BOARD OF WATER AND SOIL RESOURCES

Organizational Assessment

Isanti Soil and Water Conservation District

Local Government Unit Review

Final Report

June 2026

Minnesota Board of Water and Soil Resources

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This report has been prepared for **Isanti Soil and Water Conservation District** by the Minnesota Board of Water and Soil Resources (BWSR) in partial fulfillment of the requirements of Minnesota Statutes, Chapter 103B.102, Subd.3.

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Organizational Assessment Report Summary

Isanti SWCD

What is a PRAP Performance Review?

The Board of Water and Soil Resources supports Minnesota's counties, watershed districts, and soil and water conservation districts that deliver water and related land resource management projects and programs. In 2007, the Board established a program (PRAP) to systematically review the performance of these local units of government to ensure their effective operation. Each year BWSR staff conduct routine reviews of several of these local conservation delivery entities. This document reports the results of one of those reviews.

Key Findings and Conclusions

Both the Isanti SWCD (SWCD) is commended for their work in implementing core programs, the Wetlands Conservation Act, and planning and implementation efforts related to two comprehensive watershed management plans developed through the One Watershed, One Plan program (1W1P).

Through their involvement in 1W1P the organization is helping to protect land and water resources through planning, technical assistance, and sustainable land-use practices.

Resource Outcomes

Due to the status of approved Comprehensive Watershed Management Plans within the county, evaluation of the County Water Plan was not conducted during this review. Instead, Comprehensive Watershed Management Plan implementation will be evaluated during the Watershed-based PRAP process at the mid-point period of implementation for each plan. These include One Watershed, One Plans developed for the Rum River and Lower St Croix River watersheds.

Basic Performance Standards:

- Isanti SWCD reports compliance with 12 of 12 basic performance standards.

Commendations

- Isanti SWCD is commended for meeting 19 of 22 high-performance standards.

Required Action Items (required to be addressed within 18 months):

There are no required actions for Isanti SWCD.

Recommendations

Isanti SWCD (Board Training): The district is encouraged to develop and maintain training plans for board members to enhance their skills related to their service to the organization.

Isanti SWCD (Succession Planning/Cross Training): The district is encouraged to preserve organizational knowledge, experience, and consider opportunities for cross training.

Isanti SWCD (Workload Assessment): The district is encouraged to conduct a workload assessment to determine if staffing levels are adequate to meet core program requirements and priorities identified in shared comprehensive watershed management plans.

Isanti SWCD (Tracking): Continue to gather and compile data about implementation efforts your organization is making toward comprehensive watershed management plans.

WCA Performance Standard Requirements:

- There are no WCA required actions

	WCA Performance Standard Recommendations: • The Isanti SWCD should obtain professional certification in the MN Wetland Professional Certification (MWPCP). This would be considered a high-performance standard.

Introduction

This is an informational document prepared by the staff of the Board of Water and Soil Resources (BWSR) for the Isanti Soil and Water Conservation District (SWCD). It reports the results of a routine performance review of both organizations' respective comprehensive or water management plan implementation and overall organizational effectiveness in delivery of conservation projects and programs. The findings and recommendations are intended to give local government units (LGUs) constructive feedback they can use to enhance their joint and individual delivery of conservation services.

For this review, BWSR has determined the organization's compliance with BWSR's basic performance standards, surveyed members of both organizations and their partner organizations for feedback and conducted a routine spot check of Isanti County's Wetlands Conservation Act (WCA) activities.

This routine evaluation is neither a financial audit nor an investigation and it does not replace or supersede other types of governmental review of local government unit operations.

While the performance review reported herein has been conducted under the authority granted to BWSR by Minnesota Statutes Chapter 103B.102, this is a staff report and has not been reviewed or approved by the BWSR board members.

What is PRAP?

PRAP is an acronym for BWSR's Performance Review and Assistance Program. Authorized by the 2007 Minnesota legislature, the purpose of PRAP is to support local delivery of conservation and water management by periodically reviewing and assessing the performance of local units of government that deliver those services. These include soil and water conservation districts, watershed districts, watershed management organizations, and the local water management functions of counties.

The PRAP program includes an Annual Statewide Summary, and three types of assessments. Depending on the program mandates and needs of the local government unit, review types include both routine and specialized. The Annual Statewide Summary annually tabulates all local governmental units' compliance with basic planning and reporting requirements.

Organizational Assessments, conducted by BWSR once every ten years for each local government unit, evaluate operational effectiveness, partner relationships, and whether the LGU has achieved county water plan, watershed management plan, and/or SWCD comprehensive plan implementation goals. This assessment also evaluates compliance with performance standards, and the Wetland Conservation Act, where applicable.

