

South Washington Watershed District

Comment #	Reviewer Comment #	Reviewer	Plan Reference	Comment	Comment Category	SWWD Response	Edit Required
2		Belka, Daniel	Pages 19-23	Waterbodies pages 19 - 23 mis-identify the waterbody area as watershed area for Armstrong, Colby, La, Baily, Margrafs, Powers, Ravine, Wilmes, and O'Connors lakes. All of the waterbody images appear to be duplicates.	Content	Noted. The structure of this area of the plan has been modified extensively based on other comments.	Yes
3		Belka, Daniel	Page 48	Woodbury page 48 states Wilmes Lake has a history of flash flooding due to intense rain across the District's Northern Watershed. Runoff quickly drains through upstream lakes and then reaches Wilmes Lake, where water levels can rise rapidly. When the City's outlet for the lake cannot keep up or is blocked with debris, water levels can impact neighboring homes and roadways. The biggest flood event at Wilmes Lake occurred in October of 2005 following what – at the time – was considered a 100-year rainfall event. The peak flood elevation for the October 2005 storm occurred about 24 hours after the rainfall event and as such was not flash flooding in the strictest sense. Flash Flooding occurs in 3 - 6 hours by definition. The October 2005 storm did not exceed the overall accumulated rainfall or the peak rainfall intensity for the 100 year event standard in place in 2005. See figures 9 and 10 of the HDR Stormwater Modeling Report dated July 2006. There were "embedded storms" that exceeded the tails of the event standard, however virtually any storm would exceed the standard if compared to the distribution tails. I hope that you will remove this conclusion from the watershed management plan.	Content	Flash flooding <i>begins</i> within 3-6 hours of an event. That is consistent with what is experienced at Wilmes Lake even though the peak comes later. The July 2006 HDR Stormwater Modeling Report describes a prolonged rainfall event with intensities exceeding 1% (aka 100 year) rates for the 1, 2, 3, and 4 hour design storm. Further, the report notes that localized portions within the Wilmes basin did exceed 24 hour, 100 year rainfall totals. The report also describes impacts of the event as exceeding those of the 24 hour, 100 year design storm due to intensity and antecedent moisture conditions. Additionally, the MN DNR and State Climatology Office describes the October 2005 event as a Mega-Rain event and notes total rainfall readings of 6.46 and 7.4 inches in parts of Woodbury, both exceeding the 24 hour, 100 year design storm at the time. SWWD does consider the October 2005 storm event to be a 100 year (1% probability) event.	No
4		Belka, Daniel		Wilmes Lake overflowed to Powers Lake in 2005. Powers Lake is land locked when Wilmes Lake is in flood stage since the only outlet is a lift station that pumps to Wilmes Lake. Fortunately for Lakeview Park Pond residents there was adequate capacity to store the overflow from Wilmes Lake without causing unacceptable flood elevations. Woodbury's policies require 5' of freeboard for properties in land locked areas and it is unlikely that Lakeview Park Pond properties would meet that requirement.	Content	Noted. The City of Woodbury is the floodplain authority within that City.	No
5		Belka, Daniel		Given the importance of the proper function of the Wilmes Lake outlet, additional measures need to be planned and considered to prevent the outlet from plugging as it did during the October 2005 flood event. Woodbury's public works staff was unable to keep the outlet clear, and this became increasingly difficult as it was submerged under about 5 ft of water. A second inlet structure has been added at a higher elevation along with a string of buoys that are clamped to a couple of trees on the shore near the Wilmes outlet. The outlet is red-tagged as critical infrastructure. Although these measures should help it is likely that cable holding the buoys will fail during critical events allowing debris to flow to the outlet and plug it. The second inlet is at a higher elevation that would delay stormwater conveyance and cause higher critical event high water elevations in and around Wilmes Lake.	Content	Noted. The draft WMP prioritizes flood damage reduction and mitigation and SWWD will continue to work with City of Woodbury to identify and implement feasible interventions.	No
6		Belka, Daniel		Several homes were impacted, leading SWWD to assist the City of Woodbury in assessing the existing storm sewer system. Ultimately, SWWD and Woodbury implemented several upstream projects to reduce or slow runoff reaching Wilmes Lake.	Content	Noted.	No
7		Belka, Daniel		The SWWD increased the allowable inter-community flow allowed from Lake Elmo under highway 94 from 35 CFS (see 1997 Watershed management plan table VI-1) to 406 CFS (see Oct 2016 Plan page 25). Woodbury's storm water system is designed for a presumed flow of 347 CFS from Lake Elmo (See 1979 Storm Drainage Plan - Woodbury, MN appendix B). Although a gate was added at the Evergreen pond it has not been shown that this or any other upstream projects would reduce or slow run-off to Wilmes Lake to offset the newly allowed intercommunity flow from Lake Elmo.	Content	The 406 cfs number comes from SWWD's 2007 plan and reflects the modeled intercommunity flow at I94 resulting from the 6.3 inch (100 year, 24 hour) precipitation event which was the 100 year design storm at the time. That number would likely be higher now as design storms continue to grow with ongoing climate change. Past modeling has shown that flooding at Wilmes Lake is driven by runoff from within the City of Woodbury. While runoff from Lake Elmo does not drive flooding at Wilmes Lake, it could exacerbate issues. SWWD and City of Woodbury have implemented several projects to reduce and mitigate flood damage around Wilmes Lake. And, developments in Lake Elmo must meet the same stormwater management rules and standards as those in Woodbury.	No
8		Belka, Daniel		At the same time the City of Woodbury and the SWWD have permitted a number of developments that increased the Wilmes Lake flood risks. These include the Woodbury Lakes Retail area, Commerce Hill, and the Globe College Campus. None of these projects were required to detain 100 event year run-off and as a result increase downstream risk, contrary to Woodbury's often cited policy against increasing risk to downstream properties.	Content	All projects are required to meet stormwater requirements in place at time of development. Additionally, projects in the Wilmes Lake watershed have routinely been reviewed for impact at Wilmes Lake and may (as with Commerce Hill) be required to provide additional detention or rate restriction to alter the hydrograph and decrease impact to high water at Wilmes Lake.	No

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9		Belka, Daniel		Additionally, SWWD and Woodbury provided cost-share funding to impacted residents to flood-proof their homes. Although more recent flood events have not matched the impact of the 2005 event, flood risk remains. In fact, that risk has continued to grow over time as Minnesota's climate continues to change. In 2018, the National Oceanic and Atmospheric Administration (NOAA) updated its hydrological design guidance. Following the new guidance, the City of Woodbury updated Wilmes Lake flood modeling. The updated modeling, which reflected higher rainfall events, indicated additional risk to homes around Wilmes Lake, and a subsequent round of flood-proofing cost-share grants were offered to residents. The options for impacted residents are very limited. Aside from berming, flood walls, raising egress wells, or replacing sheathing at the foundation there are not a lot of options that homeowners can pursue. Furthermore, the flood grants were considered to be taxable and prohibited raising home elevations from consideration. The city and watershed offered very limited guidance on options that affected homeowners could pursue. A review of the effectiveness of the program to see how many affected homeowners participated should be considered.	Content	Noted. SWWD is open to working with Woodbury to design a more proactive program and evaluate other options (also see comment #135, from Woodbury).	No
10		Belka, Daniel		The City of Woodbury, supported by SWWD, has previously established that increasing flow capacity at the Wilmes Lake outlet was infeasible due to cost and impact to downstream properties.	Content	Noted. SWWD and the City have implemented several flood damage reduction projects in the Wilmes Lake watershed. However, increasing the capacity of the Wilmes outlet has been determined to be infeasible in the past.	No
11		Belka, Daniel		HDR studied the options of doubling the outlet capacity from Wilmes to Colby and doubling pipe capacities from Wilmes to Colby to Bailey Lake. In the first options the HWL in Colby increases by one foot and the Wilmes Lake decreases by 2.5 ft. When the Colby Lake outlet capacity was doubled there is minimal impact to Colby Lake. There was no conclusion about the impact to Bailey Lake other than "flow rates increased significantly south of Colby Lake to Bailey Lake". At the time of this study the central draw overflow did not exist and there was no study presented to show that there were increased risks at Bailey Lake. Since it is unlikely that the peak flows from Colby Lake and the immediate area surrounding Bailey Lake would coincide it is not clear that there would be a downstream impact to Bailey Lake. Other options such as a gated overflow or second outlet at a higher elevation at Wilmes Lake were not considered and should not be eliminated from consideration. Higher flow capacities at Wilmes Lake may enable the possibility of detaining more water in Wilmes Lake during a critical storm event to help attenuate peak flows, accelerating pre-emptive draw down prior to anticipated storm events, and allow for safe clearing of the outlets during a storm event.	Content	Noted. Increased outlet capacity was previously determined to be infeasible due to downstream impacts and cost. We feel newer technologies have potential to provide more cost effective options with reduced downstream impacts as described in the comment. SWWD will evaluate the feasibility of those newer technologies with the City during this 10 year plan cycle.	No
12		Belka, Daniel		However, new technologies may have the potential to provide additional relief. Automated and predictive controls are increasingly being used to strategically draw down regional ponds or water bodies in advance of predicted extreme rainfall events. SWWD anticipates evaluating the feasibility of such technologies across its northern watershed to see if benefits can be realized. Draw down strategies would all need to start several days in advance of the forecasted weather event. The consequences of a forecast overestimating the rainfall (temporary low ponds and lakes) are all acceptable. SWWD and Woodbury need to pursue the possibility of lowering Lake elevations to use this strategy to best effect. Since Powers Lake relies on a lift station to lower its elevation, the plan should consider if the capacity of this lift station is adequate to help protect the Lakeview Park Pond area.	Content	Noted. See response to comment #11 above.	No
13		Belka, Daniel		Additional measures beyond evaluating the feasibility of new technologies are required. If pre-emptive drawdown is not feasible other options need to be pursued. The 2006 Stormwater Modelling report proposed a number of options to increase stormwater storage in the northern watershed that could still be pursued in addition to the possibility of increasing the Wilmes Lake outlet capacity.	Content	Noted. The Draft WMP identifies flooding at Wilmes Lake as a priority issue and establishes several related goals to minimize impacts of flooding and build resilience. Those remain whether the new technologies being evaluated are determined to be feasible or not and we will continue to collaborate with the City to address the issue.	No
14		Belka, Daniel	Section 2.3.2	Powers Lake should be added since its pump station would be ineffective during an overflow condition at Wilmes Lake.	Content	As noted, Powers Lake has an existing outlet.	No
15		Belka, Daniel		Storm water storage projects in Wilmes Lake tributary areas need to be implemented to offset the development and increased inter-community flow allowed for Lake Elmo. Lake Elmo and Oakdale should be required to develop storage projects to reduce the intercommunity flow to 347 CFS..	Content	The active controls to be studied and potentially implemented under this plan would provide additional stormwater storage which to this point has been difficult or infeasible to gain. Development and redevelopment projects in Lake Elmo and Oakdale must meet the same stormwater management requirements as projects in other Cities. The intercommunity flow number is a moving target and will continue to move with ongoing climate change.	No
16		Belka, Daniel	2.4	...Although traffic impacts are important, this risk management scheme does not appear to consider residential property damage as a risk. For example, failure of the Wilmes Lake outlet should be considered to be a major risk.	Content	The section describes an analysis completed as part of SWWD's 2018 climate resilience plan. The analysis did not consider residential impacts.	No

