

**Appendix H Statutory
Reviewer Comments and
Responses**

06/03/2021 MWMO's Staff Response to Reviewer Comments Submitted Prior to and During the 60 Day Statutory Review Period

	Agency	Date Received	Statutory Reviewer Comment	MWMO's Staff Response to Comment
1	Minneapolis Park and Recreation Board (MPRB)	9/22/2020	MWMO has helped in the past with land acquisition related to stormwater facilities in parks. Specifically along the upper river, both North and NE area. MPRB hopes this support will continue.	We agreed matching MPRB funding for land acquisition within the MRCCA and other possible locations related to stormwater is something the MWMO plans to continue.
2	Minneapolis Park and Recreation Board (MPRB)	9/22/2020	During the Master Planning process, MPRB has started to lay out their implementation priorities. Discussed continuation of partnership for potential grants. MPRB mentioned MWMO had provided letters of support in the past for state grants.	MWMO is willing to continue to provide this support.
3	Minneapolis Park and Recreation Board (MPRB)	9/22/2020	MPRB is open to additional assistance in public engagement. MPRB mentioned that MWMO identifying specific engagement tools would be helpful. Thought the Columbia project went well with a quick tutorial on stormwater management.	MWMO is willing to continue to provide this support.
4	Minneapolis Park and Recreation Board (MPRB)	9/22/2020	MPRB mentioned their board has a lot of projects within different phases of their lifecycle. Provides an opportunity for partnerships on new projects. Good to start thinking of projects throughout their whole lifecycle and how they will be maintained in the future.	MWMO agrees it is important to consider low cost maintenance during design as well as who has the skills and resources to maintain them throughout their full lifecycle
5	Minneapolis Park and Recreation Board (MPRB)	9/22/2020	MPRB would like to know of any tools that are coming up with the HH modeling and ecosystem modeling to see where opportunities or gaps are occurring.	MWMO will share any related work we do in this area with MPRB
6	Minneapolis Park and Recreation Board (MPRB)	9/22/2020	MPRB would like to continue to work with MWMO on maintenance opportunities related to the complete lifecycle of the BMP as well as additional monitoring work.	MWMO is open to more discussions on how we can partner with MPRB on monitoring and maintenance in the projects we do with them.
7	Minneapolis Park and Recreation Board (MPRB)	9/30/2020	There was no explicit reference to equity or environmental justice in the plan goals or a framework to ensure that projects increase equity and address environmental justice within the watershed. As we complete our next decade of projects and partnerships, an end product should be that the watershed is not only cleaner and greener but also more equitable and just. Explicit statements and goals around equity allow for environmental justice to be taken into consideration when prioritizing projects for planning and funding.	See new content in Sections 2,5,6,7 Noted: Following the approval of this 10yr Plan the MWMO will begin a planning process specific to equity and climate change resulting in plans or policy guidance that encompass all aspects of our organization. This planning process will invite those who would be impacted by the plans to participate in the process of developing them. The MWMO considers equity and climate change as more comprehensive issues that will permeate throughout all aspects of the MWMO's organization and the work we do. As such, additional goals or strategies on these topics may be added to Table 27 as staff and the MWMO Board develop the plans and policies needed to fully address these topics.
8	Minneapolis Park and Recreation Board (MPRB)	9/30/2020	The goal focus areas do not mention or explain how the MWMO is responding to climate change. The water quality, volume, and the ecosystem health focus areas will all be intrinsically affected by climate change, and the plan could explicitly state how the MWMO is addressing this challenge in each of these areas.	See new content in Sections 2,3,4,5,6,7 The MWMO considers equity and climate change as more comprehensive issues that will permeate throughout all aspects of our organization and the work we do. As such, additional goals or strategies on these topics may be added to Table 27 as staff and the MWMO Board develop the plans and policies needed to fully address these topics. While the MWMO does not currently have a equity or climate change plan we have been providing significant staff time and resources on direct implementation efforts that will address these issues. The MWMO has been working directly with the MPRB planning and asset management departments since 2018 to implement a restorative development feasibility study, and a capital project that will directly address issues of inequity and climate change in the City. We would like to see more departments working with us on direct implementation of equity and climate change projects. In addition, we consider the impacts of climate change with most everything that we do. From our educational messaging, to plants we recommend for projects, to sizing of stormwater practices, we are constantly addressing climate change in our work.

9	Minneapolis Park and Recreation Board (MPRB)	9/30/2020	The intent of the emerging issue focus area is unclear. Many new water quality issues have emerged in the last decade and it is unclear how or if they will be addressed by MWMO. How will the MWMO address and prioritize issues like the multitude of emerging contaminants that have been identified in the last decade and the decade to come.	It is important to acknowledge that not all contaminants are currently regulated and when possible we would like to support the determination of guidelines with monitoring and other expertise. We will meet state guidelines and regulations as they are developed.
10	Minneapolis Park and Recreation Board (MPRB)	9/30/2020	How will MWMO create relationships with previously unreached audiences for education and outreach, and how will the MWMO incorporate the values of diverse citizens of the watershed into planning and projects?	See Section 2 "Community Conversations Initiative" See Section 5 and 7 for revised focus areas, and activity areas for Communications and Outreach. Activity areas, now explicitly call out a greater focus and prioritized engagement to BIPOC communities. Through our Outreach programs MWMO continues to do education and outreach activities that engage diverse community groups. We partner with the MPRB on summer jobs for youth via the Green Team; Our Stewardship Fund Grant Program continues to provide a diversity of organizations with expertise and funding that helps communities connect with water resources in the MWMO https://www.mwmo.org/news/east-side-neighborhood-services-youth-become-water-watchers/ and much more. See Stewardship Fund at MWMO.org
11	City of Fridley	9/22/2020	City council and manager have identified parks as a priority. The City is transitioning into park specific plans and prioritization with work to be done. MWMO could start planning on how to be a part of the work together	We will continue to work with Fridley and other member cities on planning for stormwater and habitat in parks or other redevelopment. These sort of efforts utilize staff areas of expertise in Watershed Assessments, Planning and CIP programs. MWMO has also identified parks as a focus for stormwater management opportunities. Will continue to work with the City to determine park needs.
12	City of Fridley	9/22/2020	Any incentive for current commercial/industrial properties to redevelop to incorporate stormwater management?	Yes potentially, depending on the size and nature of the project MWMO would handle these areas via CIP or Stewardship Fund grants or long range planning and watershed assessments. MWMO and Fridley can start conversations early on to help facilitate these projects - have conversations with landowners and starting the education long-term when they work with the MWMO. Fridley to highlight known areas of potential development.
13	City of Fridley	9/22/2020	Fridley wants to initiate a rate reflecting and promoting best practices, a study of what are good options for us would be very helpful. Basis, credits, adjustments. Make it simple enough to apply and explain/justify. Looking for MWMO assistance.	More information is needed however, this is the type of project the MWMO would evaluate and consider assisting with via the Watershed Assessments program.
14	City of Fridley	9/22/2020	Can MWMO assist the City with a vulnerability assessment tied to recommended modeling, building elevation, impervious surface, and other requirements that will inform legislation and capital planning to minimize impacts?	More information is needed however, this is the type of project the MWMO would evaluate and consider assisting with via the Watershed Assessments program.
15	City of Fridley	9/22/2020	Can MWMO provide a regular (annual?) review of monitoring results, discussing interpretation of results. Look for opportunities to partner in monitoring and data collection. Enhancing our stormwater vocabulary, understanding what furthers our water quality mission. Perhaps this could be integrated into MS4 annual report.	Our Monitoring team will work with Fridley on these needs.
16	City of Fridley	9/22/2020	Team partnerships - Green Team expansion into Fridley, including recruitment of Fridley students/residents. A complete crew with training and supervision would best work for us. Apply these resources to assist in structured improvement and/or specific maintenance projects with City planning/direction and materials/tools.	Our outreach team will reach out to Fridley on this request.
17	City of Fridley	9/22/2020	Is there interest in providing an "outdoor classroom" for education on construction stormwater mitigation and BMP testing/implementation in Fridley? Paired with University of MN SWPPP training? Fridley is interested in a more hands-on learning approach	Our outreach team will reach out to Fridley on this request.
18	City of Fridley	9/22/2020	Is there interest in preserving specific wetlands/green spaces and if so, how do we identify? Is there a role for the MWMO?	Yes this is an interest of the MWMO. We have an existing historic waters study of Fridley that can provide some initial insight of past natural systems. The MWMO will also be developing a comprehensive habitat plan for the watershed. The work Fridley is considering could provide a good basis to start from.

19	City of Minneapolis	9/25/2020	Has MWMO developed a more in-depth study on more diverse public engagement? Citizen Advisory Committee or Stakeholder Engagement Plan? Will you be updating the goals of the plan for stakeholder engagement and getting more diverse public input?	<p>For the plan process see: Section 2, Plan Comment and Review Opportunities. Currently the MWMO does not have a more in-depth study on more diverse public engagement. See 2.6 for Citizen Advisory Committee See Executive summary for MWMO's Community Conversations initiative We do not have a single stakeholder engagement plan. For projects the MWMO works through our member cities and developers to engage the community. For future projects, the MWMO may include minimum requirements for community engagement that project partners must achieve in order to receive expertise and funding support from the MWMO.</p> <p>Following the approval of this 10yr Plan the MWMO will begin a planning process specific to equity and climate change resulting in plans or policy guidance that encompass all aspects of our organization. This planning process will invite those who would be impacted by the plans to participate in the process of developing them.</p> <p>The MWMO considers equity and climate change as more comprehensive issues that will permeate throughout all aspects of the MWMO's organization and the work we do. As such, additional goals or strategies on these topics may be added to Table 27 as staff and the MWMO Board develop the plans and policies needed to fully address these topics.</p>
20	City of Minneapolis	9/25/2020	The City would like to see a focus on climate change and resiliency in the plan update. These topics are a focus for Minneapolis, specifically localized flooding. Suggest MWMO consider other types of projects to fund, not just those for water quality or habitat benefits. Should consider innovative strategies for flood mitigation for project partnering.	MWMO has identified climate change in Section 4.5.1 Climate and Precipitation and has added additional content on climate change in Sections 2, 5, 6, 7 Although it currently is not a stand alone focus area, we consider the impacts of climate change with most everything that we do. From our educational messaging, to plants we recommend for projects, to sizing of stormwater practices, we are constantly addressing climate change with all of our work.
21	City of Minneapolis	9/25/2020	Consider a Technical Advisory Committee to gather input from multiple agencies and discuss focus topics.	MWMO reached out to all agencies for input on TAC process. No other reviewers voiced a similar request to pull multiple reviewers together in discussions. Others were ok with meeting individually with MWMO staff to resolve issues specific to their organizations. There was little interest in convening a large group. BWSR accepted MWMO's proposal to hold individual meetings with interested agencies prior to the 60 day release, and we are offering individual meetings with review agencies again before the 90 day release if there are still unresolved comments. If multiple entities want to meet on a specific set of topics they can let us know and we will arrange it.
22	City of Minneapolis	9/25/2020	The City values previous work with MWMO, especially outreach activities. Would like to see this continue and to build on this area.	See section 7: The MWMO will continue to work with our member cities on outreach.
23	City of Minneapolis	9/25/2020	Continue to look at strategies and ways to partner for BMP maintenance, specifically on newer types of BMPs. This is currently a challenge for Minneapolis.	MWMO has started to monitor performance of BMPs, and has kept track of maintenance work and costs for many capital projects. We are willing to continue to work with Minneapolis on maintenance related to district and regional systems. We are tracking all past CIP and grant projects, and are working with MPRB and Minneapolis on a green infrastructure youth jobs and maintenance initiatives. We will continue this work in Minneapolis and within other member communities in other parts of the watershed.
24	City of Minneapolis	9/25/2020	Groundwater topics often falls into the gaps. Where is the MWMO in the planning process to address groundwater concerns?	The MWMO references regional studies to understand how groundwater may impact a given planning initiative and related specific project site. On site groundwater investigations are completed for MWMO capital projects. The MWMO carries out desktop and field studies on groundwater and as well as references resources like the upcoming DNR's Ground Water Atlas - Part B to help us continue to determine the viability of infiltration within the watershed
25	City of Minneapolis	9/25/2020	Equity - Additional discussions should be added in the plan and equity must be a priority.	Additional content on equity has been added to sections 2,5,6,7
26	City of Minneapolis	9/25/2020	Has the MWMO been tracking demographics with current public responses/comments to the plan?	Survey requested zip code but not ethnicity
27	City of Minneapolis	9/25/2020	Discussed the idea of MWMO creating their own watershed wide public engagement plan or using the City's. Minneapolis suggested that equitable public engagement should at least be added to the MWMO goals with a data set to support it.	See Section 3.6 MWMO Capital Project Funding For projects the MWMO works through our member cities and developers to engage the community. For future projects, the MWMO may include minimum requirements for community engagement that project partners must achieve in order to receive expertise and funding support from the MWMO.