Watershed-based Assessments are routine reviews conducted with partnerships of local governments working together to implement comprehensive watershed management plans (CWMPs) developed through the One Watershed One Plan Program. This review evaluates progress on plan implementation and analyzes partners working relationships.

Special Assessments are conducted with LGUs experiencing significant obstacles or performance deficiencies and may include BWSR Board action to assign penalties as authorized by statute.

More details can be found on the BWSR PRAP webpage.

Executive Summary

Minnesota Board of Water and Soil Resources (BWSR) staff met with Isanti Soil and Water Conservation District (SWCD) staff to discuss an evaluation of the water management functions of the SWCD. The findings in this document represent the data collected over the course of 60 days of review and the recommendations are a result of the observations and conclusions we have made based on that data. There are four distinct parts of an Organizational Assessment conducted via the BWSR Performance Review and Assistance Program (PRAP) as authorized by M.S. 103B.102.

Part 1: Evaluation of the progress made by water management entities toward goals stated in their approved and adopted local management or comprehensive plans.

Part 2: Review of the entities' adherence to level I and II standards as directed by statutes, policies, and guidelines via a performance standards certification checklist.

Part 3: Board member and staff surveys as well as partner surveys to assess internal and external perceptions of performance, communication, partnerships, and delivery of conservation programs and customer service.

Part 4: Wetlands Conservation Act (WCA) spot check to evaluate WCA program performance and delivery.

This organizational assessment of Isanti SWCD did not include Part 1. Part 1 (evaluation of water plan progress) was not conducted because Isanti SWCD participates, in various degrees, in two One Watershed, One Plans. These Comprehensive Watershed Management Plans will be reviewed at roughly the five-year point of their planning efforts. After thorough review of the data, we develop a list of actions and recommendations to help guide the water management entities in their continued growth of program delivery. We do this to ensure they continue to meet basic standards as established in statutes and policy. We also develop a list of commendations for the great work these entities do as our partners in delivering conservation across the varied landscapes of Minnesota. Each of the above listed parts of the review are described in the findings section of this document, and the completed documents can be found in the notated appendices for further review. This report will be summarized in conjunction with other PRAP Organizational Assessments collected in 2026 to be used as the official BWSR PRAP report delivered to the legislature as part of our reporting requirement under M.S. 103B.102.

Key Findings and Conclusions

Isanti SWCD is commended for their work in implementing core programs, the Wetlands Conservation Act, and for participating in planning and implementation activities in two comprehensive watershed management plans developed through the One Watershed, One Plan Program. These include the Rum River and Lower St Croix River comprehensive watershed management plans. The board and staff of the Isanti SWCD are viewed favorably by their partners which aids in the planning and implementation of activities identified within their One Watershed, One Plans.

Isanti SWCD is commended for meeting 12 of 12 basic standards, including reviewing of personnel policy within the last 5 years, completion of eLINK reporting on time, and targeting state grant funds in high priority areas.

The SWCD is commended for meeting several high-performance standards.

Summary of Recommendations

After a thorough analysis of the data collected as part of this review, BWSR staff developed several recommendations for the Isanti SWCD. We rely heavily on our relationships with County and SWCD staff as well as the input of partners, staff, and board members to make sure we provide recommendations that are relevant,

timely, and helpful for the LGUs to implement and improve their operations. The full text of the recommendations can be found in the conclusions section.

Isanti SWCD (Board Training): The district is encouraged to develop and maintain training plans for board members to enhance their skills related to their service to the organization.

Isanti SWCD (Succession Planning/Cross Training): The district is encouraged to preserve organizational knowledge, experience, and consider opportunities for cross training.

Isanti SWCD (Workload Assessment): The district is encouraged to conduct a workload assessment to determine if staffing levels are adequate to meet core program requirements and priorities identified in shared comprehensive watershed management plans.

Isanti SWCD (Tracking): Continue to gather and compile data about implementation efforts your organization is making toward comprehensive watershed management plans.

WCA Performance Standard Requirements:

- There are no WCA required actions

WCA Performance Standard Recommendations:

- The Isanti SWCD should obtain professional certification in the MN Wetland Professional Certification (MWPCP). This would be considered a high-performance standard.

Findings

This section describes what BWSR learned about the performance of Isanti SWCD via the various collection methods as outlined below.

Findings Part 1: Planning

Isanti SWCD participates in planning and implementation, in various degrees, in two comprehensive watershed management plans. The Lower St Croix River comprehensive watershed management plan will be evaluated in 2026 during a PRAP Watershed-based Assessment. The other watersheds will be evaluated at the mid-point of plan implementation. For this reason, the local comprehensive watershed management plan review was omitted from this assessment.

