

URRWMO 60-Day Plan Review Comments

URRWMO Draft Watershed Management Plan

Submitted for Agency Review December 14th, 2018

Comments Received through February 12th, 2019

COMMENT #	LOCATION WITHIN DRAFT PLAN	COMMENT	RESPONSE
Anoka Conservation District			
1	Exec Summary, Table EX-1. Goals A.1, A.2, B.1, B.2, D.1, F.2, G.2	These goals represent 32% of the URRWMO's goals. They all require the communities to update their ordinances to "applicable Federal, State and local standards." It seems meaningless to require them to do what they're already required to do.	Leaving these goals in place is harmless. However, consideration of what customized approaches would be appropriate locally was suggested by ACD. See the next line of this table for a specific example.
2	Exec Summary, Table EX-1. Goal A.1 Goal A. 1. "Require member communities to update post-construction stormwater management ordinances to be compliant with all applicable federal, state and local standards...maintain peak runoff rates."	The text requires maintaining runoff rates during development. In addition to rates, there are substantial concerns, verified by local models (see recent Lake George study and Rum River monitoring results), that increased volumes and nutrients during development will be detrimental to water quality. In order to meet the goal on page 52 of "implement policies designed to achieve a goal of non-degradation for water quality..." the URRWMO should at least provide general goals for stormwater nutrient and pollutants for new development.	Appendix D includes the URRWMO's Standards, Regulations and Operations. Policy #D-4 lists that the runoff rates and volumes from 1 and 2 year 24 hour precipitation event at remain the same post-construction. At this time, the URRWMO would prefer to continue using the minimum state standards for TSS and TP reductions. The URRWMO requirements for water quality treatment in new development sites are also listed within Appendix D. While this content is in the plan, the plan text was revised to better enforce the importance of Appendix D and encourage a careful review by the reader.
3	Ch. 3- Assessment of Issues, Page 52, Table 3-1, section 3 Table 3-1 states "the URRWMO will review applicable ordinances (post-construction stormwater management, floodplain management, and shoreline management) from each member community and require revisions to community ordinances to establish a uniform minimum standard."	It seems there is conflicting text in the plan regarding whether the communities or the URRWMO is reviewing local ordinances and creating local uniform standards. Table 3-1 states the URRWMO will do these tasks but Table 5-4 states the cities will do it. If only the cities do it, who will compare amongst cities? Also, it's unclear whether local uniform standards will be created, or there will only be a review to compare local ordinances to existing standards – different portions of the plan conflict.	The plan was updated to rectify the conflicting or unclear sections of the plan. Member Communities will be required to update their local ordinances and indicate the date of this update on their annual reporting form. The URRWMO Board can (if desired) authorize the Watershed Coordinator at any point to complete a review of all of the updated ordinances to confirm that they comply with the URRWMO standards.
4	Exec Summary, Table EX-2. Section B Exec Summary, Table EX-2. Section H	The bottom rows in "Fund ongoing water quality sampling..." are duplicative.	Removed duplicate row.
5	"...Revise [water] sampling routine to comply with WRAPS recommendation..."	The sampling routine is already defined in the monitoring plan in this draft watershed plan.	Deleted "Revise sampling routine to comply with WRAPS recommendation." Made similar edits to Table EX-1, Goal H.4.
6	Ch. 3- Assessment of Issues, Page 52, Table 3-1, row 1 The URRWMO's "monitoring plan will be developed by 2017..."	The monitoring plan has been (not will be) developed and is in the draft watershed plan.	Reworded this section to reflect existence of the monitoring plan.

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7	Ch. 3- Assessment of Issues, Page 5 2, Table 3-1, row 1 "Biomonitoring: ...plans to discontinue"	The monitoring plan includes biomonitoring, funded by outside sources.	Reworded to reflect ongoing biomonitoring.
8	Exec Summary, Table EX-2. Section B "TAC will select the project (s) based on SWAS and..."	Acronyms are not defined.	Defined acronyms.
9	Implementation plan – table 5.4 The schedule of planned expenditures includes \$50,000 in 2028 for watershed plan update.	Does the URRWMO really want to put all the watershed plan update expense in 2028? Would it be easier on local tax levies to collect \$10,000 in each of five years leading up to the plan update?	The URRWMO Board has discussed the budgeting for the next 10-year plan, and expressed a preference for keeping the plan as written with funds allocated in 2028.
10	Table 5-1, Water monitoring plan Lake George water quality is to be monitored by the Met Council CAMP volunteer program.	Professional water quality monitoring of Lake George is recommended. Investments in water quality improvement are planned so consistent monitoring methods are needed to track changes professional monitoring has been done in the past. The cost is \$500/yr more, but overall costs could be kept the same by reducing the number of years monitored.	Revised Table 5-1 to change Lake George water quality monitoring to the "ACD option."
11	Not currently in the plan	The draft plan does not include the MN Buffer Law "additional waters" policy developed by the Anoka Conservation District. The URRWMO is required to address this information, and consider whether to include ACD's criteria as general guidance or require measures such as buffers on these waters. Please contact ACD for more information.	Addressed MN Buffer Law "additional waters" in the draft plan.
12	Not currently in the plan	ACD recently completed an updated Rum River inventory with riverbank erosion sites. Please consider including this by reference in the URRWMO plan, as it includes candidate projects.	Incorporated by reference (or as a "guidance document") the Anoka Conservation District 2018 Rum Riverbank Inventory.

