

60 Day Formal Review Documentation

Review Period: 7/25/2024 - 9/24/2024

#	Name & Organization	Page	Comment	Editorial	Material	Note	Change Made (Y/N)	Resolution
1	Darren Mayers & Jeff Hrubes, Board of Water and Soil Resources	--	Thank you for the opportunity to comment on the Upper Mississippi - Grand Rapids Comprehensive Watershed Management Plan (UM-GRCWMP) 2024, as per the July 30, 2024, Notice for 60-day formal review. We have reviewed the final draft of the plan to be presented at the public hearing and have no further comments.			x	N	Thank you for your comment!
2	Bonnie Goshey, Minnesota Pollution Control Agency	--	The Minnesota Pollution Control Agency (MPCA) appreciates the opportunity to review the draft Mississippi River - Grand Rapids Watershed Plan (Plan) dated July 30, 2024, as well as providing input throughout your Plan development process. The Plan incorporates MPCA's seven issues highlighted in the May 15, 2023, priority concerns letter and we have no further comments at this time.			x	N	Thank you for your comment!
3	Chris Parthun, Minnesota Department of Health	--	The Minnesota Department of Health (MDH) has reviewed the Upper Mississippi - Grand Rapids Comprehensive Watershed Plan submitted by the Itasca County SWCD on July 25th and approves the plan and has no further comments. The entire WS planning process has been very transparent with ample opportunity to provide comment at many places in the timeline. The concerns I expressed, and data I provided, for addressing source (drinking) water protection were well received and thoughtfully incorporated. Staff have been very accessible throughout the process and have been prompt in their replies to any questions or suggestions I posed.			x	N	Thank you for your comment!
4	Rian Reed, Minnesota Department of Natural Resources	1	The final sentence of the third paragraph is incorrect and should be edited as follows: "This area is characterized by an industrial landscape with large open pits, many of which are now recreational lakes filled with water, surrounded by immense tailings basins and stockpiles." Filling with water does not make a mine pit a lake, although it can have many of the same uses as a lake. The water filled mine pits are mostly private property and are not public waters. Recreation which does occur on the mine pits often requires trespassing for access.	x			Y	Edited mine pits as suggested

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5	Rian Reed, Minnesota Department of Natural Resources	17	Shorelines are continually being developed at a high rate. The 3.6% private ownership in the entire UMGR watershed may appear to indicate population and development as a minimal factor on lake shorelines. The Radomski 2006 report helps indicate shorelines are getting more and more heavily developed statewide. A distinction noting shoreline development would help indicate the relative amount of shoreline development in the UMGR watershed.		x		Y	Added text on the 3.6% development being focused around lakeshore.
6	Rian Reed, Minnesota Department of Natural Resources	21	There are several lakes listed at the bottom of the Lake Section Introduction page where impairment is close to the standard and is noted that a small improvement could delist them. Many of the lakes listed appear to be exhibiting the natural condition based on watershed size, lake size and average depth. There are a few of the lakes below included in a modeling exercise done on Itasca lakes in 2005 with the MINLEAP model calibrated for Itasca County by Dr. William Walker. They include Bluebill, Libbey and Twenty-Four. These lakes model over the 30 ug/l standard for phosphorus, there is uncertainty with these models, however the model exhibits generally what to expect on mainly undisturbed watershed catchments in the Northern Lakes and Forests Ecoregion (NLF). Also, notable with lakes in the NLF region is wetland influence causing bog stain color, increased phosphorus, and algal concentrations. Stained water alone can cause significant clarity reductions. Marble and Sherry lakes were not included in the model runs; however, they are also stained waters and possibly naturally high in phosphorus.		x		Y	Added text: A lake modeling exercise in 2005 showed that Bluebill, Libbey, and Twenty-Four lakes are naturally over the 30 ug/L standard for phosphorus even though their watershed catchments are mostly undisturbed. It is possible that wetland-influenced lakes lead to bog-stained waters and increased phosphorus and algae. Marble and Sherry lakes were not included in the model; however, they are also stained waters and possibly naturally high in phosphorus.
7	Rian Reed, Minnesota Department of Natural Resources	24	paragraph incorrectly describes mine pits as lakes. Please edit the third sentence as follows: "Inactive mine pits can become lakes fill with water and can be used for recreation and can be stocked for fishing."	x			Y	Rephrased as suggested

