run-off driven sediment and pollution (TOC, HAAS, TTHM) transport to surface waters by targeting implementation in subwatersheds with the highest export.	Y	Edit made as recommended.

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MDH	126	4	5-9 Please delete the duplicated prioritization statement (after above edits) that only has one goal: Maintain a safe and adequate drinking water supply for residents in order to protect the public's health, safety and general welfare of the community.	N	See comment response #112.
MDH	127	4	5-18 Table 5-4 Please consider adding/editing the following non structural implementation practices: 1) Conduct additional monitoring as needed for drinking water protection 2) Conduct an unused, unsealed well inventory 3) Conduct a SSTS inventory and tracking system 4) Feasibility study for groundwater recharge, water conservation, rain and grey water irrigation alternatives. 5) Support and participate in county geologic atlas 6) Update Education and Outreach Program to include MN Buffer Initiative details and MNDNR and Department of Health Plan well management and well sealing information related to source water 7) Conduct observation well monitoring and develop participate in well head protection plan development	Yes/No	Edits were made to existing action items as suggested, but additional items were not added to the local plan action items at this time - comments noted.
MDH	128	4	5-6, 6-9, 7-2 Please edit the following Altered Hydrology prioritization statement: Promote infiltration, retention, and extended detention practices in new and existing urban developments based on current stormwater best management practices. Non-infiltration practices will be prioritized in Drinking Water Supply Management Areas (DWSMAs). Existing infiltration basins in vulnerable DWSMAs will be mitigated, if feasible.	Y	Edit made as recommended.
MDH	129	4	6-18 Table 6-4 please add/edit the following non structural implementation practices: 1) Develop and implement a Participate in wellhead protection plan development 2) Develop a county geologic atlas. 3) Inventory unused, unsealed wells 4) Seal known unused wells 5) Develop-Distribute education/outreach materials of proper well management and well sealing 6) Develop and implement a cost share program to financially assist property owners in sealing unused, unsealed wells on their property, including the public water suppliers in the watershed 7) Conduct additional monitoring as needed for drinking water protection 8) Feasibility study for groundwater recharge, water conservation, rain and grey water irrigation alternatives.	Yes/No	Edits were made to existing action items as suggested, but additional items were not added to the local plan action items at this time - comments noted.
MDH	130	5	7-17 Please update the following non-structural actions (table 7-4) as shown below: 1) Update Education and Outreach Program to include MN Buffer Initiative details, MNDNR and Department of Health Plan information related to well management, well sealing, AIS and SSTS 2) Develop and implement a Participate in wellhead protection plan development and sealing program 3) Develop a geologic county geologic atlas. 4) Distribute Develop education/outreach materials of proper well management and well sealing	Y	Edit made as recommended.
MDH	131	5	8-4 Note: MDH manages the technical portion of the Drinking Water Revolving Fund and the MN Public Facilities Authority (PFA) handles the financial end. Not sure what this list is from but PCA has a similar Clean Water Revolving Fund Program that should be added. They also do the technical review and PFA does the financial. Both programs get funds from the federal government with a state match but are considered state programs. Let me know if you have questions.	N	Comment noted.
MDH	132	5	8-10 Table 8-5 BMP alignment with resources of concern is missing Groundwater Protection BMPs • Conservation Crop Rotation • Conservation Cover • Cover Crop • Critical Area Planting • Filter Strips • Raingardens	Y	Edit made as recommended.

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MDH	133	5	8-10 Table 8-5 BMP alignment with resources of concern is missing Drinking water (Source) Protection BMPs *Note: All surface water quality improvements should also be checked for drinking water protection. • Channel Bed and Stream • Channel Stabilization • Well Sealing	Y	Edit made as recommended.
MDH	134	5	The 1w1p could be more specific, targeted, and prioritized if Step 3 (alignment of resources of concern with prioritization statements) was more detailed. Specifically, which issue/prioritization statement addresses the most resources of concern and achieves the most multiple benefits? Table 8-5 begins to identify multiple benefits that occurs for select BMPs. Identifying multiple benefits helps to plan, prioritize, and target projects.	N	Comment acknowledged.
MDH	135	5	8-22 Consider including: Reduce turbidity and TSS levels per Surface Water Quality Standards. Reduce Total Organic Carbon (TOC) to less than 12/mg/L. Reduce five haloacetic acids (HAA5) to less than 60ug/L. Reduce Trihalomethanes (TTHM) to less than 80 ug/L	N	A future update of the plan could include this recommendation.
USFW	136	1	Key Terms, beginning pg 2-1. Recommend adding "mitigation" to the terms section as it is used multiple times in the document and could have several definitions/contexts.	N	Edit made.
USFW	137	1	Use of "TBD". The acronym "TBD" is used 52 times in the tables beginning in Table 5-2 and ending in Table 8.2.2, but with what appear to be very different meanings. Assuming that the acronym stands for "to be determined", it is used in some cases where that seems a logical choice. However, it also appears to be a stand-in for "n/a", "unknown", and "unavailable" with no explanation as to what applies to each of those situations. In addition, some of the tables use "TBD" in both "management area" and "resource of concern". These are especially confusing when the same line items have specific "Measurable goals" attached. See Table S-2, pg S-6, line 1 under Altered Hydrology, as an example. A number of the TBD's are associated with future plans but specific resource concerns and priority statements. For instance, "restore or modify natural water course morphology*", has a plan as its Measurable Goal (see pg S-6). Although this plan, and others like it, are necessary to best focus time and finances, they do not, in themselves, get projects on the ground. Therefore, it would be more accurate to label these as interim steps on the way to the Measurable Goal, or possibly include the plans/assessments themselves in the Priority Statements and make the Measurable Goal the accomplishment of the milestones within those plans. This distinction is crucial because in the current document, a finished report could be considered success in meeting restoration goals, even though no actual project has been completed.	N	Comment noted.
DNR	138	1	Executive Summary – the executive summary provides a good overview of the plan, the planning process, and summaries of the key issues, priority statements, goals, and general implementation strategies. The management areas are introduced in the last paragraph on page 1-1. We suggest that the first sentence read something along the lines of: The three planning zones were divided into management areas based on identification of priority resources. A management area is the subwatershed area upstream of the priority resource. The lower planning zone included seven management areas..... Table 1-2 should be reviewed to ensure that the totals are consistent with the appropriate tables in the planning region sections of the report. In each bulleted item after the "surface water quality goals" in the measurable goal section, reference is made to "... that could feasibly be installed within individual subwatersheds..." This should be changed to "that could be feasibly installed within each management area".	Y	Edits made as recommended.

