

60-Day Plan Review Comments and Responses

For the Sunrise River Watershed Management Organization Watershed Management Plan

Agency review began May 9, 2019 and ended July 8, 2019

Comments were received from: Anoka County, City of Columbus, Metropolitan Council, MN Department of Agriculture, MN Board of Water and Soil Resources, MN Department of Natural Resources, and MN Pollution Control Agency.

Responses to comments were approved at the July 18, 2019 SRWMO board meeting.

Number	Location	Comment	Response
Anoka County			
1	Exec Summary	The Outreach Coordinator position discussed on Page 4 seems in direct conflict with the statement on Page 3 regarding how the SRWMO intends to run a financially lean, focused...by minimizing overhead (no staff, office or vehicles). If this position is contracted, maybe that should be added to the description.	The description was modified to note this position is housed at the Anoka Conservation District.
2	Exec Summary	As a reminder, Anoka County does have an Aquatic Invasive Species (AIS) Coordinator that can be a resource and/or partner on community outreach regarding AIS.	Policy P24 in section 7.6 states “The SRWMO supports the Anoka County Aquatic Invasive Species Prevention Program hosted by Anoka County Parks.” No plan change made.
3	Exec Summary	Is the WMO comfortable setting budgetary limits when inflation has been rising at 5% per year?	Yes. Goal 13 explains that the \$10,000 increase between the first and last 5 years of this Plan’s term is to account for estimated 4% inflation. Also, please understand that budgetary limits must consider population and development changes. In our largest community, Linwood Township, population change of -3.3% is anticipated by the Metropolitan Council during 2020-2030.
4	Sec. 3.3. SRWMO Philosophical Approach	For the section entitled “Minimize Overhead,” is there a goal of keeping this number below a certain percentage point? If so, what is that?	Goal G41 in section 7.12 is for the SRWMO to continue to spend <20% of its local funds on administration on average across years. No plan change made.
5	Map 13	You may want to change the “trailer launch” designation to “canoe/kayak launch” for Island Lake. There is not a fully developed boat launch there.	The map has been changed as suggested.

Number	Location	Comment	Response
City of Columbus			
6	Sec. 9.3 Financial Impact	The City of Columbus requests that operating expenses be split by the same formula as the non-operating expenses.	The suggested change must be addressed through a SRWMO joint powers agreement change amongst the four member communities, not within the watershed plan. No plan change made.
Metropolitan Council			
7		The Plan puts forth a good roadmap to protect water resources within the watershed and is consistent with the Council Policies outlined in the Council's <i>2040 Water Resources Policy Plan</i> . Staff commends the SRWMO for preparation of a plan that includes a clear inventory of land and water resources, the inclusion of local and regional partners in the discussion of priority issues and opportunities, and a clear statement of goals and policies. Council staff were encouraged to see SRWMO actively working to reduce the impaired waters in their jurisdiction through the development of a clear communication plan and continuing efforts to create/maintain partnerships... Council staff applaud the detailed water quality monitoring plan... Finally, the amount of effort and time invested in the stakeholder input process and issue prioritization was very impressive. Council staff are confident that the strengthened relationships developed with local stakeholders will result in better stakeholder communication, continued use and refinement of the watershed plan, and beneficial outcomes for all parties.	No change requested.
8		Five typographical errors were noted.	Typographical corrections have been made.

Number	Location	Comment	Response
9	Sec. 5.1 Assessment of Regulatory Framework	Council staff appreciate the simplification of standards in the 3 rd Generation SRWMO Watershed Management Plan in Section 5.1, however, a process for completing wetland function and value assessments is necessary to understand the impact of development on the watershed’s wetlands. The function and value process needs to be in place ahead of any proposed development that may impact a wetland so that clear direction is provided to the party impacting the wetland. All impacted wetlands need to be mitigated according to their value and replaced according to WCA requirements.	We and our TAC considered requiring wetland functions and value assessments and decided against it. Reasons included: (1) MN RAM, the state tool for this task is no longer supported by BWSR. Their website states “...using MnRAM as the sole means to compare wetlands when making wetland permitting/impact decisions is discouraged by BWSR.” (2) Other tools are lacking, but under development by the state. (3) WCA does not require it. (4) Our past wetland standards were complex and unwieldy (and likely less used) because they incorporated functions and values assessments. No plan change made.
10	Sec. 7.1 High Priority Issue: Lake and Stream Water Quality	Policy P1...states that “the SRWMO will not pay for maintenance treatments of aquatic invasive species unless those treatments will achieve water quality benefits.” Council staff have concerns about how this policy will be enacted. If an AIS has serious ecological detriment to the waterbody it will eventually have water quality implications. An example is zebra mussels. They have a huge impact on the ecology of the lake, but actually have a positive effect on water quality. How would the SRWMO address this water quality/AIS concern? The Plan would benefit in a further discussion about this topic area and how this policy would be applied.	P1 has been expanded as follows: <i>“The SRWMO will not pay for maintenance treatments of aquatic invasive species unless those treatments will achieve a water quality benefit. <u>Maintenance treatments are treatments expected to recur regularly over many years to maintain AIS density for recreational purposes. Water quality benefits are reductions in water borne nutrients.</u>”</i>

