



## Board of Managers Meeting Agenda

Wednesday - August 12<sup>th</sup>, 2020 - 3:00 p.m.

Held Remotely Online

1. Call Meeting to Order
  - 1.1 Public Comment / Introductions  
Audience members may address the Board regarding items not on the agenda. Please limit to three minutes.
  - 1.2 Approval of Agenda\* (Additions/Corrections/Deletions) Action
2. Approval of June 10<sup>th</sup>, 2020 Meeting Minutes - Chair\* Action
3. Approval of August 12<sup>th</sup>, 2020 Financial Summary & Invoices - Treasurer\* Action
4. Determine 2020 Watershed Based Implementation Funding Projects - SWCD\* Action
5. Discuss Insurance Liability Coverage Waiver - SWCD\* Action
6. Watershed Plan Update Review of Existing Plans and ID of Gaps - Barr Engineering\* Discussion
7. Updates and Handouts
  - 7.1 Grant Tracking Update - Barr\*\* Information
  - 7.2 CRWD Draft Plan Letter and CRWD Response - SWCD\* Information
  - 7.3 Website Re-Do Update - SWCD Information
  - 7.4 Other Updates / Member City Updates Information
8. Agenda Items for Next Meeting: September 9<sup>th</sup>, 2020, Location & Format TBD  
Draft 2021 Budget, Grant Update
9. Adjourn

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Please note, the August 12, 2020 LMRWMO Board meeting will take place **via teleconference by phone and/or the web-based application, Zoom, at 3:00 pm.** We are following provisions in Minnesota Open Meeting Law addressing meetings in the case of pandemic. Please visit the meeting listing below for instructions on how to participate. **The meeting link will be open at 2:15, 45 minutes prior to the start time, to allow for technical troubleshooting for people to get connected and into the meeting.**

**LMRWMO August 12th Board Meeting**

Time: Aug 12, 2020 02:15 PM Central Time (US and Canada) (Zoom meeting opens at 2:15 for troubleshooting, meeting starts at 3:00 pm)

**Join Zoom Meeting**

<https://dakotacountymn.zoom.us/j/94369757806?pwd=MUICQkVvSFRjUmNXSUZLREpZU0xrQT09>

**Meeting ID: 943 6975 7806**

**Passcode: 651569**

One tap mobile

+13126266799,,94369757806#,,,,,0#,,651569# US (Chicago)

+16465588656,,94369757806#,,,,,0#,,651569# US (New York)

**Dial by your location**

+1 312 626 6799 US (Chicago)

+1 646 558 8656 US (New York)

Meeting ID: 943 6975 7806

Passcode: 651569

\*Materials included in full packet

\*\*Materials available separately on website:

[www.dakotacountyswcd.org/watersheds/lowermisswmo/agendas.html](http://www.dakotacountyswcd.org/watersheds/lowermisswmo/agendas.html)

## MEETING MINUTES

Board of Managers Regular Meeting

June 10, 2020 - 3:00 p.m.

Meeting Held Remotely

### **Managers and Alternates in Attendance:**

Sharon Lencowski, (Chair) Inver Grove Heights

Mary Jeanne Schneeman, (Sec/Tres) Mendota Heights

Sheila Vanney, West St. Paul

Karen Reid, (Vice Chair) Saint Paul

Tom Sutton, Lilydale

Jill Smith, Mendota Heights (Alt)

### **Advisors and Others in Attendance:**

Tom Kaldunski, Inver Grove Heights

Pat Murphy, Saint Paul

Cody Joos, West St. Paul

Joe Barten, Dakota County SWCD

Ryan Ruzek, Mendota Heights

Krista Spreiter, Mendota Heights

Greg Williams, Barr Engineering

## **1. Call Meeting to Order**

The meeting was called to order by Chair Lencowski at 3:00 p.m.

### **1.1 Public Comment / Introductions**

### **1.2 Approval of Agenda**

Lencowski asked for any changes to the agenda, there were none.

**MOTION** by Reid to approve the agenda for the June 10, 2020 meeting, second by Schneeman; Roll call approval by Lencowski, Schneeman, Sutton, Reid, Vanney; motion passed.

## **2. CONSENT AGENDA**

### **2.1 Approval of the May 13<sup>th</sup>, 2020 Meeting Minutes**

Lencowski asked if there were any changes to the previous meeting minutes; one minor change was noted by Sutton.

### **2.2 Approval of June 10, 2020 Financial Summary & Invoices**

Spreiter provided an overview of the financial summary including invoices to be paid and recommended approval.

**MOTION** by Reid to approve the Consent Agenda, second by Schneeman; Roll call approval by Lencowski, Schneeman, Sutton, Reid, Vanney; motion passed.

## **3. Discuss MWS 2020-2021 Continued Participation**

There was support for continued participation in the program for the coming year with priority to those communities who do not yet have representation with a Steward in their City thus far. Barten explained that FWS staff are still figuring out how the program will be implemented with COVID restrictions. Kaldunski suggested more field-based work for capstone projects going forward.

**MOTION** by Reid to approve participation in the program at the same rate as in past years and authorize the LMRWMO Administrator to execute a contract as necessary with the FWS for the program, second by Schneeman; Roll call approval by Lencowski, Schneeman, Sutton, Reid, Vanney; motion passed.

**4. Review the 2019 Financial Audit and Approve Submittal to State**

Barten summarized the audit findings and recommended submittal to the State.

**MOTION** by Reid to approve the 2019 financial audit and submit to the State, second by Sutton; Roll call approval by Lencowski, Schneeman, Sutton, Reid, Vanney; motion passed.

**5. Discuss LMRWMO Visioning Exercise Follow-Up and Watershed Plan Update Delay**

Williams summarized the discussion topics from the previous meeting. The Board discussed and followed up on the visioning exercise from the May meeting and overall found the exercise worthwhile but recognized the difficulties inherent in remote meeting coordination and visioning exercises without the ability to meet in person. There was additional feedback on the visioning exercise language. Barten noted that it appears BWSR will likely be willing to provide a plan extension due to COVID meeting restrictions. There was general agreement to hold off on the plan update process items, including the visioning statement, TAG and CAC meeting coordination, etc. which include community engagement and go forward with items such as a gaps-analysis which could be done regardless of the ability to meet in person.

**6. Discuss Capital Region Watershed District Draft Plan Implementation Item**

Barten summarized the information provided in the packet. There was discussion on the previous letter to the CRWD, boundaries, and issues concerning consistent City of Saint Paul stormwater ordinances.

**MOTION** by Reid to direct the Board Chair and LMRMWO Administrator to draft and send a letter to the CRWD indicating the LMRWMO Board's position, as discussed, on the CRWD draft implementation item, second by Sutton; Roll call approval by Lencowski, Schneeman, Sutton, Reid, Vanney; motion passed.

**7. Updates**

**7.1 Grant Tracking Update**

There were no items specifically mentioned from the grant tracking spreadsheet.

**7.2 Other Updates / Member City Updates**

Member Cities provided updates on relevant projects in their municipalities.