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17		Belka, Daniel	3.1.4	Active controls will certainly help with Wilmes high water elevations if they are feasible; however, it appears that these are the only actions being considered. The SWWD should commit to a specific flood event high water elevation for Wilmes Lake. It had been 906.5 feet for a 6.3", 24-hour rainfall event. That elevation was used to determine minimum house opening elevations when much of the development surrounding Wilmes Lake was completed. Until that goal is met the SWWD should continue to identify and fund projects to lower the Wilmes Lake critical event HWL.	Content	SWWD is not the floodplain authority and will refrain from setting specific lake elevation targets. Evaluation and possible implementation of active controls is included as an action in part 3. However, even if that specific action (active controls) is determined to be infeasible, the flood related goals of part II remain and SWWD will continue to support and collaborate with the City of Woodbury to address and mitigate flooding.	No
22		1 MPCA	Table 1	Would it be helpful to identify which listed municipalities are part of an MS4 permit?	Content	Yes. Because MS4 permitted communities are discussed in Part II it would be helpful to add an indicator to this table.	Yes
26		5 MPCA	1.2.3	History of water. Lake St. Croix – Could you add more details of what it is impaired for here? With three of the four impairments being for consumption – are those the impairments you are referencing or more the recreation and nutrients? The public may view “impaired” differently than you are meaning it here.	Content	Noted. We feel the discussion provided is adequate for an introductory section. The section specific to Lake St. Croix will be updated to provide greater detail.	Yes
27 5a		MPCA		Same section a little further down – the lakes are referenced as being impaired. You could narrow the focus and include impaired by nutrients, which limits recreation.	Content	Noted. The structure of this area of the plan has been modified extensively based on other comments.	Yes
28		6 MPCA	Lake Summaries	May still be a work in progress since all lake images are the same.	Content	Noted. The structure of this area of the plan has been modified extensively based on other comments.	Yes
29 6a		MPCA		Could include both lake and watershed in the map image.	Content	Noted. The structure of this area of the plan has been modified extensively based on other comments. Major subwatershed boundaries will be shown on a new figure in the plan.	Yes
30 6b		MPCA		Could summarize BMPs or phosphorus reductions in each lakes watershed.	Content	We appreciate the suggestion but do not feel that the information fits into the scope and context of the plan. Our lake management plans will be added as an appendix and provide nutrient information for each waterbody.	No
31 6c		MPCA		Delisted lakes – add what the delisting is for. Ex: La Lake: Delisting for nutrients in 2024.	Content	Detail will be added.	Yes
32 6d		MPCA		Would you like to add some information on whether water quality is trending better or worse? Or a 5- or 10-year average for nutrients (secchi, P, and chl-a)?	Content	This information will be best accessed on SWWD's website where it will be routinely updated. We will add text within the plan to point people to the website to access those updates.	Yes
33		7 MPCA	Lake Summary	Cross check with current Impaired waters list. A link could be provided in the explanation paragraph same as was done for the MDH consumption guidance. <a href="https://www.pca.state.mn.us/air-water-land-climate/minnesotas-impaired-waters-list">https://www.pca.state.mn.us/air-water-land-climate/minnesotas-impaired-waters-list</a>	Content	Details will be added.	Yes
40 7g		MPCA		The only stream that is mentioned is O'Connor's. There are other streams that have impairments. You may want to include those here.	Content	Detail will be added.	Yes
42 7h		MPCA		In the narrative, the Mississippi River is mentioned several times. If you wanted to include that in the list of water bodies, that section of the Mississippi would be 07010206-814.	Content	The Mississippi River and its backwater lakes and side channels will be added to the water bodies section.	Yes
57		BWSR	N/A	There is currently no executive summary in the plan. Please add one prior to the Introduction section that begins on page 2. The executive summary should function as an abstract to give a concise overview of the plan contents.	Content	An executive summary will be added that identifies how the issues within Part 2 and goals in Part 3 are organized and related.	Yes
58		BWSR	18	Threatened and endangered species are mentioned as a group, but there is no real inventory of the specific threatened and endangered species in the District. This should be added.	Content	Noted. See response to DNR comment 2.	Yes
75		BWSR	107	The issues facing distinct water resources are explained well all throughout the plan. When writing about monitoring to assess the progress the water resources are making, please include information about the specific sampling locations, proposed parameters to be measured, and the requirement of periodic analysis of data	Content	The plan draft references a monitoring plan as being available on the website. That monitoring plan includes the requested additional information. We will incorporate that monitoring plan as an appendix in the final review draft.	Yes
79		2 DNR		We recommend the WMP include a discussion of how Threatened and Endangered species are regulated. All projects must comply with Minnesota's endangered species law in accordance with Minn. Stat. 84.0895. Permit applicants should be aware that they may need to seek an NHIS review from the DNR regardless of the size of their project area. Early coordination is strongly encouraged.	Content	SWWD's knowledge of T&E species is limited and we do not wish to identify specific locations of species sightings. This information is managed and maintained by MnDNR within the Natural Heritage Information System. SWWD prefers to send interested parties to the NHIS for information on this topic. We can commit to including in the plan a short narrative on where to find more information about T&E Species.	Yes
80		3 DNR		The new WMP should include a discussion of Rare Natural Communities (RNCs). RNCs are determined by the DNR and are a special consideration under the Wetland Conservation Act. A guidance document on RNCs is available at <a href="https://bwsr.state.mn.us/sites/default/files/2019-01/Wetland_WCA_Rare_Nat_Comm_Tech_Guidance.pdf">https://bwsr.state.mn.us/sites/default/files/2019-01/Wetland_WCA_Rare_Nat_Comm_Tech_Guidance.pdf</a> .	Content	WCA is referenced in the plan. Consideration of RNC's is a standard procedure within WCA and addressed on a project-by-project basis.	No

