



SOUTH WASHINGTON
WATERSHED DISTRICT

June 28, 2016

VIA EMAIL

Metro Plan Review Roster

http://www.bwsr.state.mn.us/planning/metro/Plan_Review_Roster.pdf, and All Commenters
Accessed April 7, 2016

RE: SWWD WMP 60 Day Review Response to Comments and Public Hearing

Dear Agency Representative:

Consistent with MN Statute 103B and MN Rule 8410, SWWD has prepared a 10 year Watershed Management Plan (WMP) update. The update was prepared following request for input from your agency and in cooperation with the District's Citizen Advisory Committee and Technical Advisory Committee. The plan was submitted for 60 day review which closed June 17, 2016.

Attached are comments received and SWWD responses. Most comments were minor and while they will help to make the plan stronger and more useful did not pertain to items required under Rule 8410. There are some comments which do pertain to MN 8410, particularly the use of guidance documents and plan amendments. SWWD will further discuss those issues with BWSR.

SWWD has scheduled a public hearing for July 12 as part of its regular Board meeting. The meeting will begin at 7:00 pm at the City of Woodbury Public Works building, 2301 Tower Drive, Woodbury, MN 55125.

If you have any questions or need additional information, please contact me at 651/714-3714 or jloomis@ci.woodbury.mn.us.

Sincerely,
South Washington Watershed District

John Loomis
Water Resources Program Manager

Comment #	Commenter	Plan Ref	Comment	Response	Edit Required?
1	Met Council	General/Flooding	...include in the main body of the plan a map of the subwatersheds, and particularly the areas of flooding concerns. If a reader is unfamiliar with the district the locations of areas such as the "West Draw", "Northern Subwatershed", and "Clear Channel Pond", are difficult to find.	We will add subwatersheds to an existing map. Additionally, a map will be added to identify locations of existing flooding concerns on pg. 23.	Yes
2	St. Paul Park	Primary Resources of the District	Update the map to more clearly differentiate from the key water resources and the municipal boundaries.	Municipalities will be added	Yes
3	St. Paul Park	Primary Resources of the District	Identify the municipality where each of these water resources are located.	Municipalities will be added	Yes
4	St. Paul Park	Flood Damage Reduction and Mitigation	Clearly identify the location of this pond [Clear Channel] and include potential projects in the implementation plan. It is acknowledged that the location and potential improvements can be found in the districts former version of the SWMP. Perhaps these assessments need to be more clearly organized to be coordinated with this new plan format.	We agree additional information is needed re:clear channel. The regional portion (pond) of the project is complete. The District is currently evaluating its role in remaining portions of the project which are likely to occur with school construction in 2016/2017. Additional information in to be provided in the plan will include project status and SWWD role going forward. Additionally, a story map will be created specifically regarding Clear Channel.	Yes
5	St. Paul Park	Planning/Retrofit Analysis	A stormwater retrofit analysis is a great tool to focus on key areas and ensure projects are being implemented in areas where they will provide the most cost benefit. This will also position the SWWD and its partner communities to receive funding for future stormwater improvement projects. The City of St. Paul Park would support this effort and would request this be added as an item to be completed in the City and coordinate through the CCIP.	Discussion of resource management plans will be expanded. It should identify that retrofit analyses follow development of resource management plans. Additionally, a schedule will be provided which identifies the current status of each plan/analysis. Implementation of identified retrofits is accomplished through the District's Watershed Restoration, Reconstruction, and Resiliency program.	Yes
6	St. Paul Park	Figures/Maps	It is recommended that this link (http://www.swwdmn.org/resources/watershed-management-plan/) on the District website include maps/figures that clearly shows watershed boundaries, key watershed resources, ravine erosion, and potential water quality improvement projects, etc. This will provide a clearing house for all figures/maps associated with the plan. The map viewer is very useful, but one figure that shows key issues for reference would be helpful. Another example is the reference to flooding associated with the clear channel pond. It is difficult to find that pond on the District's map viewer.	Noted. We will provide a figure showing locations of flooding concerns. We feel the rest of the information is accessible via the web viewer.	Yes
7	MPCA	General	...we believe that your current draft of your Watershed Management Plan appears to be well done and that you have sufficiently addressed informal comments provided in an e-mail dated 1/11/16.	Noted	No
8	BWSR	General	We would like to commend the SWWD for both preparing an innovative plan that is highly integrated into the SWWD website while at the same time completing an extensive update to the SWWD website coordinated for use with the amended plan. We also appreciate the effort made to incorporate recommendations from the BWSR 2013 PRAP Level II review of the SWWD.	Noted	No