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Anoka County			
13	General Comments	<p>In 2017, URRWMO further revised their ten-year plan to include comments by state and local agencies. The comments and recommendations that Anoka County Environmental Services submitted in its December 12, 2016 review (combined with other County agencies) was considered and responded by the URRWMO. We see that many were included in the revised draft of the Plan. The revised Plan includes greater detail in the collaboration and funding for implementation by the Watershed. We commend the Upper Rum River Watershed Management Organization for its persistence in establishing this plan.</p> <p>We do not have any further comments and are therefore waiving further review of the 60-day submittal.</p> <p>The following includes comments from the Environmental Services and Parks Department's within the County.</p>	The URRWMO Board is happy to hear that the major plan revisions were appreciated by Anoka County.
14	Figure 2-9, Planned Land Use Map	<p>The URRWMO should change the designation for Cedar Creek Conservation Area, which is owned and operated by the County to Open Space or Restrictive Use from the current designation of Rural or Large Lot Residential.</p>	Revised Figure 2-9
15	Chapter 2, Page 26, 2nd paragraph	<p>The WMO should consider referring to this area as the Sandhill Crane Natural Area and not County Park, as several agencies have partnered together to establish this area.</p>	Revised text with appropriate name.
16	Page 31, 2.3.3.	<p>Neds-Mud-Deer Lake County Park should be referred to as Sandhill Crane Natural Area.</p>	Revised text with appropriate name.
17	Table 3-3	<p>Rum River WRAPS Strategies with the URRWMO, East Twin Lake: Primary Responsibility to ensure new development adheres to standards is listed as the County, but the County does not have land use authority to regulate or enforce the standards. This would be the WMO through the local cities. The same will be true for the Rum River, Urban Stormwater Management Practices, to stabilize outfalls and stormwater discharge points. The County can only address those areas that fall within the County's jurisdiction. Other areas outside the County's jurisdiction will be the responsibility of the URRWMO or the local cities to regulate and enforce.</p>	Revised text to assign appropriate responsibility.
Lower Rum River Watershed Management Organization			
18	General Comments	<p>LRRWMO comments on the December 2016 draft were provided in correspondence to the URWWMO dated January 19, 2017. These comments are restated below with a response provided.</p>	Summary comment – no action required.

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19		<p>2017 Comment: The implementation of storm water management practices by the URRWMO on surface water reaching the Rum River will have a direct effect on the water flowing through the LRRWMO and reaching the Mississippi River. The draft management plan states that the local communities through their approved local plans will manage and regulate the quantity and quality of surface water within the URRWMO. However, there are no specific standards or criteria identified in the Plan. Standards are necessary for implementing consistent management practices throughout the WMO. It is recommended that the URRWMO establish the rate control, volume retention and water quality management goals established by the MPCA as minimum standard to be met. Adopting these standards would be consistent with the current management practices of the LRRWMO.</p> <p>2019 Updated Comment: It does not appear that specific design standards for surface water management have been provided in the 60-day draft report. Managing the quantity and quality of storm water within the watershed is key in maintaining the integrity of the Rum River. Table 5–3 for Water Quantity and Floodplain Management states a uniform minimum runoff control standard for new development and redevelopment that incorporates current state and federal standards is to be established. If the municipalities are to be regulating on-going development, a uniform set of criteria should be established and overseen by the URRWMO. The plan should address how this is to be regulated, through a permitting program or other regulatory control, and how it will be enforced. The current draft does not specify this.</p> <p>Atlas 14 is the current precipitation tool used for the management of storm water quantity. Atlas 14 precipitation is referenced in the draft plan but how it is to be implemented and used as a design tool by the URRWMO of the local communities has not been identified.</p> <p>The Plan needs to reference water quality standards to be used and enforced as development continues and redevelopment is proposed in the URRWMO. If the standards are to be regulated by the municipalities, again the URRWMO needs to specifically specify the standards to be met. This would include a reporting program by each municipality to the URRWMO showing how these standards are being implemented. The current draft does not specify this.</p> <p>As previously stated, management practices implemented by the URRWMO will have a direct effect on the water quantity and quality of the Rum River reaching the downstream LRRWMO.</p>	<p>Appendix D includes the URRWMO's Standards, Regulations and Operations, including the development standards for water quality. While this content is in the plan, the plan text was revised to better enforce the importance of Appendix D and encourage a careful review by the reader.</p> <p>The Draft Plan for 60-day review included the older member City Annual Reporting Form, confirming that municipalities are implementing their standards. An updated reporting form is now included with the Draft Plan for 90-day review that will provide more clarity on this issue. Member communities are required to indicate the date of their review to ensure they comply with the URRWMO standards.</p> <p>In addition, Goal A.1 was revised to "Require the use of either the 24-hour NOAA Atlas-14 data in Table 2-3 or the NRCS published county-wide data for Anoka County, whichever is greater"</p>

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COMMENT #	LOCATION WITHIN DRAFT PLAN	COMMENT	RESPONSE
20		<p>2017 Comment: The plan also needs to address the improvement and maintenance of drainage systems, whether it is a ditch, storm sewer or the river, crossing WMO boundaries. This should include, 1) establishing an on-going inspection program to ensure the conveyance system is functioning properly and 2) a plan for joint projects, should it become necessary, for the improvement and maintenance of these drainage systems.</p> <p>2019 Updated Comment: <i>If the management of surface runoff within the URRWMO is primarily through existing and proposed ditch systems, a plan for the improvement and maintenance of these system needs to be established. The ditch systems, if not properly maintained, will continue to provide of source of sediment and nutrients that will eventually reach the Rum River. Incorporation of the management objective required in the prior comment [sic] should be a high priority of the URRWMO in water quantity and quality improvements within the URRWMO. In areas where the ditch(s) have not been maintained and the drained area has reverted back to wetland the function and value of the restored wetland should be maintained. Again, this does not appear to have be addressed in the Plan.</i></p>	<p>The DRAFT plan indicates in Appendix D (L-15) that each member community is responsible for the maintenance and proper functioning of the public drainage system, with the exception of County ditches.</p> <p>The URRWMO Board discussed the idea of revising the plan to require member communities to inventory and inspect all of the public (non-County) drainage systems and report their findings back to the URRWMO. However, the board recognized that each member community is different and should be allowed to complete inventories and inspections based on their community needs. Therefore, the plan was kept as written with member communities held responsible for non-county public drainage systems. They could report back to the URRWMO on the status of their infrastructure and communicate the need for joint projects if they arise. County ditches will remain the responsibility of the County, since the County is not a formal member of the URRWMO.</p>
21		<p>2017 Comment: The plan should address coordination with the LRRWMO or cities within the WMO the control of invasive species, fish, in the Rum River.</p> <p>2019 Updated Comment: <i>A high priority has recently been place on the control of aquatic invasive species from migrating upstream in the Rum River and eventually reaching Mille Lacs Lake. It does not appear that the plan states how the URRWMO will participate in proposals for addressing this issue presented by the Minnesota Department of Natural Resources and the US Army Corps of Engineers.</i></p> <p><i>Reference to a Feasibility Study for the Anoka Dam identified in Table 3, Special Projects, should be removed since the dam is not located in the URRWMO.</i></p> <p><i>A statement describing the URRWMO participation in the planning process for aquatic invasive species management should be stated.</i></p>	<p>The URRWMO Board discussed the control of aquatic invasive species migrating upstream in the River River. The URRWMO is supportive of the LRRWMO's efforts in this area, however it was determined that the URRWMO would be focusing on other implementation efforts within this 10-year planning cycle. Therefore, the plan was left as written in regards to this issue.</p> <p>The reference of the Anoka Dam feasibility study was removed from table 3.</p>
22		<p>The Plan does not specifically define how wetland buffer standards are to be established and regulated by either the URRWMO of the local communities. Wetland buffers should be established based on the type, function and values of a wetland with the criteria uniformly applied over the entire URRWMO watershed. Buffers provide a significant role in water quality improvement and wildlife habitat associated with wetland management. The responsibilities of wetland management including the establishment and maintenance of wetland buffers needs to be included in the Plan.</p>	<p>The current URRWMO Wetland standards are posted on the URRWMO website. The draft plan currently states that the URRWMO TAC will review the wetland standards in 2020 and advise the URRWMO board on any changes that could be made to these standards. The plan text was revised to provide more clarity on this issue and direct the reader to the URRWMO website for the current standards.</p>