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81		4 DNR		We recommend that the plan point out the many benefits of using native plants, including: deep roots to help control runoff, reduce erosion, and reduce flooding; providing shelter and food for wildlife, including pollinators; requiring little to no fertilizer, which is a benefit to establishing native plants around water systems; and plants that adapted to local climate conditions.	Content	Noted. These descriptors will be included where appropriate in the plan, likely within sections 2.1.4, 3.6.1, and/or 3.7.1.	Yes
82		5 DNR		There are numerous online resources that could be included in the plan covering native plants and their use to protect shorelines and streambanks from erosion. These include: BWSR's list of state seed mixes, BWSR's page on native plant identification and establishment, information from Blue Thumb, a BWSR partner at <a href="https://bluethumb.org/">https://bluethumb.org/</a> , the DNR's native plant supplier webpage, BWSR's Streambanks and Shorelines webpage, BWSR's Lakeshores fact sheet, DNR's Planting Trees and Shrubs on Your Shoreline fact sheet, and DNR's Natural Shorelines webpage.	Content	Noted. SWWD is refraining from, when possible, incorporating specific URL links inside the plan due to risk of link breakage in the future due to actions outside of SWWD's control. The listed resources will be evaluated for descriptive and/or hyperlink inclusion in the plan.	Yes
83		6 DNR	Section 1.2.3 (page 13)	Section 1.2.3 (page 13) of the WMP includes the statement: "Lake St. Croix is listed as an impaired water by the Minnesota Pollution Control Agency (MPCA)." We recommend stating the specific pollutant or stressor for this impairment.	Content	Detail will be added per MPCA comment 7e.	Yes
89		Met Council		Consider including an Executive Summary at the beginning that highlights the main ideas the District wants the audience to take away from the Plan.	Content	An executive summary will be added.	Yes
90		Met Council		All figures and maps need number codes added.	Content	Will be added	Yes
91		Met Council		Specific SWWD subwatersheds are mentioned throughout the plan, however there is not a map of the subwatershed delineations included. Consider adding this figure to the plan.	Content	Noted. A subwatershed map will be added	Yes
96		Met Council	Page 30	Since this page (and similar pages throughout, e.g. pg 33, 36, etc.) contains a fair amount of open space, consider filling it with additional details that support the goal. For example, on page 30, you could include where the priority restoration areas are located in the District. Alternatively, the boxes at the bottom of the page listing related programs could briefly explain how each program connects to the goal described. Adding this information might strengthen these pages and help the reader understand relationships between the goals and programs.	Content	Reformatting of the final plan will address large open spaces. In addition, the "Related Programs" areas will be new sections describing District strategies to address each issue. Goals will be established in Part 3 of the plan. A table will be included that connects all the dots.	Yes
100		Met Council	Page 70-71	There do not appear to be any goals listed related to the issue area 2.6.2 Impaired Ecology. This is the only issue area in Part 2 with no goals associated with it.	Content	This was a drafting oversight. Goals will be included in the final draft, although they will all be relocated to Part 3 to address others' comments.	Yes
103		Met Council	Part 3	It's not entirely clear how the actions listed under each program area correspond to line items in the implementation table. Consider adding a coding scheme whereby you assign a short code to each action throughout the section, then add a column to the implementation table that references the corresponding code. This would make it easier to understand which actions are reflected in each budget line.	Content	The LRWP will be modified to better integrate with identified actions.	Yes
105		Washington County	3.4	The county recommends the SWWD strive for consistency in permit processes and practices with other Watershed Districts when examining and updating their watershed rules. The county acknowledges rules differ across watershed boundaries based on the water resource being protected and land uses but appreciates when Watershed Districts look for opportunities for alignment across boundaries.	Content	Noted. As included in 3.4.1, SWWD will engage District TAC and partner agencies to maintain consistency of rules across watershed jurisdictions where possible.	No
106		Washington County	Introduction	Consider strengthening the Introduction section by reducing repetition throughout.	Content	Noted.	Yes
109		Washington County	Groundwater Quantity	The Watershed Management Plan doesn't include conversation of industry use's impact on groundwater quantity. Consider including discussion of SWWD's position on development reviews, including discussion on emerging large groundwater users, in chapter 2.6.3 Groundwater Quantity or 3.4 Regulatory.	Content	We have added a new section 3.4.3 within our Regulatory discussion that highlights SWWD's limited role in the review of DNR groundwater appropriation permits. We commit to reviewing every application that DNR shares with us.	Yes
118		Washington County	Page VIII	Consider including the cities or townships represented by the community advisory committee members so that SWWD residents and WMP readers can more easily see their communities reflected.	Content	Noted. CAC municipal representation will be added.	Yes
123		Washington County	Page 11	consider including a brief definition of bathymetry, such as: "Bathymetry is a measure of the underwater depth and shape of a body of water."	Content	Noted.	Yes
129		Washington County	Page 71	Consider including a description of the photograph.	Content	Noted.	Yes
132		Woodbury	Page 40	The District employs highly experienced and talented staff that provide technical support on this topic. The city requests the District continue to do so and solidify this role by adding a goal to "Support ecosystem functions by providing technical support to partner organizations and landowners."	Content	Agreed. Language will be added.	Yes

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133		Woodbury	Page 46	The City supports programming focused on community resilience as climate change progresses and local impacts evolve. We request 'water resources' be added to the first goal in this section. As we actively await the release of Atlas 15 from the National Oceanic and Atmospheric Administration, it is possible release of Atlas 15 from the National Oceanic and Atmospheric Administration, it is possible Atlas 16 be released in the life of this plan. We would look to the District to support the community's response to increases in flood risk and finding solutions to decrease impacts on human and natural assets.	Content	SWWD is committed to utilizing the most current climate understanding and modeling available in its planning efforts. Goal 1 will be reworded to state "Maintain <b>current</b> knowledge of...".	Yes
134		Woodbury	Starting Page 51	In the past, the City and District have partnered on supporting residents to make private property improvements to decrease the risk of flooding. This started following the 2005 100-year rain event that fell in the watershed. Subsequent programs should be proactive and informed by modeling potential impacts of flooding, instead of responding after a flood occurs. We request that language referencing a program for flood proofing be replaced with 'flood risk reduction' to capture the intention to continue modeling and responding to model results, as opposed to rainfall experienced and emergencies that follow.	Content	We will make the suggested changes.	Yes
136		Woodbury	Page 53	La and Ria Lakes to Mississippi River. We request language be rephrased in this section to incorporate the following: Within the timeframe 2015-2021, the lake levels also had an impact on trees that were intentionally preserved through funding partnership with Washington County and a conservation easement was placed over them. This potentially justifies a higher level of response. It is our understanding that the damage downstream to Ria Lake has been evaluated by Washington County and may be a result of the lake levels but also an impact of increased rainfall and flow off surrounding areas. The City of Woodbury seeks to construct downstream volume storage prior to modification of the outlets, through partnerships with the District and Newport. This subwatershed the City and District have limited funds available and strained funding sources, partnership to identify and acquire external funds will be critical to see the package of improvements are able to be accomplished in a reasonable timeframe.	Content	This section is written to reflect the issue of intercommunity flow, not impact to trees around La Lake. There are funds identified in Part 3 and the Long-Range Work Plan to address intercommunity flow.	No
137		Woodbury	Page 84	Flood Damage Reduction and Mitigation. We support continued partnership in response to La and Ria Lake drainage and the Northern Watershed active controls. We feel a core role of the District is to convene neighboring communities and oversee proper measures are implemented in regard to intercommunity flow.	Content	Noted. That role is reflected throughout Part 3 and the Long-Range Work Plan.	No
138		Woodbury	Page 87	Groundwater Modeling. All modeling efforts should continue to be adjusted for climate change projections. This should include evaluation of risk tolerance and a variation of scenarios.	Content	Noted. That will be considered when modeling is developed, as is considered with current modeling.	No
139		Woodbury	Starting Page 94	Riparian habitat and buffers. The action to work with Woodbury to improve riparian habitat and buffers and stabilize eroding shorelines falls short of our current efforts and goals identified throughout this plan. We can acknowledge that water quality impacts are lessened further an upland area is, but the systems-approach to biodiversity, habitat and ecosystem resilience relies on connectivity and upland areas are equally important. Please consider incorporating language within the City's Systems-wide Natural Resources Management Plan such as: Preserve existing high-quality natural areas and improve the quality of natural areas to increase biodiversity. Increase the restoration and management of natural areas over time.	Content	Our redrafted section 3.6 covers these inter-related issues District-wide. SWWD supports the City's use of its Systems-wide Natural Resources Management Plan to guide its land management efforts.	No
140		Woodbury	Page 96	Wilmes Lake. We believe the action to 'complete a stream stability and restoration assessment for the open channel and surrounding corridor between Armstrong and Wilmes Lakes' has already been completed by the City. We look forward to sharing the results of this work and partnering on implementation of the suggested improvements to decrease erosion and improve habitat quality in this section of the watershed.	Content	SWWD is not aware of a comprehensive study covering the entirety of this channel through Oakdale, Lake Elmo and Woodbury from Armstrong Lake to Wilmes Lake. SWWD intends to undertake additional planning and diagnosis work in this area and will certainly include any previous work completed by the City of Woodbury.	No
141		Woodbury	Page 96	Colby Lake. As a municipal golf course, the action related to Eagle Valley Golf Course should be a partnership between our organizations. With funding support from the District, we are currently expanding native habitat on the golf course starting this year and hope this effort can continue with support from Golf Course staff.	Content	Noted and agreed.	No
142		Woodbury	Page 103	Internal Load Controls. The action to implement internal phosphorus control projects throughout Woodbury and Cottage Grove lakes appears to be premature. We support continued evaluation of deployment of this technology, among others, to decrease phosphorus impacts to water quality throughout the City.	Content	Noted. SWWD's updated lake management plan indicates substantial potential benefit from internal controls on several lakes. In many cases, internal control treatments alone may be adequate to delist impaired waters. We do acknowledge that work is needed to evaluate feasibility and benefit of potential treatments. That work will be done in coordination with the Technical Advisory Committee which will include staff from both Woodbury and Cottage Grove.	No