**8. Adjourn** - Meeting adjourned by Chair Lencowski at 4:40 p.m.



**FINANCIAL SUMMARY**  
**June 12, 2020 to August 12, 2020**

<b>Beginning Balance - Key Community Bank</b>			<b>\$337,717.80</b>
<i>Interest</i>	June 2020 Interest	+	\$14.20
		+	
<b>Deposits</b>		+	
		+	
		+	

To be approved at this meeting:

**Key Community Bank:**

<b>Bank Fee</b>	6/30/2020	Paper Statement Fee June 2020	-	\$2.00
<b>3700</b>	8/12/2020	Campbell Knutson	-	\$51.00
<b>3701</b>	8/12/2020	Barr Engineering	-	\$1,281.50
<b>3702</b>	8/12/2020	League of Minnesota Cities	-	\$2,275.00
<b>3703</b>	8/12/2020	Peterson Company LTD	-	\$4,000.00
<b>3704</b>	8/12/2020	Dakota County Soil & Water	-	\$19,337.62

**Available Balance at Key Community Bank** **\$310,784.88**

**Gateway Bank Accounts:**

<u>Savings</u>		<i>Balance</i>		\$70,880.78
<b>Deposits</b>	<i>Interest</i>	6/30/2020	+	\$29.13
		7/31/2020	+	\$30.12
			-	
		<i>Ending Balance</i>		<b><u>\$70,940.03</u></b>
<u>Checking</u>		<i>Balance</i>		\$1,000.00
			-	
		<i>Ending Balance</i>		<b><u>\$1,000.00</u></b>

**Available Balance at Gateway Bank** **\$71,940.03**

**Available Balance - Key Community & Gateway Banks** **\$382,724.91**

**4th Generation Plan Balance for 2020** **\$45,000.00**

\*Balance includes dedicated funds to 4th Generation Watershed Plan

**CAMPBELL KNUTSON**  
***Professional Association***  
**Attorneys at Law**  
**Federal Tax I.D. #41-1562130**  
**Grand Oak Office Center I**  
**860 Blue Gentian Road, Suite 290**  
**Eagan, Minnesota 55121**  
**(651) 452-5000**

Lower Mississippi River WMO  
c/o Nancy Bauer  
City of Mendota Heights  
1101 Victoria Curve  
Mendota Heights MN 55118

Page: 1  
May 31, 2020  
Account # 601-0000G  
69

RE: GENERAL SERVICES  
RENDERED TO DATE:

			HOURS	
05/11/2020	RNK	Emails from and to Joe Barten.	0.30	51.00
		AMOUNT DUE	0.30	51.00
		TOTAL CURRENT WORK		51.00
		PREVIOUS BALANCE		\$102.00
05/19/2020		Payment - thank you		-102.00
		TOTAL AMOUNT DUE		<u>\$51.00</u>

Amounts due over 30 days will be subject to a finance charge of  
.5% per month (or an annual rate of 6%). Minimum charge - 50 cents.



# INVOICE

Barr Engineering Co.  
4300 MarketPointe Drive, Suite 200  
Minneapolis, MN 55435  
Phone: 952-832-2600; Fax: 952-832-2601  
FEIN #: 41-0905995 Inc: 1966

Ms. Nancy Bauer  
Lower Mississippi River Water Mgmt. Org.  
City of Mendota Heights  
1101 Victoria Curve  
Mendota Heights, MN 55118

July 10, 2020  
Invoice No: 23190078.00 - 230

<b>Total this Invoice</b>	<b>\$625.50</b>
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## Regarding: Watershed Management Organization

The following invoice is for professional services related to the above project, which include:

- Preparing materials for and participating in the June 10, 2020 Board of Managers meeting
- Communicating with BWSR and closing out the Lake Augusta alum treatment grant
- Communicating with LMRWMO Administrator and project management

### Professional Services from May 16, 2020 to June 12, 2020

Job	2020	2020 Engineering Services
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Task	001	Board Meetings
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#### Labor Charges

	Hours	Rate	Amount	
Engineer / Scientist / Specialist III				
Williams, Sterling	4.00	145.00	580.00	
	4.00		580.00	
<b>Subtotal Labor</b>				<b>580.00</b>
		<b>Task Subtotal</b>		<b>\$580.00</b>

Task	002	Technical Assistance
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#### Labor Charges

	Hours	Rate	Amount	
Principal				
Kieffer, Janna	.10	170.00	17.00	
Support Personnel II				
Nypan, Nyssa	.30	95.00	28.50	
	.40		45.50	
<b>Subtotal Labor</b>				<b>45.50</b>
		<b>Task Subtotal</b>		<b>\$45.50</b>
		<b>Job Subtotal</b>		<b>\$625.50</b>
		<b>Total this Invoice</b>		<b>\$625.50</b>

PLEASE REMIT TO ABOVE ADDRESS and INCLUDE INVOICE NUMBER ON CHECK.

Terms: Due upon receipt. 1 1/2% per month after 30 days. Please refer to the contract if other terms apply.

Thank you in advance for your prompt processing of this invoice. If you have any questions, please contact your Barr Project Manager, Janna M. Kieffer Phone: 952-832-2785 or E-Mail: [jkieffer@barr.com](mailto:jkieffer@barr.com).

Barr declares under the penalties of law that this account, claim or demand is just and no part of it has been paid.

Authorized By: \_\_\_\_\_



Janna Kieffer





# INVOICE

Barr Engineering Co.  
4300 MarketPointe Drive, Suite 200  
Minneapolis, MN 55435  
Phone: 952-832-2600; Fax: 952-832-2601  
FEIN #: 41-0905995 Inc: 1966

Mr. Joe Barten  
Lower Mississippi River Water Mgmt. Org.  
c/o Dakota County SWCD  
Suite 102  
4100 220th Street West  
Farmington, MN 55024

July 16, 2020  
Invoice No: 23191436.00 - 4

<b>Total this Invoice</b>	<b>\$656.00</b>
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**Regarding: Fourth generation update to the Lower Mississippi River WMO Watershed Management Plan**

This invoice is for professional services, which include the following:

- Continuing the gaps analysis based on the existing plan and responses to the notification letter
- General communicating with LMRWMO Administrator and project management

**Project Budget Status:**

Job	Task	Contract Budget	Previously Billed	Invoice Amount	Total Billed	Balance
ENG - Stakeholder Engagement	1A0	\$ 1,210.00	\$ 1,603.50	\$ -	\$ 1,603.50	\$ (393.50)
	1B0	\$ 2,930.00	\$ -	\$ -	\$ -	\$ 2,930.00
	1C0	\$ 1,550.00	\$ 510.00	\$ -	\$ 510.00	\$ 1,040.00
	1D0	\$ -	\$ -	\$ -	\$ -	\$ -
	1E0	\$ 3,580.00	\$ -	\$ -	\$ -	\$ 3,580.00
	1F0	\$ 3,520.00	\$ -	\$ -	\$ -	\$ 3,520.00
	1G0	\$ 4,880.00	\$ 1,769.00	\$ 656.00	\$ 2,425.00	\$ 2,455.00
	1H0	\$ 3,170.00	\$ -	\$ -	\$ -	\$ 3,170.00
PLAN - Prepare Draft Plan	2A0	\$ 6,890.00	\$ -	\$ -	\$ -	\$ 6,890.00
	2B0	\$ 6,730.00	\$ -	\$ -	\$ -	\$ 6,730.00
	2C0	\$ 6,840.00	\$ -	\$ -	\$ -	\$ 6,840.00
	2D0	\$ 7,540.00	\$ -	\$ -	\$ -	\$ 7,540.00
	2E0	\$ 7,710.00	\$ -	\$ -	\$ -	\$ 7,710.00
REV - Review and Adoption	3A0	\$ 4,240.00	\$ -	\$ -	\$ -	\$ 4,240.00
	3B0	\$ 3,600.00	\$ -	\$ -	\$ -	\$ 3,600.00
	3C0	\$ -	\$ -	\$ -	\$ -	\$ -
	3D0	\$ 5,000.00	\$ -	\$ -	\$ -	\$ 5,000.00
	3E0	\$ 2,260.00	\$ -	\$ -	\$ -	\$ 2,260.00
<b>Total</b>		\$ 71,650.00	\$ 3,882.50	\$ 656.00	\$ 4,538.50	\$ 67,111.50

**Professional Services from May 16, 2020 to June 12, 2020**

Job	ENG	Stakeholder Engagement
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PLEASE REMIT TO ABOVE ADDRESS and INCLUDE INVOICE NUMBER ON CHECK.

Terms: Due upon receipt. 1 1/2% per month after 30 days. Please refer to the contract if other terms apply.



