

Public Waters Inventory Update

Response to Public Comments, Aitkin County

In 2024, the Minnesota Legislature enacted Minn. Stat. § 103G.201 (f), which directed the Minnesota Department of Natural Resources (DNR) to update the state's Public Waters Inventory (PWI). As a part of this process, the DNR prepared a map and list of preliminary corrections within Aitkin County (County) based on whether an identified water feature appeared to meet the statutory definition of public water. The DNR provided a 60-day public comment period and hosted a public meeting in the County to obtain feedback on the preliminary corrections.

The preliminary map and list were submitted to the County board and soil and water conservation district. Potentially affected landowners received direct mail notice including a township map locating the proposed correction(s). Details about the public meeting and public comment period were provided to all notified parties.

Additionally, notices of the public meeting and public comment period were published in the State Register (50 SR 570), EQB Monitor (Vol. 49, No. 50), PWI Update project notification subscribers (i.e., GovDelivery), and county newspapers of record. The preliminary map and list, and details about the public meeting and public comment period were posted on the project webpage (mndnr.gov/pwi-update).

Following this, the DNR accepted written public comments on the initial maps for a period of 60 calendar days, beginning December 29, 2025, and ending at 4:30 pm on February 27, 2026. The public meeting was held on January 28, 2026 at the Aitkin Public Library Community Room, 110 First Avenue NE, Aitkin. On February 19, 2026, the comment period was extended to March 14, 2026, providing an additional 15 days for public input.

The DNR received public input through a web-based tool accessible on the project webpage. Written comments could also be submitted to Public Waters Inventory Update, Minnesota Department of Natural Resources, 500 Lafayette Road, St. Paul, MN 55155-4025, or PWI.Update.dnr@state.mn.us. Comments requesting the addition or removal of a feature from the PWI were asked to submit evidence supporting the request.

A total of 30 substantive comments were received. The DNR evaluated each substantive written public comment to determine whether it warranted a modification to the preliminary map and provided the following determinations based on the available evidence:

- No Further Action. These comments were reviewed and warrant no modification to the PWI preliminary map of corrections.
- Removal from PWI. These comments were reviewed and warrant modification to the PWI preliminary map of corrections to show a waterbody as a new proposed removal on the PWI provisional final map, or remove a waterbody included on the PWI preliminary map as a proposed correction.
- Addition to PWI. These comments were reviewed and warrant modification to the PWI preliminary map of corrections to show a waterbody as a new proposed addition on PWI provisional final map.

The substantive comments are grouped by the DNR determination in tables on the following pages. The ID number included for each comment is the unique ID assigned to the comment received.

Additionally, 281 commenters provided non-substantive comments in support of or in opposition to this update project, personal opinions on the project, or general concerns that did not provide specific information relevant to the project. These comments did not warrant further investigation.

This Response to Public Comments document as well as a PWI provisional final map and list of corrections will be submitted to the County and made available on the DNR's project webpage. Potentially affected landowners will be notified by mail.

No Further Action

The following comments were reviewed and warrant no modification to the PWI preliminary map of corrections.

ID	Waterbody Type	Waterbody ID	Comment	Comment Response
889	Wetland	01047400	According to the Minnesota Natural Resources Atlas, Circular 39 identifies this as a Class 3 wetland of 79.8928 acres.	Following submittal of this comment, DNR performed a detailed technical review and site visit of the wetland area for possible addition to the PWI. Analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, field observations, and other relevant data determined that the wetland is a Type 1 – Seasonally Flooded Basin or Flat and Type 2 – Wet Meadow dominated system. The feature does not meet the statutory requirement of being a Type 3, 4, or 5 wetland for designation as a public waters wetland and will not be added to the provisional final map of PWI corrections.
890	Wetland	01047300	According to the Minnesota Natural Resources Atlas, this is a Circular 39 Class 3 wetland of 91.6200 acres	Following submittal of this comment, DNR performed a detailed technical review and site visit of the wetland area for possible addition to the PWI. Analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, field observations, and other relevant data determined that the wetland is a Type 2 – Wet Meadow and Type 6 – Shrub Swamp dominated system. The feature does not meet the statutory requirement of being a Type 3, 4, or 5 wetland for designation as a public waters wetland and will not be added to the provisional final map of PWI corrections.
892	Wetland	Null	According to the Minnesota Natural Resources Atlas, this	Following submittal of this comment, DNR completed a screening review of this feature based off