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143		Woodbury	Page 104	Central Draw Storage Facility and Overflow. It's imperative to acknowledge the significance of the Glacial Valley Park property and future development of amenities. Once construction is complete, this will serve as an amenity to Woodbury and neighboring communities and create a regionally significant park and open space.	Content	Noted. The referenced section includes an identified action to "Maintain a fully operational Central Draw Storage Facility (Glacial Valley Park) and Central Draw Overflow indefinitely. Construction of future amenities is included in its own section (3.9.8) under education and outreach and is included in the long range workplan.	No
144		Woodbury	Page 108	Groundwater and Surface Water Interactions. While PFAS-science continues to develop and improve our understanding of impacts of surface water and groundwater, there is a significant amount of land being held within Woodbury due to contamination and remediation. Under the life of this plan, the City requests the District considers its role in remediation and repurposing the property.	Content	Noted. We intend to restore and protect priority lands identified in our plan (3.6.1).	No
148	3 MDH		n/a	Overall, the organization of the plan is a bit hard to follow. A lot of information is repeated in various areas of the plan, both section to section (such as 1.1 and 1.2 - what is the intended difference between these sections? Can they simply be combined or the introduction shortened to avoid repeated information?) and chapter to chapter (Part 1 and Part 2). In Part 1, section 1.1 is mostly all one big section, while section 1.2 is broken up by topic - this breakup is very helpful, however, there are multiple instances of content in sections that doesn't make sense (examples: population and development information in the Wetlands section; climate change and endangered specifics information in the Groundwater section). Similarly, it is a bit confusing to have the Municipal Local Water Plans section as a subsection of the One Watershed, One Plan section in Part 3. In Part 2, it would be very helpful to see a comprehensive list of all the issue/goal categories, as it is a bit hard to follow. Additionally, it is a bit hard to connect the dots between Part 2 and Part 3 as far as how the various actions relate to the goals. Consider referring back to relevant goal(s) or creating some form of table or graphic that helps lay things out. Lastly, section 3.5.1 is particularly challenging to follow - initially, I thought the subsections were being broken up by subwatershed, but then I came to think it was just the specific waterbody, along with a variety of other topics after the subsections on specific waterbodies. Consider how the organization of various sections and the plan as a whole could be improved to ensure the plan is easy for readers to follow and to avoid repeating information when unnecessary.	Content	Organizational issues in Part 1 will be addressed per others' comments which will satisfy the noted concerns here. Section 3.3 will be retitled "Regional Planning" and we will reorganize the 1W1P & WBIF sections and include discussion of Washington County's Groundwater Plan. Goals will be relocated to Part 3 to better demonstrate their connections to action items. A table will be developed that connects Part 2 Issues of the Goals and Actions presented in Part 3.	Yes
149	4 MDH		n/a	Related to the above comment, an Executive Summary could significantly improve the navigability and comprehension of the plan for readers. This could be a place to lay out the issues, goals, and related programs to help address the previous comment, well as comment #14.	Content	An executive summary will be added along with more info on how to use the plan and connect parts 2 and 3.	Yes
151	6 MDH		9	Suggest including a sentence or two about groundwater quality in the watershed. Appreciate the mention of the high sensitivity to pollution, however, a brief overview of groundwater quality in the watershed would make this chapter more complete, as well as support other areas of the plan that discuss groundwater issues without really any background information on contaminants of concern, any patterns or trends within the watershed, etc.	Content	Section 2.6.4 of the plan is all about groundwater quality.	No
152	7 MDH		9-10	Either here and/or in section 1.2.7, suggest including a bit more about worsening groundwater sustainability concerns due to climate change. This is important not only when discussing groundwater, but also when discussing climate change and associated impacts more broadly.	Content	We will include a brief discussion of the potential impacts to groundwater from climate change in this area of the plan. A more thorough discussion is found in Section 2.6.3 of the plan.	Yes
153	8 MDH		17-18	As with comment #9, suggest including a sentence or two about groundwater quality in the watershed here as well with a summary of the primary contaminants of concern. There is mention of PFAS in fish in section 1.2.8, but there is no mention of it in the groundwater sections of Part 1.	Content	There was some text duplication in these areas, the final plan draft will clean this up. All discussion of fish tissue contamination will be moved and treated as an issue in Part 2 of the plan.	Yes
155	10 MDH		19-24	It would be helpful to have these figures numbered. Also, it is confusing that the diagrams don't show the actual lakes and are all the same. Suggest either making the diagrams look like the actual individual lakes or removing the diagrams to reduce confusion.	Content	Noted. This will be updated in the final plan draft.	Yes
158	13 MDH		19-24	Consider also noting the waterbody-specific guidelines for the Mississippi River (Ford Dam to Hastings Dam, Pool 2) due to mercury, PCBs, and PFOS, as well as for the St. Croix River (Stillwater to Mississippi River) due to PCBs. <a href="https://www.health.state.mn.us/communities/environment/fish/docs/eating/rivers.pdf">https://www.health.state.mn.us/communities/environment/fish/docs/eating/rivers.pdf</a> .	Content	We intend to simplify our labeling and discussion of this issue, removing specific information due to the ever-changing nature of advisories. We will direct residents to MDH resources online for the most up-to-date information.	Yes
159	14 MDH		n/a	It would be helpful to have some context for the Related Programs that are listed under each goal or set of goals, even if just in the form of a list of all the options at the beginning of the chapter. Also, consider if there is a better way to display the issue statements - currently they don't stand out and are a bit hard to find. Another idea could be to list the issue instead or again on the page with the goal(s) so that there is a nice summary page for each item. This would help readers more easily connect the issue statements to the associated goal(s).	Content	These areas will be revised extensively and be replaced with information directly connecting Part 2 Goals/Issues to Part 3 Action Items.	Yes

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Comment #	Reviewer Comment #	Reviewer	Plan Reference	Comment	Comment Category	SWWD Response	Edit Required
160	15	MDH	27-28	It is unclear what these two figures are trying to show - What changes have occurred between 2000 and 2020? What is the significance? Suggest referencing the figures in the text and what is being showed/why these are included in the plan.	Content	Language will be added to page 26 to add context for the two figures.	Yes
161	16	MDH	30	We would support the inclusion of groundwater in the health of water resources, as sometimes restoring ecosystems and processes (such as recharge) to pre-settlement conditions cause be complicated by existing contamination or other site conditions.	Content	Noted. This plan section is being reorganized pursuant to others' comments.	No
162	17	MDH	31-32	Suggest including a bit more about groundwater and known nitrate issues here. In particular, the MDA Township Testing Program results highlight Cottage Grove and Denmark Township. You can view this information, along with the County Well Index Max Nitrate layer, visually using the DNR WHAF Explorer at: <a href="https://www.dnr.state.mn.us/whaf/index.html">https://www.dnr.state.mn.us/whaf/index.html</a> . Learn more about the Township Testing Program here: <a href="https://www.mda.state.mn.us/township-testing-program">https://www.mda.state.mn.us/township-testing-program</a> . This is particularly important later in the plan (page 77) when the text states that "nitrates in groundwater are a major concern of the SWWD and its member communities", however, little context for this concern is provided in the plan.	Content	We will include additional information about nitrate issues from the Washington County Groundwater Plan, and other sources, as appropriate.	Yes
163	18	MDH	41	Suggest including a bit more about groundwater sustainability concerns due to climate change in this section. Groundwater sustainability is mentioned in a list of issues, but there is no previous or follow up discussion on the topic here.	Content	Section 2.6.3 discusses groundwater sustainability in the face of climate change. We will review which section of the plan, or possibly both, is most appropriate to contain this information.	Yes
164	19	MDH	47-54	As briefly mentioned on page 53, private wells and septic systems can become flooded during flood events. This is a public health and safety concern. Suggest specifically calling out this public health and safety concern in the 2.3 intro section. Please contact MDH if any assistance is desired. Similarly, suggest modifying the first goal on page 54 from "risk to public safety" to "risk to public health and safety".	Content	Noted. These changes will be made.	Yes
168	23	MDH	67	Consider linking again to the MDH website so that readers can access the relevant information. Or, consider using references more throughout the plan, including here, as mentioned in comment #1.	Content	We will review the entire plan for inclusion of relevant hyperlinks, where and when appropriate.	Yes
174	29	MDH	73	Additionally, the statement mentioned in the previous comment is the only reference to wellhead or source water protection in the plan. Approximately one-third of the area of the watershed overlaps one or more groundwater DWSMAs, most of which are moderate or highly vulnerable. Additionally, the DWSMA for Cottage Grove includes a large surface water contribution area (SWCA), which means that surface water infiltrating within this area could rapidly move into the aquifers that supply the city's wells. DWSMAs indicate the area that should be managed to protect the public water system's drinking water. While public water suppliers are the entities responsible for wellhead protection, local partners like watershed districts are important contributors as well. One primary way wellhead protection intersects with the work of watershed districts is through stormwater management ( <a href="https://stormwater.pca.state.mn.us/stormwater_and_wellhead_protection">https://stormwater.pca.state.mn.us/stormwater_and_wellhead_protection</a> ). We strongly suggest additional information is added here or elsewhere in the plan to explain what wellhead protection is, what DWSMAs are, and how this relates to the watershed's work. Please refer to MDH's initial comment letter for a variety of resources. MDH staff are also happy to assist with wording, content suggestions, maps, etc. Consider including a link to the MDH Source Water Protection Map Viewer in the plan ( <a href="https://www.health.state.mn.us/communities/environment/water/swp/mapviewer.html">https://www.health.state.mn.us/communities/environment/water/swp/mapviewer.html</a> ). A figure/map showing the current DWSMAs and other related information could also be beneficial; however, also including this link ensures that readers can find the most up-to-date information, as both Cottage Grove and Woodbury will be updating their Wellhead Protection Plans in the near future.	Content	We will include a subsection within Section 2.6.4 (Groundwater Quality) that addresses the use of DWSMAs by municipalities to manage and protect groundwater resources. Addition of a hyperlink to the MDH map viewer will ensure access to the most up-to-date information. We do not wish to publish a DWSMA map in our plan that will be quickly inaccurate.	Yes
175	30	MDH	73	Similar to the above comment, this paragraph is the only mention of special well and boring construction areas and pollution remediation. Suggest including some additional context to help readers understand the significance of this information being mentioned in the plan. MDH staff can help with suggestions for the special well and boring construction areas, but we recommend connecting with the municipalities and/or MPCA regarding the 3M pollution remediation if needed. Also, these topics are primarily related to groundwater quality vs. quantity. Consider moving this paragraph to the quality section.	Content	The last paragraph on page 73 will be moved to the Groundwater Quality section. We don't feel that the SWWD plan is the place to go on at length about 3M pollution remediation or special well and boring construction protections beyond mentioning they exist.	Yes
176	31	MDH	74	Consider if other Related Programs are relevant to the groundwater quantity goal. The primary one that comes to mind is Education & Outreach.	Content	"Related Programs" will be replaced with information directly connecting Issues in Part 2 to Goals & Action Items in Part 3.	Yes
177	32	MDH	75	Much of the information on chloride is repeated from page 66. Consider if there are more issues or concerns specific to groundwater regarding chloride. Are any of the public waters suppliers concerned about chloride levels in groundwater level, either in the near term or long term? Could that impact drinking water treatment facilities and equipment?	Content	These sections seem to be sufficiently different, related to surface and groundwater management, respectively. There are two sentences that are repeated in both section, but they provide important context if the sections were to be read independently by a plan user.	No