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11	Sec. 7.2 High Priority Issue: Water Monitoring	...the SRWMO plans to monitor chloride concentrations in only the streams in the watersheds. Council staff would recommend that the lakes should be sampled for chloride at depth. This information would be beneficial, especially for lakes that have nearby residential septic systems that could be a potential source of chlorides from water softening systems.	We had not included lake chloride monitoring because: (1) chloride concentrations locally have been low. (2) winter sampling of lakes at depth would require separate trips and special equipment it relatively more expensive. We have modified Action A68 in section 7.13 as follows: <i>“Periodic monitoring of streams and lakes for chlorides, as described in the Monitoring section of this Plan. <u>That section currently includes only stream monitoring, but lake monitoring at depth is a medium priority if funds allow.</u>”</i>
12	Sec. 7.2 High Priority Issue: Water Monitoring	...the SRWMO plans to evaluate the monitoring data for trends. Council staff have concerns that this monitoring plan might not provide enough data to accurately calculate certain types of trends. Depending on the trends the SRWMO wants to use, Council staff may be able to assist with the trend calculations.	The SRWMO has separated its monitoring into three purposes – surveillance, diagnosis and effectiveness. Each has differing schedules designed to allow sufficient data. The Council’s offer to assist with analysis is appreciated and we may request that help. No plan changes made.
13	Sec. 7.3 High Priority Issue: Funding	...the SRWMO estimates that 50% of its annual budget will be provided by grants that are not yet secured. Council staff agree with the assessment that this area of the metro has an abundance of water and a lower population density than other areas in the metro, which makes funding the SRWMO actions difficult. However, staff have concerns about this uncertainty in funding and the ability of the SRWMO to accomplish the water improvement projects and feasibility studies in the Plan.	We agree and are glad you think our plan is ambitious. Recent State-level round tables have identified predictable funding as a major obstacle to water management state-wide. As a result, the State is shifting more resources from competitive grants to non-competitive Watershed Based Funding. This helps address the concern, as do having multiple partners and a strong watershed plan. No plan changes made.
14	Sec. 7.3 High Priority Issue: Funding	Council staff agree with and would like to reiterate the importance of Member Community Action MC2...The Watershed Based Funding process depends on the cooperation between member communities and the SRWMO. It is in all parties’ best interest to have the communities’ projects listed in or amended to the SRWMO plan to be eligible for funding.	No plan change requested.

Number	Location	Comment	Response
15	Sec. 7.8 Medium Priority Issue: Development	Council staff support the continuance of SRWMO review of development plans...This process evaluates the impact of projects from the watershed perspective and allows for oversight and protection that may be missed by the community review.	No plan change requested.
16	Sec. 7.2 High Priority Issue: Water Monitoring	Citizen monitoring programs are effective and efficient ways to gather surface water information...The University of Minnesota Extension has created a training program to educate citizens about AIS plant identification and reporting practices. This may assist SRWMO with the identified AIS priority issues and opportunities.	The Anoka County AIS Coordinator, who we rely upon for important services, coordinates volunteer AIS detection and similar programs. That coordinator utilizes U of M and other resources. No plan change made.
MN Department of Agriculture			
17	Sec. 7.1 High Priority Issue: Lake and Stream Water Quality	...the Minnesota Agricultural Water Quality Certification Program (MAWQCP) could be referenced in the plan. MAWQCP is a voluntary opportunity for farmers and ag landowners to take the lead in implementing conservation practices that protect our water. Those who implement and maintain approved farm management practices will be certified and in turn obtain regulatory certainty for a period of ten years. See: https://www.mda.state.mn.us/environment-sustainability/minnesota-agricultural-water-quality-certification-program This could be in addition to or complimentary to, Goal G1, or G2 on page 48 and Action A1 page 49.	The program has been referenced as an option in Action A1.
MN DNR – Carlos Avery Wildlife Management Area staff			
18	Sec. 4 Resource Inventory and Assessment	A variety of factual corrections were provided to improve description of the Carlos Avery WMA and nearby natural resources.	All suggested natural resource description changes were made.