Findings Part 2: Performance Standards

BWSR has developed a set of performance standards that describe both basic requirements and high-performance best management practices related to the overall operation of an organization. These standards are different depending on the type of LGU. Each set of standards addresses four areas of operation: administration, planning, execution, and communication/coordination. The basic standards describe practices that an organization is either legally required and defined by state statute or are fundamental to operations as determined by BWSR board policies. Each year BWSR tracks all of Minnesota's water management LGUs' compliance with a few of the basic standards to make sure our partners stay in compliance with statutory or other legislative requirements, which include standards such as annual report submittals for BWSR activities, website reporting requirements, and financial reporting requirements.

The high-performance standards describe practices that reflect a level of performance that exceeds the required practices. While all local government water management entities must meet the basic standards, the most proactive LGUs will meet many high-performance standards. The review of the performance also includes basic and high-performance criteria for administration of the Wetland Conservation Act (WCA). A more detailed discussion specific to administrative WCA performance may be found in the **Findings Part 4** section of this report. The performance standards checklists submitted and reviewed for both Isanti Soil and Water Conservation District are contained in Appendix A.

For this Organizational Assessment, the Isanti SWCD reports compliance with 12 of 12 applicable basic standards, and 19 of the 22 high performance standards for SWCDs. A few notable high achievements include:

Isanti SWCD is commended for:

- Keeping job approval authorities up to date
- Having up to date policies and procedures in place
- Active partner/participant in at least one 1W1P planning or implementation process
- Prioritized, targeted, and measurable criteria used for goals, objectives and actions in LWMP
- Having a certified wetland delineator on staff
- Water quality data collected to track priority concerns and priority water bodies
- Website contains additional requirements beyond minimum requirements
- Coordination with state watershed-based initiatives
- Communication piece sent within the last 12 months
- Obtained stakeholder input within the last 12 months
- Coordination with County Board by supervisors or staff.
- Partnerships: cooperative projects/tasks with neighboring districts, counties, watershed districts, non-governmental organizations.

Findings Part 3: Internal and External Surveys

Part 3 of this performance assessment is based on responses to an on-line survey of each LGUs' staff and board and an online survey from partner organizations. Each LGU's board and staff were asked different survey questions than their respective partners. The survey questions are designed to elicit information about LGU successes and difficulties in implementing plan goals and objectives and assessing the extent and quality of partnerships with other related organizations. The SWCD invited a total of 35 individuals to take the online survey, and 24 responded, a (69%) response rate.

Internal Surveys: Summary of Self-Assessments by Organization Staff & Board Members

***Please note: Information in this section has been analyzed and paraphrased to keep responses anonymous*.**

Survey participants were asked which programs or projects they consider to be particularly successful over the past few years. Responses provided for Isanti SWCD included:

- Too many to list all, but examples are water retaining basins, cover crops, no till, Blue Lake alum treatment, and shoreland improvements
- Rain garden projects
- Wetland restorations, working with drainage authority, community education, and quality of lakes and partnering with Lake Improvement Districts
- Shoreland restorations and rain gardens
- Soil health, surface water protection and storage, and easements
- More farmers using green cover crops
- Increase of staff to promote forestry improvements, conservation easements and educational outreach
- Well-sealing projects
- Oxford Lakes monitoring, minimizing rainwater runoff with rain gardens and landscaping
- Playing a role in the Rum River and Lower St Croix watershed partnerships
- Having very successful working arrangements with all our partners.
- People are seeing the work we are doing to restore wetlands, and it is getting us more wetland projects to do in the county.

Survey participants were asked what helped make these projects and programs successful? Responses provided for Isanti SWCD included:

- Good teamwork from staff and with various partner agencies
- Pairing dollars from the state and federal government
- Adequate funding, dedicated staff, and low staff turnover
- Citizens are working with SWCD staff to complete projects
- We strive to provide the best service to our producers and landowners by building trust and providing excellent service
- Our commitment to educating the public
- Excellent utilization of getting the word out
- Staff work very well with residents in the county
- Partnering with other agencies to make projects happen
- BWSR funding and great staff
- Great relationships have been formed between management and staff and partners and landowners

SWCD staff and Board were asked to provide examples of areas where the agencies' work has been difficult to implement, as well as potential explanations for the difficulties.

Responses provided for Isanti SWCD included:

- Projects that are underfunded as we have a waiting list of projects that are ready to go once funding comes in
- Conservation easements primarily RIM
- Groundwater protection/storage has been something that we have not focused on, but it has not been identified as a high priority

Reasons why the above projects or programs have been difficult included:

- Lack of funding
- Staff lacked experience with conservation easements and there was no dedicated position for easement work which made it a low priority among other duties
- Low interest from the public
- Short staffed when it comes to projects stalling out

Participants for both surveys were asked to identify partners they had good working relationships with, responses for both entities included:

SWCD

- BWSR, DNR, MN Extension
- Nature Conservancy, Minnesota Land Trust
- SWCDs in our watershed partnerships
- NRCS, USFWS
- MASWCD, Nonprofits
- I truly believe we work well with all of them