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			is three Circular 39 Class 3 wetland and one Circular 39 Class 5 pond, totaling to 32.9779 acres.	information gathered by the PWI Update Project mapping application. No supporting evidence was submitted with this comment. The description from the Feedback Text field does not match the single Type 5 – Shallow Open Water wetland found at the location marked by the comment. The wetland is 3.63 acres in size and does not meet the size requirement for the statutory definition of a public waters wetland. It will not be added to the provisional final map of PWI corrections.
894	Wetland	01048900	According to the Minnesota Natural Resources Atlas, this is a Circular 39 Class 3 wetland totaling to 1139.3014 acres.	Following submittal of this comment, DNR performed a detailed technical review and site visit of the wetland area for possible addition to the PWI. Analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, field observations, and other relevant data determined that the wetland is a Type 2 – Wet Meadow and Type 6 – Shrub Swamp dominated system. The feature does not meet the statutory requirement of being a Type 3, 4, or 5 wetland for designation as a public waters wetland and will not be added to the provisional final map of PWI corrections.
895	Wetland	01049100	According to the Minnesota Natural Resources Atlas, this is two Circular 39 Class 3 wetlands, totaling to 107.7088 acres.	Following submittal of this comment, DNR performed a detailed technical review of the wetland area for possible addition to the PWI. Desktop analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, and other relevant data determined that the wetlands are hydrologically connected as a Type 2 – Wet Meadow and Type 6 – Shrub Swamp dominated system. The available desktop evidence was sufficient to support the determination; therefore, a field review was not

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				necessary. Collectively the features do not meet the statutory requirement of being a Type 3, 4, or 5 wetland for designation as a public waters wetland and will not be added to the provisional final map of PWI corrections.
924	Wetland	01049600	Five Class 3 wetlands of 139.3607 acres total, along upper Dam Brook.	Following submittal of this comment, DNR performed a detailed technical review and site visit of the wetland area for possible addition to the PWI. Analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, field observations, and other relevant data determined that the wetland is a Type 2 – Wet Meadow and Type 6 – Shrub Swamp dominated system. The feature does not meet the statutory requirement of being a Type 3, 4, or 5 wetland for designation as a public waters wetland and will not be added to the provisional final map of PWI corrections.
925	Wetland	01049500	Seven Class 3 and two Class 5 wetlands of 110.1027 acres total	Following submittal of this comment, DNR performed a detailed technical review of the wetland area for possible addition to the PWI. Desktop analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, and other relevant data determined that the wetlands are hydrologically connected as a Type 2 – Wet Meadow and Type 6 – Shrub Swamp dominated system. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. Collectively the features do not meet the statutory requirement of being a Type 3, 4, or 5 wetland for designation as a public waters wetland and will not be added to the provisional final map of PWI corrections.

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1264	Watercourse	M-117-D001-D001	This 0.32 mile portion of ditch is part of County Ditch 37, Branch No. 1.	This section of the watercourse was removed by the 2017 Commissioner's Order. Prior to the public comment period, DNR completed review of this watercourse for possible addition to the PWI. Desktop analysis of relevant data concluded the channel was present throughout the original PWI for Aitkin County in 1985 and was visible in recent aerial images and LiDAR surface models. It was included as an addition on the preliminary map of PWI corrections. Following submittal of this comment DNR reviewed the evidence submitted, which included a 1922 county ditch map of this segment. This section of County Ditch 37 is classified as a public ditch in DNR databases. Because the section connects two public watercourses, it is considered a continuous designated public water. The submitted evidence did not change the DNR's decision to include this watercourse as an addition to the PWI. DNR will retain this watercourse as an addition to the PWI on the provisional final map of PWI corrections.
1290	Wetland	01048200	According to the Minnesota Natural Resources Atlas, this is a Circular 39 Class 3 wetland of 79.8928 acres.	Following submittal of this comment, DNR performed a detailed technical review of the wetland area for possible addition to PWI. Desktop analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, and other relevant data determined that the wetland is a Type 2 – Wet Meadow and Type 6 – Shrub Swamp dominated system. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. Collectively the features do not meet the statutory requirement of being a Type 3, 4, or 5 wetland for designation as a public

