

Public Waters Inventory Update

Response to Public Comments, Blue Earth 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 Blue Earth 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 area 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 571), 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 22, 2025, and ending at 4:30 pm on February 21, 2026. The public meeting was held on January 26, 2026 at South Central College (North Mankato Campus), 1920 Lee Boulevard, North Mankato. On February 19, 2026, the comment period was extended to March 8, 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
1680	Watercourse	M-055-076-005	Stream Segment is JD 116	The comment included this additional information by email: "The Watercourse for the unnamed stream M-055-076-005 is labelled as Willow Creek. The name for this stream segment should be JD 116 as it is a part of the County Drainage System." The DNR's data from drainage authorities during the buffer map project identifies this segment as a public ditch. The preliminary map of PWI corrections symbolizes this segment as a public watercourse and public ditch. The DNR's data includes the unofficial name "JD 116" for this segment. Reassigning whether a watercourse is a natural or altered natural watercourse is outside the scope of the PWI Update effort. The request to modify or change names of water bodies are outside the scope of the PWI Update effort. Naming a lake, river, stream or other natural geographic feature in Minnesota is guided by Minnesota Statutes 83A.02 - 83A.07. No further action will be taken by the DNR for this comment.
2080	Watercourse	M-055-076-001-001-002	This stream segment is JD 49. It is listed as Providence Creek.	The comment included this additional information by email: "Please change both the name and the type of this watercourse. It is listed as a natural watercourse named Providence Creek, but it is a Judicial Ditch referred to as JD 49." The DNR's data

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				from drainage authorities during the buffer map project identifies this segment as a public ditch. The preliminary map of PWI corrections symbolizes this segment as a public watercourse and public ditch. The DNR's data includes the unofficial name "JD 49" for this segment. Reassigning whether a watercourse is a natural or altered natural watercourse is outside the scope of the PWI Update effort. The request to modify or change names of water bodies are outside the scope of the PWI Update effort. Naming a lake, river, stream or other natural geographic feature in Minnesota is guided by Minnesota Statutes 83A.02 - 83A.07. No further action will be taken by the DNR for this comment.
1681	Watercourse	M-055-076-001-001-002	From this point downstream to the other feedback ID, this stream is JD 49.	The comment included this additional information by email: "Please change both the name and the type of this watercourse. It is listed as a natural watercourse named Providence Creek, but it is a Judicial Ditch referred to as JD 49." The DNR's data from drainage authorities during the buffer map project identifies this segment as a public ditch. The preliminary map of PWI corrections symbolizes this segment as a public watercourse and public ditch. The DNR's data includes the unofficial name "JD 49" for this segment. Reassigning whether a watercourse is a natural or altered natural watercourse is outside the scope of the PWI Update effort. The request to modify or change names of water bodies are outside the scope of the PWI Update effort. Naming a lake, river, stream or other natural geographic feature in Minnesota is guided by Minnesota Statutes 83A.02 - 83A.07. No further action will be taken by the DNR for this comment.

ID	Waterbody Type	Waterbody ID	Comment	Comment Response
2081	Watercourse	M-055-076-001-011	This is listed as a natural watercourse, but is an altered watercourse and east of this point is a County Ditch - CD 12.	The additional information submitted was: "Please change the description of the watercourse from its current natural watercourse to altered watercourse. This stream segment is shown as a Natural Watercourse but is CD 12 and is a part of the County Drainage System. The segment east of 586th Ave is CD 12 but the entire segment is an altered watercourse." The DNR's data from drainage authorities during the buffer map project identifies this segment as a public ditch. The preliminary map of PWI corrections symbolizes this segment as a public watercourse and public ditch. The DNR's data includes the unofficial name "County Ditch 12" for this segment. Reassigning whether a watercourse is a natural or altered natural watercourse is outside the scope of the PWI Update effort. It may be addressed as future map maintenance. It will not be shown as a correction.
1682	Watercourse	M-055-076-001-020	This is not Mayhew Creek and is not a natural watercourse. Please update it so that it is correct and not confusing.	This stream was reviewed prior to the public comment period. The additional information submitted by email was: "This stream segment is an Unnamed Stream or JD 11 and is NOT Mayhew Creek. It is also NOT a Natural Watercourse as it is shown in the PWI Update Map. It is an altered natural watercourse as is shown on the Waseca County Side of this system." The DNR's public watercourse GIS layer includes feature names derived from myriad sources. Feature names are an aid to identify a feature and have no regulatory bearing. The DNR's data from drainage authorities during the buffer map project does identify this segment as a public ditch. The preliminary map of PWI corrections symbolizes this segment as a public