The survey also asked participants to identify organizations with whom they would like to collaborate with more often:

SWCD

- DNR, USFWS
- Land Stewardship Project, Wild River Audubon Chapter
- Farming groups

Finally, the SWCD staff and board were also asked to identify ways to improve the effectiveness of their organizations:

SWCD

- I think we are doing a wonderful job accomplishing our goals and objectives within the finances we have available

- More targeted outreach for projects that would maximize progress toward goals and have a ranking system to prioritize projects based on goal metrics that would be accomplished
- Continued evaluation of plans, funding, staff support, learning from other SWCDs, and community engagement and feedback
- More grants, continue to pursue more funding sources
- Continue to push the programs that are working and find ways to build the programs that are less utilized to become more well rounded as a service provider
- Maintain the quality staff and continue to find innovative ways to reach out to residents of Isanti County about our goals and objectives
- Find more allies and partners
- Most important is to keep our management and staff intact, second would be to make sure we have adequate funding to make our goals and objectives

External Surveys: Organization Assessment by Partners

Isanti SWCD Partners Survey: These partners reported a high frequency of interacting with the SWCD over the past three years: 33.33% of the respondents indicated *several times a year*, 33.33% *monthly*, 20.00% *almost every week,* and 13.33% *daily*. Respondents were asked to reflect on the amount of work they do in partnership with Isanti SWCD, with 86.67% indicating *it is about right* and 13.33% indicating *not enough, there is potential for us to do more together.*

The partners were asked to assess their interactions with the SWCD in five operational areas (see table). The partners' rating of the district's work in these areas was mostly *strong* and *good* indicating a favorable performance in all areas.

In terms of rating their overall working relationship with Isanti SWCD, (53.33%) of the partners indicated that the organization was *powerful*, (40.00%) *strong*, and (6.67%) *good, but could be better.*

Performance Area	Isanti SWCD Partner Ratings (percent)				
	Strong	**Good**	**Acceptable**	**Poor**	**Don't Know**
Communication	**60.00%**	**33.33%**	**6.67%**	**0.0%**	**0.0%**
Quality of Work	**66.67%**	**26.67%**	**6.67%**	**0.0%**	**0.0%**
Customer Relations	**78.57%**	**14.29%**	**7.14%**	**0.0%**	**0.0%**
Initiative	**80.00%**	**0.00%**	**20.00%**	**0.0%**	**0.0%**
Timelines/ Follow through	**66.67%**	**20.00%**	**13.33%**	**0.0%**	**0.0%**

When asked for additional thoughts about how the Isanti SWCD could be more effective, partners offered the following comments:

- They are doing great work, not sure what they could do that they aren't doing already
- Isanti SWCD is a strong performer. They do great conservation work and are leaders at the watershed level. This is particularly notable given that this SWCD was once underperforming. The current staff and board have done exceptional work to become a model conservation agency
- Isanti SWCD operates at a high level currently. The staff and board possess skills to adapt and adjust to challenges in the natural and socio-political landscape and operate with a long-term vision in mind. Keep up the great work

- Our township has had an amazing working experience with Tiffany and her staff. The work they have done documenting our lakes' water quality will benefit generations to come and provide a long-term baseline for the conditions of our lakes
- Isanti SWCD could be even more effective than they currently are with more funding

Findings Part 3: Wetland Conservation Act Administrative Review

Wetland Conservation Act Administrative Review Report

Report Prepared for: *Isanti County and Isanti SWCD*

Report Date: *June 2, 2026*

Prepared by: *Ben Meyer, Wetland Specialist, St. Paul, ben.meyer@state.mn.us*

Checked by: *Cade Steffenson, Wetland Specialist, Brainerd, cade.steffenson@state.mn.us*

Introduction

In 1991, the Legislature passed the Wetland Conservation Act (WCA) in order to achieve a no-net loss in the quantity, quality, and biological diversity of Minnesota's wetlands. In doing so, they designated certain implementation responsibilities to local government units (LGUs) and soil and water conservation districts (SWCDs) with the Board of Water and Soil Resources (BWSR) to provide oversight. One oversight mechanism is an administrative review of how LGUs and SWCDs are carrying out their responsibilities.

BWSR uses the administrative review process to evaluate LGU and SWCD performance related to their responsibilities under the WCA. The review is intended to determine if an LGU or SWCD is fulfilling their responsibilities under WCA and to provide recommendations for improvement as applicable.

This review has been conducted in conjunction with the PRAP process, a summary of which is provided in the overall PRAP report.

