

Public Waters Inventory Update

Response to Public Comments, Benton 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 Benton 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 614), 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 27, 2025, and ending at 4:30 pm on February 25, 2026. The public meeting was held on January 26, 2026 at Foley High School, 840 Norman Avenue N, Foley. On February 25, 2026, the comment period was extended to March 12, 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 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 18 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.

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
915	Wetland	05009600	Three Class 3 and three Class 5 wetlands of 68.5094 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 available mapping data determined that the wetland is a Type 2 (Wet Meadow) and Type 6 (Shrub Swamp) dominated system and does not exhibit characteristics of a Type 3, 4, or 5 wetland. Because the wetland does not meet the statutory wetland type requirements for designation as a public water wetland, it will not be added to the provisional final map of PWI corrections.
921	Wetland	05008500	One Class 3 wetland of 39.6928 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 available mapping data determined that the wetland is a Type 2 (Wet Meadow) and Type 6 (Shrub Swamp) dominated system and does not exhibit characteristics of a Type 3, 4, or 5 wetland. Because the wetland does not meet the statutory wetland type requirements for designation as a public water wetland, it will not be added to the provisional final map of PWI corrections.

ID	Waterbody Type	Waterbody ID	Comment	Comment Response
1667	Wetland	05008900	One Class 3 and one Class 5 wetlands of 41.5107 acres total.	The feature adjoins or is currently included in the PWI as a public water basin. Linework geometry will not be modified because the precise regulatory boundary of public waters is established through an ordinary high water level survey, which is outside the scope of this project. The additional wetland area will not be shown on the provisional final map of 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
913	Wetland	05009400	Four Class 3 wetlands of 130.5034 acres total, in Benton and Mille Lacs County.	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 four wetlands exhibit characteristics consistent with Type 3 wetlands and are hydrologically connected. During the review, an additional adjacent wetland to the west was also found to exhibit Type 3 wetland characteristics and is hydrologically connected to the wetland complex. Collectively, the wetlands meet the statutory wetland type and size criteria for designation as a single public water wetland. Therefore, the four Type 3 wetlands and the additional adjacent Type 3 wetland will be included as a single public water wetland as an addition to provisional final map of PWI corrections.
914	Wetland	05009900	Three Class 3 wetlands of 74.4467 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 available mapping data determined that the wetlands exhibit characteristics of a Type 3 wetland and are hydrologically connected. Collectively the wetland size and type meet the statutory criteria for

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				designation as a single public water wetland. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. The three Type 3 wetlands, will be included as a single public water wetland as an addition to provisional final map of PWI corrections.
916	Wetland	05009300	Three Class 3 and one Class 5 wetlands of 55.9635 acres total.	Following submittal of this comment, DNR performed a detailed technical review of wetland area for possible addition to the PWI. Desktop analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, and other available mapping data determined the wetlands exhibit characteristics consistent with Type 3 and 5 wetlands and are hydrologically connected. Collectively meet the statutory size and type criteria for designation as a single public water wetland. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. The three Type 3 wetlands and one Type 5 wetland will be classified as one public water wetland will be included as a single public water wetland as an addition to provisional final map of PWI corrections.
917	Wetland	05008200	One Class 3 wetland of 53.5394 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 available mapping data determined that the wetlands exhibit characteristics of a Type 3 wetland. The wetland size and type met the statutory criteria for designation as a public water wetland. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. The Type

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				3 wetlands, will be included as a single public water wetland as an addition to provisional final map of PWI corrections.
918	Wetland	05007800	One Class 3 wetland of 50.2801 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 available mapping data determined that the wetlands exhibit characteristics of a Type 3 wetland. The wetland size and type met the statutory criteria for designation as a public water wetland. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. The Type 3 wetland, will be included as a single public water wetland as an addition to provisional final map of PWI corrections.
919	Wetland	05009800	Five Class 3 wetlands of 45.7659 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 available mapping data determined that the wetlands exhibit characteristics of a Type 3 wetland and are hydrologically connected. Collectively the wetland size and type meet the statutory criteria for designation as a single public water wetland. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. The three Type 3 wetlands, will be included as a single public water wetland as an addition to provisional final map of PWI corrections.