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23		The Plan specifically identifies FEMA Flood Insurance Studies to be used for the 100-year frequency management elevations of the water resources within the URRWMO. The Plan also mentions that member communities might consider remapping their floodplains and associated models using updated Atlas 14 estimates. This should be identified as a HIGH PRIORITY by the URRWMO and the member communities. Using precipitation amounts from T.P. 40 is obsolete in the storm water management community.	This idea was discussed at the TAC meeting on November 20, 2018. The URRWMO Board talked through the issue at the December 4, 2018 meeting, and while remapping floodplains are important and should be encouraged, the URRWMO wanted to focus more efforts on project implementation within this 10-year planning cycle.
24		Criteria should be established and presented in the plan for the regulation of development in regards to 100-year flood elevations (e.g. low floor elevation of structure established two feet above the flood elevation of a water body or stream).	Appendix D includes the URRWMO's Standards, Regulations and Operations, including a statement that the 'lowest floor elevation of all development including basements shall be at least 1 foot above the 100-year high water level'. While this content is in the plan, the plan text was revised to better enforce the importance of Appendix D and encourage a careful review by the reader.
25		The Plan should be specific on how the URRWMO will be involved in the management of new and redevelopment in relationship to water resource management. Will the URRWMO establish a permitting program for reviewing how development will be regulated? Or if left to the member communities, what will be included in the regulation process and how will it be enforced?	The idea of the URRWMO reviewing stormwater design plans (or have plans reviewed by an outside consultant) was discussed on the November 20, 2018 TAC meeting. The URRWMO Board talked through the issue at the December 4, 2018 meeting, and while this method works well for the LRRWMO, the URRWMO wanted to focus efforts on project implementation within this 10-year planning cycle.
26		It would be helpful to include in the text for each of the Goals that an associated completion date for each be provided.	Completion dates are provided within the Implementation Table 5-3
27	Table 3.1	The Plan should identify a time frame for the completion and submittal of the local plans and ordinances to the URRWMO for approval, Table 3.1.	The date is listed in the Implementation Table 5-3, under Section H Commission Operations and Programming. Reviews should be completed by 2020.
28	Table 4.1, Goal D.1	Table 4.1, Goal D.1 states, Protect the quantity and quality of groundwater resources. Measurable by community annual reports that document that communities are complying with their applicable wellhead protection plans. Do the member communities have municipal water systems with well head protection plans?	Currently Oak Grove, St. Francis and East Bethel have Wellhead Protection Plans. The Cities of Ham Lake, Nowthen and Bethel do not.
Metropolitan Council			
29	General Comment	As we stated in our original review letters, we appreciate that the original plan contained a thorough inventory of land and water resources and that the watershed included local and regional partners in the discussion of priority issues. This plan builds on those strengths and wisely shifts efforts from assessment and planning to implementation of projects to improve water quality within the watershed. We especially appreciate the intention to hire a Watershed Management Coordinator to complete administrative review work and facilitate URRWMO actions, and the goal of growing the URRWMO budget to fund local matches for projects within the watershed. We believe these actions will lead to a more effective and successful URRWMO. While we feel the Plan meets the requirements of 8410 and the Policy Plan, we recommend the following to help strengthen the Plan:	Great feedback. No action required.