28	City of Minneapolis	9/30/2020	The MWMO should complete, or provide to stakeholders if it has been completed, a gaps-analysis to evaluate the successes and limitations of the past 10-year plan. What has worked well for the Organization, what has been less successful, what are the lessons learned, etc. Without this reflection it is difficult to understand the appropriate direction the WMO is proposing.	See Section 2 "Where We Have Been and Where we are Going" The general conclusion of BWSR's 2018 Performance Review and Assistance Program "The Mississippi WMO has a good record of accomplishment in implementation of their water management plan. The organization has demonstrated how a systematic approach to water management can be delivered. The WMO's compliance with the BWSR performance standards applicable to WMOs means they are, for the most part, meeting the essential administrative, planning and communication practices. The WMO's partners reinforce these conclusions in their strong marks for communication, quality of work, initiative, follow-through and relations with customers."
29	City of Minneapolis	9/30/2020	The goals and policies section, Section 5, describes a public and stakeholder engagement process. If this section is describing the work that was done as part of the previous plan development that should be made clear.	See Section 5: Based on the public comments received between 2019 and 2021 the existing focus statements remain relevant.
30	City of Minneapolis	9/30/2020	In Section 5 there is no update to focus areas or goals. This leaves out significant issues that have arisen in the past 10-years including climate change, resiliency, green infrastructure, equity, and maintenance. These areas are critical for an updated plan to address: - Climate Change – understanding and responding to climate change and the impacts on water resources and habitat - Resiliency – the impacts will be felt by systems, including increased flooding, heat island impacts, invasive species, and contaminants of emerging concern - Green infrastructure – capturing the rain drop where it lands. This is not a new concept but if supporting this as an initiative is a priority for the Organization it should be addressed - Equity and social justice – MWMO encompasses many areas of concentrated poverty and BIPOC communities. How were these communities engaged in the plan development process and how will these communities be served by the updated plan. Environmental justice is critical for moving everyone forward, not just	See Section 5: Based on the public comments received between 2019 and 2021 the existing focus statements remain relevant. With the caveat that rather than try to narrow the more comprehensive issues of equity and climate change into a single focus area the MWMO sees these issues permeating throughout all aspects of our organization and the work we do. As such, these topics are addressed under many of the focus areas' challenges section.
31		9/30/2020	We believe that the stakeholder engagement process has been insufficient to date... A stakeholder process with JPA cities and stakeholders like MnDOT and the MPRB should be implemented.	MWMO reached out to all agencies for input on TAC process. No other reviewers voiced a similar request to pull multiple reviewers together in discussions. Others were ok with meeting individually with MWMO staff to resolve issues specific to their organizations. There was little interest in convening a large group. BWSR accepted MWMO's proposal to hold individual meetings with interested agencies prior to the 60 day release, and we are offering individual meetings with review agencies again before the 90 day release if there are still unresolved comments. If multiple entities want to meet on a specific set of topics they can let us know and we will arrange it.
32	City of Minneapolis	12/17/2020	The MWMO's Watershed Management Plan calls for focusing more resources on an organizational equity strategy and reducing the impacts of climate change. While these are listed as important factors in the narrative of the Plan there is little evidence of that in the focus areas, goals, or implementation strategies laid out in the Plan. These are significant issues that will need to drive decision-making into the next decade and the absence is noticeable. Please provide additional details on how the WMO sees equity and climate change influencing focus areas and MWMO goals and implementation actions.	See new content in Sections 2,3,4,5,6,7 The MWMO considers equity and climate change as more comprehensive issues that will permeate throughout all aspects of our organization and the work we do. As such, additional goals or strategies on these topics may be added to Table 27 as staff and the MWMO Board develop the plans and policies needed to fully address these topics. While the MWMO does not currently have an equity or climate change plan we have been providing significant staff time and resources on direct implementation efforts that will address these issues. The MWMO has been working directly with a few Minneapolis departments since 2016 to implement a restorative development feasibility study, and a capital project that will directly address issues of inequity and climate change in the City. We would like to see more City departments work with us on direct implementation of equity and climate change projects. In addition, we consider the impacts of climate change with most everything that we do. From our educational messaging, to plants we recommend for projects, to sizing of stormwater practices, we are constantly addressing climate change in our work.
33	City of Minneapolis	12/17/2020	There is a significant amount of information in the Plan that has not been updated from the MWMO's 2011-2021 Watershed Management Plan. There are numerous inaccuracies and outdated information that should be reviewed and updated. These inaccuracies have been called out where they were recognized but there may be others that were not identified. MWMO staff should complete a full review and update of the Plan to ensure that the most accurate and up-to-date information is presented to the public and is guiding decisionmaking in the watershed. The City of Minneapolis Water Resources Management Plan was sent to the WMO on August 1, 2019 to assist with the Plan development and it can be found at: http://www2.minneapolismn.gov/publicworks/stormwater/stormwater_local-surface	Updates have been made to sections using Mpls data, including maps, water resource data, flood areas, etc.
34	City of Minneapolis	12/17/2020	The City of Minneapolis and the MPRB submitted preliminary comments on the draft plan. Please provide documentation on how those comments were received and incorporated into this draft of the Plan.	All comments received preliminary or from the 60 day review are addressed in this response to comments workbook. If anything has been missed we can address it in our meeting with Minneapolis or any of the other review agencies.

35	City of Minneapolis	12/17/2020	Please ensure that a comprehensive response to comments document is released to all stakeholders to facilitate understanding of how all of our comments have been addressed or are being met within the Plan.	Noted: all predraft and 60 comments and responses are in this document; original letters and emailed comments along with document will be in the appendix of the final plan.
36	City of Minneapolis	12/17/2020	Please clarify the sources and dates for the data incorporated into the Plan figures.	A PDF of sources used and figures updated was included with this response to comments document. This source information will be included at the end of the plan for the 90 day release
37	City of Minneapolis	12/17/2020	2.0 Executive Summary <i>Comments received from the public (Appendix G) during the 10-year plan update are the basis for the focus areas and focus statements, which continue to guide the development and implementation of MWMO's goals and strategies.</i> - With comments and feedback from the public forming the basis for the focus areas and focus statements that guide the development and implementation of MWMO's goals and strategies how has the watershed reached out to BIPOC communities to ensure that their comments and concerns are being addressed. Please provide the WMO's public engagement plan as it relates to these audiences.	Section 2, Plan Comment and Review Opportunities. The MWMO reached as many audiences we could with the tools we have available. As stated, a survey was our primary tool for gathering information from the general public. We used a variety of outlets to try to reach as broad of an audience as possible regarding the survey and direct feedback. We utilized outreach events, and capital project meetings to talk with people about the plan; newsletter releases; website notices; govdelivery email releases; and mailings were sent out to all neighborhood organizations announcing the plan update and the survey opportunity. These efforts started in the summer of 2019 and ended in March of 2021. In addition we opened up the 60 statutory review period to the general public and a public hearing will be held at the MWMO's July Board meeting.
38	City of Minneapolis	12/17/2020	2.0 Executive Summary Public comments were gathered through an extensive watershed survey effort. - Please describe this survey effort; avenues for distribution, community partners, dialogue partners, details on outreach events such as schedule, location, and target audience.	Section 2, Plan Comment and Review Opportunities. The MWMO reached as many audiences we could with the tools we have available. As stated, a survey was our primary tool for gathering information from the general public. We used a variety of outlets to try to reach as broad of an audience as possible regarding the survey and direct feedback. We utilized outreach events, and capital project meetings to talk with people about the plan; newsletter releases; website notices; govdelivery email releases; and mailings were sent out to all neighborhood organizations announcing the plan update and the survey opportunity. These efforts started in the summer of 2019 and ended in March of 2021. In addition we opened up the 60 statutory review period to the general public and a public hearing will be held at the MWMO's July Board meeting.
39	City of Minneapolis	12/17/2020	2.0 Executive Summary <i>The MWMO set aside a two-week pre-draft review period and the 60-day review period to meet with statutory reviewers on an individual basis to ensure reviewers have as much time as needed to clarify and questions or resolve any priority issues.</i> - Please describe how these meetings with stakeholders and statutory reviewers were used to influence the current Plan contents.	All comments received preliminary or from the 60 day review are addressed in this response to comments workbook as well as in new content added into the plan.
40	City of Minneapolis	12/17/2020	2.0 Executive Summary <i>The team now monitors the river bathymetry to track the impact of no dredging on river morphology.</i> This is fascinating information. How will this tracking be reported to the public and/or member organizations and other stakeholders like the MPCA, DNR, and Army Corps of Engineers?	Information on our monitoring program and their findings shared with the general public, private and governmental entities via our website. Udai Singh USingh@mwmo.org or one of his staff will follow up on specific requests for information and coordinate monitoring activities with other organizations. https://www.mwmo.org/monitoring-and-reports/water-quality-monitoring/mississippi-river-monitoring/
41	City of Minneapolis	12/17/2020	2.7 Focus Areas How are response to climate change, climate resiliency, and equity being addressed within these focus areas?	See Section 5: Based on the public comments received between 2019 and 2021 the existing focus statements remain relevant. With the caveat that rather than try to narrow the more comprehensive issues of equity and climate change into a single focus area the MWMO sees these issues permeating throughout all aspects of our organization and the work we do. As such, these topics are addressed under many of the focus areas' challenges section.
42	City of Minneapolis	12/17/2020	2.7 Focus Areas: Communications and Outreach Focus Area Are there specific initiatives towards increasing communication and outreach with BIPOC communities? This should be it's own goal within this Focus Area if it is a priority	See Section 5 and 7 for revised focus areas, and activity areas for Communications and Outreach. Activity areas, now explicitly call out a greater focus and prioritized engagement to BIPOC communities.
43	City of Minneapolis	12/17/2020	2.7 Focus Areas: Ecosystem Health Focus Area The effects of climate change include an increase in invasive flora and fauna. This is a significant driver in ecosystem health and is not reflected in the goals here.	Updates have been made to the section 5.5 Ecosystem Health focus area, as well as the implementation table to reflect climate change considerations including invasive flora.