CONNECTING & INNOVATING  
SINCE 1913

## Invoice

Page 1 of 3

**Member Name and Address**  
Lower Mississippi River WMO  
C/O Dakota County Swcd  
4100 220th Street West Suite #102  
Farmington, MN 55024-7080

**Invoice Date**  
07/24/2020

**Agent**  
First National Insurance  
Po Box 130  
Farmington, MN 55024-0130  
(651)460-6014

**Account Number:** 40002486  
**Account Type:** Property/Casualty Coverage Premium  
**Current Balance:** \$ 2,275.00  
**Minimum Due:** \$ 2,275.00  
**Due Date:** 08/21/2020

Summary of activity since last Billing Invoice	Date	Activity	Account Balance	Minimum Due
See reverse side and attachments for additional information		Previous Invoice Balance	2,275.00	
		Payments Received	-2,275.00	
		Total of Transactions and Fees shown on reverse or attached	2,275.00	
		Current Balance	\$ 2,275.00	\$ 2,275.00

Detach and return this Payment Coupon with your payment

**Account Number**  
40002486

**Invoice Date**  
07/24/2020

**Due Date**  
08/21/2020

**Current Balance**  
\$ 2,275.00

**Minimum Due**  
2,275.00

**Amount Enclosed**  
\$ \_\_\_\_\_

**Member Name** Lower Mississippi River WMO

**BILLING INVOICE - Return stub with payment - make checks payable to:**

Mail payment  
7 days before  
Due Date to  
ensure timely  
receipt

League of MN Cities Insurance Trust P&C  
c/o Berkley Risk Administrators Company  
222 South Ninth Street, Suite 2700  
P.O. Box 581517  
Minneapolis, MN 55458-1517

# PETERSON COMPANY LTD

570 Cherry Drive  
Waconia, MN 55387  
(952) 442-4408  
www.pclcpas.com

Lower Mississippi River Watershed Management Organization  
4100 220th St. W, Suite 102  
Mendota Heights, MN 55024

Date: 7/21/2020  
Invoice Number: 22657  
Client: 2027125

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*For professional services rendered as follows:*

Preparation of audited financial statements for December 31, 2019 \$4,000.00

Invoice Total: \$4,000.00  
Prior Balance: \$0.00  
Current Amount Due: \$4,000.00

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Please return this portion with payment.

2027125  
Lower Mississippi River Watershed Management Organization

Date: 7/21/2020  
Invoice Number: 22657  
Invoice Amount: \$4,000.00  
Due Upon Receipt

Circle One: VISA    Master Card    Discover

Card # \_\_\_\_\_ Exp: \_\_\_\_\_

Three Digit Security Code: \_\_\_\_\_

Signature: \_\_\_\_\_ Amount Enclosed: \_\_\_\_\_



# Invoice

## Dakota County Soil & Water Conservation District

4100 220th Street West, Ste 102  
Farmington, MN 55024

DATE	INVOICE #
7/21/2020	3007

BILL TO

Lower Mississippi River WMO  
City of Mendota Heights  
Nancy Bauer  
1101 Victoria Curve  
Mendota Heights, MN 55118

Reference

TERMS

ITEM CODE	DESCRIPTION	HOURS	RATE	AMOUNT
	April - July 2019			
Lower Mis...	Administrative Assistance: Board Meeting Coordination (May 13, June 10) and Follow-Up, Financial Audit Coordination, 2019 Annual Report, Dakota County Groundwater Plan Review and Coordination, Dickman & Schmitt Lake Letter, Landowner Water Quality Concerns Addressed, Mississippi East Watershed Based Implementation Funding Coordination and Research, Ramsey County Property Information Coordination, South St. Paul Adopt a Drain Information, Website Redesign Coordination, Other Board Member Updates and Coordination.	112	80.00	8,960.00
Lower Mis...	Watershed Management Plan Update	11.5	80.00	920.00
Lower Mis...	Printing, Paper, Postage Expense		50.00	50.00
	Education and Outreach Assistance:			
Lower Mis...	Landscaping for Clean Water Workshop Virtual		1,600.00	1,600.00
Lower Mis...	Landscaping for Clean Water Design Classes Virtual		3,200.00	3,200.00
Lower Mis...	Master Water Stewards Program Coordination	1.5	80.00	120.00
Lower Mis...	MWS Program Tabling Materials (Red E Print Invoice)		142.40	142.40
Lower Mis...	Website Updates	2.5	80.00	200.00
Lower Mis...	Website Hosting Fee		25.00	25.00
	Technical Assistance and Project Implementation			
	Lake Water Monitoring			
Lower Mis...	Data Management	13.5	80.00	1,080.00
Lower Mis...	Volunteer Coordination	13	80.00	1,040.00

Thank you.

<b>Total</b>	<b>\$17,337.40</b>
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101 East 5th Street  
Suite 211 Skyway North  
Saint Paul, MN 55101-1859  
**(651) 224-2307** Fax (651) 224-2308

718423

RED E PRINT  
101 5TH ST E STE 211  
SAINT PAUL, MN 55101  
(651) 224-2307

Record Num.: 0005

### Phone Order Sale

Name Arden C. Spivey Const. Div.

Address 651-283-7604

Received By: *Tax Exempt 9714990*

AMOUNT	142.40
SALES TAX	-
TOTAL	142.40

Invoices not paid in full after 30 days will be assessed a finance charge of 1.5% per month.

THANK YOU!  
PLEASE COME AGAIN!

CARDHOLDER COPY

RETAIN THIS COPY FOR STATEMENT  
VERIFICATION

## LMR WMO Expense





# Invoice

## Dakota County Soil & Water Conservation District

4100 220th Street West, Ste 102  
Farmington, MN 55024

DATE	INVOICE #
7/21/2020	3016

BILL TO

Lower Mississippi River WMO  
City of Mendota Heights  
Nancy Bauer  
1101 Victoria Curve  
Mendota Heights, MN 55118

Reference

TERMS

ITEM CODE	DESCRIPTION	HOURS	RATE	AMOUNT
	Thompson, Sunfish, Augusta CWF Grant Tasks April 5 to June 27, 2020			
LMR WM...	THOMPSON LAKE STORMWATER IMPROVEMENT GRANT Grant Administration:			0.00
LMR WM...	Project Development: Contractor spring punch list coordination, meeting, followup. Dakota County parks planting coordination and punch list review. (17.00)		1,283.16	1,283.16
LMR WM...	Education and Outreach			0.00
LMR CWF...	SUNFISH / AUGUSTA LAKE Grant Administration:			0.00
LMR CWF...	Project Development			0.00
	17.00 Hours at BWSR Required Billable Rate.			

Thank you.

<b>Total</b>	<b>\$1,283.16</b>
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# Invoice

## Dakota County Soil & Water Conservation District

4100 220th Street West, Ste 102  
Farmington, MN 55024

DATE	INVOICE #
7/21/2020	3017

BILL TO

Lower Mississippi River WMO  
City of Mendota Heights  
Nancy Bauer  
1101 Victoria Curve  
Mendota Heights, MN 55118

Reference

TERMS

ITEM CODE	DESCRIPTION	HOURS	RATE	AMOUNT
	Cherokee Heights CWF Grant Tasks April 5 to June 27, 2020			
LMR CWF...	Administration Reimbursement coordination and agreement drafting. (1.00 Hours)		75.48	75.48
LMR CWF...	Project Development: Friends of Mississippi River rainbarrel coordination and project closeout. Establishment period and maintenance coordination for Conservation Corps Minnesota Iowa crew and St. Paul Parks staff coordination. (6.50 Hours)		490.62	490.62
LMR CWF...	Education and Outreach & Rainbarrel Program  7.50 Hours at BWSR Required Billable Rate.		0.00	0.00

Thank you.