Methods

Data for this report was collected via direct interview(s) with staff, a review of an appropriate number and type of project files, a review of existing documentation on file (i.e. annual reporting/resolutions), and through prior BWSR staff experience/interaction with the LGU or SWCD. In some cases, a project site review may be necessary. Generally, interviews, project file reviews and site visits were done with two BWSR staff on agreed upon dates.

Specific Methods

BWSR staff interviewed Holly Nelson (Deputy Zoning Administrator for Isanti County) the WCA LGU staff person, on January 13, 2026, at the zoning office in Cambridge, MN. In addition to the data collection forms completed, four project files were reviewed: 2 Boundary and Type, 1 No Loss, 1 Exemption. Resolution No. 94/01-19 was also reviewed and accepted WCA authority/delegated decisions to the zoning administrator. BWSR Wetland Specialist has retained the resolution on file.

BWSR staff interviewed Todd Kulaf, Watershed Conservation Specialist for Isanti SWCD, the WCA TEP delegate for the District, on January 13, 2026, at the District office in Cambridge, MN. Three enforcement files were reviewed. These are the only enforcement activities going back to 2018. Older files were not reviewed.

Compliance with Performance Standards is ranked from "Does not meet requirements", Meets minimum requirements, but needs improvement", to "Effectively implementing program". When applicable, recommendations to improve the WCA implementation are provided.

WCA Report Summary and Recommendations

A. Administration

WCA Performance Standard 1- **LGU has resolution assuming WCA responsibilities and appropriate delegation**

The WCA (8420.0200) allows LGU to designate decision-making authority to staff according to the procedures it establishes. Since County Board adoption of WCA in 1994 delegation of decision authority has been with the Zoning Administrator to make all decision types. **This meets minimum WCA requirements.**

The County administers the WCA for the entire county, including the cities of Cambridge and Braham and all 13 townships, except for the City of Isanti which acts as its own LGU. The city of Braham delegated WCA authority to the County in Resolution 20-22 in July 2022 and the County accepted the delegation in November of 2022. The city of Cambridge delegated WCA authority to the County in Resolution R26-037 in May 2026.

WCA Performance Standard 2 - **LGU has knowledgeable and trained staff that manages the WCA program and/or has secured a qualified delegate.**

County zoning has gone through 3 staff changes in the past five years. All these staff have had oversight by the Deputy Zoning Administrator who has 15+ years' experience in administering WCA and has kept current with the regulatory process and rule changes by attending MWPCP courses. **This meets the minimum WCA requirements.**

WCA Administrative Recommendation #1: In the fall of 2025, the county experienced retirement within zoning that was the lead staff for WCA administration and field reviews. Currently, the county is working to fill this role. In the interim, the deputy zoning administrator is covering for this role. With current workloads, this may not be sustainable. It is recommended that the county hire additional trained staff or retain a consultant that would fill the role as WCA administrator. Ideally, this staff would either currently be a Certified Wetland Professional or become certified within the first six months of hire.

WCA Performance Standard 3- **WCA Annual Reporting Requirement Met**

For calendar year 2025, Isanti County reported 14 approved boundary and type applications, 12 No Loss and 12 Exemption approvals. Of the Exemptions reported, 4 were for agricultural activities, 2 for drainage and 6 met de minimis for a total of 47,462 square feet of permanent wetland impacts. Additionally, 95 landowner contacts for wetland-related assistance and 20 potential WCA violation sites investigated with either being no impact or resolved. No appeals were made and no replacement plans were received or reviewed.

WCA Performance Standard 4- **SWCD has Technical Professional appointed and serving on WCA TEP (SWCD PS).**

The WCA (8420.0240) requires a technical professional employee of the SWCD in the county which activity is occurring to serve on the Technical Evaluation Panel. Todd Kulaf has been the SWCD TEP member since 2015 and has maintained consistency with the TEP through several LGU staff changes and BWSR Wetland Specialist changes. He has consistently been involved with TEP meetings (on and off site) and given technical assistance to LGUs and landowners when needed. **This meets minimum WCA requirements.**

WCA Administrative Recommendation: SWCD staff should obtain Professional Certification in the MN Wetland Professional Certification Program (MWPCP). This would be considered a High-Performance Standard per PRAP.

B. Execution and Coordination

WCA Performance Standard 5- **WCA decisions and determinations are made in conformance with WCA Requirements**

The WCA requires that a Notice of Decision (NOD) be sent to all required parties within 10 business days of a decision per MN Rule 8420.0255. Staff evaluated 4 project files with completed applications. In all cases, the files contained documentation that a decision was made within the required MS 15.99 timeframe with a NOD sent to all parties. Several deficiencies were noted as explained below. However, several deficiencies were noted as explained below by project file.