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30		Tie water quantity and quality to land use and establish a land use goal. The Plan identifies that increased runoff volume can occur due to development, but little on what should be done about it. We strongly recommend that the URRWMO consider adopting the state's Minimal Impact Design Standards (MIDS), which are well suited to growing communities that have not yet been fully developed. More information about MIDS can be obtained from the Minnesota Pollution Control Agency (MPCA), which developed the program.	The inclusion of MIDS was discussed carefully by the URRWMO Board during this and prior review sessions. At this time, the Board did not choose to require member communities to adopt MIDS. However, the plan was revised to referenced MIDS within the plan text, and encourage member communities to review them and potentially adopt them as they deem appropriate.
31		As ordinance review and update is a major focus of the Plan goals and actions, consider having the new Watershed Management Coordinator meet with each member community to review their current stormwater, floodplain, erosion control, and shoreland management ordinances and agree on updates to be made to meet all applicable Federal, State, and local standards. If communities have ordinances of widely varying quality, consider developing URRWMO model ordinances that communities could adopt.	The Board discussed the Watershed Management Coordinator responsibilities, and this task was not included within their scope of work. The plan was updated to rectify the conflicting or unclear sections of the plan: Member Communities will be required to update their local ordianances and indicate the date of this update on their annual reporting form. The URRWMO Board can (if desired) authorized the Watershed Coordinator at any point to completed a review of all of the updated ordianaces to confirm that they comply with the URRWMO standards.
32	Section 2.4.2, Section 2.4.3 and Table 2-10	Update Section 2.4.2, Section 2.4.3 and Table 2-10 to reflect the MPCA's 2018 Impaired Waters List that was approved by the EPA on January 28 (http://www.pca.state.mn.us/water/minnesotaS-impaired-waters-list).	Updated the plan to reflect the 2018 listings.
33	Table 2-10	Add the Rum River from Stanchfield Cr to Seelye Bk (07010207-504) to Table 2-10 for Aquatic Consumption-Mercury in fish tissue.	Updated the plan to reflect the 2018 listings.
34	Table 2-10	Add impairments for the Rum River downstream of the URRWMO and the Upper Mississippi River to Table 2-10. These water bodies are immediately downstream and may be impacted by actions taken in the URRWMO.	Updated the plan to include the additional waterbodies.
35		The Metropolitan Council looks forward to continuing to work with the URRWMO and Anoka Conservation District (ACD) through our lake monitoring program. Metropolitan Council has a goal of monitoring Fish and Pickerel Lakes every other year throughout the Plan 10-year cycle. We would encourage URRWMO and ACD to enroll East Twin Lake and Lake George in the Council's CAMP monitoring program. If a volunteer is not found for either of these lakes, the Council has a program within CAMP to work directly with agencies to monitor lakes. Please contact Brian Johnson at 651-602-8743 to discuss lake monitoring options.	The water quality sampling protocol has been extensively reviewed by ACD and the Board prior to submission of the Draft 60-day review Plan. Future changes can be addressed at a later date if needed.
MN Board of Water and Soil Resources			
36	Section 3.1.2	WRAPS Findings and Proposed Actions. The Rum River WRAPS has now been finalized as mentioned in this section but Table 3-2 title still refers to the Preliminary WRAPS and the reason why is not clear.	Updated the typo within the text.

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37	Section 3.2 – Identification of Priority Issues and Policies	In this section “Funding” availability to watershed through member communities is identified as the number 1 issue, yet this issue is not really addressed in the plan or the plan development process. The URRWMO did however work with member communities to increase annual budgets by the estimated amounts needed to fund implementation of the plan. We do still suggest that the URRWMO complete a funding capacity analysis prior to the next plan update or if the estimated funding should prove insufficient to address plan goals.	The text was revised to reframe the number one issue, since significant changes have taken plan throughout the plan development. It now indicates that efforts are underway to utilities grant funding opportunities to supplement funds provided by member communities.
38	Chapter 4 – Goals	Goals A.1, B.1 and F.2 pertain to the URRWMO requiring member communities to update all applicable water quantity, water quality and erosion control ordinances to be compliant with Federal, State and local standards. Instead of local standards the text should refer to URRWMO standards. The URRWMO will also need to be prepared to provide the member communities the specific Federal and State standards that they need to be compliant with.	Appendix D outlines the specific standards, regulations and operations for the URRWMO. However, it was unclear that this Appendix should be referenced to understand the specific standards. The Appendix D title will be revised to “URRWMO Standards, Regulations and Operations” and more supporting text was added to encourage more careful review by the reader. In addition, the updated Annual Reporting Form helps guide the municipalities on where to find more information on the minimal standards required by the URRWMO (either Appendix D or State documentation).
39	Goal A.1	Goal A.1 last sentence should probably read “...and 100-yr peak runoff rates at or below levels”. This would also be a good place to identify the volume control requirement.	Revised the text accordingly.
40	Section 4.8	Section 4.8 heading for Goal Area H should probably read URRWMO (rather than Commission) Operations and Programming.	Revised the text accordingly.
41	Section 5.1.1 Reporting and Evaluation	For the first full paragraph on Page 75, revise the second sentence to read “...the URRWMO will amend the Plan...”. The last sentence of the same paragraph mentions that the URRWMO will take action to ensure that the URRWMO rules and policies are being implemented by the member cities. This statement is good but the specific actions that the URRWMO will initially take need to be identified in the plan. An example process would be one where staff identifies the issues and brings it to the URRWMO Board for direction for staff to first try correcting the problem at the staff level. If that doesn't work then escalate the issue to direct contact from URRWMO Board and LGU City Council. If the issue still isn't corrected the URRWMO should notify the BWSR of the issue for additional guidance as the issue potentially could affect the URRWMO's ability to implement its plan.	This comment was carefully considered by the URRWMO Board, and they agreed that a process should be included to ensure that member cities are implementing the URRWMO's plan appropriately. The text was revised to include a process similar to what was described within this comment.