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				waters wetland and will not be added to the provisional final map of PWI corrections.
1291	Wetland	01048500	According to the Minnesota Natural Resources Atlas, this is a Circular 39 Class 3 wetland of 10 areas totaling to 4670.3247 acres.	Following submittal of this comment, DNR performed a detailed technical review and site visit of the wetland area for possible addition to the PWI. Analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, field observations, and other relevant data determined that the wetland areas are hydrologically connected as a Type 1 – Seasonally Flooded Basin or Flat and Type 6 – Shrub Swamp dominated system. Collectively the features do not meet the statutory requirement of being a Type 3, 4, or 5 wetland for designation as a public waters wetland and will not be added to the provisional final map of PWI corrections.
1308	Wetland	01048600	Circular 39 Class 3 shallow marsh south of Hwy 210.	Following submittal of this comment, DNR performed a detailed technical review and site visit of the wetland area for possible addition to the PWI. Analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, field observations, and other available mapping data determined that the wetland is a Type 2 – Wet Meadow and Type 6 – Shrub Swamp dominated system. Collectively the features do not meet the statutory requirement of being a Type 3, 4, or 5 wetland for designation as a public waters wetland and will not be added to the provisional final map of PWI corrections.
1317	Wetland	01048700	Two Class 3 wetlands of 229.0464 acres total, near Kimberly Marsh.	Following submittal of this comment, DNR performed a detailed technical review and site visit of the wetland area for possible addition to the PWI. Analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, field observations,

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				and other relevant data determined that the wetlands are hydrologically connected as a Type 2 – Wet Meadow and Type 6 – Shrub Swamp dominated system. Collectively the features do not meet the statutory requirement of being a Type 3, 4, or 5 wetland for designation as a public waters wetland and will not be added to the provisional final map of PWI corrections.
1669	Wetland	01050000	One Class 3 wetland of 65.3846 acres, adjacent to Sandy River at Minnewawa Creek	Following submittal of this comment, DNR performed a detailed technical review of the wetland area for possible addition to the PWI. Desktop analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, and other relevant data determined that the wetland is a Type 2 – Wet Meadow and Type 6 – Shrub Swamp dominated system. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. The feature does not meet the statutory requirement of being a Type 3, 4, or 5 wetland for designation as a public waters wetland and will not be added to the provisional final map of PWI corrections.
1670	Wetland	01049900	Five Class 3 wetlands of 51.4792 acres total	Following submittal of this comment, DNR performed a detailed technical review of the wetland area for possible addition to the PWI. Desktop analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, and other relevant data determined that the wetlands are hydrologically connected as a Type 2 – Wet Meadow and Type 6 – Shrub Swamp dominated system. The available desktop evidence was sufficient to support the determination; therefore, a field review was not

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				necessary. Collectively the features do not meet the statutory requirement of being a Type 3, 4, or 5 wetland for designation as a public waters wetland and will not be added to the provisional final map of PWI corrections.
1671	Wetland	01047800	One Class 3 wetland of 30.6576 acres	Following submittal of this comment, DNR performed a detailed technical review and site visit of the wetland area for possible addition to the PWI. Analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, field observations, and other relevant data determined that the wetland is a Type 2 – Wet Meadow and Type 6 – Shrub Swamp dominated system. The feature does not meet the statutory requirement of being a Type 3, 4, or 5 wetland for designation as a public waters wetland and will not be added to the provisional final map of PWI corrections.
1678	Basin	01036300	3-5-26	Following submittal of this comment, DNR completed a screening review of this feature based off information gathered by the PWI Update Project mapping application. No supporting evidence was submitted with this comment. The selected Feedback Category was set to “Request to Add Feature” and the Feedback Text field contained the date the comment was submitted with no other details. The location of the comment is within Public Water Basin ID 01036300 and is currently included in the PWI. It will not be added nor will Basin ID 01026300 be modified on the provisional final map of PWI corrections.