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9	BWSR	General	In addition to the plan technical innovations mentioned above the SWWD is also to be commended for its development of a method to biannually evaluate its progress towards meeting its goals and its implementation progress through the development of "Implementation Indicators" and "Performance Measures" for each goal and implementation program.	Noted	No
10	BWSR	General	We noted that the cover identifies the plan year as 2017 however the plan is expected to be adopted in 2016. We also noted that neither the page headers nor footers identify the draft date or version which would be useful in distinguishing from future plan versions.	A note will be added to the footer to identify appropriate plan date and version information prior to submittal of the 90 day review draft.	Yes
11	BWSR	General	The plan is not organized like typical watershed management plans having a numbered outline format. Refer to the SWWD 2007 WMP for an example. This makes navigating the plan and referencing various portions of the plan somewhat cumbersome. See also the comments regarding the table of contents.	As the comment notes, this plan is not organized like a typical watershed management plan. We feel the TOC is broken down enough at this point although we will add some detail to more quickly direct the readers to resource information and differentiate appendices.	Yes
12	BWSR	General	We suggest adding a page acknowledging persons and groups who participated in the preparation of the plan.	Noted	Under Review
13	BWSR	General	We suggest adding a glossary defining terms used in the plan that may not be familiar to the average resident reading this plan. A list of acronyms used in the plan would also be helpful.	Noted. A glossary will be added.	Yes
14	BWSR	General	The plan should be proof read again...All hyperlinks should be double checked. Some of the links we checked were broken or led to documents that we were not expecting.	Noted	Yes
15	BWSR	General	When referencing documents like MN rule 8410 or MN Statutes 103D or 103B provide as detailed reference as possible to bring the reader to the specific part of the rule or statute being discussed in the plan. Sometimes this level of detailed reference is provided and sometimes it is not provided.	Noted	Yes
16	BWSR	General	It would be helpful (if possible) when following an internal plan link if there was a button to get back to where you started from. Otherwise once you follow the link you lose your place.	Noted	No
17	BWSR	General	We noted that naming convention used in the plan (esp. link name) is not always consistent with the name used for the SWWD website (i.e. "Electronic Library" in the plan is called "Resources" in the website).	Noted. The Plan and website will be reviewed for consistency.	Under Review
18	BWSR	Table of Contents	More detail should be provided in the Table of Contents. We suggest including at a minimum subheadings (and consider sub-subheadings) in the TOC to help the reader more easily navigate the plan. The TOC should function as an index allowing the reader to quickly navigate to the portions of interest.	We added detail prior to submission for 60 Day review. At this point we feel the TOC provides for adequate navigation. See also, response to comment 11.	No
19	BWSR	Table of Contents	TOC should include a list of appendices, as well as all tables, figures and maps used in the body of the plan. (Note there are a couple of figures in the plan that were not labeled and numbered as figures).	Noted. See response to comment 11. We do not intend to provide for navigation to individual tables or figures (except LRWP). We feel it is important that figures and tables be considered in context of the section in which they are included.	No
20	BWSR	Table of Contents	It is recommended that a bibliography or similar reference be added to the plan that provides an actual bibliographic reference along with the path name for the hyperlinks to the various documents and information that are external to the plan...	Noted. A bibliography will be added.	Yes
21	BWSR	Executive Summary	The link to the map of the District did not work. The executive summary should stand by itself for the purpose of summarizing the plan so you may want to include the map in the executive summary rather than or in addition to the reference.	Noted. A map figure will be added.	Yes

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22	BWSR	Executive Summary	Consider including a subheading for "Local Government Responsibilities" preceding the last paragraph in this section.	Noted	Yes
23	BWSR	Executive Summary	Consider highlighting (or some other enhancement) of the District Mission Statement, identified in the last paragraph of the section, to make it pop out to the reader.	Noted	Yes
24	BWSR	How To Use This Plan	What exactly does "implementation flexibility" mean? The plan is supposed to identify specific actions and implementation activities that the District will take during the plans lifespan to address the identified District priority issues. Changes to the proposed implementation activities likely will require a plan amendment.	Refers to the ability to respond quickly to new or changing issues. Will clarify.	Yes
25	BWSR	How To Use This Plan	Additional information: it is not always clear which of the additional information sources listed were used in the development of the plan (i.e. relevant to the plan or used to make SWWD decisions) and which are only provided as a link for a source of additional reading on the subject. There is also no information as to what is included in the linked information, so how is the reader to know if the need to follow the link or not?	All sources are merely additional information, unless specifically referenced in discussion. Will clarify.	Yes
26	BWSR	How To Use This Plan	Web Viewer, Water Quality Monitoring Database, Story Maps, and Electronic Library: it would be helpful if there was some information on how to use the various interactive tools (especially the web viewer and WQ database) either in this section and/or at the webpage.	We believe the web tools should stand alone and therefore the plan is not the place for "how to use" information. We will continue to refine web tools going forward to ensure that information is up to date and easily useable. Funds are budgeted annually for that effort.	No
27	BWSR	How To Use This Plan	Are there any special browser or computer requirements to be able to view the plan or use the interactive web resources?	No	No
28	BWSR	Board of Managers	There are boxes adjacent to each manager name that have nothing in them. We assume that they are for manager photos, similar to information presented in the website.	Correct, information/photos will be updated for final draft.	Yes
29	BWSR	Board of Managers	Update the list to include recently appointed manager.	Correct, information/photos will be updated for final draft.	Yes
30	BWSR	Part 1	The link to the first SWWD plan goes to the 2007 Plan.	Noted	Yes
31	BWSR	Part 1	We suggest adding subheadings to Part I specific to the requirements of MR 8410.0060 Subpart 1 which will help show that the required elements are being provided in the plan. It appears that required elements F, H, I, J, K, and M are still needed.	Noted. The introduction is meant to be broad while pointing to other resources. While we do not intend to provide subheadings specific to 8410.0060, we will ensure that general discussion is provided for all required items as well as explicitly state that information provided in the 2007 plan is adopted by reference.	Yes
32	BWSR	Part 1	When using the on-line District web viewer to show that land and water resources information it would be helpful if there were links to specific maps with the information. As it is right now the link is just to the map viewer and the user has to figure out how to show the desired information.	Noted. We will continue to work on improving functionality of the web viewer. Those improvements are independent of the WMP update.	No
33	BWSR	Part 1	The on-line map viewer soil map layer did not work when we tried it.	Noted. It will be updated.	Yes
34	BWSR	Part 1	Is the information from the new Washington County geologic atlas included?	No. The information came out after submission of the WMP for 60 day review. Web viewer will be updated.	Yes
35	BWSR	Part 1	The foot notes on pages 10 and 13 should be complete bibliographic references.	Noted.	Yes
36	BWSR	Part 1	Page 10, last sentence of the first paragraph of the second column should be "Primary Water Resources..." and the page numbers should be 15-20.	Noted.	Yes