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				watercourse and public ditch. Reassigning whether a watercourse is a natural or altered natural watercourse is outside the scope of the PWI Update effort and may be addressed as future map maintenance. No further action will be taken by the DNR for this comment.
2079	Watercourse	M-055-076-001-014-005	Request to remove stream segment as it does not meet public waters criteria with a bed and bank	This stream was reviewed following the public comment period. The additional information submitted by email was: "The section of the stream from the area north of County Road 184 for approximately ½ Mile is a farmed field and is not a watercourse with a definable bed and bank as listed in statute 103G and therefore does not meet the criteria to be a public water. There has not been a stream channel in this area since before 1979." Despite the absence of a required buffer, the watercourse retains its public water designation because the original inventory and available aerial documentation from 1949, 1964, and 1979 confirm the presence of a natural channel which appears to have been farmed through in past years. The segment will remain on the PWI.
1311	Watercourse	M-055-086-005	The Stream segment to the southeast should be the added stream. The west branch of this stream does not meet the PWI criteria.	This stream was reviewed prior to the public comment period. The additional information submitted by email was: "Part of this stream segment does not have a definable bed or bank as outlined in MN Statute 103G.005 Subd 13." The technical review identified the proposed tributary as a natural watercourse with defined bed and bank through the evidence of aerial imagery and contour data. A site visit was performed after the public comment period and, in addition to re-review of

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				aerial and contour data, confirmed a natural channel is present up to an earthen embankment. DNR will reduce the tributary length and continue to include this proposed tributary as an addition to the PWI and it will be shown on the provisional final map of corrections.
2077	Watercourse	M-055-086-004	Request to Remove segment in field. Grassed waterway but not a stream	This stream was reviewed prior to the public comment period. The additional information submitted by email was: "This new unnamed stream segment was added to the PWI likely as a trout stream tributary. Part of this stream segment does not have a definable bed or bank as outlined in MN Statute 103G.005 Subd 13 and is an upland portion of a farm field or grassed waterway. The proposed new stream segment extends east 1,100 feet into a farm field and terminates next to 505th Lane." A detailed review found bed and bank evidence included aerial images and contour data. A natural channel does not need perennial flow to qualify as a public water. The DNR will continue to include this addition to the PWI and will 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.

ID	Waterbody Type	Waterbody ID	Comment	Comment Response
1299	Watercourse	M-055-078-003-002	Stream does not have the required 2 square mile drainage area.	This stream was reviewed following the public comment period. The additional information submitted by email was: "The stream lacks the 2-square mile total drainage area to qualify as a public water. When the watershed area for this stream is calculated using a LiDAR DEM the watershed is well under one square mile. Using the DNR's Level 9 Auto Catchment layer, is also well under the required 2-square miles with a drainage area of .54-square miles." The data from the USGS supports the conclusion that this does have a 0.56 square mile drainage area. The DNR will remove this watercourse from the PWI and will not be shown on the provisional final map of corrections.
899	Watercourse	M-055-078-003-001	Stream does not have the required 2 square mile drainage area.	This stream was reviewed after the public comment period. The additional information submitted by email was: "The stream lacks the 2-square mile total drainage area to qualify as a public water. Using the DNR's Level 9 Auto Catchment layer, it shows that the stream's watershed is under the required 2-square miles with a drainage area of .76-square miles." The data from the USGS supports the conclusion that this does have a 1.3 square mile drainage area. The DNR will remove this

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				watercourse from the PWI and will not be shown on the provisional final map of corrections.
900	Watercourse	M-055-076-005-002	Request to remove stream that does not exist. It is a County Tile ditch and not an above ground watercourse.	This stream was reviewed after the public comment period. The additional information submitted by email was: "There was not a stream in those sections in 1938, 1983, 1991, 2022, 2005, 2009, or 2025. Aerial Photos showing this are attached to this request. The USGS Topo map, the 2012 LiDAR hillshade, and the DNR's Hydrographic Position Index maps also do not show evidence of a stream or a stream channel in this location." LiDAR and historical aerial images supports the conclusion that this segment does not have bed and bank at the time of the original inventory and through time. The DNR will remove this segment from the PWI and will not be shown on the provisional final map of corrections.