44	City of Minneapolis	12/17/2020	<p>3.0 Member Authorities and Responsibilities <i>The MWMO's volume control standards ... and are consistent with the Minnesota Pollution Control Agency's Construction Stormwater Permit volume control requirements.</i> - This is not precisely accurate. The MPCA's General Construction Stormwater Permit only requires permanent stormwater management and volume control if there has been a net increase of 1 acre of impervious surface on the project. While the MWMO's standards may be the same as the GCP the triggers are not the same. Please clarify your language accordingly.</p>	This is general language in the introduction and is appropriate for this section of the plan. The actual trigger and standard in the plan is stated very clearly. No change was made.
45	City of Minneapolis	12/17/2020	<p>3.0 Member Authorities and Responsibilities <i>Although triggers vary, the MWMO is surrounded by watershed organizations that require retaining approximately the first 1 inch of runoff onsite. These currently include the Capitol Region Watershed District, the Minnehaha Creek Watershed District, the Rice Creek Watershed District, the Coon Creek Watershed District, the Shingle Creek Watershed Management Commission, and the Bassett Creek Watershed Management Commission. In addition, the MWMO's volume standard is in line with the Minnesota Pollution Control Agency's current Construction Stormwater Permit requirements of retaining 1-inch volume onsite. This is a requirement that all MS4s must meet.</i> - As mentioned in the previous comment, the standard may be the same but the trigger is not. And the General Construction permit doesn't just apply to MS4s it applies to all construction projects that disturb more than one acre, regardless of jurisdiction. conflating these two different NPDES permits is confusing two different permit programs within the NPDES regulatory umbrella. Precision and clarity within a regulatory document are important.</p>	The actual trigger and standard in the plan is stated very clearly. No change was made.
46	City of Minneapolis	12/17/2020	<p>3.0 Member Authorities and Responsibilities 3.1.2 <i>Limiting Costs of Stormwater Treatment</i> - This section is very vague. Does the MWMO have a plan to implement this? Are there any concrete numbers or directions towards understanding what the limitations of cost should be on projects? Is there going to be a future study into this area? There is no direction on how this information will be used when implementing WMO rules and regulations.</p>	To date, the MWMO has not implemented this concept, and has continued to work with landowners on what is seen as the most cost effective solution to achieve MWMO standards for a site. We also have an alternative design sequence flow chart for developers to follow. We are keeping the language as it provides direction on what we may do when other options are exhausted.
47	City of Minneapolis	12/17/2020	<p>3.0 Member Authorities and Responsibilities 2. <i>Rate control: Runoff rates for the proposed activity shall meet the member cities and MS4 runoff rate control requirements.</i> - The MS4 General Permit and the Phase I MS4 permit held by the City of Minneapolis do not have rate control requirements.</p>	It is up to member cities and MS4s to set their runoff rate control requirements. The MWMO does not have rate control standards we expect cities to adopt and enforce. We do have a water quality/volume control standard that every city within the watershed has adopted, We anticipate that Minneapolis will be enforcing an equivalent volume standard when ordinance update goes into affect in January 2022.
48	City of Minneapolis	12/17/2020	<p>3.0 Member Authorities and Responsibilities <i>The Minnesota Department of Transportation (MnDOT) must operate in compliance with the MWMO's Standards within the same timeframe as MWMO's member cities.</i> - As MnDOT is not a member of the MWMO and MWMO does not have formal permit authority how will the Organization's standards be enforced with those projects?</p>	It is our understanding that MNDOT has stated the City cannot regulate them but MNDOT is subject to our Watershed Standards. The MWMO reviews MNDOT projects within the watershed to assure they are compliant with our Standards.

49	City of Minneapolis	12/17/2020	<p>3.0 Member Authorities and Responsibilities</p> <p><i>c. Inspection and maintenance plans (wet ponds, infiltration basins, raingardens, storm sewer systems, etc.)</i></p> <p>- Please clarify what the Organization is seeking with this requirement. All stormwater management facilities have individual O&M plans associated with them. Is the Organization looking to receive a copy of all of them or is it looking to receive a template based on the Facility type?</p>	<p>Member Cities need to have their records on hand and updated as needed.</p> <p>These topics need to be addressed in Member Cities Local Water Plans. See Table 6: Local Water Plan Content Requirements</p> <p>7. Provide a summary of the member organization's Storm Water Pollution Prevention Program and conformance with the requirements of the Environmental Protection Agency's National Pollutant Discharge Elimination System (NPDES) for municipal separate storm sewer systems (MS4s) or summarize relevant plans and programs of the member organization that address:</p> <p>a. Inspection and maintenance plans (wet ponds, infiltration basins, raingardens, storm sewer systems, etc.) b. Street sweeping, right-of-way maintenance, road icing, salt storage, snow plowing, and snow storage programs</p> <p>c. Spill response and containment plans</p> <p>d. Identify who (e.g. private, city, state entities) is responsible for inspection, operation, and maintenance of all storm water infrastructure, public works facilities, and natural and artificial watercourses within in the MWMO's city boundaries.</p>
50	City of Minneapolis	12/17/2020	<p>3.0 Member Authorities and Responsibilities</p> <p><i>e. Spill response and containment plans</i></p> <p>- Please clarify for what facilities, properties, and activities the Organization would like spill response plans for. Is this a requirement of member cities or will cities be required to solicit this information from private properties?</p>	See prior response
51	City of Minneapolis	12/17/2020	<p>3.0 Member Authorities and Responsibilities</p> <p><i>h. Describe how the city will comply with County groundwater plan requirements</i></p> <p>- Hennepin County does not have a formally adopted Groundwater Plan. Please clarify this requirement in light of no formal document within the City.</p>	If the County does not have an adopted plan The City should explain what actions if any, they will take related to managing groundwater
52	City of Minneapolis	12/17/2020	<p>4.0 MWMO Resource Inventory</p> <p><i>4.2.4 Soils</i></p> <p>- One area where the MWMO may be able to assist the City is with soil mapping. the City has a vast inventory of data and underground mapping dating back to the original installation of city sanitary infrastructure in the early 1900s. This mapping includes detailed information on soils but it has not be digitized and applied to larger areas. There is a need to take this data and use it to create a more accurate and comprehensive understanding of underground conditions that would expand our current understanding of "urban soils."</p>	<p>Our Historic Waters Study from 2008 used the City's historic soil plat maps extensively in our research to detail soil data from pre-settlement conditions. This study georeferenced this information to present day locations in the watershed. Recreating a historic record of soils, vegetation, recharge and discharge areas throughout the watershed. The MWMO has been using this study to inform our planning assumptions for restoration should occur in the watershed.</p> <p>https://www.mwmo.org/monitoring-and-reports/watershed-assessment/historic-waters-of-the-mississippi-watershed-management-organization/</p>
53	City of Minneapolis	12/17/2020	<p>4.0 MWMO Resource Inventory</p> <p><i>The Hmong community served as a pilot group for this thorough cultural analysis with respect to water resources management. The information in the report informs the design and implementation of focused stewardship campaigns about water. The MWMO and its partners may repeat and adapt this approach for other communities in the MWMO.</i></p> <p>- The MWMO completed it's work with Hmong community over 13 years ago. Is there realistically any intention of repeating and adapting that approach for other communities in the MWMO? If so please describe how the insights gained from this cultural analysis have influenced MWMO education and outreach activities and engagement with other diverse community groups.</p>	Yes through our Outreach programs MWMO continues to do education and outreach activities that engage diverse community groups. We partner with the MPRB on summer jobs for youth via the Green Team; Our Stewardship Fund Grant Program continues to provide a diversity of organizations with expertise and funding that helps communities connect with water resources in the MWMO https://www.mwmo.org/news/east-side-neighborhood-services-youth-become-water-watchers/ and much more. See Stewardship Fund at MWMO.org
54	City of Minneapolis	12/17/2020	<p>4.0 MWMO Resource Inventory</p> <p><i>4.4.5 Redevelopment Opportunities</i></p> <p>- While the City has identified areas that are likely to redevelop and experience significant shifts in land use there is no way for the city to predict when these changes will occur and when developers and developments will be brought forward in the Planning process. Involving the MWMO "early" in the process may not be possible due to the timing of development submittal and regulatory requirements around timelines and City approvals.</p>	We don't agree that there is nothing the City can do to get out ahead of the social, environmental, and economic issues related to the redevelopment process and advance planning that leads up to it. We would appreciate the chance to further discuss this with the City.
55	City of Minneapolis	12/17/2020	<p>4.0 MWMO Resource Inventory</p> <p><i>4.4.6 Surface and Groundwater Appropriations Currently there is not permitting in place for appropriations that draw less than 10,00 gallons per day or 1 million gallons per year.</i></p> <p>- There is not permitting in place at the state level for addressing groundwater appropriations of less than 10,000 gallons per day or 1 MGY. However there are many watershed management organizations that have established this permitting. Does the MWMO have any intention of taking on this permitting role?</p>	The MWMO is a non-regulatory/permitting entity with only a few public waters basins, all of which are surround by public land with potable water sources. As such, setting up a permit program and having the city set up a complementary enforcement program that would not be used does not seem to be an appropriate use of public funds.
56	City of Minneapolis	12/17/2020	<p>4.0 MWMO Resource Inventory</p> <p><i>4.4.8 Potential Environmental Hazards MS4s are defined by the Minnesota Pollution Control Agency (MPCA) as conveyance systems owned or operated by an entity such as a state, city, town, county, district, or other public body having jurisdiction over disposal of stormwater or other wastes.</i></p> <p>- This definition is not consistent with the MPCA's definition. There is no provision for disposal of "other waste" as you have in your definition. MS4s are only regulated to discharge stormwater and authorized non-stormwater discharges, none of which are "wastes". Please update this language for clarity.</p>	MWMO has updated plan language to reflect "and authorized non-stormwater discharges".

57	City of Minneapolis	12/17/2020	4.0 MWMO Resource Inventory <i>Permit Holder and Permit ID</i> - The correct permit number for the City of Saint Paul is MN0061263	St. Paul permit number has been updated, thank you.
58	City of Minneapolis	12/17/2020	4.0 MWMO Resource Inventory <i>Figure 40</i> - Please provide the source and date for this information presented in this figure.	We updated the data and map with most recently released information. (MPCA industrial stormwater permit sites, 2014.)
59	City of Minneapolis	12/17/2020	4.0 MWMO Resource Inventory <i>Impacts to Water Resource: Changes to availability of Drinking Water Supplies, Water air temperature</i> - Can you clarify what this means. I am unfamiliar with this term, or it is a typo.	Corrected to read "water temperature"
60	City of Minneapolis	12/17/2020	4.0 MWMO Resource Inventory <i>Water Boundary Movement and Displacement: Decreased Groundwater Recharge</i> - It is interesting that this is listed as an issue after the past few years have seen unprecedentedly high groundwater levels that are having affects on property owners and on lake levels.	No Change Made. There is much to be learned about the specific cyclical nature of groundwater recharge. Avoiding the reduction of recharge areas in a fully developed urban area is important to maintaining groundwater supplies over the long term.
61	City of Minneapolis	12/17/2020	4.0 MWMO Resource Inventory <i>Based on the study, the Combined Sewer Overflow (CSO) Program requires the removal of both public and private stormwater inflows to the sanitary sewer system. The Program's 2009 report of 2008 activities reports zero CSO events within the city of Minneapolis in 2007 and 2008. However, eight potential CSO discharge locations still remain. The elimination of all potential CSO discharge locations may not be feasible in every case without causing a public health or safety hazard. However, additional Program activities (including rain leader inspection and infiltration and inflow reductions) are being undertaken to reduce the volume of stormwater flows to the sanitary system. The city of Minneapolis and the Metropolitan Council continue to operate under the expired permit, which includes recording and data requirements for all CSO events as well as maintaining operation and maintenance data for CSO events and elimination efforts.</i> - his information needs to be updated and corrected. Please see the City's WRMP , Chapter 4 for correct information-7 CSO regulators-there have been no CSO discharges to the River since 2006 that were caused by rainfall events. -The joint Met Council/City of Mpls CSO permit was terminated in 2018.	See section 4.52 ...Revised plan language reflects the City's WRMP .
62	City of Minneapolis	12/17/2020	4.0 MWMO Resource Inventory <i>Metropolitan Council Surcharge Program</i> - Please review the information in this section. It does not appear to have been updated from the 2011-2021 MWMO Plan and is not current.	Revised and updated.
63	City of Minneapolis	12/17/2020	4.0 MWMO Resource Inventory <i>The City of Minneapolis Local Surface Water Management Plan identifies in its Figure 4-6 the location and status of known flood areas (City of Minneapolis, 2006). The Local Surface Water Management Plan indicates that the following projects are completed or were under construction at that time (City of Minneapolis, 2006)</i> - Please update this information to reflect the City's 2018 Water Resources Management Plan; the information presented in this section is out of date.	Revised and updated information to reflect the City's 2018 Water Resources Management Plan. Removed Figure 48 flood areas and updated language in this section to reflect Mpls WRMP.
64	City of Minneapolis	12/17/2020	4.0 MWMO Resource Inventory <i>4.5.5 Floodplain and Shoreland</i> - There should be some mention of the Mississippi River Critical Corridor rules and how they impact all communities that lay along the River.	See Section 4.5.5 for updated content on Shoreland Management, MRCCA and Buffer Law. As a part of our plan update, the MWMO is developing web based guidance on with the current status of our Member cities plans / ordinances for the MRCCA. The link will be inserted in the final Plan.
65	City of Minneapolis	12/17/2020	4.0 MWMO Resource Inventory <i>The most recent FIRM update in the Twin Cities metropolitan area was September 2, 2004.</i> - This is incorrect. The most recent FIRM updates in the Twin Cites were in 2016.	Updated to 2016
66	City of Minneapolis	12/17/2020	5.0 Watershed Issues, Goals, and Strategies <i>Ten watershed focus areas</i> It is surprising that Climate Resiliency is not considered significant enough to include as a focus area. Can the MWMO indicate how they will be measuring response to climate change and resiliency within their Plan goals?	See new content in Sections 2,3,4,5,6,7 The MWMO considers equity and climate change as more comprehensive issues that will permeate throughout all aspects of our organization and the work we do. As such, additional goals or strategies on these topics may be added to Table 27 as staff and the MWMO Board develop the plans and policies needed to fully address these topics. While the MWMO does not currently have a equity or climate change plan we have been providing significant staff time and resources on direct implementation efforts that will address these issues. The MWMO has been working directly with a few Minneapolis departments since 2016 to implement a restorative development feasibility study, and a capital project that will directly address issues of inequity and climate change in the City. We would like to see more City departments work with us on direct implementation of equity and climate change projects. In addition, we consider the impacts of climate change with most everything that we do. From our educational messaging, to plants we recommend for projects, to sizing of stormwater practices, we are constantly addressing climate change in our work. We use Atlas 14, we consider incorporation of climate resilient trees in our habitat restorations, like sycamore. We look to retain as much runoff on site as possible. We always try to include pretreatment devices that dissipate flow before entering BMPs, as we know rains are becoming more and more flashy.