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42	Section 5.1.4	<p>Section 5.1.4 Implementation of the URRWMO Capital Improvement Program, introduces the concept of "Guidance Documents" and identifies the initial three that the WMO Board has adopted. The implementation program budgets for 4 additional SWAS's to be prepared during the life of the plan. However the plan doesn't specifically identify which are the next ones to be completed. Instead this is deferred to the TAC to select in the year before the study is proposed. This process would likely result in the need for a plan amendment to do the study, potentially resulting in a delay in applying for the grant. Then another amendment to include the finished study into the WMO plan. The WMO Managers need to select, prioritize and identify in the plan the next 4 subwatershed SWAS's based on their best available information. This will avoid the need to do a plan amendment just to do the study. Should the TAC identify a different priority subwatershed that is not in the plan the WMO can then pursue an amendment to add it at that time. The plan also needs to identify the process and criteria that the WMO will follow in developing and adopting a SWAS and amending it into the plan. We would suggest consulting with the ACD on the selection of the future SWAS locations. One other point of clarification that needs to be made is that the TAC would not actually select project or future SWAS locations but would instead make recommendations to the URRWMO Board.</p>	<p>The Board discussed ranking of potential future SWASs and agreed to include a list within the plan, ranking them into categories of "High, Medium or Low Priority". This should provide support when applying for grant funding and reduce the need to plan amendments. A process was also included within the text indicating how the URRWMO could add a different priority subwatershed/area/study through an amendment process.</p> <p>In addition, the text was revised to state that the TAC will advise the URRWMO Board on selecting future project/SWAS efforts</p>
43	Section 5.4.2	<p>"Local Water Management Plans and Official Controls" needs to be consistent with the Local Plan Requirements identified in 8410.0105. Subp. 9 and 8410.0160 which deals with Local Water Plan requirements. Note 8410.0105 Subp. 9, B. ties local plan updates to within two years of their required comprehensive plan update. The local comprehensive plans were due December 31, 2018. Since this date has already passed the URRWMO plan will need to include language for Local Plan updates to bring them into compliance with this new plan and then also tie future local water Plan updates to the 10-yr comprehensive plan update cycle.</p>	<p>Revised the plan to reference that Comp Plans that were submitted by the Dec 2018 deadline will need to review the URRWMO plan and amend the Comp Plan to comply if there are any discrepancies. A copy of the draft plan will be sent to all of the member communities reminding them that Comp Plans need to be in compliance.</p>
44	Section 5.5.2 – Amendments to Plan	<p>This section would benefit from more specific Rule references.</p>	<p>Revised the plan to have more specific rule references.</p>

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45		The Plan, as required by 8410.0105 Subpart 1, still needs to include a procedure (or a better defined procedure) to evaluate the WMO's progress towards achieving the various goals and implementation actions identified throughout the plan. This issue has been partially addressed by assigning the responsibility for preparation of this bi-annual evaluation to the new Watershed Management Coordinator. The actual procedure still needs a little more information to provide guidance for the Watershed Management Coordinator. We would suggest providing a draft reporting form that can be used to chart how much of each goal has been achieved. The WMO plan per 8410.0105 Subpart 1. C, still needs a procedure to evaluate progress for implementation of local water plans and procedures to address a local government unit failing to implement parts of its local water plan. The inclusion of forms from the previous 2007 plan, which the local communities were to complete for that 2007 plan is not sufficient.	<p>The plan includes a new annual reporting form for member communities, replacing the form from the 2007 plan. Text content was also added to provide a procedure to address a local government unit failing to implement parts of its local water plan.</p> <p>The Board carefully considered the comment regarding the procedure/method for the URRWMO to evaluate its progress towards its goals. The Board wanted to allow the new Watershed Coordinator to craft their own form to record progress towards the URRWMO goals. The Board agreed that the Coordinator should have the flexibility to craft this form based on their own ideas/experiences, including feedback from both the Board and TAC as needed. However, in order to assist the Watershed Coordinator in developing this form, text was added to the plan to provide more guidance on how complete the bi-annual evaluation.</p>
46	Appendix D	Appendix "D" URRWMO Regulations and Operations" contains a table of policies that appear to be from the 2007 plan that relate to regulations and another table of policies from the 2007 plan that relate to URRWMO operations. Both contain good information but it is not clear how they apply to the new plan. Provide some further clarification on this appendix and how it is used for implementation of the 2019 WMO plan.	<p>Appendix D was originally taken from the 2007 and then significantly revised based on the plan updates, new regulations/standards. These policies are what the URRWMO will use to confirm that member communities are complying with a set of minimum standards.</p> <p>The Appendix D title will be revised to "URRWMO Standards, Regulations and Operations".</p> <p>In addition, the updated Annual Reporting Form helps guide the municipalities on where to find more information on the minimal standards required by the URRWMO (either Appendix D or State documentation)</p>
47	Appendix F	Appendix "F" has been added which provides a table of District adopted "Guidance Documents" which the District uses to prioritize project selection and is easily amended to add future Guidance Documents as they are completed and adopted by the WMO Board. All adopted guidance documents should be available on the WMO website for reference. The criteria and process the WMO will follow in adopting new guidance documents needs to be described in the Plan.	<p>The Board requests for ACD to post the guidance documents on their website. Appendix F lists all of their current locations on the internet (not housed on the URRWMO website)</p>

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COMMENT #	LOCATION WITHIN DRAFT PLAN	COMMENT	RESPONSE
MN Department of Natural Resources			
48	General Comments	<p>From Area Hydrologist, Jason Spiegel: The Plan provides a very thorough and well-organized inventory and assessment of the resources as well as a good assessment of issues and opportunities. The implementation plan, however, does not seem adequate to address the identified issues and opportunities. Additionally, while this version of the plan does take a small step forward on funding for projects, the proposed funding levels remain very low and will limit the number and quality of projects that can be completed.</p> <p>Since this is a “fourth generation” plan, and a WRAPS report is available for this watershed, we would expect more specific and targeted action plans and implementation activities be identified and carried out by the watershed district during this 10-year period. Only three projects are projected to be completed during this 10-year plan, and two of the three proposed projects are not yet identified. Without identified projects, it is hard to develop an appropriate budget to ensure that projects will be able to be completed.</p> <p>While this iteration of the plan at least provides some funding for the implementation of projects, overall the proposed funding levels do not appear to be reasonable for producing meaningful protection or improvements to water resources. Most of the responsibility to identify and implement improvement and protection projects within the watershed continues to be passed on to other agencies. As such, it is strongly recommended that significant increases in funding by member communities be obtained to adequately meet the needs of providing meaningful support for the Upper Rum River Water Management Organization to address water resource concerns within the watershed.</p> <p>An analysis completed as part of the Plan development indicated that City membership contributions per \$100,000 of taxable market value are much lower than other Metro Area Water Management Organizations and is much less than what citizens participating in the open house survey indicated they were willing to pay. Many grant and partnership opportunities exist to supplement local tax dollars, but the WMO should work towards developing a more substantial budget that includes a higher percentage of match in order to competitively tap into these opportunities and meet the goals laid out in this plan.</p> <p>This iteration of the Upper Rum River’s Watershed Management Plan takes a small step towards fulfilling the responsibilities and goals of the WMO, but large gaps remain. The DNR encourages the WMO to continue to develop capacity and work towards a more substantial budget to fill these gaps and to play a stronger role in the management and protection of water resources within the WMO boundaries.</p>	<p>The URRWMO has discussed funding levels and projects with the various stakeholders, most notably with each Member Community. The URRWMO Board of Managers agreed that funding levels in the Draft Plan and project identified are appropriate, adequate, and reasonable for producing meaningful protection and improvements to water resources.</p> <p>The URRWMO has made progress within this planning cycle to focus efforts on implementing projects throughout the Upper Rum. The Board has agreed to significant increases in funding (approximately 60K per year) in comparison to prior funding levels (approximately 14K per year). This amounts to nearly a 400% increase in overall spending. The URRWMO also plans to make better use of grant funding opportunities and other funding sources. While the budgeted amounts might not match those in more urbanized areas, it represents a significant change in how the URRWMO has operated historically, and has coordinated closely with ACD and BSWR throughout the planning process. There is still much work yet to be accomplished, but the URRWMO is excited to start implementing projects within the watershed and work on garnering more public support for these efforts.</p>