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8	Rian Reed, Minnesota Department of Natural Resources	25-29	Consider targeting wild rice lakes and shallow lakes or areas on lakes/ivers with similar habits for conservation protection as a high priority. The threats to these shorelines are from development and associated disturbance to waterfowl and traditional hunting/trapping opportunities. Protecting water quality on recreational type lakes can be enhanced with buffer and runoff protection and following zoning laws that reduce nutrient contribution. Shoreland activities related to disturbance to waterfowl and providing hunting opportunity can be much more impactful. Larger sections of shoreline need to be protected to maintain waterfowl use and hunting that zoning laws are not designed to do. It will be important to work with landowners with larger acreages to preserve these resources. There are many other lakes besides the focus on Big Rice Lake and working with DNR Wildlife and Shallow Lakes Program can help to identify important areas. These areas can also be important for other fish and wildlife species that need security and larger habitat requirements. Not long ago much of Minnesota's lakes had valuable waterfowl habitat. The miles of shoreline that no longer provide important waterfowl habitat and associated recreational hunting opportunity has not been fully measured, however with collaboration among DNR and other agencies and interest groups much like prairie wetlands we can look for opportunities to help preserve remaining areas.		x		Y	Added a strategy box that NE lakes are a focus for wild rice and habitat protection. The priority map for protection is in Section 6. Forests, Figure 6.2. Wild rice and habitat protection will be funded by habitat funds, not clean water funds.
9	Rian Reed, Minnesota Department of Natural Resources	32-33	For future projects it will be important to recognize the value gained for restoration and protection activities. Near shore nutrient management will normally have the best results for improving water quality on lakes with smaller watershed size/lake area due to the higher shoreline nutrient contribution to the overall load. Hypothetically applying the total potential lakeshore contribution and comparing to the total watershed contribution helps better understand this concept. There is also shoreline habitat value that can be equally important to fish and wildlife. Will there be a tracking mechanism to evaluate at least theoretically how we are doing beyond the total projects/acres implemented?			x	N	The local partners don't have a way to do this currently but would look for help in developing something in the future.

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10	Kelly Applegate, Mille Lacs Band of Ojibwe	17	"What" covers Action name, outcome, and program, but it should also have information to clearly spell out how this question ties to the other questions, especially "Who" and "Cost".		x		N	Action tables have each action in a row, so what, who, and cost are all associated with one action.
11	Kelly Applegate, Mille Lacs Band of Ojibwe	112, 113	Where does the MLBO fit into this table?		x		Y	Added MLBO in the monitoring table.
12	Kelly Applegate, Mille Lacs Band of Ojibwe	116	This section only mentions and shows the "MPCA environmental justice area" but there also are the Federal "IRA Disadvantaged Community" areas that can be found on the US EPA tool EJScreen.		x		Y	Added a description and link to the EPA tool.
13	Kelly Applegate, Mille Lacs Band of Ojibwe	119	How does the MLBO fit into this?		x		N	We acknowledge that the MLBO has goals for resource management. Where those align with this plan, there is opportunity for increased collaboration.
14	Kelly Applegate, Mille Lacs Band of Ojibwe	120	How does the MLBO fit into this?		x		N	If MLBO is a formal partner on the Memorandum of Agreement, they would be a part of the Policy Committee. Local partners will meet with MLBO to discuss opportunities.
15	Kelly Applegate, Mille Lacs Band of Ojibwe	121	How does the MLBO fit into this?		x		N	
16	Kelly Applegate, Mille Lacs Band of Ojibwe	121	MLBO is a government, not a civic organization, conservation group, business, or individual, so placing MLBO in this section is inappropriate.		x		Y	Moved MLBO to government collaboration
17	Dave Purgett, Thunder Lake Association	--	Please let us know how we can help with the program concerning Thunder Lake			x	N	Thank you for your comment!