67	City of Minneapolis	12/17/2020	<p>5.0 Watershed Issues, Goals, and Strategies</p> <p>5.4 Focus Area: <i>Communications and Outreach</i></p> <p>- There needs to be a more direct focus on engaging BIPOC communities in the WMO. These communities need to be reflected in the decision making in the Organization. The MWMO should look at additional equity initiatives to ensure that all residents of the watershed are included in outreach messaging and invitations to decision making.</p>	<p>See Executive summary for MWMO's "Community Conversations initiative"</p> <p>We do not have a single stakeholder engagement plan. For projects the MWMO works through our member cities and developers to engage the community. For future projects, the MWMO may include minimum requirements for community engagement that project partners must achieve in order to receive expertise and funding support from the MWMO.</p> <p>Following the approval of this 10yr Plan the MWMO will begin a planning process specific to equity and climate change resulting in plans or policy guidance that encompass all aspects of our organization. This planning process will invite those who would be impacted by the plans to participate in the process of developing them.</p> <p>We are creating a specific district stormwater project engagement plan for the Upper Harbor Terminal project, where North Minneapolis and BIPOC communities can be directly engaged in informing future decisions.</p>
68	City of Minneapolis	12/17/2020	<p>5.0 Watershed Issues, Goals, and Strategies</p> <p>5.4 Focus Area: <i>Communications and Outreach</i></p> <p>- The Organization should include an equity metric to determine how well they are reaching disadvantaged communities and those with diverse backgrounds. Relying on existing participants in MWMO activities will miss the opportunity to engage others that would otherwise not have a seat at the table.</p>	<p>Following the approval of this 10yr Plan the MWMO will begin a planning process specific to equity and climate change resulting in plans or policy guidance that encompass all aspects of our organization. This planning process will invite those who would be impacted by the plans to participate in the process of developing them.</p> <p>The MWMO considers equity and climate change as more comprehensive issues that will permeate throughout all aspects of our organization and the work we do. As such, additional goals or strategies on these topics may be added to Table 27 as staff and the MWMO Board develop the plans and policies needed to fully address these topics.</p>
69	City of Minneapolis	12/17/2020	<p>6.0 MWMO Financials</p> <p><i>MWMO Capital Improvement Projects: Greening in the Public Right of Way</i></p> <p>- Thank you for continuing this program. This led to the successful completion of several projects and we anticipate more projects being developed and implemented.</p>	<p>We intend to continue the Greening in the ROW program, and look forward to future discussions and project opportunities to further integrate green infrastructure, stormwater management, and habitat restoration within the ROW with our member communities.</p>
70	City of Minneapolis	12/17/2020	<p>6.0 MWMO Financials</p> <p><i>Table 27</i></p> <p>- Please clarify meaning of abbreviations.</p>	<p>See updated content Section 6.2 Layout and Content Guidance on Table 27</p>
71	Conservation District	9/24/2019	<p>Promoting riverbank and green infrastructure cost share programs.</p>	<p>Providing funding for feasibility studies, riverbank restoration and green infrastructure, at all scales continues to be a central part of MWMO's Plan .</p> <p>The following request is addressed in the plan Sections mentioned below.</p> <p>See section 5.0 for annual meeting with partners to discuss upcoming CIP schedules</p> <p>See Section 7.1 : Watershed Assessments</p> <p>MWMO's work planning and funding activities are guided on an annual basis by the Plan and MWMO Board. As an example Section 6.1 MWMO's Capital Improvement Schedule has many projects that include green infrastructure.</p> <p>See Section 6 Focus area and statement in Table 27: Ecosystem Health (EH) EH 1 Protect, create, and enhance vegetated areas, springs, native plant communities, habitat, open space, and green infrastructure. These strategies allow for a continuum of related green infrastructure activities.</p> <p>See section 3.6 MWMO Capital Project Funding Natural Resource-Oriented Land Management and Ecological Restoration: The MWMO wants to support the restoration of diverse and functional natural landscapes, enhance areas of biological significance, or protect rare or endangered species. The MWMO seeks projects that are aligned with long-term planning and management efforts to create more connected landscapes, reduce habitat fragmentation, and enhance habitat complexity.</p>
72	Conservation District	9/24/2019	<p>Continue to find cost effective stormwater management at all scales.</p>	
73	Anoka Conservation District	9/24/2019	<p>Use of data to guide long-term management, including continuing to fund stormwater retrofit analyses to identify cost effective practices that could lead to implementation within Anoka County.</p>	
74	BWSR	9/24/2019	<p>Prioritized Implementation Program (Capital Improvement Program). The implementation program should be clear in identifying what implementation actions the MWMO will accomplish in the next ten years regardless of whether or not they receive any new grant funding.</p>	<p>See Table 26: MWMO Capital Improvement Schedule 2021 to 2026</p> <p>The implementation actions shown in Table 26 for the next 5 years are not depended on MWMO's receipt of grant funding.</p> <p>However, this implementation program is depended on the readiness of the partners identified, any feasibility studies that will proceed each project, and assurances that partners funding not related to MWMO's estimated costs is secured.</p>

			See 7.1 MWMO Project Expertise and Services All projects undertaken and services provided have an evaluation component. Evaluations measure the impact of MWMO's efforts and are a critical part of improving its projects and activities. Evaluations clearly state objectives, measure results, and serve as a valuable tool in documenting the success of the MWMO's implementation plan. The MWMO includes results of the evaluations as part of its annual reporting and financial summary submitted to BWSR.
75		9/24/2019	Procedure to evaluate progress for implementation activities at a minimum of every two years.
76		9/24/2019	Define process for evaluating implementation of local water plans.
77	BWSR	9/24/2019	Define who is responsible for inspection, operation and maintenance of stormwater facilities in the MWMO.
78	BWSR	9/24/2019	If the MWMO has or proposes an incentive type program it needs to be defined in the plan (the plan can also include a reference to MWMO website for more detailed information on the program).
79	BWSR	9/24/2019	Continue to utilize information from State studies developed for the Mississippi River – Twin Cities HUC-8 including TMDLs and WRAPS to drive implementation programs and targeting.
80	BWSR	9/24/2019	The MWMO should include a reference to the Twin Cities Metropolitan Area Chloride TMDL and incorporate elements of the Chloride Management Plan.
81	BWSR	12/17/2020	There may be an opportunity for collaboration with MDAs Emerging Farmers activities (See: https://www.mda.state.mn.us/business-dev-loans-grants/emerging-farmers) with the MWO Restorative Development initiative (Demographics section 4.4.1; Table 14 in the plan). Note the legislative report and Emerging Farmers' Work Group formed the past year to see how this may fit into the urban farming activities the MWMO is involved with.
82	BWSR	12/17/2020	The Plan identifies goals consistent with those identified in Minnesota Rule 8410.0080 within its ten focus areas. We acknowledge that these are unchanged from the current MWMO Plan and remain consistent with the needs of an urban watershed.
83	BWSR	12/17/2020	The plan includes a five-year Capital Improvement Program (CIP). While we recognize the commitment to review of the Plan every two years and completing amendments as necessary, programming and costs are required for the ten-year Plan cycle. Without a ten-year CIP, BWSR staff will not be able to make a ten-year Plan approval recommendation.
84	BWSR	12/17/2020	The discussion of prioritization is helpful for partners and stakeholders to recognize the factors that the MWMO is basing it on (i.e. the degree to which it advances improvements in water quality, habitat, and flood reduction in the watershed).
85	BWSR	12/17/2020	We appreciate the high prioritization of Creation and Implementation of Diversity, Equity and Inclusion Plan.
86	BCWMC	9/24/2019	Section 2.1 of the 2016 MWMO Plan amendment incorrectly characterizes the 2000 agreement (see attached page with highlighted incorrect text). Please revise this text – see the correct text on page 100 in Section 4.5.2 of the 2016 MWMO Plan amendment (see attached page with highlighted text). During the planning process, we recommend that the MWMO coordinate with the City of Minneapolis regarding flows beyond the 50 cfs overflow that the Old Tunnel must accommodate.
87	BCWMC	9/24/2019	Figure 48 on page 113 of the 2016 MWMO Plan amendment (also attached) shows the Minneapolis storm tunnel system and tunnel condition ranking. The figure shows the new Bassett Creek tunnel, and that no information is available regarding its condition. The BCWMC performed an inspection of the upper reach of the new tunnel (double box culvert) in 2014 and of the lower reach of the new tunnel (deep tunnel) in 2008, in coordination with the City of Minneapolis and the U.S. Army Corps of Engineers. Inspection reports are available, if the MWMO is interested. Another tunnel inspection is to be completed as soon as it can be arranged.
			Following the approval of this 10yr Plan the MWMO will begin a planning process specific to equity and climate change resulting in plans or policy guidance that encompass all aspects of our organization. This planning process will invite those who would be impacted by the plans to participate in the process of developing them. The MWMO considers equity and climate change as more comprehensive issues that will permeate throughout all aspects of our organization and the work we do. As such, additional goals or strategies on these topics may be added to Table 27 as staff and the MWMO Board develop the plans and policies needed to fully address these topics.
			Noted. Staff have updated the plan language in section 2.1 to correctly reflect the 2000 agreement between the MWMO and BCWMC.
			noted. MWMO is updating this map, and will likely take out the tunnel ranking across the watershed. The map of major storm tunnels may still exist in the plan, but showing an up to date ranking of them will not be included.