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49	General Comments	<p>From Environmental Review Specialist Becky Horton:</p> <p>We appreciate the WMO's attention to the abundance, variety, and quality of native plant communities, sites of biodiversity significance, regionally significant ecological areas, and rare plant, animal, and insect species. The presence of large tracts of these features is one indication of the health of a watershed, as plant and animal diversity help the landscape to maintain important watershed functions. Specific comments related to these items are below.</p>	No changes required.
50	Section 2.2.2 Natural Areas and Wildlife Management Areas and maps	<p>They include a large list of natural areas present within the WMO, but it's not complete (which I think is ok, since I'm not sure that they need to mention everything, rather than highlight), though they could add the Carl B Bonnell WMA, Robert and Marilyn Burman WMA, and Mallard Marsh WMA, and the George Lake AMA to the list. As a side note, in looking at the land use map, it looks like these WMA's are depicted on the map, except for the Mallard Marsh WMA seems to be missing. Shapefiles are available on the Minnesota Geospatial Commons website</p>	Revised the text to include the natural areas mentioned within the comment and update the Land Use Map
51	Section 2.2.2 Natural Areas and Wildlife Management Areas and maps	<p>The map that shows the Central Region Regionally Significant Ecological Areas map seems to use the data layer that was created in 2000. This layer was updated in 2008, at least for this portion of the Region. I recommend that they download the updated data layer to use in this plan. The new layer is available on the Minnesota Geospatial Commons website; additional information regarding CRRSEA data can be found at the following website: http://www.dnr.state.mn.us/rsea/index.html</p>	Revised the Regionally Significant Ecological Areas map to reference the 2008 dataset.
52	Section 2.2.2 Natural Areas and Wildlife Management Areas and maps	<p>The MBS map looks like it needs to be updated, as the legend shows the MBS sites, however, the map itself does not have these areas shown.</p>	Revised the MBS map with the more recent data.
53	Section 2.2.2 Natural Areas and Wildlife Management Areas and maps	<p>Within the WMO, there are a few lakes identified as Lakes of Biological Significance: Norris, George, Hickey, and Fish. Lakes are designated as moderate, high, or outstanding based on unique plant or animal presence (aquatic plants, fish, amphibian, and birds). This data layer can be downloaded from the Minnesota Geospatial Commons website. I recommend they consider using this data to help identify lakes that could be managed/studied/protected for these resources.</p>	Updated the text to mention the Lakes of Biological Significance, and add the data to one of the maps.

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54	Section 2.2.4.1 Rare and Endangered Species	<p>Rare plant, animal, insect species: The Natural Heritage Information System (NHIS) is continually updated as new information becomes available and will include current records and survey. As the WMO works on updating the Plan, we recommend that the WMO request an updated NHIS database query and list the new date in the WMO Plan update, It is DNR policy that NHIS reviews are not considered valid if it has been more than one year since the review.</p> <p>In addition, we recommend that WMO consider applying for a NHIS data license. As a watershed management organization, you would receive the license for free. The license is provided on a two year basis. Under a license agreement, you would have access to rare features data for the WMO. Information on the DNR Rare Features data license, and a Data Request form for a NHIS review completed by the can be found at: http://www.dnr.state.mn.us/eco/nhrp/nhis.html.</p>	<p>The URRWMO requested updated NHIS data from the DNR and updated the table within the Plan Text. In the future, the URRWMO can request a free NHIS data license. If directed/approved by the URRWMO Board, this would be an action item for the new Watershed Management Coordinator.</p>
55	Section 2.2.4.1 Rare and Endangered Species	<p>Native plant communities: We recommend including the S rank (conservation status) of these communities. The S rank reflects the relative rarity and endangerment of these communities throughout Minnesota (S1 = Critically Imperiled, S2 = Imperiled, S3 = Vulnerable to Extirpation, S4 = Uncommon but not Rare, S5 = Common and Abundant). Including these S ranks can help identify priority areas that require additional protection.</p>	<p>Included the S rank for the Native Plant Communities.</p>
56	Section 2.2.4.1 Rare and Endangered Species	<p>DNR recommends that the plan include specific goals and policies to address how rare species and native plant communities will be protected. Information on the biology, habitat use, and conservation measures of the rare species of interest can be obtained from the DNR Rare Species Guide: http://www.dnr.state.mn.us/rsg/index.html.</p>	<p>Revised the plan to reference the DNR Rare Species Guide to direct readers to conservation practices.</p> <p>At this point, the URRWMO is focused on project implementation based on SWAS reports. However, the text was revised to state that "Future priorities & protection efforts may be added with the completion of future inventories and assessments"</p>
57	General Comments	<p>Comments from DNR Forestry , Michelle Martin:</p> <p>There's no forestry state land within the Upper Rum River WMO area (there is ~480 ac of school trust land in the WMO that Forestry administers, however), so I have no major or specific comments regarding their draft plan. Below is some information that the WMO might be interested in and perhaps beneficial to add to their draft plan:</p>	<p>No changes required.</p>

