

Kettle River and Upper St. Croix CWMP

Response to Formal Review Comments



Comment #	Commenter	Page	Comment	Editorial	Material	Note	Plan Revision (Y/N)	Resolution
1	DNR		Having reviewed the official 60-day review draft in mid-November, we are pleased to confirm that all high-level priorities outlined in the initial letter were addressed. At this juncture, we do not see a need for any additions or changes.			X	N	Comment noted with thanks
2	MDA		The MDA has no substantive comments on the plan, though we were excited to see the plan calling out the need to address "existing barriers to conservation action."			X	N	Comment noted with thanks
3	BWSR	Cover	BWSR would prefer that you put the Legacy logo on the front cover of the report along with the date (when approved).		X		Y	Title shrunk to make room for the logo in the middle/left title page. Date added.
4	BWSR	Entire Report	Report is very well-written, easy to understand, and is visually appealing.			X	N	Comment noted with thanks
5	BWSR	Entire Report	Minor typos, formatting and clarification suggestions were noted throughout report and will be sent to Partnership as unofficial comments.			X	Y	Document revised per BWSR unofficial comments
6	BWSR	Land and Water Resources Narrative	The Land and Water Resources Narrative is required to have information on "The narrative must acknowledge the watershed's context regarding the influence it has on downstream waters, and it may discuss impacts from upstream watersheds if applicable" (Page 5, 1W1P Plan Content Requirements version 2.1). This information seems to be missing from this chapter so please add it. Additional guidance can be found in our 1W1P Guidebook.	X			Y	Existing language in the LWRN: "Streams within the Kettle River Watershed flow into the Kettle River which flows into the St. Croix River. Streams in the St. Croix Watershed flow into the St. Croix River." Additional language will be added. "Activities in the Kettle St. Croix Watershed can have downstream impacts. The St. Croix River is impaired due to nutrients at a stretch including Taylor's Falls. Reducing nutrients leaving the KSC Watershed will decrease nutrient loads downstream."
7	BWSR	ES-5, 2-4	Please clarify what the weighting of the datasets in the table means. What is the range of weights, and which is highest. Why are some datasets weighted and others not? Please clarify how the weights affected how resources were prioritized (e.g. Level 1 vs Level 2).	X			Y	Table revised: (in table heading) Higher number indicates higher weight. Apply equal weights where not noted (1).
8	BWSR	ES-7 and 2-5	Please add recreation to the list of issue statements, or clarify with narrative text why one does not exist.	X			Y	Narrative added to clarify that recreational areas were not geographically targeted through a weighted dataset analysis.
9	BWSR	ES-9	Please add total cost to table and refine WBIF number to match allocated biennial amount (\$1,412,047 and 10-year would be \$7,060,235).	X			N	WBIF allocation is Clean Water Fund money, and changes every biennium. The provided number is an estimate of what biennial allocation may be during the ten year timeframe of the plan, based on past allocation amounts.
10	BWSR	1-9, 1-10, 11-2	Please add relevant information from the DNR report Evaluation of Hydrologic Change (published August, 2023) to the Land and Water Resources Narrative. Please remove text about draft report from page 11-2, since the report is complete.	X			Y	Information on change in hydrology added to LWRN, streams row in Table 11.2 edited to say the EHC will be reviewed