88	BCWMC	9/24/2019	<p>Page 140 and Table 19 of Section 6.1 of the 2016 MWMO Plan amendment (see attached highlighted pages) describe a proposed Old Bassett Creek Tunnel Water Quality and Water Conservation Improvements project. If this project carries forward into the fourth generation plan, please include language regarding coordination with BCWMC, similar to the highlighted text on page 140. Also, the BCWMC completed its watershed-wide XP-SWMM model (Phase 2 model), which is available for the City of Minneapolis to use or the MWMO to use (if requested by the City of Minneapolis) to help analyze the potential impacts of a weir in the old tunnel (e.g., will there be overflows to the new tunnel).</p>	<p>Funding for the OBCT has gone to cleanout of accumulated sediment only thus far, and will likely remain the same moving forward. There was some feasibility of looking into the installation of a weir to work as a temporary storage of runoff, but is no longer being explored. The language around this CIP in the plan has been updated to better represent the work MWMO is doing. We also appreciate knowing that the BCWMC has conducted an XP-SWMM model for the area, and we will utilize if it could inform future decisions.</p>
89	BCWMC	11/18/2020	<p>The BCWMC reviewed the plan specifically for references to Bassett Creek and the Bassett Creek tunnel. We appreciate the inclusion of information in Section 2.1 History, and Section 4.5.2 Surface Water/Water Resources regarding the old and new Bassett Creek tunnels and the requirements of the 2000 Joint and Cooperative Agreement between the MWMO and the BCWMC that apply to the tunnels. We also appreciate the MWMO's stated intent to coordinate with the BCWMC on the design of the "Old Bassett Creek Tunnel: Water quality and water conservation improvements" project and the reference to the 2000 Joint and Cooperative Agreement (from Section 6.1 Capital Improvement Schedule).</p>	<p>noted, thank you</p>
90	DNR	9/24/2019	<p>Recommends using DNR Watershed Health Assessment Framework tool to plug MWMO goals into this framework to identify gaps, prioritize actions and examine opportunities. General watershed management strategies:</p> <ul style="list-style-type: none"> - Keep water where it falls by protecting and restoring wetlands, ensuring water courses are connected to their floodplains, and managing stormwater runoff with rate control and volume reduction standards - Protect and create buffers of native perennial vegetation along watercourses and water bodies - Reduce the flow of water volume and nutrients through ditches and drainage systems - Design culverts and bridges to retain floodplain functions and bank stability on natural channels and other drainage systems - Support land use planning and practices that protect, restore, and enhance priority resources - Maintain and enhance perennial vegetation including protection of working forest lands - Promote conservation practices on agricultural lands and drainage systems - Use water efficiently and implement conservation measures that further reduce water demand 	<p>Thank you for the comment. While we have yet to fully utilize the watershed health assessment framework, we have downloaded the relevant information and could use it as a tool to help inform future decisions and prioritization. Some of the layers within the tool are similar to studies we have done within our watershed in the past, where we may already have more detailed information to make informed decisions on. But, the tool could definitely be helpful, and we will keep it on hand for future planning efforts.</p>
91	DNR	9/24/2019	<p>DNR Recommended Action: MWMO plays an important role in urban stormwater management and DNR encourages the WMO to continue to work with its partners to:</p> <ul style="list-style-type: none"> - Monitor and protect the water quality of the WMO's water resources - Implement best management practices to reduce stormwater runoff - Investigate new stormwater management techniques - Promote green infrastructure - Address storm sewer infrastructure capacity and corresponding flooding problems 	<p>noted, thank you. We will continue to work with our partners to accomplish our goals of improved water quality, quantity and habitat in our urban watershed.</p>
92	DNR	12/10/2020	<p>4.2.1 Potential Limitations to Infiltration (Table 7); 4.2.2 Topography and Geomorphology. It is important to note that soil structure is irreplaceable, and damaging it reduces soil function including infiltration. A soil texture in hydrologic soil group B may have an infiltration rate closer to that of hydrologic soil group D in an urban/disturbed setting where it has been filled or compacted. Decompaction techniques have only a short-term effect and cannot restore soil structure. In addition to soil texture classification, soil structure should be assessed and/or an infiltration test should be performed to verify design infiltration rates to prevent infiltration basin failure.</p>	<p>Noted: As stated: "...helpful from a planning level perspective, any information required for development purposes requires a site scale review..." This figure and table are for very High level (e.g. a perspective from 30,000 ft) preliminary planning in the watershed. I provides a initial glance of where limitations to infiltration may occur. The MWMO completes a site level review of soils on all projects we do.</p>
93	DNR	12/10/2020	<p>4.3.2 Rare Biological Features. A significant portion of the Mississippi Watershed is within the habitat zone of the federally endangered, Rusty-patched Bumble Bee. Excellent programs such as Lawns to Legumes are raising awareness and providing resources to help homeowners/businesses create pollinator habitat within urban environments. We encourage LGUs to promote the use of native landscaping where possible through wildlife-friendly permits and ordinances.</p>	<p>noted. We have recently completed an Ecological Systems Plan with the MPRB that identifies areas most ideal to add pollinator habitat, to help enhance corridors by adding greater patches between large existing habitat areas. We will definitely continue to work to add pollinator habitat throughout the watershed in a methodical way for the foreseeable future.</p>
94	DNR	12/10/2020	<p>4.5.2 Surface Water/Water Resources (Table 23). A significant number of waterbodies within the watershed are impaired due to excess levels of chloride. Chloride released into local lakes and streams does not break down, and instead accumulates in the environment, potentially reaching levels that are toxic to aquatic wildlife and plants. Consider promoting local business and city applicator participation in the Smart Salting Training offered through the Minnesota Pollution Control Agency as a strategy for addressing polluted stormwater. More information and resources can be found at this website. Many winter maintenance staff who have attended the Smart Salting training — both from cities and counties and from private companies — have used their knowledge to reduce salt use and save money for their organizations.</p>	<p>Noted: MWMO actively participates in smart salting workshops, marketing the program to contractors within our watershed. We also communicate the trainings to our partners in hopes of spreading the work to get as many contractors trained through the program as possible. We partner with Fortin Consulting on these trainings.</p>

95	DNR	12/10/2020	Also, according to this recent study by the University of Minnesota, household water softeners are an important point source of chloride. Minnesota generally has groundwater with high levels of calcium and magnesium that must be removed through softening in order to improve taste and prevent lime scale buildup in appliances, pipes and water fixtures. The majority of home water softeners use sodium chloride (NaCl) in a softening process that replaces calcium and magnesium ions with sodium, while the chloride ions are discharged in the wastewater and eventually end up in the environment. Each community that uses well water needs to determine which tool is appropriate for their situation. This factsheet suggests ways for homeowners to optimize their water softener salt use, while this link provides resources for cities and examples of how other communities in Minnesota are addressing their high chloride levels.	Noted, we have updated our 4.4.8 Potential Environmental Hazards language to site this information, and we will look into future results from this topic to inform future decisions on pollutant targeting within our watershed. https://www.pca.state.mn.us/water/skinny-water-softeners https://www.pca.state.mn.us/water/chloride-salts
96	DNR	12/10/2020	Section 4.5 addresses aspects of hydrology through a majority of the methods used to analyze hydrologic change. Actionable methods exist to assess, model, regulate or minimize/mitigate impacts from these changes to hydrology. Aspects relating to groundwater are thorough/robust. Specific high value resources have great background and goals spelled out.	noted. We are actively updating our H&H and P8 models of our watershed to help inform these decisions on where we are seeing flooding occur, as well as where the largest pollutant loadings occur. We will use this data to help inform not only project prioritization, but the type of project to focus on to create the greatest positive impacts to our urban watershed.
97	DNR	12/10/2020	In Sections 4.4.6 and 4.4.9, the document identifies the Division of Waters. The correct name for the Division is now the Division of Ecological and Water Resources (EWR).	Correction made: Division of Ecological and Water Resources (EWR).
98	DNR	12/10/2020	Though one reviewer noted that the plan "Anticipated factors of, and mitigating and adapting to climate change are discussed", another felt that the plan could do more: "the plan should emphasize climate change impacts to water management with current climate projections over the next 10 years, and support projects that proactively design for reducing these impacts."	Noted. MWMO has updated the precipitation tables to include the most current and updated future precipitation projections. While MWMO does not have plans to update our water quality/quantity standards, we are using our H&H modeling to inform decisions around where, attempting to capture greater than the 1.1" rain event could make sense to alleviate structural impacts or downstream flooding.
99	Met Council	9/24/2019	Council staff will be looking for the plan to address the issues and problems in the watershed and include projects or actions and funding to address the issues and problems. At a minimum the watershed should address: 1. Any problems with lake and stream water quality and quantity including information on impaired waters in the watershed and the WMO's role in addressing the impairments	See Section 4.5.2 Table 23 identifies impaired waters within the MWMO. MWMO does not own any MS4s, nor have we created any individual water resource specific management plans. We will assist our partners with priority projects they have identified to address water resource specific impairments.
100	Met Council	9/24/2019	2. Flooding issues in the watershed, including from urban flooding	Updates included in section 4.5.4 (check LWMPs: Mpls, St Anthony, Fridley, Columbia heights LWMP's add brief text update)
101	Met Council	9/24/2019	3. Stormwater rate control issues in the watershed	See section 4.5.2, 4.5.3 (check LWMPs: Mpls, St Anthony, Fridley, Columbia heights LWMP's add brief text update)
102	Met Council	9/24/2019	4. Impacts of water management on the recreation opportunities	Updates included in section 4.4.7 (check LWMPs: Mpls, St Anthony, Fridley, Columbia heights LWMP's add brief text update)
103	Met Council	9/24/2019	a. In particular for Mississippi WMO, a focus on parks. Along with the Mississippi National River and Recreation Area, there are a number of regional parks which the Council has made a substantial investment in through its park implementing powers: Above the Falls Regional Park, Anoka County Riverfront/Islands of Peace Regional Park, Central Mississippi Riverfront Regional Park, Minnehaha Regional Park, Mississippi Gorge Regional Park, and North Mississippi Regional Park	The MWMO is involved with Regional parks and Trails. We Partner with the MPRB who seeks funding from Met Council for regional parks and trails. One project we are currently working on with MPRB and Wall Companies is Towerside Phase II District Stormwater System (Malcom Yards). This is a 23-acre redevelopment project that will have a regional trail passing through the center of it. with a significant amount of additional public space added due to stormwater easements + privately owned park spaces (POPS). See Section 6.1 CIP Schedule The MWMO has invested much time and resources into regional parks throughout our watershed. This includes the Mississippi River Gorge, Riverfront Regional and Islands of Peace parks, just to name a few. We have ongoing erosion pin monitoring along the riverbanks for these parks, and intend to continue to monitor them, with a long term investment on preserving the bank stabilization and ecological function these parks provide.
104	Met Council	9/24/2019	5. Impact of soil erosion problems on water quantity and quality	See section 5.1 MWMO has been working to better understand soil erosion along the riverbanks of our watershed. In 2008 we put out a bioengineering manual to give the public a better understanding of how plants can be utilized to retain soil and stabilize the slope even while being inundated. Staff have been monitoring erosion bank pins at multiple sites along the river, and are working with some of the larger river bank land owners (MPRB, Anoka County Parks) to implement these bioengineering practices with reconstruction projects at the parks.
105	Met Council	9/24/2019	6. The general impact of land use practices on water quantity and quality	See sections 4.4.2 - 4.4.5 includes information that MWMO uses related to historic, present and future land use. Being an urban watershed, we are closely watching future land use decisions, as redevelopment leads to some of the greatest opportunities to integrate stormwater management into previously untreated water.