Number	Location	Comment	Response
MN DNR – Ecological and Water Resources Division			
19		We encourage the WMO to consider taking small steps in building capacity throughout this plan. The proposed budget only accounts for inflation and will not allow the WMO to expand the quantity or quality of the work it already does. The additional threats from climate change and development may require the WMO to undertake additional projects to mitigate those impacts...	Noted. No plan changes made.
20		Large areas of undeveloped woodland and wetland are a primary reason that many of the water features in this watershed are still in good shape. We strongly recommend that the WMO develop plans to work with agency and nonprofit partners on developing and promoting a voluntary conservation easement program to help preserve high quality natural areas.	We added the following policy in section 7.1 (high priority issue: lake and stream water quality): <i>“The SRWMO supports development of a voluntary conservation easement program to help preserve high quality natural areas, particularly where easements will protect or improve water quality.”</i> We anticipate that such a program is best led by others on a regional or county level. Prioritized locations will be identified through the Landscape Stewardship Plan to be developed by the MN DNR and considered within the One Watershed One Plan.
MN Pollution Control Agency			
21		Upon review, the plan does not violate any statutory or rule requirements administered by the MPCA.	No plan change requested.
22	Sec. 7.16 Low Priority Issue: Water Quantity	Policy P43 states that “New culverts and conveyances should be sized using Atlas 14 precipitation records for at least 10-year storms.” In Appendix B – SRWMO Regulatory Standards of the draft plan for Stormwater Standards it states that both volume and pollutant control development standards for post development rates should equal 100-year storm events. Although culverts and conveyances may not be specific to stormwater infrastructure, buy may also part of a stream reach’s normal flowage, would it be appropriate to size new culverts and conveyances for 100-year storm events? ...This is not a comment, but more of a clarifying question.	Policy P43 is meant to apply to stormwater conveyances. The policy has been modified for clarity as follows: <i>“New <u>stormwater</u> culverts and conveyances should be sized using Atlas 14 precipitation records for at least 10-year storms.”</i>

Number	Location	Comment	Response
23		Are the cities of Ham Lake and East Bethel the only MS4 permitted entities in the SRWMO boundary? Are there any other expected communities that may be added within the next 10 years based on projected growth or development?	Because growth in the watershed has been relatively light, no new communities may be designated MS4s, but that is speculation.
24		The MPCA recommends that the plan be approved.	No plan change requested.
MN Board of Water and Soil Resources (BWSR)			
25		The WMO should be commended for their outreach efforts to obtain input from state review agencies and local governments and citizens throughout the entire plan development process as well as the WMO's self-assessment.	No plan change requested.
26	Executive Summary	Revise the Executive Summary as needed to be consistent with the plan revisions resulting from addressing the 60-day review comments.	After other edits were made, no revisions to the executive summary were needed.
27	Executive Summary	The Figure 2 pie chart on 10-yr planned expenditures indicates that the WMO is not expending any funds on development reviews but one of the tasks is to provide comments on sketch plans?	Elsewhere in the plan we describe that development reviews will be paid by direct billing to the member community where the development is proposed. It is not part of annual WMO budgetary requests to the communities and is budget neutral and therefore is intentionally excluded from Figure 2. No plan changes made.
28	Sec. 3.3 SWRMO Philosophical Approach	Disproportionately More Water Needs than Funding - This section provides a nice description of the burden/blessing of the large amount of resources found in the WMO and implies a reason for insufficient local funding to address the resource issues. This argument could be made stronger if it was tied to the funding capacity of the WMO and compared it with other metro watersheds. The analysis and estimate of what it would cost to address the needed pollutant load reductions to meet the TMDL for all of the impaired waters in the WMO helps provide additional context and need for additional funding to meet the TMDL water quality goals. Refer also to comments on Section 6.3.1 and 7.3 Funding.	Our access to data on the funding capacity of other watersheds in the metro is limited. However, we do know the following 2016 per capita levies for nearby watershed organizations: Unstaffed – Lower Rum River WMO \$0.70 Unstaffed – Upper Rum River WMO \$0.81 Unstaffed – Sunrise River WMO \$2.67 Staffed - Mississippi WMO \$14.42 Staffed - Coon Creek WD \$18.99 Staffed - Rice Creek WD \$19.98 We did not add this information to the plan, because it does not reflect tax capacity.