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37	BWSR	Part 1	The primary water resources figure on page 14 needs a figure or map number.	Noted.	Yes
38	BWSR	Part 1	The various primary water resources of the district depicted on pages 15-20 should somehow be labeled and then identified in the TOC.	Noted. See response to comments 11 and 19.	No
39	BWSR	Part 1	It was our understanding that the District intends to annually (or some other interval) update the 3-year average TP for each of the primary water resources. If so this should be mentioned in the narrative.	Noted.	Yes
40	BWSR	Issue ID and Prioritization	Page 21, second paragraph identifies a 2013 planning workshop by the Board that identified plan changes the managers wanted to pursue. The document summarizing the workshop should be referenced.	Noted.	Yes
41	BWSR	Issue ID and Prioritization	Page 22, first paragraph describing the summary of the BWSR PRAP mentions the comment on area of improvement "...area of improved communication about changing timelines or follow-through on projects or programs". The district should look for the opportunity to mention in the plan that they are addressing this issue through a renewed effort in engaging their CAC and TAC as well as through implementation of their new evaluation process.	Noted. Will be mentioned under Issues/collaboration and coordination of efforts.	Yes
42	BWSR	Issue ID and Prioritization	On page 22 the plan very briefly mentions the issues assessment process. Additional detail on the process, especially work by the CAC and TAC (meetings, timeline, etc.) should be provided either in this section or as part of appendix 1.	A summary will be added to appendix 1.	Yes
43	BWSR	Issue ID and Prioritization	The process the managers went through to prioritize the issues and implementation in the plan should be summarized in the plan.	Noted.	Yes
44	BWSR	Issues/Flooding	Suggest providing a map of flooding problem areas	Noted.	Yes
45	BWSR	Issues/Flooding	Page 23 last sentence mentions that it is District policy to opportunistically manage flood plains. Where are District policies stated?	"Policy" is a carryover from the past plan. Language will be modified.	Yes
46	BWSR	Issues/Flooding	It is not always clear how the implementation indicators are quantifiable and will measured. Should be a map of key flood storage areas and volumes they provide. Are intercommunity flow limits identified? If so, they should be included in plan.	A map will be provided. We will review discussion of intercommunity flow limits.	Yes
47	BWSR	Issues/Flooding	Implementation tools. It would be helpful to identify, where appropriate, the identification tools mentioned as the District programs (i.e. regulatory, implementation and maintenance).	Noted. All of the implementation tools identified are district programs. Hyperlinks will be added.	Yes
48	BWSR	Issues/Central Draw Overflow	Figure on page 25 should be numbered and included in TOC.	Referenced item is a graphic.	No
49	BWSR	Issues/Surface water deg	Figure 5 at the bottom of page 26 needs to be labeled.	Noted.	Yes
50	BWSR	Issues/Surface water deg	We need clarification on what is meant by the last two sentences of the second paragraph. Usually a plan amendment would be required for the District to update actions not specified in the plan. These two sentences appear to be an attempt to go around that requirement.	This refers to use of resource management plans and retrofit analyses as guidance documents to target SWWD implementation efforts. Issues are identified in the WMP, action is prioritized by inclusion in Long Range Workplan, the guidance documents target the use of those funds. We will clarify that these tools/documents are to be adopted as guidance documents.	Yes
51	BWSR	Issues/GW Sustainability	Identify specific local actions that the District is going to implement.	Noted.	Yes
52	BWSR	Issues/Natural Resources	Noted that no additional information links are included.	Noted.	Yes

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53	BWSR	Issues/Climate Change	Why isn't Atlas 14 being mentioned or used to update District modeling efforts?	Use of atlas 14 is implicit under 2nd implementation indicator: require use of up to date hydrologic data...	No
54	BWSR	Issues/District Wide Modeling	Identify remaining subwatershed models to be completed.	Noted. A table will be added.	Yes
55	BWSR	Issues/Research	Last sentence under issue: "SWWD will continue to develop web applications and..." this item does not appear to be included as a goal or an implementation activity.	Noted.	Yes
56	BWSR	Issues/Research	Wouldn't the District website also be an implementation tool?	Education and Information refers to the District's Education and Information program, which includes the District's website. Also see response to comment 47.	No
57	BWSR	Issues/Education	How was a need for a District Learning Center identified as a priority issue to be included in the plan?	Plan should identify that the District will evaluate the need and benefits of such a facility. Facility is identified in District's natural resource management plan for its Central Draw Storage Facility. If a facility is pursued, it would likely be as a collaboration between SWWD/City/County and others. Discussion will be added.	Yes
58	BWSR	Issues/Progress Evaluation	Need clarification of third paragraph second sentence discussion of "unmeasurable goals" when in previous paragraph RBA identifies need for "clear, measureable goals."	Noted.	Yes
59	BWSR	Part 3	The SWWD administers a very well thought out, robust implementation plan, that is well coordinated with its local communities. Implementation activities follow a programmatic framework of adaptive management, where issues are identified and prioritized through a combination of monitoring and study/modeling. The result of which is a prioritized list of projects that are then pursued for implementation. For larger capital improvement type projects the SWWD takes the further step of having its engineer prepare a feasibility study, prior to ordering final plans and specs. Following implementation of projects the SWWD follows up with monitoring and additional analysis and tweaking of projects as needed to ensure the project continues to function as designed.	Noted.	No
60	BWSR	programs	We noted that several of the implementation programs identified in this plan are not identified as programs in the SWWD website. Since this plan and the website are so highly integrated similar terminology should be used between the two.	Noted.	Yes
61	BWSR	programs	Review all performance measures items identified for the various programs in part 3 to see that they are consistent with what is proposed in the long range work plan.	Noted.	Yes
62	BWSR	programs/planning	We recommend including a schedule/table describing the remaining resource management plans to be completed and also the schedule (best guess) for evaluation of existing plans.	Noted. A Status table will be added.	Yes
63	BWSR	programs/planning	Is the Flood damage reduction and mitigation plan the same as flood response planning identified in the long range work plan?	Yes. We will make sure terminology is consistent.	Yes