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
2075	Watercourse	M-055-076-001-014-003	Request to add Stream that is outlet from Eagle Lake	This stream was reviewed after the public comment period. The additional information submitted by email was: "This unnamed stream is the outlet stream from Eagle Lake. It has a watershed area that is clearly over the 2-square mile threshold for natural or altered watercourses. The portion of the stream closest to Eagle Lake appears to be an altered natural watercourse while the majority of this stream is a natural watercourse with definable beds and banks." The DNR performed a detailed technical review which identified this feature has a defined bed and bank and a 11.1 square mile drainage area. The bed and bank evidence included aerial images, contour data, and other available information. The DNR will include this addition to the PWI and will be shown on the provisional final map of corrections.
1679	Watercourse	M-055-076-003-002-014-001	This Stream Segment is not on the Current PWI List, Current Map or Preliminary PWI Map.	This stream was reviewed after the public comment period and was identified as a county boundary error. The additional information submitted by email was: "This is a tributary to Perch Creek and is shown on the PWI Updated Public Map Viewer but

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				not the preliminary Blue Earth County PWI map. The stream is not on the current PWI map or PWI list. However, it may meet the criteria to be public waters. The stream is not a part of a county drainage system. The online PWI Update Public Map viewer should be consistent with the printed PWI Map. Attached are maps showing the inconsistency.” The DNR performed a detailed technical review which identified this feature has a defined bed and bank and a 16 square mile drainage area. The bed and bank evidence included aerial images, contour data, and other available information. The DNR will include this addition to the PWI and will be shown on the provisional final map of corrections.
2078	Watercourse	M-055-076-003-002-014	This Stream Segment is not on the printed preliminary PWI Map, Current Map or Current PWI List.	This stream was reviewed after the public comment period and was identified as a county boundary error. The additional information submitted by email was: “This is a tributary to Perch Creek and is shown on the PWI Updated Public Map Viewer but not the preliminary Blue Earth County PWI map. The stream is not on the current PWI map or PWI list. However, it may meet the criteria to be public waters. The stream is not a part of a county drainage system. The online PWI Update Public Map viewer should be consistent with the printed PWI Map.” The DNR performed a detailed technical review which identified this feature has a defined bed and bank and a 16 square mile drainage area. The bed and bank evidence included aerial images, contour data, and other available information. The DNR will include this addition to the PWI and will be shown on the provisional final map of corrections.

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1297	Watercourse	MAJ-070212838	Unnamed Stream - Outlet from Madison Lake Addition	This stream was reviewed after the public comment period. The additional information submitted by email was: "This unnamed stream is the outlet stream from Mud and Madison Lake. It has a watershed area that is clearly over the 2-square mile threshold for natural or altered watercourses. This unnamed stream is the outlet for a sub-watershed with a HUC 12 ID number 070200110606. This HUC 12 sub-watershed contains over 19 square miles according to the MPCA watershed area." The DNR performed a detailed technical review which identified this feature has a defined bed and bank and a 19.6 square mile drainage area. The bed and bank evidence included aerial images, contour data, and other available information. The DNR will include this addition to the PWI and will be shown on the provisional final map of corrections.
898	Watercourse	M-055-075.7	Indian Creek - Watercourse Addition	This stream was reviewed after the public comment period. The additional information submitted by email was: "Indian Creek is a natural stream on the southwest side of Mankato. It has a watershed area of over 5 square miles." A detailed technical review and site visit provided clear evidence that this feature has a defined bed and bank and a drainage area of 8.15 square miles. The bed and bank evidence included aerial images, contour data, visual inspection, and other available information. The DNR will include this as an addition to the PWI and will be shown on the provisional final map of corrections.

ID	Waterbody Type	Waterbody ID	Comment	Comment Response
856	Watercourse	M-055-076-003-002-014	I'm curious why this portion is not considered public waters when it crosses the county line. In Watonwan it is public waters. Why is this considered private and not public between counties?	This stream was reviewed after the public comment period and was identified as a county boundary error. Evidence was not found for why this watercourse segment was not included in the final 1984 Blue Earth County PWI map and list. The DNR performed a detailed technical review which identified this feature has a defined bed and bank and 16 square mile drainage area therefore meets the statutory definition of a public watercourse. Bed and bank was consistently observed in aerial images, contour data, and other available information. The DNR will include this as an addition to the PWI and will be shown on the provisional final map of corrections.
6100	Watercourse	MAJ-07028445	This feedback point was created by PWI Update staff based on combined information submitted within feedback point 1311.	This stream was reviewed after the public comment period. The additional information submitted by email was: "A different part of this new stream segment appears to have the required bed and back as does the stream segment that bends to the south." A site visit and a subsequent technical review of aerial imagery and contour data confirmed the unmapped segment is a natural channel with defined bed and bank. The DNR will include this proposed tributary to a trout stream as an addition to the PWI and it will be shown on the provisional final map of corrections.