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29	Sec. 3.3 SRWMO Philosophical Approach	No Regulatory Program – Suggest adding some text mentioning the WMO’s commitment to assist member communities in permitting by providing input related to WMO standards at the sketch plan phase of a proposed development.	The following sentence was added: <i>“The SRWMO may provide input when requested related to SRWMO standards.”</i>
30	Chapter 4 – Inventory and Condition Assessment	The inventories and assessments presented in this chapter are good and fairly complete.	No plan change requested.
31	Sec. 4.10 Stormwater System	Provide information on how the reader can obtain the detailed mapping and information on the municipal stormwater conveyance systems mentioned in this section (provide a link if available).	Text was added directing the reader to the city or township for the most updated maps.
32	Sec. 4.12 Watershed Models	The text mentions that a valuable tool SWAT Model (water quality and hydrology) that includes the WMO has been prepared. Clarify how the WMO used the model results in the development of this Plan and also intends to use in the future.	The following text was added: <i>“The model has been used by the SRWMO when doing regional One Watershed, One Plan preparation with other water managers in the region.”</i>
33	Sec. 4.13 Lakes	Refer the reader to a map that identifies the locations of the lakes mentioned.	Text was added referring the reader to the appropriate map.

34	Sec. 4.15 Guidance Documents	<p>This section introduces the concept of “Guidance Documents” and incorporates existing ones into this plan.</p> <ul style="list-style-type: none"> ○ Since the primary purpose of the Guidance Documents appears to be for implementation of projects the WMO should consider including this information in the implementation section. ○ We noted that it appears only three of the documents contain prioritized, targeted and measurable PTM) implementation projects: A) Ditch 20 Wetland Feasibility Study; B) Coon Lake Stormwater Retrofit; and C) the Martin Lake Stormwater Retrofit Assessment. It is our understanding that the development of these documents included at least a rudimentary feasibility design and study that included estimated costs, a cost effectiveness evaluation and ranking. These documents should be identified separately as “Implementation Guidance Documents”. The others could be considered something like “Reference Guidance Documents” if you want to keep them all in the same table. <ul style="list-style-type: none"> ▪ The implementation program budgets for one additional SRA (subwatershed retrofit assessment) for the Linwood Lake subwatershed assessment. Once completed the WMO will need to formally adopt and then amend the plan to include the SRA. If the WMO anticipates completing other SRA’s in priority subwatersheds they should be identified in the plan now to avoid the need for a future plan amendment to add the task to the implementation program. ▪ The plan also needs to identify the process and criteria that the WMO will follow in developing and adopting a SRA’s and amending them into the plan. This process should include advisory committee input with a recommendation to the Board for adoption, since it will eventually be 	<p>Section 4.15, Guidance Documents, was moved to the appendices.</p> <p>The text in the plan describing the guidance documents was moved to the implementation section.</p> <p>The text states that the list of guidance documents may be updated from time to time by minor amendment of the plan.</p> <p>We have separated the guidance documents into two types within the table: (1) Project prioritizing, targeting documents and (2) Diagnostic or analytical studies. Both types do include science and cost-effectiveness based project recommendations.</p> <p>The following text has been added to clarify the methods and advisory involvement for future subwatershed studies: <i>“For subwatershed studies or similar project ranking studies done by the SRWMO, the SRWMO will follow methodologies consistent with previous studies that result in a list of projects that are ranked by cost effectiveness at pollution reduction. These studies typically include advisory assistance from the member community where the study occurs, as well as the Anoka Conservation District and others the SRWMO deems appropriate such as lake associations.”</i></p>
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Number	Location	Comment	Response
		<p>included in the implementation plan for expenditure of public funds.</p> <ul style="list-style-type: none"> ▪ To make amending of the WMO Plan to include new SRA's we suggest that Table 8 be included as appendix to the plan. 	
35	Chapter 6 – Prioritization of Issues	We appreciate the significant effort and thought the WMO put into identifying and then prioritizing issues with a “High”, “Medium” or “Low” ranking.	No plan change requested.
36	Chapter 7 – Goals, Policies and Actions	<p>Goals need to be written so they are measurable as required by 8410.0080, Subpart 1. This is important so that the WMO can then measure and document its progress towards achieving those goals. Goals and actions need to be clearly tied back to the identified issues they are addressing and to the specific actions in the Implementation Program.</p> <p>Provide additional detail in the goal statements to identify when and what portion of each overall goal will be obtained during the life of this plan. It is also not always easily apparent which action items are intended to accomplish which goals.</p>	Additional detail from BWSR is requested regarding which goals or actions and deficient. Revisions can then be considered.
37	Sec. 7.1 High Priority Issue: Lake and Stream Water Quality	There does not appear to be any water quality goal associated with Coon Lake, which is a high priority resource. The only “Action Item” is related to carp screening. We also anticipate that there would be action items to implement the highest priority projects identified in the Coon Lake Stormwater Retrofit Analysis.	<p>Goal G9 has been added: <i>“Maintain Coon Lake water quality through projects that offset landscape pressures that might cause eutrophication.”</i></p> <p>Other projects for Coon Lake that are in the plan that you may have missed include:</p> <ul style="list-style-type: none"> • Project #37 in implementation Tables 11 and 12 include installing projects from the Coon Lake Stormwater Retrofit Analysis. • Project #46 lakeshore photo inventory. • Project #35 cost share grant program through lake associations.