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64	BWSR	programs/planning	Climate adaptation plan does not appear to be included in the long range workplan.	It is represented as scenario planning within the LRWP. We currently expect the climate adaptation plan to be compiled by staff following scenario planning. Staff time is included under administration. We will clarify what scenario planning is for.	Yes
65	BWSR	programs/planning	There are several groundwater planning activities included in the long range workplan, so there should probably be a section on the SWWD groundwater plan in this section. This would also be a good place to identify the various local implementation actions identified in the Washington County groundwater plan that the SWWD has committed to doing as part of this plan.	SWWD does not have a groundwater plan nor does it plan to develop one. Rather, SWWD participates in groundwater planning through Washington County. GW planning activities within LRWP are minor and are meant to support collaborative efforts. GW sustainability related activities in LRWP fit within Implementation and Maintenance programs.	Under Review
66	BWSR	programs/planning	The in lake restoration plans identified in the first paragraph on page 42 do not appear to be included in the long range workplan.	Included as Aquatic Habitat under Planning/Natural Resources. Will clarify. Note, the amounts do not include SWWD staff time.	Yes
67	BWSR	Guidance Docs	The SWWD guidance documents are integral to the operation of the District and the process through which they identify, quantify, prioritize, and ultimately allocate funds to solve SWWD issues. As such they need to be specifically included in this WMP. The typical way of doing this would be to include each guidance document in a section of the plan or as an appendix to the plan. Updates to the various guidance documents once included in the plan would likely require an amendment to the plan. Inclusion of a new guidance document would require an amendment to the plan for inclusion. BWSR then typically requires a hard copy of each guidance document, including revised documents for its plan documentation files to provide a record of the actual documents considered part of the plan. BWSR also recognizes and appreciates the SWWD's need/desire for their guidance documents to be live nimble documents able to respond to new and changing information in a reasonable time frame. We believe the 2015 revision of MN Rules 8410 (particularly 8410.0140 Plan Amendments) will work nicely with SWWD's Guidance Documents allowing them to remain current effective documents, while meeting the requirements of MN Rule 8410.	The use of guidance documents and procedure for adoption was established in the current SWWD WMP. The updated plan is meant to be condensed and easily useable by District residents and therefore adding each guidance document as part of the plan would defeat that goal. Further, we feel it is unnecessary given that the WMP is meant to be viewed electronically and will provide fast and easy navigation to all guidance documents. However, we do agree that altering the Guidance Document adoption process to follow that of a plan amendment would not greatly effect District operations/administration. Plan will be edited to indicate that Guidance Documents are to be adopted through plan amendment.	Yes
68	BWSR	Guidance Docs	Include a table (probably as an appendix) of all current SWWD Guidance Documents the District wishes to include as part of its new plan. The table should include a complete bibliographic reference, brief description of the document and its use in the WMP, Board adoption date, and comments or other information the District feels would be helpful to the reader	Noted. A table will be added, either separately as part of a larger bibliography.	Yes
69	BWSR	Guidance Docs	BWSR (and other organizations requesting hard copies of the plan) will get, in addition to the hard copy of the plan, a CD with electronic copies of all current Guidance Documents included in the appendix as part of the 90 day final draft plan submittal. BWSR will decide as part of the 90 day final draft review if the SWWD will be required to provide hard copies (or electronic copies on a CD) of the guidance documents when providing BWSR with its copy of the final approved/adopted plan, and subsequent updates and amendments.	Noted. Although all guidance documents are readily available on the SWWD website, we will provide copies in the format required/requested.	No