Project file 1, Wicklund B&T. NOA was found in the electronic file but not filled out. BWSR staff had no record of NOA being sent. NOD was sent within the 60-day timeline and NOD was adequately filled out for this type of decision, although the "decision by staff" box was not checked. Box is checked "approved with conditions" but no conditions specified which would be expected with a driveway de minimis and B&T. NOA should be sent within 15 business days when application is determined to be complete. Staff should review NOD for completeness.

Project file 2, Reimann B&T. NOA and NOD sent properly. Several deficiencies on forms noted: staff decision box not checked, appeal box not checked, TEP findings produced but not summarized in NOD. TEP findings are used only for internal purposes. Findings are not needed for every project and may cause confusion unless they are sent to applicants to address specific comments. It is recommended that the County use the most current NOA and NOD forms and create a template that includes many of the check boxes already completed.

It should be noted that the WCA noticing, and decision process can be difficult to manage – especially during high workloads. Within project files reviewed, the LGU **does not meet minimum requirements**. The recommendations below are intended to improve noticing, accurately complete forms within the file and augment the record.

WCA Administrative Recommendation: It is recommended that the County implement a tracking system and calendar reminder to track application intake and WCA timelines. Forms should be reviewed for completeness and tracked via sent folder in Outlook. An internal review process prior to sending it may be appropriate with new staff during a training period.

WCA Performance Standard 6 - **Certified wetland delineator on staff or retainer**

Holly, Deputy Zoning Administrator, has been administering WCA intermittently since 2006 with various staff functioning as field staff and LGU role. She has attended BWSR and MWPCP training (examples include virtual WCA 101, TEP Academy, etc.). The County is in the process of transitioning a new staff into the LGU position. It is recommended that any new hire, if not already a certified wetland professional, take, at least, the Intro to Wetland Delineation and Regulations offered by BWSR several times each year.

This is high performance standard and not a requirement.

WCA Performance Standard 7 - **Replacement and restoration orders are prepared in conformance with WCA (SWCD PS)**

Per WCA 8420.0900 Subp. 3. B. SWCD is responsible for writing restoration plans in coordination with the LGU, TEP and DNR Enforcement. Prior to the PRAP review, it is known by BWSR Wetland Specialist(s), that Todd Kulaf proactively assists the LGU and landowners and communicates with the public to support WCA compliance.

For the review, 3 WCA violations files were evaluated. They all occurred within the past 5 years.

The first file involved several wetland impact sites for which a RPN was issued. The Certification of Completion was issued 5 years from the initial RPN date. The second case reviewed was handled via voluntary restoration. No timelines were given, but SWCD had ongoing communication and restoration was completed. The third case involved a site visit and moved to a formal Restoration Order (RO). The RO was thorough with maps and actions needed to comply. A Certificate of Satisfactory Restoration was issued within 1 year of RO issuance.

Effectively prepares enforcement orders.

> **WCA Administrative Recommendation:** If future enforcement cases occur, documentation of timelines, site visits and deadlines should be added to the file to support the communication efforts and document results.

> WCA violations are relatively rare in Isanti County due to the proactive nature of WCA administration and involvement of the SWCD staff. When violations do occur, landowners are often offered a voluntary restoration option prior to formal enforcement. This is a very common practice across many MN counties and can help expedite the enforcement process while also maintaining good relations with landowners.

WCA Performance Standard 8 - **Replacement plan applications are prepared in conformance with WCA**

There are no replacement plan applications within the electronic files going back to 2017. Staff are proactive in communicating with the public about WCA rules. **Effectively implementing the program**

WCA Performance Standard 9- **Technical Professional Appointed and serving on the TEP (SWCD PS)**

The WCA (8420.0240) requires a technical professional employee of the SWCD in the county which activity is occurring to serve on the Technical Evaluation Panel. Todd Kulaf has been the SWCD TEP member since 2015 and has maintained consistency with the TEP through several LGU staff changes and BWSR Wetland Specialist changes. He has consistently been involved with TEP meetings (on and off site) and gives technical assistance to LGUs and landowners when needed. **This meets minimum WCA requirements.**

> **WCA Administrative Recommendation:** SWCD staff should obtain Professional Certification in the MN Wetland Professional Certification Program (MWPCP). This would be considered a High-Performance Standard per PRAP.

WCA Performance Standard 10 - **Effective Communicates and Coordinates with other agencies and the public**

Although the County has experienced several WCA LGU staff changes (resignations and retirement), they do maintain a high level of involvement in administering the Wetland Conservation Act via the Zoning office staff with their local application and fee schedule. Staff effectively track projects and reviews in a timely manner and involve TEP when needed. The SWCD TEP member is technically competent and helps when necessary and is the local expert that both the BWSR Wetland Specialist and LGU can rely on for support.

The LGU is meeting this high-performance standard.