Number	Location	Comment	Response
38	Sec. 7.1 High Priority Issue: Lake and Stream Water Quality	For Goal G5 consider listing the specific lakes. Otherwise there is the potential for confusion between what the WMO considers recreation lakes and the zoning designation of "Recreational Development Lake", "General Development Lake" and "Natural Environment Lake".	Goal 5 has been modified as follows: <i>"Manage carp in recreational lakes Typo, Martin, Linwood and Coon Lakes to 100 /kg per hectare or other lake-specific, the threshold above which they are destructive to lake health. 100 kg/hectare This is equivalent to 89 lbs/acre."</i>
39	Sec. 7.2 High Priority Issue: Water Monitoring	For Action Item A17 the WMO should also consider monitoring for Chlorides in lakes due to water softeners, especially given the concern over potentially failing septic systems.	See response to comment 11.
40	Sec. 7.2 High Priority Issue: Funding	We recommend the removal of Goal G13 that caps local member funding at an already minimal \$50,000 per year since it doesn't allow the WMO to consider larger projects or an increase in WMO capacity. Also revise Action A24 language. The desired caps could still be an internal policy that the WMO strives towards but it shouldn't really be in the plan as a specific goal or Action item to be accomplished.	We feel funding is a priority issue, and should therefore have accompanying numeric goals. Among the goals are securing grants for priority projects that wouldn't otherwise happen with just local funds, financial predictability for our communities and setting realistic (but ambitious for us) budgetary limits. For our communities and taxpayers, it's not enough to "strive toward" our financial goals. We need to state them plainly and meet them. With that said, if there is ever an instance where we need new additional funds for new circumstances, we won't be afraid to have that discussion with our communities, make the case, and amend our plan.
41	Sec. 7.2 High Priority Issue: Funding	Action A26 identifies that a reserve fund capped at 15% of average annual expenditures. We would suggest that this be set at about 50% of average annual expenditures or 6-months. 15% would only give the WMO \$7,500 of reserve. Since the WMO is going to be pursuing more grants and most grants other than BWSR CWF grants tend to be reimbursement grants, meaning the WMO would first have to pay for the work out of pocket and then submit a reimbursement request to the grant entity, a larger reserve would help the WMO accommodate these grants.	Please understand that some of our community leaders have in the past expressed concerns about the WMOs having stockpiled cash unless a clear purpose is upcoming. We anticipate that most grants we use will be through BWSR and are not reimbursement-based. However, the point is well-taken for instances when we use reimbursement grants. Action 26 has been modified to state that we will have a reserve fund of at least 15%, and not more than 30%, of average annual expenditures.