<b>Total</b>	<b>\$566.10</b>
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# Invoice

## Dakota County Soil & Water Conservation District

4100 220th Street West, Ste 102  
Farmington, MN 55024

DATE	INVOICE #
7/21/2020	3018

BILL TO

Lower Mississippi River WMO  
City of Mendota Heights  
Nancy Bauer  
1101 Victoria Curve  
Mendota Heights, MN 55118

Reference

TERMS

ITEM CODE	DESCRIPTION	HOURS	RATE	AMOUNT
	Watershed Based Funding Grant April 5 to June 27, 2020			
LMR CWF...	Administration		0.00	0.00
LMR CWF...	Education Programs		0.00	0.00
LMR CWF...	Stenciling Programs		0.00	0.00
LMR CWF...	Lake Agusta Study Landowner coordination on cormorant issues. (1.50 Hours)		150.96	150.96
LMR CWF...	Interstate Valley Creek  1.50 Hours at BWSR Required Billable Rate.			0.00
			<b>Total</b>	<b>\$150.96</b>



LMRWMO 2020 Financial Summary									
Actual Revenues									
ESTIMATED REVENUES AND ASSETS	Budget	Dec 12 2019 - Jan 8 2020	Jan 9 - Feb 12 2020	Feb 13 - Mar 11 2020	Mar 12 - May 13 2020	May 14 - June 10 2020	June 11 - Aug 12 2020	Total	Variance
Use of Fund Balance	\$34,750							\$0.00	\$34,750.00
Dues from Members	\$110,224				\$96,062.24	\$14,162.11		\$110,224.35	(\$0.35)
Interest	\$500	\$81.25	\$84.89	\$100.56	\$100.08	\$48.48	\$73.45	\$488.71	\$11.29
Other/Grant Match	\$0							\$0.00	\$0.00
LMCIT Rebate	\$500	\$163.00						\$163.00	\$337.00
Other Grants	\$0.00	\$150,000.00						\$150,000.00	(\$150,000.00)
BWSR FY16-18 CWF & FY19 WBF Grants <sup>2</sup>	\$250,000.00							\$0.00	\$250,000.00
<b>TOTAL</b>	<b>\$395,974.00</b>	<b>\$150,244.25</b>	<b>\$84.89</b>	<b>\$100.56</b>	<b>\$96,162.32</b>	<b>\$14,210.59</b>	<b>\$73.45</b>	<b>\$260,876.06</b>	
Actual Expenses									
ESTIMATED EXPENSES AND LIABILITIES	Budget	Dec 12 2019 - Jan 8 2020	Jan 9 - Feb 12 2020	Feb 13 - Mar 11 2020	Mar 12 - May 13 2020	May 14 - June 10 2020	June 11 - Aug 12 2020	Total	Balance Remaining
<b>Engineering/Technical Assistance</b>									
Technical Assistance	\$5,500.00	\$317.00	\$817.00	\$34.00	\$2,972.00	\$2,140.00	\$45.50	\$6,325.50	(\$825.50)
Meetings	\$6,000.00	\$675.40	\$523.00	\$507.50	\$1,308.50	\$76.00	\$580.00	\$3,670.40	\$2,329.60
Plan Reviews	\$0.00							\$0.00	\$0.00
Watershed Plan Amendment	\$40,000.00				\$2,491.50		\$1,576.00	\$4,067.50	\$35,932.50
<b>Project Planning/Implementation</b>									
Plan Implementation	\$0.00							\$0.00	\$0.00
Landscaping for Clean Water Projects	\$15,000.00		\$6,000.00					\$6,000.00	\$9,000.00
Water Monitoring	\$6,500.00	\$330.00	\$924.00		\$480.00		\$2,120.00	\$3,854.00	\$2,646.00
Seidl's Lake Grant	\$0.00	\$150,000.00						\$150,000.00	(\$150,000.00)
<b>Education</b>									
Landscaping for Clean Water Workshops	\$6,400.00				\$1,600.00		\$4,800.00	\$6,400.00	\$0.00
Master Water Stewards Program	\$8,500.00	\$500.00	\$1,600.00		\$6,400.00		\$262.40	\$8,762.40	(\$262.40)
Storm Drain Stenciling Program	\$0.00							\$0.00	\$0.00
Stormwater Signage Program	\$2,500.00							\$0.00	\$2,500.00
WMO Tabling/Event Materials	\$600.00							\$0.00	\$600.00
Host Neighborhood or Lake Assn. Mtgs	\$1,200.00							\$0.00	\$1,200.00
General Education Requests	\$1,000.00				\$200.00			\$200.00	\$800.00
Metro Watershed Partners Membership	\$1,000.00			\$1,000.00				\$1,000.00	\$0.00
Board Tour / Boat Tour	\$4,000.00							\$0.00	\$4,000.00
Website Maint.	\$1,700.00		\$385.00		\$545.00		\$225.00	\$1,155.00	\$545.00
CAC Coordination	\$1,120.00							\$0.00	\$1,120.00
Board Education	\$1,500.00							\$0.00	\$1,500.00
<b>Administration</b>									
General Administration	\$30,000	\$2.00	\$5,459.10	\$4.00	\$9,854.00	\$2.00	\$9,012.00	\$24,333.10	\$5,666.90
Accounting Services	\$1,400							\$0.00	\$1,400.00
Insurance	\$2,500						\$2,275.00	\$2,275.00	\$225.00
Attorney and Audit	\$4,500	\$255.00		\$85.00	\$102.00		\$4,051.00	\$4,493.00	\$7.00
<b>BWSR FY16-19 CWF &amp; WBF Grants<sup>3</sup></b>	<b>\$550,000.00</b>	<b>\$0.00</b>	<b>\$487.50</b>	<b>\$0.00</b>	<b>\$78,317.35</b>	<b>\$0.00</b>	<b>\$2,000.22</b>	<b>\$80,805.07</b>	<b>\$469,194.93</b>
<b>Subtotal Operating Costs Only</b>	<b>\$140,920.00</b>	<b>\$2,079.40</b>	<b>\$15,708.10</b>	<b>\$1,630.50</b>	<b>\$25,953.00</b>	<b>\$2,218.00</b>	<b>\$24,946.90</b>	<b>\$72,535.90</b>	
<b>TOTAL</b>	<b>\$831,840.00</b>	<b>\$152,079.40</b>	<b>\$16,195.60</b>	<b>\$1,630.50</b>	<b>\$104,270.35</b>	<b>\$2,218.00</b>	<b>\$26,947.12</b>	<b>\$303,340.97</b>	
<b>Overall Fund Balance</b>		<b>\$423,354.67</b>	<b>\$407,243.96</b>	<b>\$405,714.02</b>	<b>\$397,605.99</b>	<b>\$409,598.58</b>	<b>\$382,724.91</b>		
<b>Total Clean Water Fund Grant Balance</b>		<b>\$276,463.72</b>	<b>\$275,976.22</b>	<b>\$275,976.22</b>	<b>\$197,658.87</b>	<b>\$197,658.87</b>	<b>\$195,658.65</b>		
<b>LMRWMO Operating Fund Balance</b>		<b>\$146,890.95</b>	<b>\$131,267.74</b>	<b>\$129,737.80</b>	<b>\$199,947.12</b>	<b>\$211,939.71</b>	<b>\$187,066.26</b>		
<b>Unencumbered Operating Fund Balance<sup>1</sup></b>		<b>\$101,890.95</b>	<b>\$86,267.74</b>	<b>\$84,737.80</b>	<b>\$154,947.12</b>	<b>\$166,939.71</b>	<b>\$142,066.26</b>		

Carryover Fund Balance from Dec. 12, 2019      \$ 425,189.82

2020 Budget Notes:

1. \$45,000 total set aside in 2020 for Watershed Management Plan
2. Includes final payment for Alum Treatment grant and 40% payment for Thompson Lake grant
3. Budget is an estimate and will vary depending on grant project progress.