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11	BWSR	2-6, 9-6	SSTS goal seems low given existing upgrade grants and programs in the counties.		X		Y	Language added to plan: Goal is beyond SSTS systems that are being replaced using existing, baseline funds. Goal is also specific to targeted areas (Priority Level 1).
12	BWSR	2-7 and 2-8	Nice walkthrough of how the targeted implementation table is laid out.			X	N	Comment noted with thanks
13	BWSR	3-2, 11-2	Great to see chlorides included as an emerging issue. Please consider adding chloride to items to revisit during the 5-year review point of plan.	X			Y	Added chloride to lakes and streams rows in Table 11.2
14	BWSR	3-3 and 4-4	Need to explain the difference between Protection and Restoration lakes and streams in the plan narrative.	X			Y	Added text on the difference in plan actions for protection vs restoration lakes
15	BWSR	3-4 and 3-6	Consider enlarging the size of the subwatersheds to priority waterbodies so it includes the full drainage areas to each lake and offers more opportunities for implementation activities that could reduce pollution. Consider using the watershed areas that were used in the modeling efforts and/or development of the TMDLs/WRAPS.		X		Y	Figure title revised to "... priority lakes and lakesheds. Actual boundaries of lakesheds may shift during implementation upon completion of priority lake subwatershed analyses."
16	BWSR	3-7	Thank you for including the figure on phosphorus reductions for impaired lakes as it can help focus efforts during implementation.			X	N	Comment noted with thanks
17	BWSR	3-8	Consider rewording the sentences on watershed to lake ratios as it is not always true that lakes with smaller W:L ratios only need work in nearshore areas as pollution sources vary widely. Recommend removing the bullets. Suggest instead including the method of developing subwatershed analyses and conducting diagnostic monitoring to help determine pollution sources.	X			Y	Kept bullet points. Revised first sentence to say 'The W:L ratio can be a tool used to help decide where to focus BMPs around lakes'. The paragraph after the bullet points says the W:L ratio is not always accurate. Added sentence after '...will not be used exclusively to decide on projects on a per lake basis. Water quality monitoring and analyses will provide insight into to pollution sources which will influence BMP targeting.'
18	BWSR	3-9	Suggest revisiting the 10-year target goals for lakes in Table 3.3. It seems unrealistic to work on reducing small amounts of phosphorus in ~40 different lakes. Recommend that the Partners discuss increasing the reductions for impaired lakes with Total Maximum Daily Load studies so meaningful progress can be made towards reaching water quality standards in the next 10 years. Note the current Plan goals would only make 0.5% to 7% progress towards water quality standards for impaired lakes in the next 10 years. For unimpaired lakes, the small amount of phosphorus reduction seems more realistic but likely Partners will not be able to work in all ~40 lakes so you may want to discuss focusing protection goals too so they are more realistic. Recommend that Partners could primarily focus on the 19 Level 1 priority lakes during the next 10 years of the Plan.		X		Y	List of priority lakes will remain as is. Priority lakes were developed during the planning process based on feedback received from Steering, Advisory, and Policy Committee discussions. <i>Language added: The Steering Committee recognizes that some lake targets are small compared to TMDL load reduction targets. Implementation actions related to this goal are primarily directed at direct drainage contributions (Figure 3.4). Actions within this plan will also include activities to better understand other contributions for impaired lakes, such as internal loading.</i> Ranges will be added to each lake. For lakes that are not impaired with a TMDL, range will be 0-(current target). For impaired lakes, target will have a "greater than equal to" sign before the target. <i>Language added: The list of priority lakes and per lake targets will be reviewed during the 5 year evaluation.</i>
19	BWSR	3-12, 3-14 and throughout Plan	Recommend deleting "using nearshore projects" out of the phosphorus goal. Projects may vary from watershed to in-lake projects so Partners should have more flexibility for implementation. Instead, please add a description of how the phosphorus reduction goal was estimated.	X			Y	Revised to nearshore or direct drainage to priority lakes.