Number	Location	Comment	Response
42	Sec. 7.2 High Priority Issue: Funding	Funding was identified as a high priority issue for the WMO in Section 6.3.1 and Section 3.3 described the “Disproportionately More Water Needs than Funding” that the WMO faces and the need for outside funding through grants. We highly recommend that the WMO work with its member communities and other local and other non-state entities to obtain additional match dollars for State Clean Water Fund Grants. This is needed to take advantage of the currently available Clean Water Funds (CWF) which are scheduled to only be available for another 15-yrs. The competitive CWF Grants currently only require a 25% match. As pointed out in Section 3.3 it was estimated to take 30-yrs at \$1,000,000 per year to achieve the pollutant reductions needed to meet the TMDL’s for the WMO’s impaired waters. To further build on this observation the proposed WMO Implementation Plan calls for a total of only \$657,000 in total grant and WMO funds for implementation of water improvement projects for the 10-yr plan life. At this rate would take about 460-yrs to address the TMDL’s and that is assuming no inflation and no additional impairments are identified. The other thing that can help is to work to identify projects that are significantly more cost effective than \$1,000 per pound of phosphorus.	We agree, and will continue to seek additional match dollars from sources other than our member communities. Lake and community groups, with whom we’ve been building relationships, are the most likely source. We felt it would be presumptuous to put possible future contributions from them into our plan, but will continue to work with them and ask their financial support. In this way, we can hopefully over-perform on our goals.
43	Sec. 7.5 High Priority Issue: Outreach and Education	Goal G21 consider adding a message to also address using less water softener salt to reduce chloride pollutant of lakes.	See response to comment 11.
44	Sec. 7.5 Medium Priority Issue: Multi-Partner Coordination	For Action A55 the LSC-1W1P date range should be 2018 – 2019.	The date range is already 2018-2019. However, we understand that this project recently received a grant extension, so we will modify the timeline to 2018-2020.

Number	Location	Comment	Response
45	Sec. 7.5 Medium Priority Issue: Multi-Partner Coordination	For Action A56 the process for adopting a portion of the LSC-1W1P into an existing metro WMO has not been determined but you can assume it will take an amendment to the WMO Plan including amending the implementation program and some details as to what portions are being adopted.	Action A56 has been revised as follows: <i>“Consider adopting the Lower St. Croix One Watershed, One Plan in 2020. If adopted, the 1W1P shall be considered incorporated into the SRWMO 4th Generation Watershed Management Plan by reference. The process for adoption will follow a process to be determined by the State.”</i>
46	Sec. 7.14 Lower Priority Issue: Ditching/Drainage	Policy P40 notes that the WMO prefers in-line settling ponds. Typically we see off-line settling ponds preferred since there is less chance of resuspending the settled solids during conditions of high flow.	Policy P40 has been revised as follows: <i>“When ditch maintenance cleaning is conducted, the SRWMO strongly favors adding water quality treatment such as <u>in-line settling ponds (preferably off-line)</u>...”</i>
47	Chapter 8 – Implementation Plan	The implementation section needs in one location a little more detailed narrative description of how the WMO will be administered for implementation of the plan. The contracted Watershed Administrator duties, responsibilities and authorities (i.e. when can the administrator make decisions and speak for the WMO) should be identified. There also needs to be a description of any administration/plan implementation duties that are to be performed by managers.	<p>A new section has been added, including this text: <i>“The SRWMO anticipates contracting for administrative and project management services throughout implementation of this plan. There are two contracted positions: recording secretary and administrator.</i></p> <p><i>The recording secretary position takes meeting minutes, distributes meeting materials, prepares checks and handles the mail.</i></p> <p><i>The administrator position is contracted annually. The administrator is expected to carry out day-to-day operations following the annual contract and following board policies. The extent of the administrator’s responsibilities and authorities are specified in the contract and may vary by year or selected administrator.</i></p> <p><i>It is worth noting that the City of East Bethel’s Finance Director also provides administrative services but charges no fee. This person keeps the SRWMO checkbook, financial ledger and related documents and generally assists the board Treasurer.”</i></p>