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70	BWSR	Guidance Docs	Revisions or changes to existing guidance documents that meet the requirements of MN Rule 8410.0140 Subp 1a. <i>Changes no requiring an amendment</i> , would be made by following the requirements laid out in subp 1a with the following caveats: updates resulting in changes in cost estimates that are greater than 25% of the estimates identified in the current long range work plan, would require an amendment, and additions or deletions of guidance document projects/activities that are specifically called out in the long range workplan (i.e. capital improvement project) would require a plan amendment.	This needs further discussion. Will request a meeting with BWSR. Adoption of a guidance document itself does not necessarily change the long range workplan or District budget. It only provides guidance for how funds, should they be available, would be spent. Changes to long range workplan would require an amendment as the WMP currently reads.	Under Review
71	BWSR	Guidance Docs	The addition of a new guidance document to the plan would require a plan amendment (we expect that in most instances the addition of a new guidance document will be able to follow the minor amendment process, which effectively allows for BWSR staff approval by determining that they amendment is a minor amendment).	Noted. See, also, response to comment 67.	Yes
72	BWSR	Amendments to Plan	All plan revisions and updates must be consistent with MN Rule 8410.0140.	Noted.	Yes
73	BWSR	Amendments to Plan	Refer to previous comments on plan changes and amendments due to additions of new guidance documents and revisions to existing documents	Noted. See previous responses.	No
74	BWSR	Amendments to Plan	Revise the first sentence of the first paragraph to identify the year the plan extends to, in this case 2026 assuming Board approval in 2016. Refer to MN Rule 8410.0140 Subp 1.A. for additional information.	Noted.	Yes
75	BWSR	Amendments to Plan	Amendments not requiring a plan amendment: fourth bullet, remove new from the sentence.	Noted.	Yes
76	BWSR	Amendments to Plan	Amendments not requiring a plan amendment: fifth bullet, include a qualifier for the specific case when an updated cost estimated in the long range work plan will not require a plan amendment. We suggest an amendment would not be needed unless the change in estimated cost exceeds 25% of the amount in the currently approved long range workplan.	Noted.	Yes
77	BWSR	Amendments to Plan	Amendments not requiring a plan amendment: sixth bullet, we are not exactly sure how this exception is intended to be used however, if it is for the deletion of existing activity/study from the long range workplan this activity would require at least a minor plan amendment. Similarly the addition of a completely new activity/study not currently in the long range workplan would also require at least a minor plan amendment.	Noted. Bullet will be removed.	Yes
78	BWSR	Amendments to Plan	We suggest rewording the last paragraph of the section to take advantage of the minor amendment process now allowed in MN Rule 8410.0140 subp 2...	Noted. Will be added.	Yes
79	BWSR	Amendments to Plan	The plan effective date is established as 10 yrs. from the date of the BWSR Board approving a 10-yr plan amendment.	Needs further discussion. Will request meeting with BWSR	Under Review
80	BWSR	Amendments to Plan	If the SWWD feels it is necessary to extend the plan date they will have to follow the steps laid out in MN Rule 8410 pertaining to a 10 year plan amendment...	Needs further discussion. Will request meeting with BWSR	Under Review
81	BWSR	Amendments to Plan	Consideration of a plan extension makes most sense when the SWWD is going to already be evaluating its issues and goals, which is proposed to occur at a minimum of every 5 years, per the 5th sentence of the first paragraph of this section.	Correct, that is why we propose that the plan should be valid for 10 years from adoption of a major plan amendment which re-evaluates issues and goals. Needs further discussion.	Yes

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82	BWSR	Programs/Regulatory	It would be helpful if the plan identified what LGUs had current approved LWMP and were implementing SWWD rules.	Noted. However all Cities will need to update their LWMPs over next few years following SWWD's adoption of the updated WMP. We will consider adding a table that can be updated to show when each city has updated its LWMP. We will also consider adding a table which identifies applicable permitting authority for District rules. Currently, Lake Elmo's LWMP states that the District will permit and enforce its rules. All other municipalities permit and enforce ordinances/rules consistent with District rules.	Under Review
83	BWSR	Programs/Monitoring	The District is to be commended on its efforts to identify trends in regional water quality and quantity as well as potential areas of concern through its regional assessment monitoring efforts.	Noted.	No
84	BWSR	Programs/Inspection and Maintenance	The narrative mentions the development of a BMP database and annual inspection program. Is there a link that can be referenced to provide additional information on this effort?	Under review.	Under Review
85	BWSR	Programs/Inspection and Maintenance	The figure on page 52 should be given a figure number.	The referenced item is a graphic. It is not referred to in the text and thus does not need a figure number.	No
86	BWSR	Programs/Inspection and Maintenance	We appreciate the directions given to the additional information figure reference on page 52 that helps the reader bring up the referenced map.	Noted.	No
87	BWSR	Programs/Incentives	Information on SUF credits and how it is funded was not easy to find on the SWWD website. Suggest a direct link to the program webpage.	Noted.	Yes
88	BWSR	Programs/Incentives	The SUF credit program does not appear to be included in the long range workplan.	It does not require funding. It is a credit program which reduces SUF rates on a given parcel.	No
89	BWSR	Programs/Incentives	CCIP would benefit from more information on the criteria for applying for the grants, and how they are prioritized and evaluated. It appears that there are several management areas in the District but not all of them have available funds every year? For this year it appears that only projects in the South Washington Management Area were eligible? Please clarify.	Correct, only projects in the South Washington management area have been eligible to this point. The program is funded through stormwater utility fees which SWWD requires to be expended within the management area where they are collected. Only South Washington Management Area fees have been allocated to CCIP to this point. Should the program expand to East Mississippi or Lower St. Croix management areas, SWWD would allocate funds through its annual budgeting process and amend the long range workplan as necessary.	No
90	BWSR	Programs/Incentives	When discussing the proposed CCIP budget it should be clarified that the long range workplan assumes an annual average of \$500,000 per year limited by the \$1,000,000 maximum. Also that the District will seek a plan amendment for the long range workplan if it appears that the 10 yr. budget amount of \$5,000,000 is expected to be exceeded.	Noted. Clarification will be provided on current scope of program and possible future expansion.	Yes
91	BWSR	Programs/Incentives	A map of the management areas related to the stormwater utility credits would be helpful.	A map of management areas is provided on the SWWD web viewer.	No