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20	BWSR	3-14 - 3-15	You are missing an implementation action item that would "implement the activities from lake management/subwatershed assessment plans". Please add an action/row.	X			Y	Action added for additional plan action
21	BWSR	4-8	Is it possible to estimate water quality benefits?			X	N	Benefits would vary depending on projects implemented. Benefits should be evaluated and estimated on a per project basis.
22	BWSR	4-11	Item 9. The output is 2 waterways assessed. If the partnership wants upgrading failing SSTS near bacterial impaired streams to be eligible for WBIF, suggest adding an upgrade target to the outcome target.	X			Y	Output: '2 waterways assessed & 2 SSTS upgraded'
23	BWSR	5-7	Exciting to see the exploration of new outreach methods to farmers in the implementation table.			X	N	Comment noted with thanks
24	BWSR	5-5, 6-7, 8-5	Thank you for discussing and including climate resiliency benefits.			X	N	Comment noted with thanks
25	BWSR	6-6	Table 6-1 is inaccurate as currently formatted. Remove the first column "High RAQ Score Parcel Acres (score of 7-10) and add it to the narrative paragraph. Change table title to "Level 1 and 2 priority forestry acres" or equivalent.	X			Y	Text edited: '...protected forest land, and quality. Acres with high RAQ scores (7-10) in the Watershed are given in Table 6.1' Table caption changed to 'Level 1 and 2 priority forest acres'
26	BWSR	6-10	For action items #11 and #12, please add "WBIF/other" under funding source.		X		Y	Other added to funding
27	BWSR	7-5	The overall goal to restore 30 acres of wetlands in the watershed is low. According to NRRRI restorable wetlands index, there are over 12,000 acres of restorable wetlands in the watershed. A recently approved wetland bank in Pine County was just under 60 acres. During the last 10 years, 63 acres of impact were replaced in the BSA- although only 82% of those impacts were replaced within the watershed due to credit shortages at the time of replacement. In that time, a total of 69 wetland credits were withdrawn from banks within the BSA (the difference between impact and credits withdrawn is due to replacement requirements). The watershed will likely continue to see an equal (or greater) demand for wetland credits demand over the 10 year goal outlined in the plan. For this reason, we recommend a goal to generate approximately 70-90 credits. This estimate comes with a list of caveats but it is a rough prediction of demand. Restoration sites receive 50-100% credit per area restored. Using an average of 75% credit, this translates into approximately 90-115 acres of wetlands that would likely have to be restored to generate 70-90 wetland credits and meet the demand to achieve replacement within the BSA. We recommend revising the 10 year goal to restore 100 acres of wetlands.	X			Y	Wetland goal changed to 100 acres over 10 years per BWSR recommendation. Cost of action increased accordingly, with focus going into the "Other" funding source. Goal target is based on engaged relationships with the USFWS in Pine and Carlton County.
28	BWSR	7-7	In the table, for action #3, please add the acres to be restored in addition to the acre fee of storage.	X			Y	Outcome: 100 acres restored resulting in 60 ac-feet storage
29	BWSR	8-2	Under Resource Prioritization, consider rewording for clarity: "Communities considered Level 1 for stormwater work are those adjacent to priority Level 1 streams and rivers from Section 4, and priority Level 1 lakes from Section 3. Communities considered Level 2 for stormwater work are other communities in the watershed."		X		Y	Reworded as suggested

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30	BWSR	8-8	For table item 5, are these the same 10 BMPs planned for action item 4, or 10 additional BMPs. Please clarify, as the plan goal is to "Install and maintain 20 stormwater BMPs in high priority areas."		X		Y	Different, as the BMPs in actions 4 + 5 result in the 20 BMP goal. Action 5 edited to 'e.g. raingardens, buffers, swales, trees; <i>in addition to Action 4 BMPs</i> '
31	BWSR	9-4	The goal for SSTS upgrades seems low given existing programs and funding sources.		X		N	See Comment #11
32	BWSR	9-6	Outcome should say, "1 campaign developed <u>and implemented</u> ".		X		Y	Edited as suggested
33	BWSR	11-2	Consider making the farm goal more measurable with pollution reduction estimates at the 5-year review point of plan implementation (add to page 11-2).	X			Y	Farm issue added to table 11.2 with bullet: 'assess pollution reduction at farms and explore any new practices'
34	BWSR	12-2	Table 12.1 should clarify that the Policy Committee, through their local entities, will also approve contracts, grant requests, and Plan amendments. Also, Steering Committee should be responsible for developing the biennial work plan. Fiscal agent should review and pay invoices.	X			Y	These items added as bullet points to Table 12.1
35	BWSR	12-5	Tables 12.2, 12.3, and 12.4 need to be revised. The biennial amount and 10-year plan total for WBIF are incorrect. Please add total numbers for Table 12.2. Consider being consistent between tables so it is either a biennial average or estimated annual average. Some of the numbers in both tables seem incorrect. For Table 12.4, the sum of 10-year costs seem incorrect compared with implementation tables earlier in the Plan.	X			Y	See Comment #9. Math totaling errors in 12.3 resolved.
36	BWSR	12-9	The fiscal agent One of the LGU Partners will apply for...(since this hasn't been discussed as staff yet recommend this change)		X		Y	Edited as suggested
37	BWSR	12-10	Please clarify in the first paragraph that the governing boards of the Partnership have ultimate responsibility for approving the biennial work plan not the Policy Committee since this Partnership will be operating under a Joint Powers Collaboration.		X		Y	Sentence added: 'Then the biennial work plan will be presented to the PC for approval, although under the JPC the Partnership will ultimately be responsible for the biennial work plan approval.'
38	BWSR	12-10	May want to discuss if the partnership assessment could be every 5 years instead of 2 years to be aligned with the midpoint evaluation and make implementation efforts more efficient.	X			Y	Frequency moved to once every 5 years
39	BWSR	12-11	Reporting...by the plan's fiscal agent <u>or another LGU entity</u> ...(since this hasn't been discussed as staff yet recommend this change)		X		Y	Edited as suggested
40	BWSR	12-11	The fiscal agent <u>or another LGU entity</u> is responsible for submitting all required reports...(since this hasn't been discussed as staff yet recommend this change)		X		Y	Edited as suggested
41	BWSR	12-11	Recommend deleting text as shown - "Therefore, in 2028-2029, a midpoint evaluation will be undertaken, as per the BWSR order approving it, to determine if the current course of actions is sufficient to reach the goals of the plan, or if a change in the course of actions is necessary " as this statement is incorrect.		X		Y	Edited as suggested
42	BWSR	12-12	Please add more language about the decision of the Policy Committee to form a Joint Powers Collaboration.	X			Y	Text on JPC added.