LMRWMO Grants Financial Summary (2016-2020)														
ESTIMATED REVENUES AND ASSETS	Budget	Sum: Mar 10 - Dec 14 2016	Sum: Dec 15, 2016 - Dec 13, 2017	Sum: Dec 14, 2017 - Dec 12, 2018		Sum: Dec 13 2018 - Dec 11 2019	Dec 12 2019 - Jan 8 2020	Jan 9 - Feb 12 2020	Feb 13 - Mar 11 2020	Mar 12 - May 13 2020	May 14 - June 10 2020	June 11 - Aug 12 2020	Total	Variance
BWSR FY16-18 CWF Grant Payment - Thompson	\$576,000.00		\$288,000.00										\$288,000.00	(\$288,000.00)
BWSR FY16-18 CWF Grant Payments - Alum	\$196,000.00		\$98,000.00			\$78,400.00							\$176,400.00	(\$19,600.00)
BWSR FY18 CWF Grant Payments - Cherokee	\$700,000.00			\$350,000.00		\$280,000.00							\$630,000.00	(\$350,000.00)
*Lake Augusta Matching Funds	\$24,500.00		\$37,500.00										\$37,500.00	\$13,000.00
*Sunfish Lake Matching Funds	\$24,500.00	\$26,129.13	\$870.97										\$27,000.10	\$2,500.10
Thompson Lake Matching Funds	\$144,000.00												\$0.00	(\$144,000.00)
FY-2019 Watershed Based Funds	\$144,670.00					\$72,335.00							\$72,335.00	(\$72,335.00)
TOTAL MATCH FUND RECEIVED	\$193,000.00	\$26,129.13	\$38,370.97	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$64,500.10	(\$128,499.90)
TOTAL GRANT FUNDS RECEIVED	\$1,616,670.00	\$386,000.00	\$0.00	\$350,000.00		\$430,735.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,166,735.00	(\$808,335.00)
ESTIMATED EXPENSES AND LIABILITIES	Budget	Sum: Mar 10 - Dec 14 2016	Sum: Dec 15, 2016 - Dec 13, 2017	Sum: Dec 14, 2017 - Dec 12, 2018		Sum: Dec 13 2018 - Dec 11 2019	Dec 12 2019 - Jan 8 2020	Jan 9 - Feb 12 2020	Feb 13 - Mar 11 2020	Mar 12 - May 13 2020	May 14 - June 10 2020	June 11 - Aug 12 2020	Total	Balance Remaining
Internal Phosphorus - Augusta & Sunfish														
Grant Administration	\$8,000.00		\$3,900.00	\$2,062.50		\$2,834.35							\$8,796.85	(\$796.85)
Project Development	\$10,000.00	\$4,904.33	\$4,955.20	\$487.50		\$261.42							\$10,608.45	(\$608.45)
Lake Augusta Alum Treatment														
Lk Augusta Stakeholder Participation	\$2,500.00		\$2,475.00										\$2,475.00	\$25.00
Lk Augusta Alum Dosing	\$20,000.00		\$19,856.75	\$3,161.90		\$1,824.10							\$24,842.75	(\$4,842.75)
Lk Augusta Alum Application	\$55,000.00		\$55,000.00										\$55,000.00	\$0.00
Lk Augusta Alum Application Match	\$24,500.00		\$37,493.70										\$37,493.70	(\$12,993.70)
Lk Augusta Shoreline/Inlet Engineering	\$0.00													
Lake Augusta Shoreline / Inlet Assessment	\$7,000.00												\$0.00	\$7,000.00
Sunfish Lake Alum Treatment														
Sunfish Lake Stakeholder Participation	\$4,000.00	\$4,104.48											\$4,104.48	(\$104.48)
Sunfish Lake Alum Dosing	\$20,000.00		\$20,272.47										\$20,272.47	(\$272.47)
Sunfish Lake Alum Application	\$63,000.00		\$63,000.00										\$63,000.00	\$0.00
Sunfish Lake Alum Application Match	\$24,500.00		\$27,000.10										\$27,000.10	(\$2,500.10)
Sunfish Lake Rainbarrel Program	\$6,000.00		\$6,000.00		\$487.50								\$6,487.50	(\$487.50)
Sunfish Lake Shoreline Survey	\$500.00		\$412.50										\$412.50	\$87.50
Thompson Lake Stormwater Improvements														
Grant Administration	\$15,000.00		\$1,912.50	\$2,437.50		\$3,256.48				\$865.32			\$8,471.80	\$6,528.20
Project Development	\$15,000.00	\$1,077.50	\$4,347.50	\$8,737.50		\$5,983.64		\$112.50				\$1,283.16	\$21,541.80	(\$6,541.80)
Education and Outreach	\$18,000.00			\$2,375.00		\$18,072.64				\$315.23			\$20,762.87	(\$3,237.13)
Engineering, Design, Permitting	\$140,000.00		\$1,960.00	\$44,409.65		\$56,869.10				\$3,090.26			\$106,329.02	\$33,670.98
Forebay, Wetland, & Pond Install	\$344,000.00					\$72,719.65				\$71,912.11			\$144,631.75	\$199,368.25
Match	\$144,000.00			\$11,102.41		\$63,382.60							\$74,485.01	\$69,514.99
Water Reuse Irrigation System	\$44,000.00												\$0.00	\$44,000.00
Cherokee Heights Stormwater														
Grant Administration	\$12,000.00			\$520.00		\$5,014.73				\$1,550.37		\$75.48	\$7,160.58	\$4,839.42
Project Development	\$10,000.00			\$5,240.00		\$5,543.36		\$375.00		\$252.39		\$490.62	\$11,901.37	(\$1,901.37)
Rainbarrel Program	\$15,000.00			\$840.00		\$11,163.91							\$12,003.91	\$2,996.09
Ravine Stabilization	\$275,000.00					\$187,519.28							\$187,519.28	\$87,480.72
Ravine Stabilization Match	\$210,000.00					\$57,996.18							\$57,996.18	\$152,003.82
Design	\$137,000.00					\$90,323.45							\$90,323.45	\$46,676.55
Stormwater BMP Construction	\$211,000.00					\$137,011.46							\$137,011.46	\$73,988.54
Match	\$170,000.00					\$117,003.82							\$117,003.82	\$52,996.18
Design	\$40,000.00					\$25,448.93							\$25,448.93	\$14,551.07
FY 2019 Watershed Based Funding														
Grant Administration	\$8,000.00					\$37.35				\$43.23			\$80.58	\$7,919.42
Education Program Implementation	\$36,000.00					\$914.60							\$914.60	\$35,085.40
Education Program Project Dev.	\$4,670.00					\$87.41				\$144.22			\$231.63	\$4,438.37
Match	\$4,670.00												\$0.00	\$4,670.00
Interstate Valley Creek Project Dev.	\$4,000.00					\$74.69							\$74.69	\$3,925.31
Interstate Valley Creek Study	\$44,000.00												\$0.00	\$44,000.00
Interstate Valley Creek Study Match	\$25,000.00												\$0.00	\$25,000.00
Lake Augusta Project Development	\$4,000.00					\$373.45				\$144.22		\$150.96	\$668.63	\$3,331.37
Lake Augusta Study	\$44,000.00												\$0.00	\$44,000.00
Lake Augusta Study Match	\$30,000.00												\$0.00	\$30,000.00
TOTAL GRANT EXPENSE	\$1,616,670.00	\$10,086.31	\$184,091.92	\$70,759.05		\$625,334.00	\$0.00	\$487.50	\$0.00	\$78,317.35	\$0.00	\$2,000.22	\$971,076.35	\$645,593.65
TOTAL MATCH EXPENSE	\$632,670.00	\$0.00	\$64,493.80	\$11,102.41		\$238,382.60	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$313,978.81	\$318,691.19
LMRWMO GRANT FUND BALANCE		\$375,913.69	\$191,821.78	\$471,062.73		\$276,463.72	\$276,463.72	\$275,976.22	\$275,976.22	\$197,658.87	\$197,658.87	\$195,658.65		

1. Includes \$35,000 from City, \$2,500 from Lake Augusta residents.  
Note: Budget reflects most recent BWSR work plan, not original work plan  
Note: Revenue and expenditures from 2016, 2017, 2018, and 2019 are shown but have been aggregated