CONCLUSIONS

BWSR commends Isanti County for their implementation of the Wetland Conservation Act and the SWCD in their continued support on the TEP. With the integration of recommended administrative improvements in this report, WCA administration and execution will be further strengthened by hiring and training qualified staff that supports the Zoning Department in implementing the WCA. On behalf of BWSR, thank you for cooperating in this WCA Review.

General Conclusions

After a thorough review of the Isanti County Wetland Conservation Act administrative performance, and SWCD organizational performance standards, and analysis of survey results, we have made some recommendations for both the SWCD as found below.

In brief review, the Isanti SWCD reports compliance with 12 of the 12 applicable basic performance standards, and 19 of 22 high performance standards. The SWCD is currently doing a good job in implementation of core programs. The SWCD's partners believe the SWCD is doing good work and has been good to work with.

Commendations

Commendations are based on achievement of BWSR's high performance standards (see Findings, Part 2 and Appendix A). These practices reflect above average operational effectiveness and level of effort.

Isanti SWCD is commended for:

- Keeping job approval authorities up to date
- Having up to date policies and procedures in place
- Active partner/participant in at least one 1W1P planning or implementation process
- Prioritized, targeted, and measurable criteria used for goals, objectives and actions in LWMP
- Having a certified wetland delineator on staff
- Water quality data collected to track priority concerns and priority water bodies
- Website contains additional requirements beyond minimum requirements
- Coordination with state watershed-based initiatives
- Communication piece sent within the last 12 months
- Obtained stakeholder input within the last 12 months
- Coordination with County Board by supervisors or staff.
- Partnerships: cooperative projects/tasks with neighboring districts, counties, watershed districts, non-governmental organizations.

Action Items

Action items are based on compliance with BWSR's basic practice performance standards (see Findings, Part 2 and Appendix A). Action items address lack of compliance with one or more basic standards.

There are no required actions for Isanti SWCD.

Recommendations

This section contains recommendations offered by BWSR to the Board members and staff of the Isanti SWCD. The intention of these recommendations is to enhance the organization's delivery of effective water and related land resource management and service to the residents of Isanti County. BWSR financial assistance through the Performance Review and Assistance Program may be available to support the implementation of some of these recommendations. See BWSR website for more information: PRAP Grants | MN Board of Water, Soil Resources.

Isanti SWCD (Board Training): This recommendation is based on findings from the organizational checklist. Your organization is encouraged to develop training plans for your board members. Board members play a critical role in shaping strategies, making decisions, and adopting organizational goals related to the district's programs and locally adopted plans. Investing in professional development as needed will ensure board members are equipped with the knowledge and skills to carry out their role(s) and will contribute to the ongoing success of your organization.

Isanti SWCD (Succession Planning/Cross Training): This recommendation is based on findings from internal and external surveys. The loss of experienced staff and/or board members can create operational challenges during periods of transition. Thinking about succession plans for board and staff can strengthen your ability to govern, manage resources, and deliver conservation programs that benefit those you serve. Cross training can also be an important mechanism to preserve and pass on organizational knowledge. As a result, we encourage you to think about how cross training can help with day-to-day needs as they arise. Together these approaches can help to preserve organizational knowledge and experience, and support ongoing organizational resiliency.

Isanti SWCD (Workload Assessment): This recommendation is based on findings identified from internal and external surveys. Periodically conducting a workload assessment can help your organizations understand staffing needs based on your core program requirements and local commitments made to implement plan priorities. This effort is complementary to your recent strategic planning efforts and can be helpful in identifying staff capacity gaps/needs and help local boards make informed decisions related to hiring, prioritizing work, and streamline processes to improve organizational effectiveness.

Isanti SWCD (Tracking): This recommendation is based on findings from the internal and external surveys. As organizations who are participating in multiple 1W1P partnerships you are completing important work that contributes toward plan goals.

Consistently tracking implementation information and sharing it among partners allows for a holistic picture of work completed to implement your shared plans. The work you've done should be used by the partnership for reflection and evaluation of progress toward plan goals. Your contributions make a difference, and we encourage you to work closely with your watershed-based partners as you implement your plans.

WCA Performance Standard Requirements:

- There are no WCA required actions

WCA Performance Standard Recommendations:

- The Isanti SWCD should obtain professional certification in the MN Wetland Professional Certification (MWPCP). This would be considered a high-performance standard.

LGU Comments and BWSR Responses

Isanti SWCD were invited to comment on the findings, conclusions and joint recommendations in the draft version of this report. BWSR Acknowledges the County and SWCD responses and is willing to help in any way requested.