ID	Waterbody Type	Waterbody ID	Comment	Comment Response
920	Wetland	05008800	One Class 3 and three Class 5 wetlands of 43.9638 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 available mapping data determined that the wetlands exhibit characteristics of a Type 3 and Type 5 wetlands and are hydrologically connected. Collectively the wetland size and type meet the statutory criteria for designation as a single public water wetland. The one Type 3 and three Type 5 wetlands will be included as a single public water wetland as an addition to provisional final map of PWI corrections.
922	Wetland	05009500	Two Class 3 and 2 Class 5 wetlands of 38.1730 acres total.	Following submittal of this comment, DNR performed a detailed technical review of wetland area for possible addition to the PWI. Desktop analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, and other available mapping data determined the wetlands exhibit characteristics consistent with Type 3 and 5 wetlands and are hydrologically connected. Collectively they meet the statutory size and type criteria for designation as a single public water wetland. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. The two Type 3 wetlands and two Type 5 wetland will be classified as one public water wetland will be included as a single public water wetland as an addition to provisional final map of PWI corrections.
923	Wetland	05008100	One Class 3 wetland of 30.4416 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

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				Inventory (NWI) classifications, field observations and other available mapping data determined that the wetlands exhibit characteristics of a Type 3 wetland. The wetland size and type meet the statutory criteria for designation as a public water wetland. The one Type 3 wetland will be included as a single public water wetland as an addition to provisional final map of PWI corrections.
1312	Wetland	05009200	Two Class 3 and one Class 5 wetlands of 158.2828 acres total in T36N R31W, Sections 12, 13, 14.	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 wetlands exhibit characteristics of a Type 3 and Type 5 wetlands and are hydrologically connected. Collectively the wetland size and type meet the statutory criteria for designation as a single public water wetland. The two Type 3 and one Type 5 wetlands will be included as a single public water wetland as an addition to provisional final map of PWI corrections.
1313	Wetland	05008300	One Class 3 wetland of 79.4130 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 available mapping data determined that the wetlands exhibit characteristics of a Type 3 wetland. The wetland size and type met the statutory criteria for designation as a public water wetland. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. The Type 3 wetlands will be included as a single public water

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				wetland as an addition to provisional final map of PWI corrections.
1314	Wetland	05007900	Three Class 3 wetlands of 72.4434 acres total.	Following submittal of this comment, DNR performed a detailed technical review of wetland area for possible addition to the PWI. Desktop analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, and other available mapping data determined the wetlands exhibit characteristics consistent with Type 3 wetlands and are hydrologically connected. Collectively they meet the statutory size and type criteria for designation as a single public water wetland. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. The three Type 3 wetlands wetland will be classified as one public water wetland and included as a single public water wetland as an addition to provisional final map of PWI corrections.
1315	Wetland	05010100	Three Class 3 and one Class 5 wetlands of 38.0058 acres total.	Following submittal of this comment, DNR performed a detailed technical review of wetland area for possible addition to the PWI. Desktop analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, and other available mapping data determined the wetlands exhibit characteristics consistent with Type 3 and 5 wetlands and are hydrologically connected. Collectively they meet the statutory size and type criteria for designation as a single public water wetland. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. The three Type 3 wetlands and one Type 5 wetland will be classified as one public water wetland and included as a single public water wetland as an addition to provisional final map of PWI corrections.

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1316	Wetland	05010000	Three Class 3 wetlands of 66.7777 acres total.	Following submittal of this comment, DNR performed a detailed technical review of wetland area for possible addition to the PWI. Desktop analysis of aerial imagery, LiDAR, National Wetlands Inventory (NWI) classifications, and other available mapping data determined the wetlands exhibit characteristics consistent with Type 3 wetlands and are hydrologically connected. Collectively they meet the statutory size and type criteria for designation as a single public water wetland. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. The three Type 3 wetlands will be classified as one public water wetland and included as a single public water wetland as an addition to provisional final map of PWI corrections.
1668	Wetland	05008000	One Class 3 wetland of 33.2281 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 available mapping data determined that the wetlands exhibit characteristics of a Type 3 wetland. The wetland size and type met the statutory criteria for designation as a public water wetland. The available desktop evidence was sufficient to support the determination; therefore, a field review was not necessary. The Type 3 wetland will be included as a single public water wetland as an addition to provisional final map of PWI corrections.