Summary	Elink Verification 2-1-20
<b>Internal Phosphorus - Augusta &amp; Sunfish</b>	
\$196,000.00 Total Grant	
\$64,493.80 Match	
\$196,000.00 Spent	100.00%
\$0.00 Balance	
\$196,000.00 Funds Received 90%	
\$0.00 Funds on Hand	
<b>\$196,000.00</b>	
<b>Thompson Lake Stormwater Improvements</b>	
\$576,000.00 Total Grant	
\$301,737.24 Spent	52.38%
\$74,485.01 Match	
\$343,777.75 Balance	
\$288,000.00 Funds Received 50%	
-\$13,737.24 Funds on Hand	
<b>\$224,158.66</b>	
<b>Cherokee Heights Stormwater</b>	
\$700,000.00 Total Grant	
\$471,368.98 Spent	67.34%
\$175,000.00 Match	
\$433,631.02 Balance	
\$630,000.00 Funds Received 90%	
\$158,631.02 Funds on Hand	
<b>\$468,625.12</b>	
<b>FY 2019 Watershed Based Funding</b>	
\$144,670.00 Total Grant	
\$1,970.13 Spent	1.36%
\$0.00 Match	
\$142,699.87 Balance	
\$72,335.00 Funds Received 50%	
\$70,364.87 Funds on Hand	
<b>\$1,487.50</b>	

\$562,300.91



## MEMORANDUM

**To:** LMRWMO Board of Managers  
**From:** Joe Barten, Dakota County SWCD  
**Subject:** FY 2020-2021 Metro Watershed Based Implementation Funding (WBIF)  
**Date:** August 8, 2020

### Summary

Attached is the planned approach and blank list of project details to populate for the Mississippi East area [Watershed Based Funding](#) dollars. (See link for grant policy information.) The funding approach document came from a subgroup of the 16 Watershed Management Organizations, Watershed Districts, County, City, and SWCD representatives that make up the group. Based on the current plan, the 60% allocation to WD's and WMOs would be split evenly and therefore the LMRWMO will be allocated roughly \$93,000 in funding available through this state grant program to use for projects clearly identified in the LMRWMO Watershed Management Plan. A 10% match is required from the LMRWMO. Last time these funds were available, the LMRWMO focused on education programs and studies with these funds and I think it makes sense to focus on projects or studies for this round of funding. These funds are to be used in 2020-2022.

Below is a short list of three potential implementation items from the [LMRWMO Watershed Management Plan](#) that we could implement with these funds. There are a few other potential projects in the implementation table that we could discuss but these seem to be the most feasible for this funding round. The Board will need to decide on a way to utilize these funds prior to September 1<sup>st</sup>, 2020, meaning the decision should be made at the August 12<sup>th</sup> LMRWMO meeting.

### Thompson Lake Stormwater/Sediment Improvement Project

- There is the potential to work with developers on stormwater improvements at the Signal Hills shopping area, which drains directly to Thompson Lake, which could fit under this item. Funding could go towards underground stormwater treatment chambers which treat stormwater above and beyond regulations and already planned treatment. Early discussions are in progress with the developers, City, and WMO on the potential for additional improvements. The timing of this item is in question as the development is going forward quickly and the funding may not be available in time for the needed improvements.

**Work with ACOE to identify location/extent of erosion issues on Mississippi River**

- There are many areas along the Mississippi River, within the boundary of the WMO, that are experiencing stream bank or ravine erosion. This erosion results in a large sediment load to the river. This item could include a study of direct drainage watersheds to the Mississippi River and identification of water quality improvement projects in those subwatersheds, focusing on erosion issues, but also including stormwater management projects as well.

**Local government to construct Seidls Pond/Lake lift station**

- This project has been put on hold due to funding limited funding. It was set to be a combined project with the City of Inver Grove Heights, South St. Paul, and West St. Paul. If the \$93,000 was instrumental in getting this project implemented, perhaps it is a viable option. Note that State funding cannot be counted as match for other State funding.

**Board Action Requested:** Decide on preferred project or study to implement, utilizing the approximately \$93,000 available through the FY 2020-2021 WBIF dollars.

**Attached:**

- Planned approach for the Mississippi East Watershed Based Funding
- Blank WBIF spreadsheet to be populated with project information

## **DRAFT East Mississippi Watershed Based Implementation Funding Approach**

- 1) WBIF should be a locally collaborative process and not a locally competitive process. The process should be consistent with the Local Government Water Roundtable to provide stable and reliable funding. To that end (recognizing a 1W1P is not developed for the East Mississippi Watershed Implementation Partnership), funding should be distributed to partner groups to implement 103b, and 103c activities based on the following formula:
  - a. 10% for groundwater-centric implementation activities (discussion to be hosted by Washington County while inviting others with groundwater activities in their approved plans to participate or at least submit activities for consideration.)
  - b. 30% to SWCDs to implement activities in state-approved plans
  - c. 60% to WDs/WMOs to implement activities in state-approved plans
- 2) Partner groups shall convene to:
  - a. Determine distribution within their respective groups (County Groundwater Plans or Groundwater Implementation, SWCDs and WDs/WMOs) given the variability of size, scale and projects within in each partner group.
  - b. Develop a list of programs and projects that follows BWSR's guidance on being prioritized, targeted, and measurable.
- 3) To ensure inclusivity and collaboration;
  - a. The groundwater group should invite submittal of eligible groundwater implementation activities from implementers throughout the watershed (unless this is just 5% to Washington Co).
  - b. SWCD's should work toward coordination with their respective Counties and WDs/WMOs.
  - c. WDs/WMO's should consider high priority eligible projects supported by their cities.

Following this process, individual partner group project/program lists will be compiled and the whole partnership will convene to concur on the project/program list. It is anticipated that LGUs with state-approved plans would be the direct recipients of grant funds. Opportunities may emerge from a Partner Group to consolidate grants into fewer, larger grants in a way that simplifies reporting and maximizing implementation flexibility, i.e. MCD/TSA.

## East Mississippi River Collaborative Project List

Responsible Party/Agency	Name of Activity/Project/Program	Description of Activity/Project/Program	Plan reference	Water Resource(s)	LGU Coordination	Timeframe for implementation	Grant funds requested	Local match funds (minimum 10%)	Total project cost	Measurable Outcomes	Other Notes (if needed)
CCWD									\$ -		
CRWD									\$ -		
LMRWMO									\$ -		
RCWD									\$ -		
RWMWD									\$ -		
SWWD									\$ -		
VLAWMO									\$ -		
Anoka CD									\$ -		
Dakota SWCD									\$ -		
Ramsey CD									\$ -		
Washington CD									\$ -		
Washington County							\$ 108,549		\$ 108,549		
						Totals:	\$ 108,549	\$ -	\$ 108,549		
						WMOs 60%	\$ 651,291				
						SWCDs 30%	\$ 325,646				
						GW 10%	\$ 108,549				
							\$ 1,085,485				

## LIABILITY COVERAGE – WAIVER FORM

**Members who obtain liability coverage through the League of Minnesota Cities Insurance Trust (LMCIT) must complete and return this form to LMCIT before the member's effective date of coverage. Return completed form to your underwriter or email to [psstech@lmc.org](mailto:psstech@lmc.org).**

*The decision to waive or not waive the statutory tort limits must be made annually by the member's governing body, in consultation with its attorney if necessary.*

Members who obtain liability coverage from LMCIT must decide whether to waive the statutory tort liability limits to the extent of the coverage purchased. The decision has the following effects:

- *If the member does not waive the statutory tort limits, an individual claimant could recover no more than \$500,000 on any claim to which the statutory tort limits apply. The total all claimants could recover for a single occurrence to which the statutory tort limits apply would be limited to \$1,500,000. These statutory tort limits would apply regardless of whether the member purchases the optional LMCIT excess liability coverage.*
- *If the member waives the statutory tort limits and does not purchase excess liability coverage, a single claimant could recover up to \$2,000,000 for a single occurrence (under the waive option, the tort cap liability limits are only waived to the extent of the member's liability coverage limits, and the LMCIT per occurrence limit is \$2,000,000). The total all claimants could recover for a single occurrence to which the statutory tort limits apply would also be limited to \$2,000,000, regardless of the number of claimants.*
- *If the member waives the statutory tort limits and purchases excess liability coverage, a single claimant could potentially recover an amount up to the limit of the coverage purchased. The total all claimants could recover for a single occurrence to which the statutory tort limits apply would also be limited to the amount of coverage purchased, regardless of the number of claimants.*

Claims to which the statutory municipal tort limits do not apply are not affected by this decision.