Number	Location	Comment	Response
48	Table 11 – Implementation plan task descriptions	Implementation Item 14 , add the year (2029) to the approximate 5 th Gen plan expiration.	The year has been added.
49	Table 11 – Implementation plan task descriptions	Consider adding a message to also address using less water softener salt to reduce chloride pollutant of lakes.	See response to comment 11.
50	Table 11 – Implementation plan task descriptions	Implementation Item 37 and Implementation Item 44 appear to be the same or based on the same guidance documents. Please clarify. For Item 44 as worded appears to be a catch all and not necessarily PTM which is not acceptable, also it does not appear that there are any above projects that are not already budgeted for. Suggest that the description be revised to read something like “Projects identified in adopted Implementation Guidance Documents (Table 8)”. This way it is clear that the projects have already been vetted by the Advisory Committee and approved by the WMO Board and amended into the plan.	Item 44 has a new description as follows: <i>“Projects identified in adopted guidance documents.”</i> Furthermore, the description now reads, <i>“Projects that are prioritized, targeted and measurable; vetted through scientific and stakeholder processes, and in adopted guidance documents.”</i>
51	Table 11 – Implementation plan task descriptions	Implementation Item 48 for the Linwood Lake SRA is missing from the table.	The missing row has been added.
52	Table 12 – Implementation plan timeline and estimated costs	Plan years 2028 and 2029 do not contain any project implementation towards meeting goals? We highly recommend that the implementation projects continue to be budgeted for even during the process of preparing the next plan update. We have a significant concern that momentum towards achieving goals will be lost as a result of the interruption in pursuing goals for a 3 or 4 yr period.	We agree, and wish large implementation projects could be done in those years. However, the cost of updating the watershed plan is estimated at \$54,000. Doing other large projects at the same time is financially difficult. Other smaller projects will occur during that time. No plan changes made.
53	Table 12 – Implementation plan timeline and estimated costs	Item 32 Development Reviews. The budgeted amount does not appear to be sufficient for the Watershed Administrator to provide input starting at the sketch plan phase and follow-up through final design. The WMO will probably need to budget some of their own funds for this work as the \$50 fee per development (charge to the city) is unlikely to be sufficient.	The charge will be up to \$500 per development charge to the city/township. It was incorrectly written as \$50 in section 7.8. Previous correspondence with the communities was for the charge to be up to \$500. The plan has been corrected.

Number	Location	Comment	Response
54	Table 12 – Implementation plan timeline and estimated costs	Item 45 and Item 47 are both Carp Management Studies. It appears that Item 47 should be Alum feasibility studies. The description for alum Studies should identify what lakes are being studied and the criteria for considering an alum project (i.e. watershed loading has already been addressed and in-lake loadings still need to be addressed to meet the water quality goals).	The row headings have been corrected.
55	Table 15 – Funding carried forward by year	Goal G13 indicated that the first five years were to be budgeted at a flat \$50,000 per year and the final five years at \$60,000 to account for inflation. Therefore the budget for year 2025 in this table should be \$60,000. The additional funds could be budgeted in years 2028 and 2029 for project implementation.	Goal G13 reads: “Maintain average annual budgets of local funds from member communities <\$50,000 from 2020-2025 and <\$60,000 from 2026-2030.” Action A24 is consistent. No plan change made.

56	Sec. 8.2 – Cost Share Grant Program	This program needs more detail defining the program, both in the plan and the WMO and ACD websites. Refer to 8410.0105 for additional information on the plan requirements.	<p>MN Rules 8410.0105 subp. 7 states “The plan must define, for cost share or grant programs, if any, the general purpose, scope, time period, amount of funds, funding source, general eligibility criteria for dispersing funds, and a clear link to the goal the program addresses.” The SRWMO has developed cost share grant policies and posted them on its website. These policies appear to meet state rule. Above and beyond state rule requirements, our policy has clear priority areas (including specific waterbodies), ownership and maintenance agreement requirements, and a description of the application and approvals process.</p> <p>The cost share program will change with time. We’ve added a description of those changes to the draft plan, including how we plan to supplement the program with grants and how that may require policy modifications. Current policy will always be on our website.</p> <p>The draft plan section 8.2 was replaced with this text:</p> <p><i>The SRWMO will maintain a cost share grant program to incentivize natural resource improvement projects. At the beginning of the plan period this program is funded with only local dollars. Later, the program will likely also use state and other grant dollars. The program policies and criteria will be revised as needed to be consistent with the specific grant requirements. Grant policies are kept on the SRWMO website where they can be periodically updated. Available grant amounts will also be listed on the website.</i></p> <p><i>Important policies include:</i></p>
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Number	Location	Comment	Response
			<ul style="list-style-type: none"> • Allowable project types. • Priority locations, including specific waterbodies. • Limits on financial support. • Application and approvals process. • Requirements for ownership and maintenance. <p><i>As of 2019, and likely in the future, the grants are administered through the Anoka Conservation District (ACD). By having SRWMO grants and many other grants administered through ACD we create a “one stop shop” for our constituents. The SRWMO has policies in writing with ACD specifying the approval process and a process for involving the SRWMO board in deliberations for any application if they wish.</i></p> <p>We understand that the Anoka Conservation District website does not have detailed description of the SRWMO program or how it is administered at the ACD. This is intentional. If ACD were to list all of the funding sources and policies it juggles to put together a cost share package for a landowner it would be dizzying to the public. This is described on the ACD “financial assistance” page.</p>
57	Sec. 8.3 – Operations and Maintenance	Table 16 required regulatory controls does not include a required Floodplain Ordinance?	It was our understanding that a floodplain ordinance is required by State law. Therefore, we remained silent. Our communities already have floodplain ordinances.