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18	Dave McMillan, Long Lake Conservation Center	--	On behalf of the thousands of young people who visit Long Lake Conservation each year to study and explore the woods and wetlands of our corner of Minnesota, we support this effort to keep our watershed clean and abundant with life. We are especially passionate about any experiential educational component of the plan. To paraphrase the great David Attenborough: no one will defend what they don't understand, and no one can understand what they have never experienced. Long Lake stands with you in your efforts.			x	N	Thank you for your comment!
19	Lynn Anderson, Tamarack Water Alliance	--	The Mississippi One Watershed planning document needs to include adequate filling of exploratory mining drill holes per DNR regulations. Verification must be obtained from the DNR that this has actually happened per DNR regulations without delay.		x		Y	Added section on exploratory borings to Plan Programs page 90.
20	Lynn Anderson, Tamarack Water Alliance	--	Any waste from exploratory drilling should be properly removed and contamination mitigated.		x		Y	Added section on exploratory borings to Plan Programs page 90.
21	Lynn Anderson, Tamarack Water Alliance	--	Verification must be obtained to ensure the drilling fluids used in exploratory drilling do not contain PFAS. If PFAS is found, remediation must occur immediately to protect the excellent water quality present in the watershed.		x		Y	Added section on exploratory borings to Plan Programs page 90.
22	Lynn Anderson, Tamarack Water Alliance	--	Contamination of the clean water and forests, rare peatlands, wetlands and the aquatic life, waterfowl, and wild life they support must be considered in relation to sulfide mining (Talon Metals/Rio Tinto Tamarack Project). A review of the scientific literature indicates that whenever sulfide mining (nickel or copper) is built in a water rich area, it is toxic to all life. The sulfuric acid created when nickel or copper interact with air or water occurs slowly over many, many years and remains in the ecosystem in perpetuity.		x		N	Mining contamination is discussed in the lakes and wetland section. It is the responsibility of regulatory agencies and is not within the scope of this plan to implement.

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23	Lynn Anderson, Tamarack Water Alliance	--	All mining creates health risks for residents living near a mine site. Sulfide mining creates a number of additional health dangers for people. For example, Talon Metals/Rio Tinto has no plans to properly filter the heavy metal contaminants that would blow from their underground mine shaft vents. The toxic heavy metal contaminants would blow across the region, contaminating the clean air the watershed enjoys. Methyl mercury would accumulate in the fish due to increased sulfides in the water. When these fish are consumed it leads to neurological problems in infants and children.		x		N	This is the responsibility of regulatory agencies and is not within the scope of this plan to implement.
24	Lynn Anderson, Tamarack Water Alliance	--	Planning needs to include protections for our children and future generations given the nature paradise the area currently provides with it's clean air, abundant clean lakes, rivers, and recreation pursuits. Any mining would damage the clean air, quiet, and peace of this rural retreat, home to thousands of vacation cabins and farms with blasting 2/3 times a day, and increased noise/dust from truck traffic.		x		N	This is the responsibility of regulatory agencies and is not within the scope of this plan to implement.
25	Lynn Anderson, Tamarack Water Alliance	--	Plans need to include provisions for protecting the ecosystems of Savannah Portage State Park (Minnesota's largest state park) and Wild Rice National Wildlife Refuge.		x		N	Rice Lake National Wildlife Refuge is outside the UM-GR Watershed. These areas are managed by Federal and State agencies, not local. Privately owned parcels next to existing public lands are prioritized for protection.
26	Lynn Anderson, Tamarack Water Alliance	--	The 1855 treaty with the Ojibwe people must be upheld so that the watershed remains a sustainable and clean resource for the tribes to fish, hunt, and gather now and for seven generations forward. As the watershed plan notes the region is home to many, prime wild rice lakes that are very sensitive to sulfide pollution. As wild rice is a key part of the Ojibwe diet and culture, water quality must be protected from sulfide mining to uphold valued Ojibwe and other non-natives ability to harvest wild rice.		x		N	Protecting wild rice is incorporated into stream, wetland, and lake sections. It is also included in the RAQ scoring. MLBO has been a partner in the planning.