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Comment #	Reviewer Comment #	Reviewer	Plan Reference	Comment	Comment Category	SWWD Response	Edit Required
183	36	MDH	84, 104	Consider including impacts to public health, safety, and groundwater from flooding of wells in studies and other action items related to flooding, particularly with regard to the La and Ria Lakes drainage system, as private wells have been impacted by previous flood events in that area. MDH is available to provide input and assistance on this topic as requested.	Content	Noted. Information on this topic will be addressed with MDH comment #19 earlier in the plan.	No
184	37	MDH	85	Consider including the following action "Review and comment on wellhead protection plans within the watershed as they are developed". Perhaps this is intended to be included within the action that is listed in this section, but the preceding text only mentions the county groundwater plan. If not wanting to add an action, then consider mentioning wellhead protection plans in the preceding text.	Content	We will include an action item on this topic as suggested within section 3.1.6.	Yes
186	39	MDH	n/a	When working on various projects, refer to DWSMA maps and the Minnesota Well Index to evaluate for potential benefits and any additional considerations to keep in mind throughout the watershed. Particular attention should be paid to highly vulnerable DWSMAs and other sensitive locations as described in the MPCA Construction Stormwater Permit. While highly vulnerable DWSMAs do require additional considerations for BMPs like stormwater infiltration, pollution prevention/stormwater treatment/etc. may also benefit drinking water. Even things like street sweeping can benefit drinking water in certain areas. Acknowledging multiple benefits can help ensure these remain on the watersheds radar and can open up more opportunities for funding. MDH staff are available to assist in this evaluation upon request.	Content	Noted. This is a focus of current MDH-funded work by SWWD.	No
188	41	MDH	123	Private well and septic owners called out as a specific audience for engagement is appreciated. Consider if private wells and associated concerns can be incorporated more into the overall watershed plan since there is currently very little on this topic. The Washington County Groundwater Plan can be used as a resource when looking for specific concerns, actions, etc. to incorporate into the plan.	Content	We will add some language to describe that outreach to residents on this topic will be in partnership with Washington County.	Yes
189	42	MDH	123-127	Aside from the mention of private well owners and the EMWREP purpose statement, there is no reference to or mention of groundwater or drinking water in this Education and Outreach section. Public education, outreach, and engagement is very important in this context as what we do on the land impacts our groundwater and drinking water. Groundwater for many can be out of sight and out of mind. While that may be a bit different in the East Metro with concerns like PFAS, educating the public can also maybe help prevent misinformation. Consider helping the cities who provide water spread the message on the great work that they are doing to keep drinking water safe, along with messages about the land-water connection, groundwater conservation, etc.	Content	Noted. We will include reference to supporting our municipal partners in their groundwater education and outreach.	Yes
190	43	MDH	136	Considering including a link to the Washington County Groundwater Plan so readers can understand references made in the SWWD Plan to this plan. Also, could the reference be updated to the new Washington County Groundwater Plan? If there is something included in the old plan but not the new plan, consider referencing both if possible to ensure readers reference the most up to date plan, particularly since there are action items referencing the new plan.	Content	The new county plan will be included as a referenced document. Any references to the old plan will be updated.	Yes
1		Belka, Daniel	Page vii	How to use the Plan page vii states that the current SWWD Watershed Management Plan was initially adopted in October 2016 and substantially updated in October 2026, once again builds on past work within the district. I believe that the updates were made in April 2019.	Correction/Clarification	The text reflects the plan that will adopted later this year and describes the current update as a substantial update to the plan initially adopted in October 2016.	No
18		Polta, Dick		I see several lakes located in Cottage Grove, Woodbury, and Newport mentioned in the report, but not the ones located in the SW corner of the district. It would be beneficial to include additional Lakes in the SW corner of Washington County which are not mentioned in the study. Unless I missed them. The following Lakes / locations should also be included for study just as other Lakes are.1. Mooers Lake – it is located adjacent to the recently created Mississippi Dunes park in Cottage Grove. 2. Baldwin Lake – it is located west of Lower Grey Cloud Island. It is the connection from the Mississippi River to Mooers Lake. It is partially located in Cottage Grove and Grey Cloud Island Township. 3. Future Larson Lake – it is the lake which will be created when aggregate mining ceases on Upper Grey Cloud Island in the current Amrize Mining pit. 4. Future Lake on Lower Grey Cloud Island. It is the lake which will be created when aggregate mining ceases on Lower Grey Cloud Island in the current Amrize Mining pit.	Correction/Clarification	Discussion of the Mississippi River is intended to be inclusive of all associated backwater lakes and side channels unless otherwise specified. We will make this clarification.	Yes
19		Polta, Dick		I see the Grey Cloud Channel is listed. Does this include the entire channel from where it connects to the river on the upstream end all the way to where it meets the river on the downstream end by River Acres housing exists? If not, it should mention it does.	Correction/Clarification	Yes. Discussion of the Mississippi River and Grey Cloud channel is inclusive of all waters within SWWD's jurisdiction.	No
20		Polta, Dick		One could also include the back channel of the Mississippi River located in Newport, and the back channel of the river located in Saint Paul Park.	Correction/Clarification	Discussion of the Mississippi River and Grey Cloud channel is inclusive of all waters within SWWD's jurisdiction.	Yes

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21		Sarah, Lilja	various	Reviewer noted several punctuation and grammatical errors and some suggestions for clarity.	Correction/Clarification	Corrections will be made and suggestions considered.	Yes
25	4	MPCA	1.2	"The state goal is what is being pursued". Citing the referenced document or linking to which state goal is being pursued would be helpful.	Correction/Clarification	Modifications to this part of the plan due to other comments have eliminated the identified language.	Yes
34	7b	MPCA		Bailey – ID number should be 82-0456.	Correction/Clarification	Noted.	Yes
35	7c	MPCA		Powers – It is written correctly that there aren't impaired waters, but the image representing Impaired waters is there – remove that.	Correction/Clarification	Noted.	Yes
36	7d	MPCA		O'Connor's Creek and Lake Hastings – the 2024 Impaired Waters List does not list the same impairments that are listed. Review. With reference to the upstream portion, it is recommended to include the ID for the stream. There is an impairment for E. coli.	Correction/Clarification	Details will be added. Formatting of this information has been changed significantly.	Yes
37	7di	MPCA		The ID number for the Lake may be incorrect. That ID number is for a lake that is near Stillwater.	Correction/Clarification	The ID number is correct. The lake is in Denmark Township, not Hastings which is the postal address. Formatting of this information has been changed significantly.	Yes
38	7e	MPCA		Lake St. Croix has additional nutrients, and fish tissue PFOS, Mercury, and PCB impairments.	Correction/Clarification	Detail will be added.	Yes
39	7f	MPCA		Ravine Lake has a nutrient impairment.	Correction/Clarification	Detail will be added.	Yes
41	7gi	MPCA		Additional stream impairments on 07010206-517, -568, and -607.	Correction/Clarification	Detail will be added.	Yes
43	8a	MPCA	Goals	Suburban Development: First goal includes development, would including re-development also be relevant in this statement.	Correction/Clarification	Issues and goals have been completely restructured in the final draft.	Yes
44	8b	MPCA		Ecosystem Functions – Protect and preserve are written; would you also want to include restore.	Correction/Clarification	Issues and goals have been completely restructured in the final draft.	Yes
46	10	MPCA	2.2	Risk Assessment Matrix – It's a nice visual, but is there one for the Midwest or do you have plans to make a matrix that is more relevant to your community?	Correction/Clarification	The figure will be modified for the final review draft.	Yes
84	7	DNR		DNR notes that the inserted figures for each lake in Section 1.2.8 contain several errors, such as stating watershed area when waterbody area is intended. Further, the legend for the maps is unclear; it is not evident what is meant by "5 ft gradient intervals."	Correction/Clarification	Noted. This entire section is being restructured in the final plan draft.	Yes
85	8	DNR	Section 2.2 (page 42)	Section 2.2 (page 42) includes a figure showing a Risk Assessment Matrix. The text in this figure is geared towards coastal systems. We recommend adapting this figure for local conditions.	Correction/Clarification	The figure will be modified for the final review draft.	Yes
86	9	DNR	Section 2.4 (page 57)	Section 2.4 (page 57) includes a figure showing a map of the District's greenway corridors. It appears to be out of place in this section focused on stormwater management systems.	Correction/Clarification	Page 57 is an erroneous duplication of Page 39. Page 57 was supposed to be a map showing SWWD's Qualitative Storm Sewer Risk Analysis and will be updated for the final review draft.	Yes
87	10	DNR	Section 2.6.2 (page 70)	Section 2.6.2 (page 70) of the WMP includes the statement: "All District lakes are productive, nutrient-rich lakes that should exhibit diverse and abundant native aquatic vegetation." DNR notes that productive lakes usually yield more algae than aquatic plants. Aquatic plants are limited by light in these systems, not nutrients. Further, this section includes the statement: "However, when systems are stressed and native vegetation is diminished, the invasive species can thrive and rapidly lead to a degraded habitat." DNR recommends rewriting this statement as follows: "However, when systems are stressed and native vegetation is diminished, the invasive species can thrive and can rapidly lead to an unbalanced, less abundant ecosystem."	Correction/Clarification	Noted. We prefer our initial language and believe it is more clear.	No
88	11	DNR	Section 3.5.1 (page 107)	Section 3.5.1 (page 107) of the WMP includes the statement: "More recently, the District began monitoring aquatic vegetation in several lakes to inform and support ongoing management of aquatic invasive species." We recommend indicating the year this monitoring began.	Correction/Clarification	Noted. The language will be updated as follows "The District routinely monitors aquatic vegetation in several lakes to inform and support ongoing management of aquatic invasive species."	Yes
92		Met Council	Section 1.1 & 1.2	A lot of the information in the Land and Water Resources narrative (pgs. 3-10) is identical to the information and wording in section 1.2 "Primary Water Resources of the District" (pgs. 11-18). Consider consolidating these two sections to reduce the repetitive information communicated in each.	Correction/Clarification	Noted. This has been resolved to remove the erroneous duplication.	Yes
93		Met Council	Page 8 & 16	The Plan references the Council's 2040 MUSA, however this can be amended to "2050MUSA" since the latest 2050 regional development guide was adopted in 2025.	Correction/Clarification	Noted.	Yes
94		Met Council	Pages 19-24	All lake images on these pages appear to be Markgrafs Lake.	Correction/Clarification	Noted. Maps were incomplete at the time of draft release.	Yes
95		Met Council	Page 20	The "Fish Contaminant Advisory" information for the Colby Lake profile includes information about Markgrafs Lake, not Colby Lake.	Correction/Clarification	Noted. This entire section is being restructured in the final plan draft.	Yes