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43	BWSR	13-9	Please clarify how state-agency representatives will be included in the implementation process, for example be invited to review and give input on workplans at least biennially and be included on the advisory committee.	X			Y	Add to last sentence of first paragraph: State agency staff will be brought into the implementation process through implementation of many actions in partnership with DNR/MPCA/NDH as indicated on Targeted Implementation Table in each section. State staff are also appointed to the Advisory Committee and will be involved in the biennial work plan (see Table 12.1 for roles).
44	BWSR	13-11	Appreciate the inclusion of equity in the consideration of water resources. It might fit better in the Land and Water Resources Narrative in / near the Demographics section.		X		N	Equity section to remain, it fits in this section as it mentions addressing equity through implementation to close out the plan.
45	BWSR	3-12 to 3-16	Overall lake goal is 340 lb/year TP, however the action table sums to 310 lb/year.		X		Y	Actions revised to sum to 340 to match lake goal table.
46	BWSR	Appendix G	Please provide more information about the modeling efforts in Appendix G such as why these reduction coefficients were chosen, what assumptions were made for the modeling efforts, how the pollution reductions numbers in the tables were calculated, why these lakes were chosen, etc.	X			Y	More detail added. Reduction coefficients are from HSPF SAM, and lakes modeled are those priority lakes that could be within HSPF SAM.
47	BWSR	Acknowledgements	Add Erin Loeffler (BWSR) to the Advisory Committee		X		Y	Erin Loeffler added to Acknowledgements
48	MDH	ES-6, Table ES	Table ES.1 it provides the issue statement, the datasets used to make the issue statement and their weighted value. The plan has identified "karst & high pollution sensitivity at wells" as a targeted area for groundwater protection in the watershed. I encourage the partners to consider revising the language to state "karst & areas of high pollution sensitivity" then note the two different data sets that are implied in the original reference. 1) DNR - Minnesota Regions Prone to Surface Karst Feature Development 2) MDH - Pollution Sensitivity of Wells The reference "karst & high pollution sensitivity at wells" is continued throughout the document. Please revise to the suggested language proposed above		X		Y	high pollution sensitivity' revised to 'areas of high pollution sensitivity' as recommended
49	MDH	6_1	I wanted to thank the planning partners for recognizing the importance of forest health as a key strategy for protecting groundwater quality in the watershed.			X	N	Comment noted with thanks
50	MDH	9_2	The last paragraph on this page identifies the two data sets that were combined to form Figure 9.2. Groundwater Priority Areas. The data sets referenced in this section are noted as "Geologic Sensitivity at Wells" (MDH 2021) and "Minnesota Regions Prone to Surface Karst Feature Development" (DNR 2022). Please revise "Geologic Sensitivity at Wells" to "Pollution Sensitivity of Wells" to have it match the dataset referenced in the plan.		X		Y	Geologic sensitivity revised to 'Pollution Sensitivity of Wells' as recommended
51	MDH	9_4	I commend the planning partners on identifying ordinances as a groundwater protection goal. These are important measures that will lead to sustained groundwater protection.			X	N	Comment noted with thanks