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92	BWSR	Programs/Education and Information	The District should be commended on the performance measures it has established for this program. We are especially interested in how they go about increasing use of the Website and Web Tools as the information will be helpful to other watershed management organizations.	Noted.	No
93	BWSR	Programs/Administration	Local Water Plans: Revise the last sentence of the first paragraph pertaining to the timeline for adoption of the LWMP so that it is consistent with the requirement in MN Rule 8410.0160 subp 6.	Noted.	Yes
94	BWSR	Programs/Administration	Local Water Plans: A process for evaluating the implementation of the LWMP and procedures per MN Rule 8410.0105 Subp 1.C. However, the SWWD plan still needs to identify the procedures the District will use to address a local government failing to implement its local water plan or portions of its local water plan.	Noted. We will add language consistent with the District's current WMP to indicate that administrative or legal action will be used to compel compliance.	Yes
95	BWSR	Programs/Administration	Reporting and Progress Evaluation: It would be helpful to also include a table that lists each of the implementation indicators for each goal and the performance measures for each program along with the implementation schedule and current long range workplan budget. Having this information up front as part of the plan will make completing the various evaluation forms easier when conducting the evaluations in the future.	One example was provided as part of the plan to illustrate the process. Sheets for each Issue and Program will be developed and included as part of SWWD's annual reporting.	No
96	BWSR	Long Range Workplan	Give the LRWP a number and include it in the TOC.	See response to comments 11 and 19.	No
97	BWSR	Long Range Workplan	Each implementation in the workplan was a priority of 1, 2, or 3, that are based on when they are expected to be implemented during the next 10 years. What was not clear in the plan was an explanation of the process the Board went through in assigning these priorities.	Noted. Description will be added.	Yes
98	BWSR	Long Range Workplan	Refer to previous comments pertaining to long range workplan and the various implementation activities, consistency with how the workplan activities are labeled in other parts of the plan.	Noted.	Under Review
99	BWSR	Long Range Workplan	MN Rule 8410.0105 subp 1.A. requires the inclusion of a table that briefly describes each component of the implementation actions. We think this could most easily be accomplished by adding more description to each identified activity and more detail to the various activities (i.e. list each of the individual resource management plans separately)	Noted.	Under Review
100	BWSR	Long Range Workplan	Groundwater sustainability is identified in the workplan table but there are no activities associated with it describing what the money, programmed for each year will be spent on.	Funding is meant to supplement County efforts under the County GW plan. Incentives section will be edited to include these funds under GW Pollution Prevention.	Under Review
101	BWSR	Appendix 1	Suggest a brief narrative of the issues and goals identification process, especially documenting the public input process. This narrative could also explain the information presented in the table.	Noted. Description of process will be added in addition to acknowledgements.	Yes
102	BWSR	Appendix 1	Repeat table headings on each page.	Noted.	Yes
103	BWSR	Appendix 2	Refer to previous comment suggesting an additional table identifying the implementation schedule and long range workplan budget for each of the performance indicators identified in the plan.	Noted. Under Review	Under Review
104	MnDOT	Programs/Regulatory	On page 45, please add that MnDOT is the WCA LGU on its' right-of-way.	Noted.	Yes
105	Woodbury	programs/planning	The City of Woodbury is very supportive and interested in partnering with the watershed district on the development of the ravine inventory and stabilization project(s). The City would encourage the district to complete this work within the lake subwatersheds in a similar timeframe as the stream-drained watersheds, as ravine/channel maintenance and stabilization has recently become a maintenance priority in Woodbury.	Noted. Completion of a ravine inventory is currently prioritized for years 1-3 of the updated WMP. We anticipate work would begin in 2017.	No

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106	Woodbury	Programs/Regulatory	The City would encourage additional text regarding the buffer law language including the exemptions, specifically areas covered under an MS4 permit, since a significant portion of the district will fall into this exemption category.	Based on our current understanding of the buffer law and pending guidance, use of the MS4 exemption requires that the MS4 have some other form of riparian protection. We do not expect many MS4s within the District to qualify for the exemption. In any case, as the District's responsibilities become clearer we will work with partners at the City and Washington Conservation District to amend the District's WMP and Rules as necessary.	No
107	Woodbury	Programs/Administration	The City of Woodbury would discourage the district from requiring the annual progress update from municipalities as described in the referenced section. If the district believes this is necessary, the district should provide additional direction to municipalities on format and content of such reporting.	Noted. We are requiring some sort of report from the Cities. We are deliberately leaving this requirement broad so as to provide Cities flexibility in how the report activities. We will work with individual Cities during development of the LWMPs to figure out formatting and content. The goal is to show that Cities are implementing the LWMP.	No
108	MDA	Part 1	The plan states, "As a result, the biggest issue causing concern for the streams is runoff and field erosion early in the season before crops are established." You may want to clarify this language to state that the key time period when runoff and erosion occurs is before row crops have fully canopied.	Noted.	Yes
109	MDA	Issues/GW Sustainability	The plan contains groundwater sustainability language that may align with Nitrogen Fertilizer Management Plan (NFMP) activities that are currently or will be occurring within SWWD. An important component of implementing the NFMP is working with local partners on identifying nitrogen management issues, and nitrogen fertilizer BMPs and other local efforts to address nitrate. Your plan contains areas of potential collaboration and you may want to include these MDA programs/projects in the plan and include web links as 'additional information'.	Noted.	No
110	MDA	Issues/GW Sustainability	The MDA developed the NFMP to prevent and mitigate the effects of nitrogen fertilizer on groundwater quality. Activities associated with implementing the NFMP include private well water testing for nitrate, education and outreach opportunities, nitrogen BMP survey(s), and voluntary agricultural BMP adoption. Implementation strategies for the NFMP are dependent upon the results of the private well testing results. For more information see the NFMP at: http://www.mda.state.mn.us/chemicals/fertilizers/nutrient-mgmt/nitrogenplan.aspx	Noted. Will be added as additional information under Issues/GW sustainability/Pollution prevention	Yes
111	MDA	Issues/GW Sustainability	As you are aware, the MDA has conducted nitrate testing of private wells in Denmark Township and the City of Cottage Grove. Preliminary private well testing results are currently available (See: http://www.mda.state.mn.us/protecting/cleanwaterfund/gwdwprotection/~media/Files/chemicals/nfmp/washington2014sum.pdf) with final results expected in late summer of 2016.	Noted. A link to the township testing page is already included. Once final results are reported, we can add a link.	No
112	MDA	Issues/GW Sustainability	Expanding a groundwater monitoring program through a partnership was listed as an important implementation indicator in the plan, therefore you may wish to include or reference nitrate monitoring information. The private well water testing done in the City of Cottage Grove Denmark Township is based on guidance of the Township Testing Program as part of the Nitrogen Fertilizer Management Plan (NFMP). More information on the Township Testing Programs is available at: http://www.mda.state.mn.us/townshiptesting	Noted. The township testing is included as additional information under the monitoring program. We will also add MDH as a partner in the strategic groundwater assessment plan.	Yes