ID	Waterbody Type	Waterbody ID	Comment	Comment Response
2073	Watercourse	M-111.5	This unnamed stream was part of the Little Willow River. The diversion channel was constructed and the Little Willow river no longer is flowing. The portion south of 290th street has water during the spring thaw.	This section of the watercourse was removed by the 2017 Commissioner's Order. Prior to the comment period, DNR completed review of this watercourse for possible addition to the PWI. Desktop analysis of relevant data concluded the channel was present throughout the original PWI for Aitkin County in 1985 and was visible in recent aerial images and LiDAR surface models. It was included as an addition on the preliminary map of PWI corrections. Following submittal of this comment, DNR reviewed the evidence submitted, which contended there is not perennial flow in this watercourse. However, a watercourse is not required to maintain perennial flow to meet the definition in statute of a natural watercourse or altered natural watercourse. The submitted evidence did not change the DNR's decision to include this watercourse as an addition to the PWI. DNR will include this watercourse as an addition to the PWI on the provisional final map of PWI corrections.
2469	Wetland	01049800	One Class 3 wetland of 57.5154 acres	Following submittal of this comment, DNR performed a detailed technical review of the wetland area for possible addition to the PWI. Desktop analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, and other relevant data determined that the wetland is a Type 1 – Seasonally Flooded Basin or Flat and Type 6 – Shrub Swamp dominated system. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. The feature does not meet the statutory requirement of being a Type 3, 4, or 5 wetland for designation as a

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				public waters wetland and will not be added to the provisional final map of PWI corrections.

Removal from PWI

The following comments were reviewed and warrant modification to the PWI preliminary map of corrections to show a waterbody as a new proposed removal on the PWI provisional final map, or remove a waterbody included on the PWI preliminary map as a proposed correction.

No modifications to the PWI preliminary map of corrections proposed for this determination category.

Addition to PWI

The following comments were reviewed and warrant modification to the PWI preliminary map of corrections to show a waterbody as a new proposed addition on PWI provisional final map.

ID	Waterbody Type	Waterbody ID	Comment	Comment Response
888	Watercourse	M-120-005-002-002	Extend the Altered Natural Watercourse by 3.6127 km to south of 480th Ln.	Following submittal of this comment, DNR performed a detailed technical review of the watercourse segment for possible addition to the PWI. Desktop analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, and other relevant data determined that this feature is a natural watercourse with a drainage area of 12 square miles. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. The watercourse channel type and drainage area meet the statutory criteria for designation as a public waters watercourse and will be included as an addition to provisional final map of PWI corrections.
891	Wetland	01049200	According to the Minnesota Natural Resources Atlas, this is a Circular 39 Class 3 wetland and two small Circular 39 Class 5 pond, totaling to 22.7035 acres.	Following submittal of this comment, DNR performed a detailed technical review and site visit of the wetland area for possible addition to the PWI. Analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, field observations, and other relevant data determined that the wetlands are hydrologically connected as a Type 3 – Shallow Marsh dominated system. Collectively the wetland size and type meet the statutory criteria for designation as a single public waters wetland and will be included as an addition to provisional final map of PWI corrections.

ID	Waterbody Type	Waterbody ID	Comment	Comment Response
907	Wetland	01048300	Circular 39 Class 3 shallow marsh with small Class 5 freshwater ponds.	Following submittal of this comment, DNR performed a detailed technical review and site visit of the wetland area for possible addition to the PWI. Analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, field observations, and other relevant data determined that the wetlands are hydrologically connected as a Type 3 – Shallow Marsh dominated system. Collectively the wetland size and type meet the statutory criteria for designation as a single public waters wetland and will be included as an addition to provisional final map of PWI corrections.
1288	Wetland	01048800	According to the Minnesota Natural Resources Atlas, Circular 39 Class 3 Wetland of 5 pieces totaling 141.6875 acres	Following submittal of this comment, DNR performed a detailed technical review of the wetland area for possible addition to the PWI. Desktop analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, and other relevant data determined that the wetlands are hydrologically connected as a Type 3 –Shallow Marsh dominated system. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. Collectively the wetland size and type meet the statutory criteria for designation as a single public waters wetland and will be included as an addition to provisional final map of PWI corrections.
1289	Wetland	01049000	According to the Minnesota Natural Resources Atlas, this is a Circular 39 Class 3 wetland in two parts totaling to 66.6941 acres.	Following submittal of this comment, DNR performed a detailed technical review of the wetland area for possible addition to the PWI. Desktop analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, and other relevant data determined that the wetlands are hydrologically