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52	MDH	Table 11.2	Table 11.2 under the groundwater section it notes to check with DNR/MDH for new data collected. Please consider adding the MPCA as an additional resource for groundwater data. The MPCA collects data through their Ambient Groundwater Monitoring Program on chlorides and contaminants of emerging concern, such as PFAS, that have been identified in the plan for more information needed.		X		Y	Added MPCA to text
53	MDH	12_7	Table 12.5 Funding sources available to implement the CWMP. Please considering adding the MDH "Accelerated Implementation Grant – Groundwater Protection Initiative" to assist with monitoring and data collection actions identified in the plan.		X		Y	Added this grant to table 12.5
54	MPCA	All	We are glad to see the inclusion of protection of wild rice and goals to collaborate with Tribal partners on identifying resources of cultural importance and when building watershed stewardship. Continued collaboration and consultation with the Tribal communities within the watershed will be key for successful implementation of the plan.			X	N	Comment noted with thanks
55	MPCA	All	We are glad to see that Karst areas and areas of high sensitivity for potential groundwater pollution have been identified for groundwater protection.			X	N	Comment noted with thanks
56	MPCA	All	The watersheds in this plan have a mixed governance regarding feedlots with most counties having adopted their own local ordinance. Even though the amount of registered feedlots and animal units may not be as high as in other watersheds in Minnesota, we commend the plan's inclusion of manure management, education opportunities, and targeted BMPs in feedlot operations that may contribute to E. coli impairments in streams and impact on groundwater in sensitive areas.			X	N	Comment noted with thanks
57	MPCA	All	We are excited to see the plan addressing concerns and goals surrounding the impacts that altered hydrology and culverts can have an impact on aquatic habitat. The MPCA is available to provide additional context and data surrounding identification of biotic stressors in the watershed.			X	N	Comment noted with thanks
58	MPCA	All	Many of the actions identified in the targeted implementation schedule will have the added surface water quality benefit of reduced phosphorus, nitrogen, and sediment pollution. We commend the inclusion of recognizing these added benefits of many of the identified practices. According to the fiveyear progress report on the State's nutrient reduction strategy, phosphorus concentrations have been decreasing at the Kettle River outlet, whereas nitrate concentration have been shown to be increasing. We support the planning implementation of best management practices (BMPs) that confer "stacked benefits" as already identified in the draft plan.			X	N	Comment noted with thanks

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59	MPCA	All	Although the environmental justice (EJ) was not directly called out in the draft plan, we would support any efforts that would incorporate principals of EJ when targeting and designing civic engagement, restoration, or protection projects, or any activities associated with this plan. There are a number of tools available to determine where underserved communities could receive the most benefit from watershed work in the Kettle River/Upper St. Croix River Watersheds, and the MPCA staff is equipped to assist in locating areas of the watershed where low income, linguistically isolated, or minority people are most likely to benefit from the work done in the 1W1P process. Please consider engaging our assistance in identifying and prioritizing these areas.			X	N	Comment noted with thanks
60	MPCA	All	One comment for potential consideration, the draft plan currently sets a 10-year phosphorus reduction target that aligns with the 5% reduction targets per the DNR Lakes of Phosphorus Sensitivity Significance dataset. This is also reflected in Table 3.3. Lake Targets and Phosphorus Loading Focus. While this may be an appropriate goal set across a watershed and for specific lakes where protection strategies are appropriate, we would suggest that the partnership consider addressing reduction goals on a case-by-case approach, especially where TMDLs or other modeling targets indicate greater reductions would be required for restoration. I believe this sentiment is already captured in the sentence on Page 3 through 9: "Additional information will be referenced for resource specific long-term goals, such as TMDLs and WRAPS", but feel it is important to reiterate that refined goals and phosphorus reduction targets may be necessary to see significant improvements on more impaired water bodies. The MPCA has many tools available that could assist with setting these targets, which include HSPF and SAM modeling, lake monitoring, and providing technical assistance when considering in-lake management actions.		X		Y	See response to Comment #18
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61	Carlton County	Lakes	Develop a new online permit platform, or other software, to improve the efficiency and effectiveness of implementing local ordinances which are in place protect, enhance and restore priority water resources identified in the plan."		X		Y	Action added as activity (action) in the plan. Focus area: Watershed wide (Pine and Carlton) Funding: Include staff time; Pine following Carlton \$120,000; WBIF and Other
62	Charles Lippert		The southern half of the watershed is within the 1837 Treaty of St. Peters (7 Stat. 536) ceded territory, and there was no mention of it, the northern half of the watershed is within the 1854 Treaty of LaPointe (10 Stat. 1109) ceded territory, and the document appears to refer to the 1855 Treaty of Washington (10 Stat. 1165) ceded territory, but the watershed is not even in this third ceded territory.		X		Y	Plan revised accordingly
63	Mille Lacs Band	Executive Sum	ES-1: "This area also has great cultural importance due to wild rice (manoomin) that grows on numerous lakes and rivers throughout the watershed."				[Y]	"also" removed from text