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58		Importance of forested riparian areas to water resources cannot be understated. Forested riparian areas provide an array of goods and services for plant diversity, wildlife and fish habitat, nutrient, sediment, and water interception, storage, and transformation and recreational opportunities. Keeping riparian areas intact so that the functions and roles of terrestrial and aquatic ecosystems can continue to provide these services is imperative. We recommend keeping forested riparian areas forested, which does not necessarily preclude forest management activities. If riparian forests are managed in the WMO area, we highly recommend consulting and using the Minnesota Forest Resource Council's Voluntary Site-Level Forest Management Guidelines for Landowners, Loggers, and Resource Managers to protect these valuable ecosystems into the future.	Revised the text to mention forested riparian areas and direct the reader to the documentation referenced within this comment.
59		Emerald ash borer (EAB) will likely have an impact on communities in the WMO area within the next 10 year watershed plan cycle. Communities should start planning for EABs arrival and take action now to reduce the sudden financial burden that comes with EAB. One can find information at this website. You can visit this interactive website to see the status of EAB in Minnesota. A small portion of the WMO area is the "EAB Generally Infested Area" and all of Anoka County is within the quarantine area. At a city level, large amounts of dead ash trees will need to be dealt with about 6 years after the initial infestation is noticed in a community. For example, EAB was discovered in Winona in 2010. Massive numbers of ash trees started dying in that area in about 2015. To minimize pesticide exposure in the environment and to save people's money, we would not recommend applying insecticides to save ash trees until symptoms of EAB infestation are within about ¼ - ½ mile of any given location. Note that ash trees can still be saved from EAB if they are lightly infested (they must still have over 50% of their normal number of leaves that are normally sized). Ideally ash trees should be treated when they are 100% healthy and not infested at all, so there is some risk of waiting until EAB infestation symptoms are visible within a ½ mile. In natural areas, forested wetlands with ash dominant in the canopy will experience a more drastic change in plant community composition and hydrology than upland communities with a minor ash component.	Revised the text to include more information about the Emerald Ash Borer. Specifics are provided as given by the comment with links to the appropriate sites on the DNR's website.
60		Two schools in the WMO area are enrolled in the DNR's School Forest Program. These two schools are located in Cedar: Cedar Creek Community School has a 70 acre school forest and East Bethel Community School has a 50 ac school forest. These forests act as an outdoor classroom for students and provides important water quality benefits for the watershed. For more information about the School Forest Program, visit our website: http://www.dnr.state.mn.us/schoolforest/index.html	Revised the text to reference the DNR's School Forest Program.

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61		The Forest Stewardship Program at the DNR provides private landowners with at least 20 acres of forested land (or land that will have trees) professional forest management advice from a qualified DNR forester or private land forestry consultant. For a fee, landowners will consult with a forester to talk about their goals for forest management. The forester will write a forest management plan and the land will be eligible for property tax relief programs and state cost-share assistance for management work. For more information on the DNR's professional forest management assistance for private landowners, please visit our webpage.	Revised the text to reference the DNR's Forest Stewardship Program.
62		Communities interested in caring for and managing their urban and community forests can find helpful information at the DNR's website on the Community Forestry webpage. Information and links about grant programs, DNR Arbor Month, and best management practices for preventing spreading invasive species and conserving wooded areas can be at this website.	Revised the text to reference the DNR's Community Forestry webpage.
63		The Minnesota Forest Legacy Program helps protect private forest land from conversion to non-forest uses through conservation easements. A portion of the Upper Rum River Watershed Management Organization is within one of the Forest Legacy Program designated Areas, the Lower St. Croix Forest Legacy Area.	Revised the text to reference the DNR's Minnesota Forest Legacy Program.
64	General Comments	Comments from District Appropriations Hydrology, Joe Richter: I've taken a look at the Upper Rum River WMO Plan and I'd like to offer you the following comments:	No changes required.
65	Page iv, Goal D.1	On Page iv, Goal D.1 is to "Protect the quantity and quality of groundwater resources". Upper Rum River WMO has proposed actions to measure the protection of groundwater quality in the WMO. We recommend that the Upper Rum River WMO adopt actions to assess the quantity of groundwater use within the WMO. DNR Water Use records could allow the Upper Rum River WMO to follow the trend of water use in the WMO and to become aware of the locations and aquifers within the WMO where groundwater use is excessive.	The URRWMO has discussed this comment and decided to keep its focus within this 10-year planning cycle on project implementation. The text however, was revised to reference the DNR's Water Use Records and provide more information on how the reader/member communities might gather data to access trends for water use.
66	Page viii, Strategy D	Page viii, Strategy D. Groundwater. As a means of improving the DNR Water Use information, the Upper Rum River WMO should require individuals and corporations that use more than 1.0 million gallons of water in a year, or 10,000 gallons per day, to obtain DNR Water Appropriation Permits as a means of tracking ground water use in the WMO. Upper Rum River WMO should also encourage the local communities to require their permit applicants to obtain DNR Water Appropriation Permits, if the volume exceeds 10,000 gallons per day, or one million gallons per year. DNR Water Appropriation Permits are required for both permanent appropriation and temporary appropriation (like construction dewatering), and for ground water and surface water appropriations. It is notable that the Rice Creek Watershed has used the DNR Water Appropriation Permit as a means to ensure that the discharge from dewatering projects does not exceed the ability of the receiving ditch or stream to carry the water (to prevent flooding).	State Law dictates who is required to obtain DNR Water Appropriation Permits. The URRWMO does not feel it is their role to insert themselves into the process at this time.