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LMCIT Member Name:

*Check one:*

- The member **DOES NOT WAIVE** the monetary limits on municipal tort liability established by [Minn. Stat. § 466.04](#).
- The member **WAIVES** the monetary limits on municipal tort liability established by [Minn. Stat. § 466.04](#), to the extent of the limits of the liability coverage obtained from LMCIT.

Date of member's governing body meeting: \_\_\_\_\_

Signature: \_\_\_\_\_ Position: \_\_\_\_\_



## Memorandum

**To:** Lower Mississippi River Watershed Management Organization Board of Managers  
**From:** Greg Williams, Barr Engineering Co.  
**Subject:** LMRWMO 2021 Plan Update – Review of Existing Plans and Identification of Gaps  
**Date:** August 5, 2020  
**Project:** 23191436.00

As part of the 2021 update to the Lower Mississippi River Watershed Management Organization (LMRWMO) Watershed Management Plan (Plan), Barr Engineering Co. (Barr) has reviewed the 3<sup>rd</sup> generation LMRWMO Plan (2011 Plan) to identify potential gaps, conflicts, and/or inconsistencies between the 2011 Plan and current data, regulatory and guidance documents, studies, and water resource management practice. The gaps analysis also considers input received from the following entities in response to the 2021 Plan update notification:

- City of St. Paul – Public Works
- City of Sunfish Lake
- Dakota County – Environmental Resources Department
- Dakota County Soil and Water Conservation District (Dakota SWCD)
- Metropolitan Council Environmental Services
- Minnesota Board of Water and Soil Resources (BWSR)
- Minnesota Pollution Control Agency (MPCA)

The following table identifies and organizes potential gaps. Discussion of each potential gap area includes:

- A summary of how the issue was addressed in the 2011 Plan and/or current LMRWMO practice,
- Related activities performed by member cities,
- Expectations, guidance, or applicable regulation from state agencies
- A summary of specific gaps
- Examples of how the issue is addressed by other watershed management organizations (WMOs)

The gaps analysis table is intended as a resource to support more detailed discussion with the LMRWMO Board of Managers, technical advisory committee (TAC) and city staff during the identification and prioritization of issues, revision of goals and policies, and construction of a targeted implementation program.

**To:** Lower Mississippi River Watershed Management Organization Board of Managers  
**From:** Greg Williams, Barr Engineering Co.  
**Subject:** LMRWMO 2021 Plan Update – Review of Existing Plans and Identification of Gaps  
**Date:** August 5, 2020  
**Page:** 2

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**Requested Manager Action:** Review the gaps analysis table and consider whether the identified gaps should yield new, expanded, or decreased roles for the LMRWMO and/or its member cities.

# LMRWMO 2021 Plan Update Gaps Analysis - DRAFT 08/05/2020

Subject	LMRWMO Activities (Section references refer to the 2011 Plan)	Member City Activities	External Agency/Organization Requirements/ Expectations	Potential Gap	Activities of Other WMOs
Impaired Waters and TMDLs	<ul style="list-style-type: none"> <li>- Section 2.6.3 of the Plan identified impaired waters within the WMO</li> <li>- The WRAPS addresses local impairments of Lake Augusta, Sunfish Lake, Pickerel Lake, and Thompson Lake</li> </ul>	<ul style="list-style-type: none"> <li>- Some member city local water plans address applicable TMDLs as necessary (e.g., Lilydale re: Interstate Valley Creek)</li> </ul>	<ul style="list-style-type: none"> <li>- Since completion of the last Plan, the MPCA has completed: <ul style="list-style-type: none"> <li>- Upper Mississippi River Bacteria TMDL Study &amp; Protection Plan (2014)</li> <li>- South Metro Mississippi River Total Suspended Solids TMDL (2015)</li> <li>- Twin Cities Metropolitan Area Chloride TMDL (2016)</li> </ul> </li> <li>- MPCA's response to the 2021 Plan notification included expectations for the WMO to address pollutant loading to Rogers Lake, Pickerel Lake, and Sunfish Lake</li> </ul>	<ul style="list-style-type: none"> <li>- Additional impairments have been identified since the last Plan (Mississippi River - Ag, nutrients; Interstate Valley Creek - E. coli; Thompson Lake - chloride, nutrients)</li> <li>- While some limited discussion of the WRAPS report was included in the 2015 Plan Amendment, the MPCA seeks additional discussion of progress and future plans to achieve the water quality targets specified in the WRAPS strategies table.</li> <li>- For all TMDLs developed for water resources within LMRWMO's jurisdiction, MPCA would like to see the Plan incorporate goals to track progress toward TMDL implementation.</li> </ul>	<ul style="list-style-type: none"> <li>- <b>BCWMC</b> - implementation program includes activities identified specifically in TMDLs (e.g. Medicine Lake TMDL)</li> <li>- <b>CRWD</b> - plan goals include load reduction and water quality targets from completed TMDLs, including South Metro Mississippi River TSS TMDL and draft Lake Pepin TMDL (both applicable to LMRWMO)</li> <li>- <b>RWMWD</b> - plan includes tracking of cumulative watershed TP load reduction for several impaired lakes to assess progress towards TMDLs</li> </ul>
Water Quality Monitoring	<ul style="list-style-type: none"> <li>- WMO funds monitoring of select waterbodies through CAMP using volunteers (Section 5.3.2-D, Section 5.3.2-H)</li> <li>- Section 5.3.2-E notes that the WMO will monitor select outfalls to the MS River</li> </ul>	<ul style="list-style-type: none"> <li>- Member cities perform/fund water quality monitoring of select waterbodies</li> <li>- Member cities assist in the recruiting of volunteers to assist in monitoring activities</li> </ul>	<ul style="list-style-type: none"> <li>- BWSR 2016 PRAP recommends increased use of prioritized, targeted, and measurable as criteria goals and objectives; this requires ability to assess state of water resources and trends through implementation</li> <li>- BWSR's response to the Plan update notification recommends structuring annual reports and the website to clearly report trends and progress</li> </ul>	<ul style="list-style-type: none"> <li>- Not all resources are monitored with consistency; a long-term monitoring plan does not exist</li> <li>- Criteria for waterbody monitoring is not clear</li> <li>- Outfalls to MS River are not monitored by the WMO</li> <li>- Updated waterbody classification system identifying priority waterbodies may be needed to allocate monitoring resources</li> <li>- Assessment of water quality trends is not clearly reported</li> </ul>	<ul style="list-style-type: none"> <li>- <b>BCWMC</b>, <b>BDWMO</b> - waterbody classification drives monitoring at regular intervals according to priority; monitoring performed by consultant</li> <li>- <b>VBWD</b> - waterbody classification drives monitoring at regular intervals (annual for highest priority waters); monitoring is CAMP or similar</li> <li>- <b>CRWD/RWMWD</b> - water quality monitoring performed annual by staff</li> </ul>
Water Quality Goals, Management Classification and Actions	<ul style="list-style-type: none"> <li>- Table 5-2 presents lake water quality goals equal to MPCA eutrophication standards, based on MPCA deep/shallow lake classification</li> <li>- Goal 5.3.1-C states that the WMO will improve water quality in the WMO</li> <li>- Strategy 5.3.2-B states that the WMO will focus on the water quality of intercommunity water bodies and may choose to address water quality issues within individual cities</li> </ul>	<ul style="list-style-type: none"> <li>- Member cities cooperate with the WMO to implement water quality improvement projects</li> <li>- Member city local water plans adopt MPCA water quality standards</li> </ul>	<ul style="list-style-type: none"> <li>- MPCA's response to the 2021 Plan notification included expectations for the WMO to address pollutant loading to Rogers Lake, Pickerel Lake, and Sunfish Lake</li> </ul>	<ul style="list-style-type: none"> <li>- The existing Plan does not identify (or prioritize) the lakes/resources for which the WMO intends a management role</li> <li>- The existing Plan does not specify thresholds for action to address specific water quality issues or specify WMO role for lakes/resources not meeting goals</li> </ul>	<ul style="list-style-type: none"> <li>- <b>BDWMO</b> - Plan identifies "strategic" waterbodies addressed by the WMO and action triggers for individual water bodies</li> <li>- <b>BCWMC</b> - Plan identifies two levels of "priority" waterbodies and specifies monitoring actions according to classification</li> <li>- <b>RWMWD</b> - Plan identifies "District-managed" waterbodies and classifies them with respect to water quality trends</li> <li>- <b>VBWD</b> - Plan ranks lake and stream resources by priority and identifies actions based on priority</li> </ul>
Chloride	<ul style="list-style-type: none"> <li>- 2011 Plan notes the chloride impairment of Thompson Lake</li> </ul>	<ul style="list-style-type: none"> <li>- Member cities use chloride for municipal maintenance activities and implement varying strategies to reduce chloride loading</li> </ul>	<ul style="list-style-type: none"> <li>- The Twin Cities Metro Area Chloride Management Plan provides guidance to limit chloride loading</li> <li>- MPCA's response to the 2021 Plan notification letter included a recommendation that the WMO address its role in chloride management</li> <li>- Dakota County response to 2021 Plan notification requested WMO action on chloride issues</li> </ul>	<ul style="list-style-type: none"> <li>- The role of the WMO in addressing chloride pollution is not defined</li> </ul>	<ul style="list-style-type: none"> <li>- <b>BCWMC</b> - policies identify cooperation and support roles for the WMO in managing chloride</li> <li>- <b>CRWD</b> - draft Plan includes development of strategies to regulate chloride use and increased education</li> <li>- <b>NMCWD</b> - requires site developers to demonstrate certification for salt applicators</li> <li>- <b>RWMWD</b> - plan includes activities to support cities and increased education efforts to address chloride</li> </ul>
Subwatershed Analyses	<ul style="list-style-type: none"> <li>- LMRWMO WRAPS examined pollutant loading to a subset of WMO waterbodies</li> <li>- Portions of the WMO are covered by various water quantity models, including Barr Watershed Model, XP-SWMM, and HydroCAD</li> </ul>	<ul style="list-style-type: none"> <li>- Member cities have varying degrees and extent of water quality and water quantity modeling</li> <li>- Sunfish Lake seeks WMO assistance in updating its water quantity modeling (see response to 2021 Plan notification)</li> </ul>	<ul style="list-style-type: none"> <li>- MN Rules 8410.0060 require inclusion of water quality and quantity data addressing trends and 100-year flood levels and discharges, although comprehensive modeling outputs are not specifically noted</li> </ul>	<ul style="list-style-type: none"> <li>- Available data is inconsistent across the watershed</li> <li>- Lack of comprehensive subwatershed analyses may limit the ability to target actions to the highest priority areas</li> <li>- WMO may consider implementation items to inventory and fill data gaps</li> </ul>	<ul style="list-style-type: none"> <li>- <b>BCWMC</b> - performed watershed-wide P8 and XP-SWMM modeling to target actions to address water quality and flood risk</li> <li>- <b>BDWMO</b> - water quality studies exist for select subwatersheds (not comprehensive); water quantity modeling has been done by member cities</li> <li>- <b>CRWD</b> - performed subwatershed analyses for priority areas; water quantity modeling done by member cities</li> <li>- <b>LRRWMO</b> - watershed-wide analyses do not exist; 2021 Plan implementation will include analyses</li> <li>- <b>RWMWD</b> - performed watershed-wide water quality modeling; water quantity modeling aggregated from several models</li> <li>- <b>VBWD</b> - in process of developing XP-SWMM models for entire watershed</li> </ul>
Geospatial Data	<ul style="list-style-type: none"> <li>- The 2011 Plan contains geospatial data (e.g., soils, topography, public waters) current at the time.</li> </ul>	<ul style="list-style-type: none"> <li>- City local water plans contain similar information</li> </ul>		<ul style="list-style-type: none"> <li>- Since the 2011 Plan development, some geospatial datasets have been updated, including: <ul style="list-style-type: none"> <li>- LiDAR topography</li> <li>- SSURGO soils data</li> <li>- National Wetland Inventory (NWI)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>- Other WMO/WD plans include updated geospatial information</li> </ul>