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64	Mille Lacs Band	Executive Sum	•ES-1: “The Watershed covers over 1,500 square miles, spanning four counties, two tribal nation (Fond du Lac and Mille Lacs Bands)... “	X			Y	Revised as recommended
65	Mille Lacs Band	LWRN	•1-1: “The Kettle River and Upper St. Croix Watershed (Watershed) is over 1,500 square miles (1,021,000 acres) spanning four counties, two tribal nations (Fond du Lac Band of Lake Superior Chippewa and Mille Lacs Band of Ojibwe)”	X			Y	Revised as recommended
66	Mille Lacs Band	LWRN	•1-10 People: “The ancestors of the Mille Lacs Band began migrating west from the Atlantic coast of North America to this watershed around 500 years ago due to European settlement. This area was known as “where the food grows on the water” due to the wild rice (manoomin) that grew on numerous lakes and rivers throughout the watershed. During European settlement, treaties with the US Government ceded millions of acres of lands in the Upper Midwest including Minnesota and Wisconsin to the United States, but reserved the right to hunt, fish and gather on ceded lands for Ojibwe people. Europeans first settled in the watershed during the fur trade logging era, and later the watershed was heavily farmed (Mille Lacs Band of Ojibwe, personal communication, March 12, 2024).”	X			[Y]	Revised as recommended and reference removed from Appendix J
67	Mille Lacs Band	LWRN	•Akiko-ziibi (Kettle River) is named after the rock kettles of the Kettle River white-waters. (add to Land and Water somewhere)	X			[Y]	Statement added to Land and Water Resources Narrative
68	Mille Lacs Band	Lakes	•3-2 & 3-3: Prioritization – Hay Creek Flowage - Also mark as "restoration" and include footnote that restoration for resource is for wild rice	X			[Y]	Revised as recommended
69	Mille Lacs Band	Lakes	•Manoomini-zaaga'iganing – need to add this to the map	X			[Y]	Resource is the headwaters to the Moose Horn River in Carlton County
70	Mille Lacs Band	Rivers and Streams	•4-3 & 4-4: “Culturally important streams include resources indicated by Tribal partners as culturally important.” Crooked Creek (and other segments), & Hay Creek are listed. Please add footnote that these are “culturally important” - the Hay Creek (not north and south) and 3 segments of Crooked Creek.	X			[Y]	Revised as recommended
71	Mille Lacs Band	Recreation	•10-6: Recreation Targeted Implementation Schedule: “Coordinate with existing groups (such as Wild Rivers Conservancy, tribal knowledge keepers with Tribal Ecological Knowledge)	X			Y	Revised as recommended
72	Mille Lacs Band	Plan Admin	•12-1: “The CWMP will be implemented through an agreement between the eligible parties within the watershed, which may include includes- counties, soil and water conservation districts, municipalities, and Tribal governments.”	X			[Y]	Revised as recommended

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73	Mille Lacs Band	Plan Admin	<ul style="list-style-type: none"> •12-4 Collaboration with Others: “Partners for these collaborations include, but are not limited to, lake associations, Trout Unlimited, Pheasants Forever, American Bird Conservancy, University of Minnesota Extension, civic groups, 1854 Treaty Authority, Great Lakes Indian Fish & Wildlife Commission, Fond du Lac Band of Lake Superior Chippewa, Mille Lacs Band of Ojibwe, civic groups, private businesses, individuals, and foundations. •Specific groups alphabetically and general groups alphabetically 	X			[Y]	Revised as recommended, and groups reordered so they are listed alphabetically (including general groups)
74	Mille Lacs Band	General	Throughout document, capitalize T in tribe and tribal	X			[Y]	T capitalized throughout in Tribe and Tribal