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97		Met Council	Page 56	Mentions charts 4-8 and 4-9 which do not appear to exist.	Correction/Clarification	Noted. This will be fixed. The lanugage used was a copy/paste error from our 2018 climate resiliency study.	Yes
98		Met Council	Page 57	It seems an incorrect map is featured on this page and that it should be a figure relating to O&M instead.	Correction/Clarification	Page 57 is an erroneous duplication of Page 39. Page 57 was supposed to be a map showing SWWD's Qualitative Storm Sewer Risk Analysis and will be updated for the final review draft.	Yes
99		Met Council	Page 59	The issue statement for 2.5.1 Bluffs & Ravines is the same as issue statement 2.3.2 Closed Basins on page 50.	Correction/Clarification	Noted. The correct issue statement will be included in the final draft.	Yes
101		Met Council	Page 126	The action listed under 3.9.7 EMWREP is associated with the Artist in Residence program, not EMWREP.	Correction/Clarification	Noted. This will be corrected.	Yes
102		Met Council	Page 132	"3.11.8" should be "3.10.8"	Correction/Clarification	Noted. This will be corrected in the final draft with a complete renumbering.	Yes
107		Washington County	Page 12	Switch x axis on the Figure to percentage of respondents to be consistent with the highlighted data – references % in the data call out but the graphic is in responses received (can't compare that call out to other concerns).	Correction/Clarification	We will review for agreement between the callout and figure.	Yes
108		Washington County	Page 20	Under Colby Lake's descriptive section, Markgrafs Lake is listed.	Correction/Clarification	This entire section has been restructured in the final draft.	Yes
110		Washington County		Review the formatting of superscripts throughout the document to ensure consistency.	Correction/Clarification	Corrections will be made as the plan is finalized.	Yes
111		Washington County		The use of the Oxford comma varies in different sections. For consistency, determine whether it should be included or excluded and apply that choice uniformly.	Correction/Clarification	Noted. SWWD is pro-Oxford comma.	Yes
112		Washington County		If available, please include the author and the year each photograph was taken.	Correction/Clarification	We will add photograph attribution.	Yes
113		Washington County		Add the copyright symbol wherever 3M is referenced.	Correction/Clarification	Noted.	Yes
115		Washington County	TOC	Section 2.3, Flooding Impacts, begins on page 47.	Correction/Clarification	The table of contents will be update following final edits.	Yes
116		Washington County	Page VII	The abbreviation WMP is introduced before being defined. Consider revising the first sentence to: "This Watershed Management Plan (WMP) is structured to provide implementation flexibility, or the ability to respond quickly to new or changing issues, and utilize several web-based, interactive tools."	Correction/Clarification	Noted.	Yes
117		Washington County	Page VII	The abbreviation SWWD is also introduced without prior definition. The sentence could be revised to: "The current South Washington Watershed District (SWWD) Watershed Management Plan was initially adopted in October 2016."	Correction/Clarification	Noted.	Yes
119		Washington County	Page 4	The superscript is labeled as 12. Should this be 1,2 or 2 instead?	Correction/Clarification	Noted. This will be corrected.	Yes
120		Washington County	Page 6	In the sentence "However, that historicity is not SWWD's to interpret," the word "historicity" should be corrected to "history."	Correction/Clarification	Noted.	Yes
121		Washington County	Page 7	The sentence "despite those challenges, the river exhibits relatively high-water quality as compared to other metropolitan resources; and to Mississippi River and provides extensive habitat for Native Plant and animal communities," appears incomplete and may benefit from revision for clarity.	Correction/Clarification	Noted. This will be reviewed and fixed.	Yes
122		Washington County	Page 7	The removal of La Lake from the impaired waters list is mentioned twice in close succession; consider consolidating these references.	Correction/Clarification	Noted. This will be fixed.	Yes
124		Washington County	Page 16	Review the spacing in the sentence "It's a systematic and iterative process of assessment, planning, and implementation that ensures that planned growth is accommodated and that resources are protected and restored."	Correction/Clarification	Noted.	Yes
125		Washington County	Page 17	Some percentages appear to be missing on the pie chart.	Correction/Clarification	Noted.	Yes
126		Washington County	Page 18	Check the spacing of sentence "in addition to challenges posed by development, the district also faces several confounding impacts from the changing climate."	Correction/Clarification	Noted.	Yes
127		Washington County	Page 21	Review the spacing for the fish contaminant advisory for Markgrafs Lake, Woodbury.	Correction/Clarification	Noted.	Yes
128		Washington County	Page 47	In the photograph's caption, "Fooding as Grey Cloud Island bridge" should be corrected to "Flooding at Grey Cloud Island Bridge."	Correction/Clarification	Noted.	Yes
130		Washington County	Page 103	Add punctuation to the end of the action statement.	Correction/Clarification	Noted.	Yes

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135		Woodbury	Page 51	Northern Watershed - We request language be rephrased in this section to incorporate the following: Woodbury is Minnesota's 8th most populated city. Referring to it as largest could be misinterpreted to be a reference on physical size. Replace language such as "While cities were careful about development" to clarify that this portion of the watershed was designed and constructed with previously rainfall frequency (TP-39). It is not a reflection of care but a direct example of design standards resulting in a difference of risk with current rain events.	Correction/Clarification	We will make the suggested changes.	Yes
146	1	MDH	n/a	Appreciate the references throughout. Consider linking to the reference page for all reference like you do for the discussion of the Mississippi River in section 1.1.2 on page and a few other places in the plan. Along those lines, the references noted on page 4 look like "12" rather than "1" and "2" - consider adding a comma in between 1 and 2. Throughout the plan, there also appear to be some references that are not superscripted as well as some references that don't seem to make sense - review the plan for references to make sure they are correct.	Correction/Clarification	Noted. We will review the plan to ensure consistency in reference formatting throughout.	Yes
147	2	MDH	n/a	Suggest referencing the figures in the text. Some seem out of place and are without context. Help readers understand why they are being included in the plan. Also suggest consistency in how figures are labeled. While most seem to have placeholders, some have their labels/captions as searchable and others are included in the image itself and are not searchable.	Correction/Clarification	There were placeholders and duplication errors. These will be fixed in the final draft. Figures had not been numbered in the initial review draft. References will be added and web accessibility will be addressed.	Yes
150	5	MDH	5	Consider including a north arrow to orient readers, especially since this is slanted and north isn't straight up.	Correction/Clarification	We have a different map to swap into this location that matches the formatting of the other maps in the plan. It contains a north arrow.	Yes
156	11	MDH	19-24	Suggest rewording the "Fish Contaminant Advisory" sections for all lakes with an advisory. These lakes do not have advisories just because fish in this lake tested positive for the relevant contaminants (be sure to use "contaminants" vs. "contaminates"), but rather the contaminants that are listed as contributing to waterbody-specific consumption guidelines (vs. the statewide guidelines) were measured at levels that trigger advice to limit consumption. When looking at the various guidelines, even for the same contaminant, there are different guidelines for different lakes and even for different fish species or sizes within a particular lake. So the guidelines are not blanket for all lakes that have detects of these contaminants (some lakes could even have detects but not in high enough levels to trigger an advisory). There is also a typo in the statement for Colby Lake, as is says Markgrafs Lake. Suggest the following example of a reword: "Fish from Colby Lake have been tested for contaminants and mercury was measured at a level to trigger advice to limit consumption" or "Fish from Colby Lake have been tested for contaminants and as a result, fish consumption guidelines have been established specific to Colby Lake due to mercury." To further brainstorm rewords or for any questions, please reach out to Abby Shea.	Correction/Clarification	We intend to simplify our labeling and discussion of this issue, removing specific information due to the ever-changing nature of advisories. We will direct residents to MDH resources online for the most up-to-date information.	Yes
157	12	MDH	19-24	When there are different guidelines for different groups of people, for different fish species, etc., looking at the lake-specific guidelines may show up as "Mercury PCBs" for one and just "PCBs" for another (as an example). However, when listing the contaminants of interest/concern in the "Fish Contaminant Advisory" sections, it does not make sense to say "... positive for Mercury PCBs, and PCBs" in a sentence. What this means (in this example) is that the guidelines for buffalo fish are more restrictive than the statewide guidelines due to both mercury and PCBs, whereas the guidelines for channel catfish are more restrictive only due to PCBs (if mercury was detected, the levels did not contribute to the more restrictive guidelines). Refer to the previous comment and if suggested wording specific to lakes with these different guidelines is desired, please reach out to Abby Shea and that can be provided. However, the specifics are not particularly necessary, it just should be worded in a way that makes sense. Also note that the guidelines/advisory for Powers Lake is mercury and PFOS for the general population and then just mercury for sensitive populations (not Mercury PFOS, and PFOS as stated on page 22).	Correction/Clarification	We intend to simplify our labeling and discussion of this issue, removing specific information due to the ever-changing nature of advisories. We will direct residents to MDH resources online for the most up-to-date information.	Yes
167	22	MDH	67	This section on PFAS seems to insinuate that PFAS in drinking water is being taken care of entirely by cities retrofitting and constructing new treatment plans. However, there are still a significant number of residents in the watershed on private wells, as well as some residents served by the Eagle's Watch Development non-municipal public water system. Suggest addressing this, even briefly, in this section to be clear that this is still an ongoing issue for many residents in the watershed.	Correction/Clarification	We will review this section to be clear this is an ongoing issue for residents of the District, whether they are reliant on public water supplies or private wells.	Yes
169	24	MDH	68	Consider adding a date on this figure (like "As of X/X/2026"), as MDH continues to issue new advisories/updated guidelines on an ongoing basis as new information becomes available.	Correction/Clarification	Noted. We will make the suggested addition.	Yes
170	25	MDH	72	It appears that the first paragraph here is carried over from the first paragraph of section 2.6.2 on page 70. Delete this paragraph.	Correction/Clarification	This paragraph was included here in error and will be deleted.	Yes