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DNR	139	1	<p>Section 3.3.2. This section begins with "The greater Red Lake River Watershed characteristically has a poorly defined floodplain..." We suggest a rewording to something along the lines of:</p> <p>The Red Lake River Watershed is a diverse landscape that has changed substantially since the area was settled. The watershed includes large areas where land use is almost entirely row crop agriculture with intensive artificial surface drainage and altered natural watercourses and also areas with dominated by wetlands and natural watercourses. Historically, there has been frequent flooding in areas of the watershed. This flooding can have significant negative impact on agricultural and urban infrastructure, as well as natural resources.</p> <p>The current description of the floodplain oversimplifies the description of the 120+ miles of the river.</p> <p>Also, this section starts to use the term "natural resource concerns" in the second paragraph. Previously and throughout the rest of the report, the term "resource of concern" is used. We suggest using the term resource of concern as identified in the definitions section.</p>	Y	Edits made as recommended.
DNR	140	2	The last sentence of paragraph 2 states "Above normal precipitation in the late fall...". This sentence is a bit confusing and basically says that when we have a lot of precipitation, there are floods. We suggest re-writing this sentence to reflect that flood often occur when fall moisture levels are high and when winter precipitation is high. We also recently completed a hydrologic assessment of the Red Lake River which documents that annual precipitation, mean annual flow, peak flows, and low flows have increased increased in the past 30 years. We can provide this information and can help further refine the sentences of this section. Please contact me to discuss.	N	A future update of the plan could include this recommendation.
DNR	141	2	Paragraph 3 is mostly about soils, not geomorphology and the topic sentence should reflect this emphasis.	Y	Edits made as recommended.
DNR	142	2	Section 4.7. Paragraph 1 mentioned that the WRAPs are completed, this is not an accurate statement and should be changed to reflect that the WRAPs/TMDL and 1W1P work together.	N	A future update of the plan could include this recommendation.
DNR	143	2	Goal paragraphs. As indicated in the executive summary comment above, these goal paragraphs use the term subwatershed. This should be changed to management area to maintain consistency and avoid confusion	Y	Edits made as recommended.
DNR	144	2	Habitat Goal Formation and Shoreland and Riparian Management Goal Formation. These sections provide a good overview of the priority resources for protection, restoration, and enhancement. We are actively developing a more refined list of priority stream and riparian habitat resources and look forward to sharing them with local partners this winter.	N	Comment noted.
DNR	145	2	Regarding the buffer map, Figure 4-6. Please let me know whether you need to update the figure based on the most current buffer map information. The GIS data is available.	N	A future update of the plan could include this recommendation.
DNR	146	2	Section 5. Lower Planning Zone. Paragraph 1. Suggest changing the text starting with sentence 3 to something along the lines of: These areas provide limited habitat to terrestrial species. The lower Red Lake River and Red River riparian corridors provide diverse fish and wildlife habitats year round and important refuge for aquatic species during drought periods. The tributaries and ditches within this planning zone provide some seasonal habitat for fish. Many tributaries (natural, altered, and artificial watercourse) are unstable with large amounts of active erosion.....	Y	Edits made as recommended.
DNR	147	3	Paragraph 2. The first and second sentences of this section suggests that there has been no prioritization among management areas within this planning zone. This is affirmed upon review of tables 5-1, 5-2, 5-3, and 5-4. While all this information in these tables is a step toward prioritizing implementation within this planning zone, the reader of this plan is given no indication of which management areas among the seven in this zone are the top priorities. We encourage the planning group to determine and designate which of these management areas are high, medium, and low priorities and revise this section of the plan to in order to better focus work over the next 10 years.	N	A future update of the plan could include this recommendation.
DNR	148	3	The associations between issues, goals, and strategies presented in Tables 5-1, 5-2, 5-3, and 5-4 and figures 5-3 and 5-4 are not clear to people who are not familiar with the planning process. We suggest that an example of how to use these tables together along with the PTMApp be included in the text of this section. An example would help lead a reader through how these tables work together with PTMApp to prioritize and target actions on the ground to achieve goals.	Y	Edits made as recommended. A paragraph was added to Chp 5-7 to help explain how the tables may be used during implementation.
DNR	149	3	Our concerns about prioritization of management areas, association among tables, and the need for an example outlined in review of Section 5 immediately above apply to these sections also. Please consider making some changes to prioritize management areas within zones and providing an example of how to use these tables.	N	A future update of the plan could include this recommendation.

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DNR	150	3	Appendix L. This appendix includes portions of various documents that I shared with members of the planning team and consultants during the planning process. I am not certain that the materials found in this appendix are very helpful to the reader. I would be glad to review and refine the content of this appendix to provide some of the information in a constructive context. If the planning team would like this appendix condenses and refined to key information that would be useful, please let me know the deadline for submission of revised materials to be included in this appendix.	N	A future update of the plan could include this recommendation.