SWCD Responses:

No SWCD response

Appendix A. Performance Standards

Organizational Assessment- PRAP Performance Standards 2026

SOIL AND WATER CONSERVATION DISTRICT PERFORMANCE STANDARDS

LGU Name: Isanti SWCD

Performance Area		Performance Standard ■ Basic Practice or Statutory requirement ★ High Performance standard (See instructions for explanation of standards)	Level of Review I Annual Compliance II BWSR Staff Review & Assessment (1/10 yrs.)	Rating Yes, No, or Value YES	NO
Administration	■	Financial statement: annual, on-time and complete	I	x	
	■	Financial audit: completed as required by statute (see guidance) or as per BWSR correspondence	I	x	
	■	eLINK Grant Report(s) submitted on-time	I	x	
	■	Data practices policy: exists and reviewed/updated within last 5 years	II	x	
	■	Personnel policy: exists and reviewed/updated within last 5 years	II	x	
	■	**Technical professional appointed and serving on WCA TEP**	II	x	
	■	**SWCD has an adopting resolution assuming WCA responsibilities and appropriate decision delegation resolutions as warranted (If WCA LGU)**	II	n/a	
	■	**SWCD has knowledgeable and trained staff to manage WCA program (if WCA LGU)**	II	n/a	
	■	**WCA Annual Reporting requirements met (if WCA LGU)**	II	n/a	
	★	Job approval authorities: reviewed and reported annually	II	x	
	★	Operational guidelines and policies exist and are current	II	x	
	★	Board training: orientation and continuing education plan and record for each board member	II		x
	★	Staff training: orientation and cont. ed. plan/record for each staff	II	x	
Planning	■	Comprehensive Plan: updated within 5 years or current resolution adopting unexpired county Local Water Management Plan (LWMP)	I	x	
	★	Prioritized, Targeted and Measurable criteria used for Goals and Objectives in the LWMP as appropriate	II	x	
	★	Annual Plan of Work: based on comp plan, strategic plan priorities	II	x	
	★	**SWCD is currently actively involved in at least one 1W1P**	II	x	
	★	**SWCD has received a competitive CWF grant in past 2 years**	II		x
	★	**Strategic Plan or Self-Assessment completed within last 5 years (PRAP)**	II	x	
Execution	■	Are state grant funds spent in high priority problem areas	II	x	
	■	Total expenditures per year (over past 10 years)	II		
	■	Months of operating funds in reserve	II		
	■	**Replacement and restoration orders are prepared in conformance with WCA rules and requirements**	II	x	
	■	**WCA TEP member knowledgeable/trained in WCA technical aspects**	II	x	
	■	**WCA TEP member contributes to reviews, findings & recommendations**	II	x	
	■	**WCA decisions and determinations are made in conformance with all WCA requirements (If LGU)**	II	n/a	
	■	**WCA TEP reviews/recommendations appropriately coordinated (if LGU)**	II	n/a	
	★	**Certified wetland delineator: on staff or retainer**	II		x
	★	**Effective WCA Coordination and Communication with other agencies and the public**	II	x	
	★	**Water quality data collected to track outcomes for each pr. concern (phosphorus) staff/volunteer, NO3**	II	x	
	★	**Water quality trends tracked for priority water bodies (Green Lake, Blue Lake)**	II	x	
Communication & Coordination	■	Website contains all required content elements – annual report (y), audit (24), budget (y), mtg notices (y)	I	x	
	★	Website contains additional content beyond minimum required	II	x	
	★	**Coordination with state watershed-based initiatives (WRAPS/TMDLs, MAWQCP)**	II	x	
	★	**Communication piece sent within last 12 months, indicate target**	II	x	
		Communication Target Audience (Green Lk, Blue Lk, Farmers – SH, Abandoned Wells,			
	★	Outcome trends monitored and reported for key resources - Lakes	II	x	
	★	Track progress on Information and Education objectives in Plan	II	X	
	★	Obtain stakeholder input: within last 12 months – Soil Health, Farmer led group	II	x	
	★	Annual report communicates progress on water plan goals	II	x	
	★	Partnerships: cooperative projects/tasks with neighboring districts, counties, watershed districts, NGOs, or private businesses	II	x	
	★	Coordination with County Board by supervisors or staff	II	x	

Year	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Expenditure	$456,127	$393,064	$392,352	$648,983	$486,983	$720,330	$902,942	$607,641	$1,167,858	$1,159,678

Appendix B. Comment Letter

No formal letter received to date.

Appendix C. Program Data

Time required to complete this review

Isanti SWCD Staff: 10 Hours

BWSR Staff: 40 Hours

Schedule of Organizational Assessment

BWSR PRAP Performance Review Key Dates

- February 2026: Initial meeting with Isanti SWCD
- February 2026: Survey of SWCD Supervisors, County Commissioners, staff and partners
- July 2026: Presentation of Draft Report to County and SWCD staff
- August 2026: Date Transmittal of Final Report to LGU

NOTE: BWSR uses review time as a surrogate for tracking total program costs. Time required for PRAP performance reviews is aggregated and included in BWSR's annual PRAP report to the Minnesota Legislature.