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27	Brian Huberty, Minnesota Forestry Association	--	<p>Good section on Groundwater. What is lacking overall is the status and trends for all the topics. What did the component (forests, groundwater, etc.) look like 50+ years ago and how has it changed and how might it change in the future?</p> <p>For example, this site could have been referenced for surface lake water quality maps and trends: https://lakes.rs.umn.edu/</p> <p>The great lakes solec reports may be a good reference to better understand what I mean: https://archive.epa.gov/solec/web/pdf/solec2011highlights_e.pdf</p>		x		N	Lake trend data was incorporated into prioritization process. Assessing improving/declining trend in resource condition is a part of MPCA assessments and GRAPS that are reviewed during CWMP development.
28	Brian Huberty, Minnesota Forestry Association	--	<p>The following is what I would add or edit to make it even better.</p> <ol style="list-style-type: none"> 1) There should be a chapter at the end addressing "climate change". How will it affect the watershed, waterflows, landuse changes, etc. 2) Fish and Wildlife resources should have been their own chapter as well since they are a dynamic yet significant factor for the watershed. Combining wildlife with forestry just adds more confusion. One could argue, where is the fish and wildlife component in the farming section? 3) Geology is a significant land use factor and that too should be a separate chapter. 4) Urban and Transportation networks are also a significant influence. 5) Farming - forest to farmland conversion has not happened to the degree the watershed to the West - park rapids, has made a huge impact on groundwater quality. This should be monitored for the future if increasing potato demand moves into this watershed. 6) The forestry section: wildfire is mentioned once. Firewise is mentioned once. Yet wildfire is one of the most significant impacts for the watershed bar none. It is only a matter of when. I would highly suggest revising this chapter. 		x		N	<p>Note that plan content is guided by BWSR and the suggestions here are outside the scope of a CWMP. Reivew plan content here: https://bwsr.state.mn.us/on-e-watershed-one-plan-policies. This is a local plan focused on private land management.</p> <p>Climate change is incorporated into plan sections. Emerging concerns in Streams, Forests, Wetlands, and Farms section discusses climate impact on hydrology, forest management, invasive species, and agriculture.</p>
29	Brian Huberty, Minnesota Forestry Association	--	The Stormwater chapter should be under an Urban/Transportation section.		x		N	Urban/Transportation is handled by the County and City Comprehensive Plans.

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30	Brian Huberty, Minnesota Forestry Association	98	Forests v Use drones to survey forest health and identify project opportunities, LiDAR, and historical imagery. Speaking as an expert in drones, forest health, etc. they are a useful tool but commercial aerial and daily satellite imagery will be much more useful. More importantly, we do not have a forest inventory map over all lands which includes species, size and density. The new level 0 lidar will help but it will soon be out of date as trees grow. This has been the largest data gap for decades.		x		Y	Added forest inventory to data gaps. Broadened the language to just survey forests, not say exactly how.
31	Brian Huberty, Minnesota Forestry Association	--	Finally, given the forests are the largest land cover component for the watershed, there still is not a plan of how we (all owners) will grow and maintain these forests in the future. There are plenty of 'silo' plans but not a combined plan. Involving the MFRC landscape committees may help solve this gap.			x	N	It is not in the scope of this plan to oversee how all forest owners (federal, state, tribal, county, etc) manage forests wholistically. This plan is focused on forest management on private lands. We agree with the need for integrated forest management, however.