			See section 4.5.2 and 4.5.5 We definitely have a focus on the MRCCA. From habitat restoration prioritization, to development and ordinance review and comment, we continue to have a presence on development and habitat connectivity within the MRCCA. Over the last 10 years we have provided matching funds to park Board to purchase land within the MRCCA. Protection and restoration of habitat within the MRCCA has been a central focus for the MWMO since 2003.
106	Met Council	9/24/2019	a. The watershed should pay special attention to the Mississippi River Corridor Critical Area, which extends the length of the watershed jurisdiction
107	Met Council	9/24/2019	7. Policies and strategies related to monitoring of area water resources Section 5.3 defines our issues, goals and strategies related to monitoring, including indicators and performance measures. We also have section 7, where our Monitoring Program area outlines its program specific objectives.
108	Met Council	9/24/2019	8. Policies and strategies related to use of best management practices Section 3 outlines our standards and typical requirements of partner BMPs. Section 5 and 7 include our focus areas and program areas related to stormwater management
109	Met Council	9/24/2019	9. Issues concerning the interaction of surface water and groundwater in the watershed Section 4.5 explains MWMO knowledge on surface and groundwater within the watershed. Within our long range implementation table in section 6.2, we identify many goals and strategies we intend to implement related to surface and ground water interaction within the watershed. One current example is at Columbia Park, where we are monitoring the interaction between surface and groundwater, and how that influences regional stormwater management, and flood mitigation.
110	Met Council	9/24/2019	10. A list of the requirements for local surface water management plans Section 3.2 and 3.3 identify local water plan adoption timelines and content requirements
111	Met Council	9/24/2019	11. Erosion and sediment control standards and requirements Section 3.1 identifies MWMO standards related to water. 3.1.3 specifies MWMO erosion and sediment control standards
112	Met Council	9/24/2019	12. Volume reduction goals at least as restrictive as requirements in the NPDES construction general permit MWMO standards expect that the first 1.1" runoff be retained onsite. Further detail can be found within section 3.1 MWMO standards.
113	Met Council	9/24/2019	13. Capital improvement plan (CIP) with itemized list of actions, estimated costs, and timeline See section 6.1 for most up to date CIP for 2021-2026 (6.0 Financials Table 25 includes a CIP budget forecast through 2031).
114	Met Council	9/24/2019	14. Specifics on long-term maintenance of projects identified in the capital improvement plan, including identification of entities responsible for funding and conducting maintenance, as well as how long-term maintenance will be documented. MWMO standards identify maintenance needs and requirements for projects in the watershed. Through the MWMO CIP, it is expected that landowners of MWMO projects maintain the BMPs for a minimum of 20 years, or the life expectancy of the BMP.
			See Section 2.7 which identifies the issues (10 Focus areas which are broken out into 19 issue statements). See section 4 Resource Assessment, for the watershed's characteristics of that influence the what, why, when, where, and how the issues in this Plan are addressed. See Section 5.0 Watershed Issues, Goals, and Strategies for a more in depth discussion of the ten publicly derived focus areas, that present the challenges and needs the MWMO has to address over the next 10 years. These focus areas are the underpinnings of MWMO's goals and strategies making Section 5 is a pivotal point in the plan as it informs and establishes much of the content found in Section 6.
115	Met Council	12/15/2020	While the plan is consistent with Council policies, the connection between the ten identified focus areas and implementation actions could be improved. As noted in our response to your request for information (dated 9/19/2019) the Council is particularly interested in the plan containing a logical progression, starting with identification of issues, leading to prioritization of those issues, leading to creation of a detailed CIP that itemizes specific actions along with estimated costs and dates for completion. Section 6 includes: MWMO's financials, programmatic activities, MWMO's Capital Improvement Schedule (Table 26), and The MWMO's Ten-Year Implementation Schedule (Table 27) which, aligns MWMO's key strategies with lead staff work areas, and ranks the strategies as a low, medium or high priority over the next ten years.
			See Section 7.1 MWMO Project Expertise and Services: While the MWMO Watershed Management Plan lays out the general work flow for the organization, it does not provide the year-to-year specific planning and work detail necessary to implement the goals of the plan. In addition to the Plan, the Board periodically carries out strategic planning that must be incorporated into the annual workplan of staff. Each year, MWMO staff develops an annual workplan to present to the Board of Commissioners. The annual workplan provides a schedule and details of the projects and activities to be completed each year. The process takes place concurrently with the MWMO budget process to ensure funds are directed to the priority projects and activities. The MWMO conducts an annual prioritization and selection of projects and activities based on available funding for capital projects, planning initiatives, research and watershed studies, communication and outreach initiatives and monitoring. These projects and activities selected and implemented will advance the organization's goals and strategies while responding to changing resource conditions and financial constraints of the MWMO The order items are presented in the plan does not prevent staff's annual workplan activities or projects brought to the MWMO Board from being guided by the plan. Both staff workplan activities and Requests for Board Action and funding(resolutions based on Table 27) are based on goals and strategies found in Table 27. This nested level of planning that continues directly down to the daily activities of staff allow us to stay on track and accomplish the goals and strategies set out in the plan.
116	Met Council	12/15/2020	Table 27 of the plan is indicated to be MWMO's Ten-Year Implementation Schedule Implementation Actions, but only includes goals and strategies related to each focus area, not actions. The capital improvement program (CIP) projects are described before the implementation schedule, in Section 6.1 and Table 26. The items in the CIP are not associated with the focus areas or goals identified in Table 27. We would recommend the implementation schedule be expanded to include specific actions related to each goal and strategy, followed by the CIP referencing the implementation schedule.

117	Met Council	12/15/2020	The plan also only includes a 5-year CIP. The plan will need to be amended sometime before the end of the first five years to examine the future capital needs of the WMO.	MWMO intends to continually review and update the CIP likely every 2-3 years. This has been past practice with the last 10 year plan.
118	Met Council	12/15/2020	Many subsections of Section 4: MWMO Resources Inventory, do not appear to have been updated since the previous plan. We recommend the WMO carefully review this entire section, especially those sections that have no information described beyond the year 2010. Section 3 of the plan allows member organizations to adopt all or part of the MWMO plan by reference; for this adoption to be effective the MWMO plan needs to be current.	MWMO is reviewing and updating this section as data becomes available. We have updated multiple sections, tables and maps since the 60 day release.
119	Met Council	12/15/2020	In particular, the Council would like to ensure the following sections are updated to reflect current information. Where noted we have included specific information from Council staff in an appendix to this letter that can be used to update the plan.	Intentionally Blank
120	Met Council	12/15/2020	Section 4.4.1: Demographics. Table 15: Population Projections for Cities within the MWMO and Table 16: Minneapolis 2006 Population by Race appear to be from the previous plan and are unnecessary with the inclusion of Table 10: Population projections for cities within the MWMO and Table 11: Race and ethnicity within the MWMO	Demographics section has been updated with 2010 Census data and Met Council 2014-2018 population, as well as updated areas of concentrated poverty/ ACP50
121	Met Council	12/15/2020	Section 4.5.2: Surface Water/Water Resources, subsection on Combined Sewer Overflow. This information is outdated. Please work directly with the City of Minneapolis to update this content. Some updated information is contained in the City's 2018 Water Resources Management Plan.	See Section 4.5.2: We have updated the section with recent information from City's WRMP
122	Met Council	12/15/2020	Section 4.5.2: Surface Water/Water Resources, subsection on Metropolitan Council Surcharge Program. This information is outdated. Updated information on this section is attached in the appendix for your reference.	Section 4.5.2: Surface Water/Water Resources, subsection on Metropolitan Council Surcharge Program. We have updated the section with recent information from City's WRMP
123	Met Council	12/15/2020	Section 4.5.2: Surface Water/Water Resources, subsection on Impaired Waters and Table 23: Impaired Waters of the MWMO. Please state the reference year for the Section 303(d) list, so that any member communities adopting this plan can update the table to the current reference as appropriate.	We have stated the reference year for the Section 303(d) list, Table 23: Impaired Waters of the MWMO. This was the 2018 MPCA Impaired Waters List. So that any member communities adopting this plan can update the table to the current reference as appropriate
124	Met Council	12/15/2020	Section 4.5.4: Flood-Prone Areas. Please update the section that references flood mitigation projects in the Minneapolis Local Surface Water Management Plan to include content from the 2018 Water Resources Management Plan.	Section 4.5.4: Flood-Prone Areas. We have updated this section with references to flood mitigation projects in the Minneapolis found in the 2018 Mpls Water Resources Management Plan.
125	Met Council	12/15/2020	Section 4.5.4: Flood-Prone Areas, Figure 49. Please reference the time period for this information and update if appropriate.	Section 4.5.4: Flood-Prone Areas, Figure 49. We removed this map as it was referencing outdated information.
126	Met Council	12/15/2020	Section 4.5.5: Floodplain and Shoreland. Please update information on FEMA flood mapping. The Flood Insurance Rate Maps (FIRM) references are out of date. This may also mean that Figure 50: FEMA Designated Flood Plains in the MWMO needs to be updated.	Section 4.5.5: Floodplain and Shoreland. Updated The Flood Insurance Rate Maps (FIRM) references. Figure 50 is current. This layer is from 2020. The effective FIRM maps for Hennepin and Ramsey Counties are 2016 and 2010, respectively, so the data is a bit older but is the most recent for the area. (https://files.dnr.state.mn.us/waters/watermgmt_section/floodplain/flood-map-updates-timeline.pdf)
127	Met Council	12/15/2020	Section 4.5.7: Groundwater Resources. The information on Metropolitan Council groundwater modeling is outdated. Updated information on this section is attached in the appendix for your reference.	Section 4.5.7: Groundwater Resources. Updated information on Metropolitan Council groundwater modeling using information provided in attached appendix
128	Met Council	12/15/2020	Finally, the Council appreciates the WMO's focus on equity in its plan. Equity is a key outcome highlighted in the Council's Thrive 2040 plan. We especially appreciate that the WMO references the Council's new work on equity and rethinking areas of concentrated poverty.	noted. Section 5 and 7 have had edits to better identify within our focus areas and program areas equity explicitly aligns with our work.
129	MPCA	9/24/2019	Impairments - We have identified 11 non-mercury/non-toxic impaired water bodies that are completely or partially within the boundary of the MWMO sub-watershed boundary as of the 2018 EPA approved 303(d) impaired waters list. Five of these impaired waterbodies have an approved TMDL plan with the remaining six having targeted TMDL completion dates within the timeframe of this updated water plan. Nutrient/eutrophication biologic indicators, chloride, fecal coliform (E.coli), Total Suspended Solids (TSS) (South Metro Mississippi Turbidity TMDL) remain issues within some of the surface waters within the WMOs boundaries (See Table on Next Page)	See section 3 LWMP requirements for TMDL's See section 4 new content added Both table 23 and figure 45 use the 2018 EPA approved 303(d) impaired waters list.
130	MPCA	9/24/2019	MS4- We recommend the MWMO continue to work with member organization to achieve compliance with their MS4 permit and SWPPP as well as work with communities within their boundary to develop and adopt next-generation stormwater management strategies to minimize stormwater runoff and pollution and preserve natural resources. This could be through supporting the inclusion of low impact design (LID) standards, Minimal Impact Design Standards, and redevelopment standards into local ordinance and establishment of performance goals where appropriate. The MPCA's stormwater program maintains the Minnesota Stormwater Manual that serves as a resource for stormwater managers.	Yes we continue to work with our member cities on MS4 related activities and encourage them to go beyond permit requirements through their work with their MWMO on projects.