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				connected as a Type 3 –Shallow Marsh dominated system. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. Collectively the wetland size and type meet the statutory criteria for designation as a single public waters wetland and will be included as an addition to provisional final map of PWI corrections.
1292	Wetland	01047500	According to the Minnesota Natural Resources Atlas, this is a Circular 39 Class 3 wetland and a small Circular 39 Class 5 pond, totaling to 48.4428 acres.	Following submittal of this comment, DNR performed a detailed technical review of the wetland area for possible addition to the PWI. Desktop analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, and other relevant data determined that the wetlands are hydrologically connected as a Type 3 –Shallow Marsh dominated system. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. Collectively the wetland size and type meet the statutory criteria for designation as a single public waters wetland and will be included as an addition to provisional final map of PWI corrections.
1293	Wetland	01047900	According to the Minnesota Natural Resources Atlas, this is three Circular 39 Class 3 wetland and one Circular 39 Class 5 pond, totaling to 32.9776 acres.	Following submittal of this comment, DNR performed a detailed technical review of the wetland area for possible addition to the PWI. Desktop analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, and other relevant data determined that the wetlands are hydrologically connected as a Type 3 –Shallow Marsh dominated system. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. Collectively the wetland

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				size and type meet the statutory criteria for designation as a single public waters wetland and will be included as an addition to provisional final map of PWI corrections.
1294	Wetland	01049400	According to the Minnesota Natural Resources Atlas, this is two Circular 39 Class 3 wetlands, totaling to 81.7480 acres.	Following submittal of this comment, DNR performed a detailed technical review of the wetland area for possible addition to the PWI. Desktop analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, and other relevant data determined that the wetlands are hydrologically connected as a Type 3 –Shallow Marsh dominated system. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. Collectively the wetland size and type meet the statutory criteria for designation as a single public waters wetland and will be included as an addition to provisional final map of PWI corrections.
1672	Wetland	01049700	Three Class 3 wetlands of 30.1597 acres total	Following submittal of this comment, DNR performed a detailed technical review of the wetland area for possible addition to the PWI. Desktop analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, and other relevant data determined that the wetlands are hydrologically connected as a Type 3 –Shallow Marsh dominated system. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. Collectively the wetland size and type meet the statutory criteria for designation as a single public waters wetland and will be included as an addition to provisional final map of PWI corrections.

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2069	Wetland	01049300	Three Class 3 wetlands of 59.2386 total acres	Following submittal of this comment, DNR performed a detailed technical review of the wetland area for possible addition to the PWI. Desktop analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, and other relevant data determined that the wetlands are hydrologically connected as a Type 3 –Shallow Marsh dominated system. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. Collectively the wetland size and type meet the statutory criteria for designation as a single public waters wetland and will be included as an addition to provisional final map of PWI corrections.
2070	Wetland	01047100	One Class 3 and one Class 5 wetland of 49.1336 acres total	Following submittal of this comment, DNR performed a detailed technical review and site visit of the wetland area for possible addition to the PWI. Analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, field observations, and other relevant data determined that the wetlands are hydrologically connected as a Type 3 – Shallow Marsh dominated system. Collectively the wetland size and type meet the statutory criteria for designation as a single public waters wetland and will be included as an addition to provisional final map of PWI corrections.
2071	Wetland	01047600	Two Class 3 and six Class 5 wetlands of 40.7000 acres total	Following submittal of this comment, DNR performed a detailed technical review of the wetland area for possible addition to the PWI. Desktop analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, and other relevant data determined that the wetlands are hydrologically

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				connected as a Type 3 –Shallow Marsh dominated system. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. Collectively the wetland size and type meet the statutory criteria for designation as a single public waters wetland and will be included as an addition to provisional final map of PWI corrections.