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171	26	MDH	72	Suggest acknowledging the nuance of stormwater infiltration in terms of groundwater quality, even if very briefly. Could reword the last sentence in the first paragraph of the right column to "Implementation of green infrastructure, stormwater infiltration practices (where feasible and safe), and reducing soil compaction from development can all help to offset these concerns to some degree".	Correction/Clarification	We will make the suggested addition.	Yes
173	28	MDH	73	The text "wellhead protection (municipalities)" should be changed to "wellhead protection (public water suppliers)" to accurately reflect that under MN Rules, all public water suppliers are required to engage in wellhead protection in some form. This looks different depending on the type of public water supplier, but importantly, there is a non-municipal community public water supplier with a Drinking Water Supply Management Area (DWSMA) in the watershed - Eagle's Watch Development. Eagle's Watch Development also has an MDH-approved Wellhead Protection Action Plan, which is an abbreviated version of a Wellhead Protection Plan and includes action items that local partners could take to help them protect their drinking water supply.	Correction/Clarification	We will make the suggested change.	Yes
181	34	MDH	77	The PFAS section of the plan is worded in a way that seems to imply that the cities in the watershed that are public water suppliers are working on treatment systems to comply with the MDH guidance values. However, this is not the case, but rather, they are working to meet the new maximum contaminant levels (MCLs) established by the US EPA. The MCLs are 4 ppt for PFOA and PFOS and public water suppliers currently have until 2027 to be in compliance with these MCLs. While the US EPA announced their intent in 2025 to extend that deadline, along with some other proposed changes, there is no proposal or intent to change the MCLs for PFOA or PFOS. Suggest referencing the US EPA's MCLs in this paragraph to avoid confusion or misunderstandings. Reference: <a href="https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas">https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas</a> . Additionally, the MDH guidance values listed are no longer accurate. If wanting to include MDH guidance values in addition to the US EPA MCLs, please reference the following information: <a href="https://www.health.state.mn.us/communities/environment/risk/guidance/gw/table.html">https://www.health.state.mn.us/communities/environment/risk/guidance/gw/table.html</a> .	Correction/Clarification	We will remove specific regulatory guidance levels in this section, and reference that public water suppliers are working to meet established quality standards for PFAS.	Yes
185	38	MDH	92	Suggest rewording the first action here. Are updated local controls undesirable? It is unclear what is meant by this action.	Correction/Clarification	This action item reflects standard statutory language; SWWD will operate its permit program where municipalities have not updated local controls (stormwater management ordinances) to be as stringent as SWWD's rules.	No
187	40	MDH	119	Suggest rewording the first sentence here to acknowledge that not only cities provide drinking water for residents of the watershed. In addition to non-municipal public water suppliers that provide water for people where they work and play, there is a non-municipal public water supplier that provides residents water where they live (Eagle's Watch Development). The non-municipal public water suppliers are scattered throughout the watershed, including in a mix of more suburban and more rural areas.	Correction/Clarification	Noted. We will make this change.	Yes
23	2	MPCA		The links to Native American community pages and "Why Treaties Matter" is a nice addition.	General	Noted.	No
24	3	MPCA	Intro to 1.2	The topics seemed to jump around. Could it be reviewed to create a more succinct/chronological order to tell the story of the watershed. Review paragraphs that are long and have several thoughts.	General	Yes. We will review the content in this section of the plan for clarity.	Yes
45	9	MPCA	2.2	Putting your definition of resilience in a call out box is nice.	General	Noted.	No
51	12	MPCA	3.1.2	Nice summary of how you plan to approach TMDLs.	General	Noted.	No
52	13	MPCA	3.1.3	Nice list of studies completed.	General	Noted.	No
56		BWSR	N/A	This was a pleasure to read! The plan is extremely well-written, well-organized, and visually appealing. Very nice work!	General	Noted.	No
76		BWSR	N/A	It is recommended that when this plan is uploaded to your website in final form that it will be in compliance with the Americans with Disabilities Act Title II Web and Mobile Application Accessibility Rule. For small and special district governments, the deadline for having their web content meet accessibility requirements is April 26, 2027.	General	The completed plan will comply with ADA requirements. SWWD is currently working to update its website to comply with ADA requirements as well.	Yes
77		MDA		The plan identifies the need for continued adoption of agricultural conservation practices. The District may wish to note that several statewide resources are available to support producers implementing these practices. Please see the list below for programs that may be helpful...MAWQCP, MDA Soil Health Financial Assistance Program, Ag BMP Loan Program, NFMP, MDA Fertilizer and Manure BMP Resources, PMP, Waste Pesticide Collection Program.	General	Noted.	No
78	1	DNR		The WMP contemplates changes to the outlets of several public waters in the District. We encourage SWWD to coordinate early with the DNR on such projects. Through discussion with the Area Hydrologist, public waters permitting requirements can be identified in advance.	General	Noted. SWWD will engage the DNR Area Hydrologist as part of its Technical Advisory Committee in developing any projects that would require outlet modification.	No

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104		Washington County		The SWWD Watershed Management Plan identifies goals in line with the Groundwater Plan including reducing chloride loading, groundwater sustainability, limiting potential for groundwater contamination, and preventing or mitigating negative impacts from groundwater-surface water interactions. Public Health and Environment (PHE) looks forward to working with the SWWD and finding opportunities for collaboration and partnership during the implementation of the county's Groundwater Plan and the SWWD Watershed Management Plan.	General	Noted.	No
145		Woodbury	Page 125	Stewardship Grant Program. The City supports an active stewardship grant program be implemented by the District as it has resulted in numerous projects that would not be done without the funding support. In 2024, the City established goals through its Environmental Stewardship Plan related to removing turf, increasing habitat for native pollinators, and increasing tree canopy. City staff are engaging in efforts to accomplish those goals on public property, but recognize the District, and partnerships through the Washington Conservation District, have a greater history of success doing so on privately-owned property. We look to continue to support each other on these topics and pool resources together to make the largest impact.	General	Noted.	No
154	9	MDH	19	Appreciate the inclusion of the fish consumption guidance and the link to the MDH website for people to reference the most up-to-date guidance, as MDH continues to update this information as the program continues to have its capacity expanded.	General	Noted.	No
165	20	MDH	54	Appreciate the call out to ensure flood reduction efforts extend to historically underserved communities and neighborhoods.	General	Noted.	No
166	21	MDH	66	This is a great figure/graphic from MPCA and appreciate its inclusion in the plan - it shows the connection between surface and groundwater, as well as other sources of chloride in addition to road salt.	General	Noted.	No
172	27	MDH	73	Really like this sentence - it is an example of multiple benefits and how groundwater and surface water are interconnected: "Water resources that contribute to groundwater recharge are also important to protect, as they can be direct vectors of groundwater contamination".	General	Noted.	No
178	33	MDH	76	Really glad to see this figure in the plan! This is a great way to show the groundwater-surface water connection, as well as the overall idea of what we do on the land impacts our groundwater and drinking water - an idea that is important to work to help the general public understand.	General	Noted.	No
191	44	MDH	n/a	There are lots of great goals here, including "Protect Groundwater Resources", "Facilitate Interagency Coordination", and "Evaluate Effectiveness of Management Actions". Great job on the general approach to data, including partnering with other groups to assess data needs, as well as having all data in one place and integrating other data like groundwater observations - looking forward to this being embedded within the website! Overall, the monitoring plan looks great and will help the watershed continue the great work you are doing.	General	Noted.	No
192	45	MDH	9	Specifically really like the emphasis in section 3.4 on monitoring/evaluating the influence of stormwater infiltration on groundwater quality and quantity. Keep the MDH Accelerated Implementation Grant in mind for projects like this, as well as other potential projects related to groundwater. While it cannot be used for in-the-ground projects, it can be used for capacity building, feasibility studies, etc.	General	Noted.	No
47	11	MPCA	Action Items	Review all action items for opportunities to identify number of items you will plan for. Having an estimated cost and the number of projects can help plan budgets.	PTM (prioritize, target, measure)	Action items have been restructured into measurable goals.	Yes
48	11a	MPCA		Example: 3.1.1 – Action: how many internal feasibility studies?	PTM (prioritize, target, measure)	Recommendations for internal nutrient control feasibility studies will be found in SWWD Lake Management Plans (Appendix). We have identified six lakes for which internal loading assessments will be completed.	Yes
49	11b	MPCA		Example: 3.1.5: Climate change – could include details of what to plan for (i.e. size of storm, preference for Atlas 14 or other).	PTM (prioritize, target, measure)	SWWD prefers to not lock itself into any particular model, as new guidance is released all the time that may influence decision making across SWWD's projects and programs.	No
50	11c	MPCA		Example: 3.2.2 H&H model – update at least one time and more if necessary.	PTM (prioritize, target, measure)	We presume this comment is directed at section 3.2.1, Watershed Modeling. District-wide H&H models are updated only as required due to the large expense involved in completing this task. Existing SWWD H&H models are maintained regularly. Additional clarity has been added in Goal 3.2.2.a.	Yes
53	14	MPCA	3.5.1	For each lake, having a goal of pounds of total phosphorus, total suspended solids or other pollutants to reduce by in the next 10 years could help determine success. In the watersheds you have subwatershed assessments, that may be a little easier.	PTM (prioritize, target, measure)	SWWD's updated lakes management plan will be included as an appendix to the plan in order to provide more detail. We intend to use adaptive management to address issues as they arise.	Yes