Comment #	Commenter	Plan Ref	Comment	Response	Edit Required?
113	MDA	Issues/Education	An important component of NFMP implementation, is working with local partners such as SWWD and others to provide their expertise. This will include information and education on; nitrate in groundwater, N management, BMP implementation, and other water management activities. Therefore consider including information and activities in the plan where these support SWWD priorities as well.	In our experience, MDA has worked directly with WCD and EMWREP, not SWWD. SWWD's involvement has been as a member of EMWREP which is already covered in the WMP.	No
114	MDA	Issues/Natural Resources	Restoring native habitat to benefit pollinators is mentioned as an important implementation indicator in the plan. The MDA has developed pollinator best management practices documents that can be referenced in the plan. These pollinator BMP documents information to both reduce harmful impacts on pollinators and to improve and create new pollinator habitats. Pollinator BMPs were developed for different landscape settings which can be found at: http://www.mda.state.mn.us/protecting/bmps/~media/Files/protecting/bmps/pollinators/pollinatorsagl.and.pdf , http://www.mda.state.mn.us/protecting/bmps/~media/Files/protecting/bmps/pollinators/pollinatoryard.bmps.pdf , http://www.mda.state.mn.us/protecting/bmps/~media/Files/protecting/bmps/pollinators/pollinatorbm.psroad.pdf	Noted. Links will be added as additional information under Issues/Natural Resources	Yes
115	MDA	Issues/Research	Thank you for referencing the MN Ag BMP Handbook. A link to the handbook with additional information can also be found on the MDA website at; http://www.mda.state.mn.us/protecting/cleanwaterfund/research/agbmphandbook.aspx	Noted. Link will be updated.	Yes
116	MDA	Issues/Research	Refining existing BMPs, as well as methods for reducing agricultural fertilizer inputs and working with willing landowners on agriculture BMP research (and demonstration sites) were identified as areas of interest by the SWWD. Below are activities that you may wish to reference in the plan that address research, demonstrations and implementation of agricultural BMPs. The MDA developed the Nutrient Management Initiative (NMI) to assist farmers and crop advisers in evaluating new or alternative nutrient management practices on their own fields used for corn grain production. Replicated field trial plots are implemented by the farmer and their crop adviser to evaluate agronomic and economic performance of various nutrient management practices. Some of the practices include reductions in fertilizer rate, changes in fertilizer application timing, and use of a nitrogen stabilizing product. More information on the Nutrient Management Initiative can be found at: http://www.mda.state.mn.us/nmi . Another applicable agricultural BMP implementation program that could be noted in the plan is the Minnesota Agricultural Water Quality Certification Program (MAWQCP). The MAWQCP is a voluntary opportunity for farmers and agricultural 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. Contact the Washington Conservation District for additional information and see; http://www.mda.state.mn.us/awqcp	Noted. These are programs that we will review in developing SWWDs pilot program. While SWWD's water quality goals may be different than some of the cited programs, it may be beneficial to borrow from the program framework, especially MAWQCP. The WMP calls for the program to be developed over the first 3 years of the WMP. We expect that the program details would be adopted through plan amendment.	No
117	MnDNR	General	Check spelling and grammar throughout the document	Noted.	Yes
118	MnDNR	General	Some figures are numbered and others are not. Please be consistent in how figures are presented. For example, if there is a line of text below a graphic, it is given a figure number. If there is no descriptive text, it is a graphic that does not require a figure number.	Noted.	Yes