131	MPCA	9/24/2019	Chloride - The MPCA has identified reduction of chloride as from winter maintenance practices as an agency strategic plan. The MPCA has developed a set of studies, reports, and tools to help our partners to reduce chloride.	<p>We have updated our 4.4.8 Potential Environmental Hazards language to site this information, and we will look into future results from this topic to inform future decisions on pollutant targeting within our watershed. https://www.pca.state.mn.us/water/skinny-water-softeners https://www.pca.state.mn.us/water/chloride-salts</p> <p>See Section 4.5.2 Impaired Waters and (Table 23) of our plan for new content. We will work with our partners on opportunities to offset chlorides making it to the Mississippi River.</p> <p>MWMO actively participates in smart salting workshops, marketing the program to contractors within our watershed. We also communicate the trainings to our partners in hopes of spreading the work to get as many contractors trained through the program as possible. We partner with Fortin Consulting on these trainings.</p>
132	MPCA	9/24/2019	Climate Change Adaptation - The impacts of climate change may result in the increased frequency of storm events and volume of precipitation during these events. This could have a potential impact on surface water quality through increase soil erosion.	MWMO has updated the precipitation tables to include the most current and updated future precipitation projections. While MWMO does not have plans to update our water quality/quantity standards, we are using our H&H modeling to inform decisions around where, attempting to capture greater than the 1.1" rain event could make sense to alleviate structural impacts or downstream flooding.
133	MPCA	9/24/2019	In 2010, the MPCA began work in the Mississippi River – Twin Cities HUC-8 level watershed as part of the watershed approach to restoring and protecting water quality. The resulting monitoring and assessment report can be found at the following webpage. https://www.pca.state.mn.us/water/watersheds/mississippi-river-twin-cities	See update in Section: 4.5.2 Surface Water/Water Resources
134	MPCA	9/24/2019	In 2020, the MPCA will revisit the Mississippi River - Twin Cities Watershed to monitor and reassess lakes and streams and potentially develop any new or needed TMDLs and Watershed Restoration and Protection Strategy (WRAPS) Reports.	See update in Section: 4.5.2 Surface Water/Water Resources
135	RCWD	9/24/2019	The RCWD has great continued interest in pursuing a regional capital project at Village Green Apartments (460 Mississippi Street NE) in Fridley. The parcel is currently located within MWMO's political boundary, but is within the RCWD hydrologic boundary and contains a failed and filled-in regional stormwater basin that collects runoff from roughly 80 acres of urban land within the RCWD and conveys it to Lower Rice Creek and the Mississippi River. Various capital project iterations have been proposed here over the years to retrofit/reconstruct this basin for increased water quality treatment and local flood control. During a previous meeting with the City of Fridley, MWMO staff had indicated that the agency was not interested in participating in a project at this location. RCWD encourages the MWMO to again consider partnering with the RCWD, City and local landowner to make the project a reality.	<p>With the new boundary change underway this project will be completely outside of the MWMO. The MWMO does not do capital projects outside the watershed unless there is a benefit within the watershed. However, we are willing to discuss the project further about work in MWMO that may have a positive impact to Village Green if we are contributing water to the site. Planning a CIP staff are open to discussing this project further.</p> <p>See section 5.0 for new Content added: "On an annual basis the MWMO will invite partners a on this list to meet and review with them our current capital improvement schedule. Allowing them the opportunities to partner with us on existing projects or suggest new projects."</p>
136	RCWD	9/24/2019	The RCWD values its collaborative efforts and relationships with MWMO. We encourage the MWMO to continue these efforts and maintain partnerships and membership in the Anoka County Water Resource Outreach Collaborative, Metro Watershed Partners, Metro Children's Water Festival, Blue Thumb, and other regional collaborative activities.	We intend to continue to look for opportunities to collaborate with RCWD through partnerships and memberships
137	RCWD	9/24/2019	Based on available LiDAR topography, the RCWD intends to undertake a boundary revision process along the RCWD/MWMO border during our 2020-2029 WMP cycle. There are several areas where the political boundary between our agencies does not line up well with the hydrologic boundary. The RCWD looks forward to addressing this with the MWMO in the coming years. Current RCWD hydrologic mapping is available upon request.	We are supportive of this boundary revision process along the RCWD/MWMO border.
138	RCWD	11/5/2020	<p>The Rice Creek Watershed District has one comment on MWMO's 10-year plan update, although it does not necessarily require any adjustments to the language of the plan:</p> <p>Section 7.3 (Administration of Legal Boundary): MWMO should be aware that the Rice Creek WD intends to undertake a thorough and sequential examination of the accuracy of its legal boundary in the coming decade. We are aware of locations where RCWD's original jurisdictional boundary - set in 1972 - does not match the current hydrological boundary. It is possible that recommendations for adjustment will be made along the MWMO-RCWD boundary in the coming years. If this occurs, RCWD will coordinate with MWMO to obtain concurrence on any boundary adjustments that may be proposed.</p>	Your comment has been noted and we will continue to work with Rice Creek Watershed District as boundary changes are completed.
139	St. Anthony	9/24/2019	Included Existing and Future (2040) Land use plans for the city only	Updated St Anthony's Existing and Future (2040) Land use plans in the plan
140	St. Paul	9/24/2019	Regional (or District) systems. The city has expended considerable time and resources towards defining regional solutions for key redevelopment areas. This remains a priority issue for the city with the Towerside Innovation District as the key focus area. A high-level planning study across the Innovation District to reaffirm existing priority sites and identify second tier relevant sites would be an excellent short-term task.	We look forward to working more with St Paul Planning staff on District systems planning, design and implementation. With the help of St Paul Planning staff and neighborhoods, the MWMO and CRWD completed A Blue/Green Framework for the Creative Enterprise Zone (CEZ) and Towerside Innovation District (TID). This framework is now being used by the TID and CEZ in collaboration with city staff to guide and assist redevelopment in these areas to reuse stormwater for improving habitat, and creating more acres of privately owned public spaces.

141	St. Paul	9/24/2019	Water quality capacity. The city continues to evolve towards a green infrastructure program that not only provides compliance with MWMO plan water quality standards but would consider water quality and volume control on sites less than 1-acre. MWMO involvement may be sought to help guide the city in developing a water quality review program, identify resources or demands necessary, or otherwise partner to aid the city until internal capacity is established.	The MWMO planning staff are interested in learning more about standards for water quality and volume control on sites less than 1-acre.
142	St. Paul	9/24/2019	Natural resource management. The city strives to manage wetlands strategically. These efforts go above and beyond the city's role implementing the Wetland Conservation Act. The city intends to update its 2008 wetland management plan and would involve MWMO and other agencies accordingly. The city remains in discussion about potential permanent conservation initiatives and continues to evaluate how this could be carried out institutionally and/or in concert with watershed organization partners. Policies that reflect MWMO's position and desired role on these efforts would be very useful in the watershed plan amendment.	The MWMO planning staff interested in being apart of the City's update to its wetland management plan. A better understanding of what St Paul is considering regarding permanent conservation initiatives would be need prior adding policies or positions in the plan. Currently the MWMO does not hold or manage any conservation easements. If the is a need for a new policy to be added to the Plan the MWMO can do this via an amendment process. Typically we amend the plan every 2 years to keep up with change in the watershed.
143	St. Paul	9/24/2019	Other Priorities: Water reuse is a shared focus area with Saint Paul. This can be a key strategy for redevelopment or retrofit sites.	Reuse is a common goal on MWMO projects as well. Stormwater is a valuable resource that is essential for realizing many climate and equity relate needs in our communities.
144	St. Paul	9/24/2019	Climate resilience and flood resilience is a shared focus area with Saint Paul. The City of Saint Paul, in partnership with the Great Plains Institute, has developed a Climate Action & Resilience Draft Plan. The draft plan focuses on achieving carbon neutrality in city operations by 2030, and citywide by 2050. This work includes compiling data on energy use, transportation emissions, solid waste, and water treatment and distribution. A part of that Plan discusses flood threats and resilience, both regionally (river-related) and localized.	We will look for ways to incorporate St Paul's Climate resilience and flood resilience planning into the restorative development work we are doing.
145	St. Paul	12/15/2020	Section 3.1.3.1.c Stormwater Management Standards <input type="checkbox"/> MWMO statement: In order to reduce regulatory complexity, a member may request the MWMO to allow stormwater rules set forth by adjacent watershed management organizations to govern development so long as they can be shown to be substantially equal to or greater than the level of protection afforded by the MWMO Standards. <input type="checkbox"/> Saint Paul response: The City of Saint Paul has developed draft design standards that closely mimic those of Capitol Region Watershed District. It is our belief that these design standards, once adopted, will meet or exceed requirements of the MWMO.	MWMO's approval of the Cities LWMP was based on an agreement that the city's design standards, once adopted, will meet or exceed requirements of the MWMO. Please send a final copy of the City's approved Design standards or an opportunity to review if any changes were made.
146	St. Paul	12/15/2020	Section 3.1.3.2 Rate Control <input type="checkbox"/> MWMO statement: Runoff rates for the proposed activity shall meet the member cities and MS4s runoff rate control requirements, using the member cities' and MS4s' required critical storm events (as defined by Atlas 14 Volume 8 and/or subsequent revisions). Runoff rates for the proposed activity and predevelopment shall be determined using an Atlas 14-based (nested, regional, state) rainfall distribution using NRCS-approved methodology. <input type="checkbox"/> Saint Paul response: The City of Saint Paul has developed draft design standards that incorporate Atlas-14 rainfall depths, but currently regulate private development utilizing TP-40 rainfall depths. It is our belief that these design standards, once adopted, will meet or exceed requirements of the MWMO.	Please send a final copy of the City's approved Design standards or an opportunity to review if any changes were made.
147	St. Paul	12/15/2020	Section 4.4.8 Potential Environmental Hazards <input type="checkbox"/> MWMO refers to Saint Paul's Phase I NPDES Permit Number as: MS400054, <input type="checkbox"/> Saint Paul response: The City of Saint Paul's Phase I NPDES Permit Number is MN0061263	This update has been made. Thanks
148	St. Paul	12/15/2020	Section 4.5.2 Surface Water/Water Resources <input type="checkbox"/> MWMO statement: A source water assessment area is typically mapped to show the land area over which protection measures should be taken to protect the water supply from contamination. A source water protection plan has been developed by the cities of St. Cloud, Minneapolis, and St. Paul, along with other local units of government through the Upper Mississippi River Source Water Protection Project. <input type="checkbox"/> Saint Paul response: Believe reference should be made to Saint Paul Regional Water Services (as a regional entity), not the City of Saint Paul.	Section 4.5.2 Surface Water/Water Resources: Change has been made to: "Saint Paul Regional Water Services"
149	St. Paul	12/15/2020	Section 4.5.3 Stormwater System <input type="checkbox"/> MWMO statement: The major Saint Paul storm system within the MWMO is the Eustis Tunnel in the Bridal Veil Creek region. The Saint Paul storm sewer network is available from the City in computer-aided design and drafting (CADD) format. <input type="checkbox"/> Saint Paul response: Please refine the language to: The major Saint Paul storm system within the MWMO is the Eustis Branch, of the Saint Anthony Park Storm Tunnel, in the Bridal Veil Creek region. The Saint Paul storm sewer network is available from the City in GIS format.	Section 4.5.3 Stormwater System: text changed to: The major Saint Paul storm system within the MWMO is the Eustis Branch, of the Saint Anthony Park Storm Tunnel, in the Bridal Veil Creek region. The Saint Paul storm sewer network is available from the City in GIS format.