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Comment #	Reviewer Comment #	Reviewer	Plan Reference	Comment	Comment Category	SWWD Response	Edit Required
54	14a	MPCA		When goals are related to shoreline or river mile, a goal could list the feet of shoreline to be restored in the next 10 years.	PTM (prioritize, target, measure)	SWWD prefers to pursue projects of this type based on the severity of the existing problem and opportunities available to complete the work. Given that most lakeshore is publicly owned in SWWD, establishing a numerical goal of linear feet to be restored is not necessary, in SWWD's view.	No
55	15	MPCA	3.9.1	It's good to see the incorporation of reaching previously unengaged communities in the narrative. Could that be worked into an action item?	PTM (prioritize, target, measure)	Agreed. An goal regarding previously unengaged communities will be added.	Yes
59		BWSR	26-30	Issue/Goal 2.1.1, Ecosystem Alterations, targeting the issue of the same name, feels redundant and too broad. The preceding three goal-categories (2.1.2, 2.1.3, 2.1.4) all deal with how ecosystems were altered and what can be done to address the changes. The goal of "restoring native ecosystems and their processes to support healthy water resources" could comfortably fit with the other three goal-categories. Additionally, the last sentence of section 2.1.1 mentions that it would be "advantageous to pursue strategic public acquisition of private riparian lands to further protect especially sensitive water resources from modern developed land uses." This sounds like a measurable goal, but it wasn't included in the 2.1.1 goal-category. Recommended removing goal-category 2.1.1, shifting the goals to the preceding three goals, and adding a land purchase goal.	PTM (prioritize, target, measure)	SWWD will reorganize Section 2.1 to resolve some of the organizational issues. Part 2 will be limited to describing the issues identified along with strategies to address those issues, while Part 3 will establish the District's goals. A new goal addressing land acquisition within the District will be added to Part 3.	Yes
60		BWSR	36	Goals 1 and 3 on this page could be more specific. For goal 1, I think it would be difficult to measure how coordination was proactive. Maybe add in <i>how</i> coordination will be proactive. Goal 3 does not appear to be measurable. How will you be able to report that your help to a municipal partner improved how they manage water?	PTM (prioritize, target, measure)	See response to above comment .	Yes
61		BWSR	46	All goals on this page could use some work. The first goal listed in this goal-category does not feel measurable. Knowledge should not just be maintained, but rather increased and diversified. Difficult to measure the maintenance of knowledge. "Adapt" is also listed in this first goal. Perhaps tying this concept with the other goals to assess the adaptive capacity of the District to climate change, and therefore find more targeted ways to increase the resiliency of the District and their partners. The second goal could also be clearer. How will climate resiliency be incorporated for all projects? Will nothing be allowed at the 100-year floodplain, only the 200-year? Will new modeling be adopted that accounts for increased rainfall rates? My comment for goal three on this page is the same as my comment for goal 3 on page 36. What kind of support? How will your support improve the municipal stormwater management infrastructure?	PTM (prioritize, target, measure)	See response to above comment. Goal 1 has been clarified it is a District strategy, and will state "Maintain <b>current</b> knowledge of..." in its new location.	Yes
62		BWSR	54	The second goal is about "building resiliency to withstand a changing climate" [paraphrased]. Should this be part of section 2.2 which specifically deals with community resiliency in a changing climate? This feels misplaced. Also- goal three is not very specific. Please omit it or make it more specific and measurable.	PTM (prioritize, target, measure)	Climate resilience and flooding impacts are highly intertwined and both sections have converging goals that are measured through goals defined later in section 3 of the plan. Relocating the goals to Part 3 should alleviate the noted concern. Goal 3 in section 2.3 will be redrafted to add detail in its new location.	Yes
63		BWSR	58	The first goal, "improving prioritization and targeting of inspections" feels very difficult to measure. Recommend making it more specific and measurable. How will prioritization be improved specifically?	PTM (prioritize, target, measure)	This goal has been reincorporated as a strategy, addressed by goals defined in Part 3.	Yes
64		BWSR	64	Goal one: "address eroding bluffs and ravines" is not really measurable from a water management perspective. Address could just mean acknowledge that they are there without taking any action. Goal three: define excessive erosion. The fourth bulleted goal is just a statement about construction site erosion, and appears to have been added by mistake. It should be removed since the next bulleted goal has an actionable goal addressing construction site erosion	PTM (prioritize, target, measure)	Goal #4 was included by mistake as identified and will be removed. Goal #1 has been redrafted in its new location as a District strategy to add more actionable activities. Goal #3 is intended to refer to non-natural or human-exacerbated erosion, and will be redrafted accordingly in its new location.	Yes
65		BWSR	74, 78	The groundwater goals could be more clearly tied to the Washington County 2025-2035 Groundwater Plan. On page 108 it is stated that the SWWD will remain an "active participant" with the county on this plan, so I would recommend making the associated goals more robust.	PTM (prioritize, target, measure)	SWWD appreciates this comment and will incorporate discussion of Washington County's groundwater plan and associated goals where appropriate.	Yes
66		BWSR	N/A	Goals and issues are not prioritized, at least in a clear way. There are different goals and actions that state that there will be identification actions for priority issues, there is talk of priority areas and waterbodies, and it is stated on page 80 that "the District takes seriously its general roles and responsibilities but tailors these programs to first address priority issues." Even with this statement, the actual priorities are not listed.	PTM (prioritize, target, measure)	SWWD views this plan as describing all activities we intend to pursue over the next 10 years. If an action is not a priority of the District, it is not included in the plan. Ranking the priority of specific goals or actions will handcuff the SWWD Board into predetermined annual budgets and is not recommended. However, we will include issue/strategy/goal prioritization similar to that contained in our current watershed plan.	Yes
67		BWSR	85	The second action on this page begins with "consider." I would refrain from beginning implementation actions with the word "consider." Reporting the progress of this action could be as simple and noncommittal as "during planning efforts we considered climate change adaptation." What does that mean? What can tangibly result from consideration that can be measured?	PTM (prioritize, target, measure)	Action item will be redrafted as follows (Goal 5.1.5.b): "Ensure climate change and adaptation opportunities are carefully considered as part of all District planning and project development efforts."	Yes

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68		BWSR	100-101	The action "work with municipalities... along the Mississippi River" is listed twice.	PTM (prioritize, target, measure)	The action is duplicated because it applies to both "East Mississippi Direct Drainage" and "Grey Cloud Slough and Mississippi River Pool 2 Direct Drainage" subsections. SWWD is reconsidering the structure of this section as relates to the Mississippi River and its backwater lakes based on other plan comments - these changes will address the duplication.	Yes
69		BWSR	101-102	The action "encourage implementation of agricultural conservation projects through partnerships and SWWD incentive program" is listed four times. Maybe pick a different place to put it?	PTM (prioritize, target, measure)	SWWD is reconsidering the structure of this section based on other plan comments - these changes will address the duplication of actions.	Yes
70		BWSR	101-102	The action "implement ravine stabilization... and other studies" is listed twice.	PTM (prioritize, target, measure)	SWWD is reconsidering the structure of this section based on other plan comments - these changes will address the duplication of actions.	Yes
71		BWSR	107	The action "implement flood damage... in completed studies" is listed twice.	PTM (prioritize, target, measure)	SWWD is reconsidering the structure of this section based on other plan comments - these changes will address the duplication of actions.	Yes
72		BWSR	125-126	The action under 3.9.7 is the same as the action under 3.9.5. Is there a good reason for having identical actions across areas in the plan? Won't this making reporting on plan progress difficult?	PTM (prioritize, target, measure)	SWWD is reconsidering the structure of this section based on other plan comments - these changes will address the duplication of actions.	Yes
73		BWSR	N/A	Overall, the goals and actions across the plan should have greater detail so that success or failure of the goals/actions are measurable. If possible, having quantifiable outputs will make measurement easier, but they should also be able to provide a meaningful description of progress (like water quality outcomes) that SWWD hopes to see in 10 years.	PTM (prioritize, target, measure)	SWWD acknowledges the need for additional detail in some areas, as noted. We intended for the actions to be the measurable pieces of plan implementation and anticipate that our updates per other plan comments will address this comment. Action items have been restructured into measurable goals in Part 3 of the plan.	Yes
74		BWSR	N/A	The section on Education & Outreach is detailed and robust. An email newsletter is mentioned. To be compliant with the referenced rule, it must stated that this newsletter or other forms of communication reach the residents of the WD at least annually.	PTM (prioritize, target, measure)	A goal has been added addressing this comment (3.9.3.b).	Yes
114		Washington County		In Part 3 of the plan, consider adding metrics to help measure progress, as well as additional details on timelines for implementing the outlined goals over the next ten years.	PTM (prioritize, target, measure)	We will review action items (goals, in the final draft plan) and add detail where necessary.	Yes
131		Washington County	Page 123	You may want to consider adding an action item focused on engaging underrepresented communities, potentially by collaborating with organizations that have established experience in this area.	PTM (prioritize, target, measure)	Agreed. An action item regarding previously unengaged communities will be added.	Yes
182	35 MDH		78	Suggest improving the goal for groundwater quality. Groundwater-surface water interactions are mostly natural processes and it seems like improving understanding, considering multiple benefits and/or unintended consequences of projects, etc. make more sense than trying to manage those natural processes. Consider if the goal could also tie more closely to the county groundwater plan, wellhead protection plans, and/or the Met Council water policy plan as well.	PTM (prioritize, target, measure)	We will consider these suggestions as we revise and finalize goals and actions in the final plan draft.	Yes