Comment #	Commenter	Plan Ref	Comment	Response	Edit Required?
119	MnDNR	General	Make sure that all hyperlinks within the document function correctly. Hyperlinks in the text of the WMP to outside documents are most useful to the reader when they directly extend the understanding of the portion of the narrative in which they are provided. This can be accomplished by including additional text that helps to provide that connection to the reader. Another option is to instead include a hyperlink to the document under the "Additional Information" sections.	Noted. We will review link use. We agree that links within the text should provide additional context to the discussion whereas others should be limited to inclusion under the additional information section.	Yes
120	MnDNR	General	For each of the hyperlinks under the "Additional Information" sections, add text to describe what document is being hyperlinked to so people can determine if they want to click on the hyperlink.	See response to comment 20. A bibliography will be added.	Yes
121	MnDNR	General	What is the timeline for full functionality of the tools (web viewer, water quality database, story mapping, and electronic library) and how are you prioritizing the development of the tools to ensure that key information is include in these tools before final approval of the WMP?	Tools are live. As with all web based tools we will continue to review SWWD's web tools and modify regularly to ensure that they provide accurate/current information and to improve use.	No
122	MnDNR	General	As part of the section on "How to use this plan" there should be a primer on how to use each of the tools, since there are readers that will not be familiar with how to use these tools. I think the water quality monitoring database in particular will confuse readers that have limited experience in interpreting water quality data. Instead of having only the database website available, perhaps summary sheets of water quality by lake could be included on the database website or hyperlinked to within the WMP. On page 10 it sates that up to date lake and stormwater data is available in the online database, but it was not clear to me where the stormwater data is located in the database.	SWWD prepares monitoring reports annually pertaining to individual resources. We will ensure that access to those documents is easily made from the WMP. See also response to comment 121.	Yes
123	MnDNR	Part 1	There are several statements made in the introduction section that are overgeneralized and that need additional description to more correctly characterize the statements made about resources. For example, on page 10, the St. Croix River is described as having high water quality. However, Lake St. Croix was designated as an impaired water in 2008 for excess phosphorus, so the story is a little more complicated. There is the opportunity here in the report to talk about this and include a hyperlink to MPCA's website for the Lake St. Croix TMDL project.	We will work to provide more context while also continuing to emphasize that the St. Croix does indeed have high water quality, especially when compared to the Mississippi and other rivers in the Midwest. A link to the MPCA project website will be added.	Yes
124	MnDNR	Part 1	Include in the WMP a description of what is shown in Figure 4 to help readers interpret that land use maps. For example, include the percent increases in development over the years shown.	Noted. We will review the caption for the figure.	Yes
125	MnDNR	Primary Resources of the District	It is not clear to me which resources listed have a designated impairment and TP is not defined for the reader.	We will add a note on impairment status for each impaired resource.	Yes
126	MnDNR	Primary Resources of the District	Is the period of record trend that is shown for the 3 year average TP concentration? If so change this to read 3-year period of record trend.	No. It is for the overall period of record.	No

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127	MnDNR	Primary Resources of the District	Does the SWWD collect water samples on Lake St. Croix and the Mississippi River and how was it decided to state that the water quality is improving on each of these rivers? There are large and complicated river systems and difficult to characterize a water quality trend for.	No. However we believe that both systems, while dynamic and still facing challenges, have improved. This is particularly true for Mississippi following passage of the Clean Water Act. As for the St. Croix, materials available from the MPCA as part of the TMDL project document generally improving water quality over the past 30+ years. There are of course caveats and qualifiers and additional information for each system. However, we do not feel that the introduction to SWWD's WMP is the place for that level of detail.	No
128	MnDNR	Part 2	The implementation indicators listed under each goal in Part 2 will be used to evaluate progress toward meeting goals. Many of the implementation indicators do not specifically state what will be accomplished, making it difficult to determine how the indicator will be measured to evaluate the progress of each goal. Please rewrite the implementation indicators so that they describe accomplishments more specifically. The implementation indicators under the District wide modeling section are examples of well written implementation indicators that can be measured.	Noted. We recognize that establishing measurable goals is difficult. However, we feel that we have generally established criteria (implementation indicators and performance measures) that will allow us to gauge implementation progress and demonstrate that progress in the District's annual reporting. We will review criteria for areas of improvement prior to final submittal.	Under Review
129	MnDNR	Part 2	Please explain in more detail in the WMP how the progress evaluation form in Appendix 2 will be used to measure each goal.	It is an example of the form that will be used in the District's annual reporting to provide an indication of what progress the District has made on each issue. It measures progress as related to long range workplan and documents success/failure and any necessary changes in strategy/plan.	No
130	MnDNR	Part 2	On page 29 the statement is made that there is documented aquifer depletion. Is this localized depletion or regional? Also it's not clear to me how the link to the Washington County Groundwater Plan assists in explaining aquifer depletion in the County.	Noted. It is regional and the link should be to Met Council water supply planning webpage. http://www.metrocouncil.org/Wastewater-Water/Planning/Water-Supply-Planning.aspx	Yes
131	MnDNR	Part 2	For the Issues/Natural Resources section, please provide information on what level of natural resources protection SWWD has accomplished to date.	Discussion will be added to include ongoing District efforts related to greenway planning and implementation, promotion of native vegetation, and grant programs.	Yes
132	MnDNR	Part 3	The performance measures listed under each goal in part 3 will be used to measure whether each goal is accomplished over time. Please make sure that each of the performance measures clearly state what will be accomplished and over what timeframe.	The performance measures in part 3 will be used to evaluate effectiveness of each program and provide a mechanism to identify changes to District programs. Implementation indicators in part 2 are used to measure progress on goals. See also response to comment 128.	Under Review

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133	Washington County	General	Washington County finds the WMP generally consistent with the county's 2014-2024 Groundwater Plan.	Noted.	No
134	Washington County	General	Washington County commends the SWWD for developing a Watershed Management Plan that takes a holistic approach to managing water resources. This is apparent throughout the WMP as it lays out a plan to manage water resources that considers: governance...,climate change...,resiliency...	Noted.	No
135	Washington County	Issues/GW Sustainability	Additionally the county appreciates the SWWD's recognition of the county as a partner in water resource management. This is apparent as the WMP recognizes the framework and collaboration that the county groundwater plan provides. The WMP also supports several strategies from the groundwater plan including...	Noted.	No
136	Washington County	Issues/Progress Evaluation	The county also commends the SWWD for adopting the Results Based Accountability approach to measure project outcomes and increase accountability and transparency.	Noted.	No
137	Washington County	part 3	Under strategic groundwater assessment plan, please include Washington County as a partner in this process as it relates to the County groundwater plan.	Noted.	Yes