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67	Page 12, 1.3.2	Page 12, 1.3.2 Monitoring Program. Once the Upper Rum River WMO has begun to establish the areas within the WMO boundaries where large volumes of ground water are used, the WMO may want to use a ground water well to monitoring the aquifer water levels.	The water quality sampling protocol has been extensively reviewed by ACD and the Board prior to submission of the Draft 60-day review Plan. Future changes can be addressed at a later date if needed.
68	Page 32, 2.3.4	Page 32, 2.3.4 Water Appropriations. The local communities should require residents and landowners that obtain permits from the municipality to obtain DNR Water Appropriation Permits if they are involved in an activity that requires the appropriation of more than 10,000 gallons of water per day, or one million gallons of water per year.	Revised the text to include "The Minnesota Department of Natural Resources (MDNR) regulates surface water and groundwater appropriations through a permitting program. Active surface water and groundwater appropriations can be found on the MDNR's website at: http://files.dnr.state.mn.us/waters/watermgmt_section/appropriations/index-county-locationactive.pdf "
69	Page 53	Page 53, Development Management. Member communities should require that DNR Water Appropriation Permits be obtained when the appropriation of water, including for construction dewatering, is required for a development in volumes that exceed 10,000 gallons per day, or one million gallons per year.	Revised the text to include "The Minnesota Department of Natural Resources (MDNR) regulates surface water and groundwater appropriations through a permitting program. Active surface water and groundwater appropriations can be found on the MDNR's website at: http://files.dnr.state.mn.us/waters/watermgmt_section/appropriations/index-county-locationactive.pdf "
70	Page 57	Page 57, Groundwater. The DNR recommends that the Upper Rum River WMO use DNR Water Use information to determine where the use of groundwater is the largest, and which aquifers are being used in these areas, within the boundaries of the WMO. This information will help the Upper Rum River WMO to determine where the efforts to monitor ground water levels, and determine aquifer capacity, should be targeted.	The URRWMO has discussed this comment and decided to keep its focus within this 10-year planning cycle on project implementation. The text however, was revised to reference the DNR's Water Use Records and provide more information on how the reader/member communities might gather data to access trends for water use.
71	Page 66	Page 66, Regulations. The local municipalities should require applicants for city permits to be compliant with State and Federal Regulations and obtain DNR Water Appropriation Permits and Public Water Work Permits where they're required.	State Law dictates who is required to obtain DNR Water Appropriation Permits. The URRWMO does not feel it is their role to insert themselves into the process at this time.
75	Page 72	Page 72, Goal D, Groundwater. We recommend that the Upper Rum River WMO use DNR water use data to assess the quantity and location of ground water use within the Upper Rum River WMO on an annual basis. We recommend that the Upper Rum River WMO and the local communities require permit applicants to apply for DNR Water Appropriation Permits when the proposed project involves water appropriation that exceeds 10,000 gallons per day, or one million gallons per year.	State Law dictates who is required to obtain DNR Water Appropriation Permits. The URRWMO does not feel it is their role to insert themselves into the process at this time.
73	Page 79	Page 79, Education and Outreach. The Upper Rum River WMO should also consider applicants for local community permits and variances to be an audience that should be educated.	Inform the new Watershed Management Coordinator that this is a potential educational item that could be promoted by the URRWMO.

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74	Page 80	Page 80, Lake George water quality projects. Please note that appropriation of both surface water and ground water in volumes that exceed 10,000 gallons per day, or one million gallons per year, needs to be approved under a DNR Water Appropriation Permit. This could include the dewatering necessary to construct the new weir and replace culverts.	State Law dictates who is required to obtain DNR Water Appropriation Permits. As projects move forward in Lake George, they will be required to follow the State laws.
75	Page 81	Page 81, St. Francis Stormwater Retrofit Analysis. If dewatering is required for the maintenance of the stormwater basins in St. Francis for volumes that exceed 10,000 gallons per day., or one million gallons per year, then a DNR Water Appropriation Permit will be required for the project.	State Law dictates who is required to obtain DNR Water Appropriation Permits. As projects move forward in St Francis, they will be required to follow the State laws.
76	Table 5-3	Table 5-3: URRWMO 2019 -2018 Strategies and Implementation Schedule, Part D Groundwater. We recommend that the Upper Rum River WMO include the analysis of the annual DNR Water Use Reports for determining the location, aquifer, and quantity of ground water used within the Upper Rum River WMO. We also recommend that the local communities require applicants for local permits of the need to obtain DNR Water Appropriation Permits for appropriating more than 10,000 gallons per day, or one million gallons per year.	The URRWMO has discussed this comment and decided to keep its focus within this 10-year planning cycle on project implementation. The text however, was revised to reference the DNR's Water Use Records and provide more information on how the reader/member communities might gather data to access trends for water use.
77	Not currently in the plan	It is unusual to see that the Upper Rum River WMO has not noted the existence of the East Bethel Sanitary Landfill Superfund site within the boundaries of the Upper Rum River WMO.	Revised the text to reference the Superfund Site.
MN Department of Transportation			
78	Page 69, Section 4.3 Goal Area C: Wetlands and the table on page 72, Goal C.1	Add that MnDOT is the WCA LGU on its' right-of-way.	Revised the text according to the comment.
MN Pollution Control Agency			
79	Table 3-1	Table 3-1, second surface water quality goal. East Twin Lake is impaired for mercury according to section 2.4.2. Rogers Lake is not impaired for nutrients. Rogers Lake was reclassified to a wetland for assessment purposes and the impairment for nutrients was removed. According to table 2-10 Crooked Brook is impaired for low DO and Mahoney Brook is impaired for Fish.	Revised the text to reflect 2018 impairment list.
80	Table 3-1	Table 3-1, second surface water quality goal. The second possible corrective action states "member communities shall be responsible for working with the MPCA to develop total daily maximum load (TMDL) for the impaired water to which their community drains". For your information, TMDLs for the mercury impairments have been completed, as well as TMDLs for Seelye Brook and Cedar Creek. TMDLs have not been completed for Crooked Brook or Mahoney Brook.	Revised the test to indicate that TMDLs have/have not been completed for certain impairments..
81	Section 4.2	Section 4.2, first paragraph, did you want to include Mahoney Brook?	Revised the text to include Mahoney Brook
82	Section 4.2	Section 4.2, last paragraph, did you want to include Mahoney Brook and Cedar Creek?	Revised the text to include Mahoney Brook and Cedar Creek