150	St. Paul	12/15/2020	Section 4.5.6 Surface Water and Water Quality & Quantity Modeling <input type="checkbox"/> Saint Paul inclusion: In 2019-2020 Saint Paul worked with a consultant to generate a detailed Hydrologic & Hydraulic model of the Saint Anthony Park subwatershed, including areas within Saint Paul, Lauderdale, Falcon Heights, State Fair property, and University of Minnesota property. Also created was a P8 model for water quality assessments and prioritization of capital projects.	noted, section 4.5.6 has been updated to include most up to date modeling initiatives watershed wide.
151	Friends of the Mississippi River	11/9/2020	Page numbers on the text itself would be very helpful for clarifying the location of public comments and making the document easier to reference (rather than on the pdf scroller).	We will finalize formatting pages and links etc...with 90 day and final distribution, for now please use the Find function, key words and section references.
152	Friends of the Mississippi River	11/9/2020	The bibliography has multiple references out of order, including putting Minnesota Geological Survey before Minneapolis Park and Recreation Board. Some of the references in the text (e.g. MPRB, 2016a) are hard to locate in the bibliography and make locating the reference source difficult. Even if the reference itself is a link to another document, it should have supporting information in the bibliography, including the year and the corresponding letter "a" "b" etc.	We will finalize formatting pages and links etc...with 90 day and final distribution
153	Friends of the Mississippi River	11/9/2020	The term "exotic" is an outdated term when describing place of origin in relation to invasive species. "Non-native invasive species" is a more common and widely accepted term in the field of invasion biology.	Noted
154	Friends of the Mississippi River	11/9/2020	Some of the figure legends are difficult to differentiate. For example, in Figure 13, NRCS based vegetation, the Hennepin County portion of the legend has separate orange colors for "savanna" and "prairie or savanna" vegetation. Besides those categories seeming slightly redundant, the oranges are indistinguishable on the map. Changing the color legend would help with the maps interpretability.	Noted
155	Friends of the Mississippi River	11/9/2020	The rare features appendix (Appendix F) and associated tables (Table 9) uses data from 2009. This should be updated with more recent data. The call out boxes in the appendix even say "Printed March 2009. Data valid for one year."	We submitted a request to DNR for the data on Monday, September 14, 2020 we have yet to receive the data. We will update the table prior to the 90 Day release or final posting depending on the speed of which we can receive the information.
156	Friends of the Mississippi River	11/9/2020	There seems to be no explanation of the prioritization and timing of the MWMO's Capital Improvements Schedule. A better connection between Table 27: MWMO's Ten Year Implementation Schedule Implementation Actions, which lists priority levels for goals and strategies such as habitat restoration projects, and the Capital Improvements Schedule, which allots funding and proposes timing for projects, would help partners and the public better understand how these allotments and timing decisions were decided upon.	See Section:3.6 MWMO Capital Project Funding See Section 4.4.5 Redevelopment Opportunities See Section: 5.0 The MWMO prioritizes projects based on their ability to meet our mission to improve water quality, habitat, and rate control. This is taken within the context of: available funding for capital projects; timing of planning initiatives; as well as information derived from research and watershed studies, outreach initiatives, and monitoring. We identified these specific areas in meetings with member cities during their LWMP process. These potential and upcoming project areas are discussed with member cities during annual project check-in's. They also come to our attention as we work with staff and Board members from our member organizations on other planning and projects. MWMO is in the process of developing a watershed planning tool that we can utilize in house to review specific areas of the watershed with internal and external resource/datasets to see where opportunities intersect so that we can be much more proactive in our watershed planning. This will help us when meeting with our members to identify opportunities to meet both our goals and the goals of others.
157	Friends of the Mississippi River	11/9/2020	In Section 6.1: Capital improvements schedule, FMR is not listed as a partner on the Nicollet Island project, despite bringing federal, county, and other funding toward the planning and restoration of the site and ultimately overseeing the creation and implementation of the site's management plan (funded in part by MWMO's planning and action grants). Only MWMO and MPRB are listed.	noted. We will add FMR as a partner under the Nicollet Island project, as FMR has played a critical role in the stabilization and restoration effort to date.
158	Friends of the Mississippi River	11/9/2020	"Invasive species management," mentioned only once in the document (in the wildlife section when discussing creating healthy bird habitat), should be emphasized far more. The effects on water quality should be explicitly stated. Similarly, restoration of native vegetation is mentioned throughout the document. However, removal of invasive plant species is a key component of that restoration process that is rarely discussed. In fact, removal of invasive vegetation can often have immediate benefits on water quality (e.g. Larkin et al 2013). In the explanation in the Capital Improvements section, it would be better not only talk about restoration of native vegetation, but also explicitly link the removal of invasive vegetation to water quality benefits. The document does not do an adequate job of linking habitat and natural areas restoration to water quality benefits. These benefits should be driving the prioritization of restoration within the watershed. There need to be more stated links to the effects of invasive removal and restoration of native vegetation on water quality. For example, using models like RUSLE2 that demonstrate soil loss and allow comparison of different land cover types allows us to identify the benefits on water quality of turning ag land into prairie. Journal articles like Larkin et al. 2013 show the effects of removing invasive common buckthorn on decreasing erosion and sedimentation into waterways. Restoration is also a new priority in both the WQ (medium) and EH (high, but through redevelopment?) sections. This is good, but there's little narrative to support the benefits of restoration. It's good to see that habitat restoration is now explicitly included in Capital Improvement Projects. Priorities like reducing fragmentation and creating diverse, functional natural landscapes have far reaching benefits for wildlife and humans beyond simply improving water quality. We hope to see this reflected in projects that are funded in the next few years.	see Sections 2,5,7 for multiple social and environmental benefits of habitat and stormwater the can support it. Funding programs that focus solely on Invasive species removal is not a primary focus of the MWMO. Invasive species removal activities that are a subpart of a larger bank restoration project or restoring a comprehensive habitat corridor system throughout the watershed is more likely. The watershed is seeking opportunities to bring multiple benefits to the community as a result of the work we are doing.

159	MnDOT	12/14/2020	Page 38, Local Water Plans: MnDOT is referred to in this local water plan section which discusses local water plan and city comprehensive plan processes and reviews. MnDOT doesn't have a local water plan because it is not a city and doesn't follow the same processes/reviews as the cities do. As a State agency, MnDOT is also not required to comply with the WMO plan/standards. MnDOT does follow the standards to the best of its' ability within the trunk highway right-of-way. MID's is already a part of the MWMO Standards. Due to the above, please remove the mention of MnDOT in this local water plan section.	Statement has been removed
160	MnDOT	12/14/2020	Page 186, Capital Improvement Projects: One of the projects mentioned in this section is the Fridley: University Avenue Drainage Improvement Project. It mentions that the cities and MnDOT will work to identify and implement a stormwater management solution at University Avenue, near the intersection of 49th Ave NE with the goals of the project to reduce peak flows and improve water quality. It also mentions that practices to be considered may include vaults in the right of way. MnDOT practice is not to put vaults and underground storage directly under highways. Please remove this part referring to vaults under Highway 65/University Avenue.	noted. We have removed language around vaults, or any particular BMP at this time.
161	Hennepin County	12/16/2020	Climate change and its projected impacts on water resources felt noticeably absent from this plan, and we'd encourage you to consider climate change in a variety of places in your planning, especially in the opportunities/challenges section, as well as in some way as it relates to how your plan interacts/intersects with stormwater permitting for member cities.	<p>See Section 4.5.1 Climate and Precipitation for additional content added on climate change See also Sections 2,3,4,5,6,7</p> <p>Updates have been made to the section 5.5 Ecosystem Health focus area, as well as the implementation table to reflect climate change considerations including invasive flora.</p> <p>The MWMO considers equity and climate change as more comprehensive issues that will permeate throughout all aspects of our organization and the work we do. As such, additional goals or strategies on these topics may be added to Table 27 as staff and the MWMO Board develop the plans and policies needed to fully address these topics.</p> <p>In addition, we consider the impacts of climate change with most everything that we do. From our educational messaging, to plants we recommend for projects, to sizing of stormwater practices, we are constantly addressing climate change in our work.</p> <p>We use Atlas 14, we consider incorporation of climate resilient trees in our habitat restorations, like sycamore. We look to retain as much runoff on site as possible. We always try to include pretreatment devices that dissipate flow before entering BMPs, as we know rains are becoming more and more flashy.</p> <p>MWMO has updated the precipitation tables to include the most current and updated future precipitation projections. While MWMO does not have plans to update our water quality/quantity standards, we are using our H&H modeling to inform decisions around where, attempting to capture greater than the 1.1" rain event could make sense to alleviate structural impacts or downstream flooding.</p>
162	Hennepin County	12/16/2020	Section 4.4.5 Redevelopment Opportunities – the language in the last couple sentences of this paragraph struck me as unusually noncommittal/reactionary, which has not been my experience with the MWMO, and so it just struck me as odd. In a watershed where most of your opportunities are going to be related to redevelopment, it seemed like approaching these sentences with a great sense of organizational agency would make sense. Getting together a map of these key areas seems like a really good idea. And "relying on member cities to request our assistance" just seems like it lacks strategy and intent, and leaves you vulnerable to individual staff departures at member cities (which are bound to occur). I suspect you do actually have a more strategic/intentional process in place to keep your pulse on the important redevelopment opportunities (even if that's just regular check-ins or something simple like that) – I'd suggest spelling that out.	<p>We identified these specific areas in meetings with member cities during their LWMP process. These potential and upcoming project areas are discussed with member cities during annual project check-in's. They also come to our attention as we work with staff and Board members from our member organizations on other planning and projects.</p> <p>MWMO is in the process of developing a watershed planning tool that we can utilize in house to review specific areas of the watershed with internal and external resource/datasets to see where opportunities intersect so that we can be much more proactive in our watershed planning. This will help us when meeting with our members to identify opportunities to meet both our goals and the goals of others</p>
163	Hennepin County	12/16/2020	Consider adding regional trail search areas to the plan – this could provide access to regional funding for projects that simply isn't available if you don't clearly identify those corridors in your planning documents	We will consider adding the regional trail search areas to our plan. We currently have existing regional parks and trails. While the MWMO does not fund trail construction we do partner with entities requesting funding for regional trails (e.g. MPRB requesting regional trail funding for trail that would connect the grand rounds missing link) In this case we are trying to integrate a District Stormwater system, parks, city ROW and privately owned public land into one larger seamless public space with multiple layers of benefits. At a minimum , we will consider this dataset when planning future projects and consider the layered benefits they could have, including future trail connections.
164	Hennepin County	12/16/2020	Update the plan to reflect new MS4 permittee requirements – these will (soon) be different from the construction stormwater permits, but the draft plan treats them as though they are the same – an updated plan should clearly differentiate between the two.	We think these are adequately distinguished. We have identified MS4 permittees within the MWMO and have a separate section on construction stormwater permits. We are open for more clarification, if we miss understood the question.
165	Hennepin County	12/16/2020	Updated data would make it a more useful document - The MWMO's plan cites the previous 2030 city comprehensive plans (in the document and in the bibliography), which have been superseded by the 2040 plans. These should be used consistently in the document to provide the most useful information - Sometimes the document includes information from different versions of a city plan, which is confusing. - The document uses 2010 Census data, which at this point is quite old	We have updated this section/table to reflect all cities data we have for their 2040 comprehensive plans. Cities we have 2040 data for: Minneapolis, Columbia Heights, Lauderdale, St. Anthony Village. Cities we are still using 2030 data for: Fridley, Hilltop, St. Paul

166	Hennepin County	12/16/2020	<p>In general, simplify language and structure and let key messages shine – I know there are a lot of statutory planning requirements, but those things often get in the way of the really good parts of this plan. Likely more than you're interested in doing at this stage for this plan, but maybe next time around, consider what could get shuttled to an Appendix in order to allow the plan to flow better and clearly articulate a vision/purpose.</p> <p>- Consider a re-work of the Executive Summary set an aspirational tone, summarize key messages, and elevate focus areas before launching into required plan content.</p>	<p>Well said. We considering a communications version that is more oriented for the general public consumption a quick read with key messages and a bit more color. This document is a more dry read given it is meant to satisfy statutory requirements. Our audience is primarily for other governmental entities who we need to align our goals with; clarify our role and theirs; be clear about the services we offer; and the resources we have to manage; identify significant issues to be addressed etc...</p>
167	Hennepin County	12/16/2020	<p>And, not specifically related to this plan, but feedback I heard from our Transportation Department when discussing this plan, so something I wanted to pass along: it's confusing for them to figure out when and how they need to interact with you on projects – is this plan an opportunity to more clearly spell that out? Maybe this is just because we're the county and not one of your member cities, and if that's a problem that's unique to us then maybe we should just discuss outside of the context of plan review at some point, but didn't want to miss the opportunity to have that conversation.</p>	<p>noted. We are non regulatory, so we don't have any requirements for HC projects, that would be with the cities that enforce stormwater management within the MWMO. We would be open to meeting and further discussing opportunities for partnership with the county on capital projects, through similar timelines and project review as delineated for our member cities in section 3.</p>
168	CPED	12/17/2020	<p>On pdf pages 108 and 109 the existing and future land uses refer to the Minneapolis Plan for Sustainable Growth. We have adopted a new comprehensive plan, Minneapolis 2040, with a revised future land use map. https://minneapolis2040.com/</p>	<p>noted. We will work to update this before sending out the 90 day review. Here is the dataset we are using: http://opendata.minneapolismn.gov/datasets/future-land-use-and-built-form-2040 it appears to have been last updated January 2021. If this is wrong, please let us know and we can update the information</p>
169	CPED	12/17/2020	<p>On pdf page 135 related to the MRCCA, we will be adopting our MRCCA zoning ordinance (hopefully) this Friday (12/18/2020) with an effective date of January 1, 2021. http://www2.minneapolismn.gov/cped/planning/WCMSP-225822</p>	<p>See Section 4.5.5 for updated content on MRCCA As a part of our plan update, the MWMO is developing web based guidance on with the current status of our Member cities plans / ordinances for the MRCCA. The link will be inserted in the final Plan.</p>