Number	Location	Comment	Response
58	Sec. 10.1 – Evaluation and Reporting for the SRWMO	The plan needs to identify the procedures the WMO will follow for evaluating the progress in meeting the established goals per 8410.0080, Subpart 1 and the progress made towards implementation items per 8410.0105, Subp. 1. These evaluations need to be made a minimum of every two years according to 8410.0150, Subp. 3, E. The information provided in the plan is insufficient please provide additional detail (i.e. a template for the proposed evaluations for goals and implementation activities).	Plan text has been modified to read as follows: <i>“To facilitate annual reporting and self-evaluation the SRWMO has prepared a template for self-evaluation of goals and implementation activities. The template will be populated annually and used within annual reports to BWSR.”</i> <i>The template will be emailed to BWSR staff and included as an appendix in the final draft plan.</i>

59	Sec. 10.1 – Evaluation and Reporting for the Member Communities	Per 8410.0105, Subpart 1,C, the Plan needs to define the process the WMO will follow to evaluate member community implementation activities, including what steps the WMO will take if the member community is found to be failing to implement parts of its local water plan. Provide additional detail description and include a copy of the annual reporting template mentioned.	<p>This is a difficult issue legally. We can only do what the law allows us. As we understand it, the only remedy state law offers a WMO if a community is failing to implement the local water plan is for the WMO to take over land use planning authorities in that community. Rarely would circumstances demand such a dramatic action. Moreover, our current joint powers agreement isn't very strong in this area either.</p> <p>We have added the following to section 10.2: <i>"If a member community is failing to implement their local water plan or SRWMO Plan, the SRWMO will:</i></p> <ul style="list-style-type: none"> • <i>Notify staff of the community of the concern and request a response within 60 days.</i> • <i>If the matter remains unresolved, a SRWMO manager will notify the city council or town board in-person.</i> • <i>If the matter remains unresolved, notify the MN Board of Water and Soil Resources and all the member communities of the concern and request a meeting to discuss the matter.</i> • <i>If the matter remains unresolved, the SRWMO will seek legal advice specific to the issue and consider amending its plan to take over responsibility for the task that is not being implemented."</i> <p>We have also added the following policy to section 7.12: <i>"Support a joint powers agreement update by the member communities to clarify how to handle SRWMO budgets that are not unanimously supported by all communities, and how any</i></p>
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Number	Location	Comment	Response
			<p><i>community's failure to update its local water plan will be addressed."</i></p> <p>Appendix C: Member Communities' Responsibilities Summary is intended to be the annual report template. Text was revised to make this more clear.</p>
60	Sec. 12.2 – Local Water Plan Content Requirements	If any of the local governments will be adopting by reference the WMO will need to provide some additional guidance as to what needs to be included in the resolution and any supporting documents needed to meet the content requirements for the local water plans if the information is not included in the WMO Plan.	<p>Current text with edits: <i>"Member communities may adopt the SRWMO plan or portion of it by reference, through a resolution, to satisfy the intent of local water management planning. The resolution must summarize tasks that the community is responsible to implement and be pre-approved by the SRWMO. The SRWMO believes that member communities adopting the SRWMO Plan as their local water plan is reasonable because most of the actions demanded of communities in this plan must be formalized in other ways, such as through ordinances. For other tasks, such as storm water system maintenance, this plan contains a required schedule for completion. The SRWMO will ensure tasks are completed on schedule by requiring annual reporting from all communities. The SRWMO will create a reporting template see Appendix C) that includes all tasks required of communities in this plan."</i></p>
61	Sec. 12.4 – SRWMO Review Process for Local Water Plans	Revise this section to be consistent with 8410.0160 Subp. 6. Requirement for adoption not more than two years before the local comprehensive plan is due. Also include the 103B.235 Sub. 3 and 3a. Metropolitan Council review requirements.	The text was revised and now directly references state rule and statute.
62	Chapter 14 – Maps	It would be helpful if the County Ditches were labeled on the Map 23.	Ditch number labels have been added as suggested.