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Subject	LMRWMO Activities (Section references refer to the 2011 Plan)	Member City Activities	External Agency/Organization Requirements/ Expectations	Potential Gap	Activities of Other WMOs
Climate Data and Trends	<ul style="list-style-type: none"><li>- Section 2.1 includes climate data from 1961-2009, and has been updated to reference Atlas 14 precipitation values.</li><li>- Section 2.1 alludes to climate change but does not identify specific trends</li></ul>	<ul style="list-style-type: none"><li>- City local plans generally include discussion of climate change and Atlas 14 design storms</li></ul>		<ul style="list-style-type: none"><li>- Atlas 14 is referenced in the text, but design storms applicable to the LMRWMO are not included.</li><li>- Climate trend data does not reflect consensus of observed trends in Minnesota or present estimates of possible future precipitation, examples of which are now available.</li></ul>	<ul style="list-style-type: none"><li>- <b>RPBCWD</b> - Plan includes fact sheets addressing climate change, including trends and future precipitation estimates</li><li>- <b>CRWD</b> - Plan includes discussion of trends and future precipitation estimates; addressing climate change is identified as 1 of 9 themes affecting all District activities</li></ul>
Wetland Management	<ul style="list-style-type: none"><li>- Section 5.5 includes wetland goals, strategies, and policies and notes the Cities role as LGUs for the Wetland Conservation Act</li><li>- Section 4.4 notes that the WMO will evaluate and pursue locations for wetland restoration</li><li>- Section 5.3.2-I requires member cities use a wetland management classification system that ranks wetlands and sets wetland management standards based on rank and level of protection</li></ul>	<ul style="list-style-type: none"><li>- Cities serve as LGUs for Wetland Conservation Act and inventory wetlands through comprehensive wetland management plans or as part of project review and permitting</li></ul>	<ul style="list-style-type: none"><li>- MnDOT serves as LGU for Wetland Conservation Act in its Right-of-Way</li><li>- MN Rules 8410 requires priority areas for wetland preservation, enhancement, restoration, and establishment identified in the Plan</li></ul>	<ul style="list-style-type: none"><li>- Current implementation program does not include funding for evaluation and restoration of wetland sites</li><li>- Current Plan does not identify priority areas for wetland preservation, enhancement, restoration, and establishment</li><li>- Current Plan does not specify a wetland classification or include standards for bounce, inundation, or stormwater impacts</li></ul>	<ul style="list-style-type: none"><li>- WDs with permit programs (<b>VBWD</b>, <b>RWMWD</b>, <b>CRWD</b>) generally serve as LGU for Wetland Conservation Act with some exceptions (e.g., St. Paul as LGU)</li><li>- <b>CRWD</b> - Plan includes priority wetland areas carried over from prior (2010) Plan; implementation program includes funding for natural resource inventories and improvement projects</li><li>- <b>BCWMC</b>/<b>BDWMO</b>/<b>VRWJPO</b> - specify MnRAM (or similar) wetland classification system</li><li>- <b>BDWMO</b> - requires cities to limit water level bounce depending upon wetland classification</li></ul>
Wetland Buffers	<ul style="list-style-type: none"><li>- Section 5.5.3 notes the WMO policy that 15 foot buffers around wetlands, lakes, and streams are required for projects disturbing over 1 acre</li></ul>	<ul style="list-style-type: none"><li>- Cities implement wetland buffer requirements through local controls</li><li>- Local wetland controls vary by City and may be more stringent than LMRWMO policy</li></ul>	<ul style="list-style-type: none"><li>- State buffer law requires minimum 16.5 feet buffer adjacent to certain waterways</li></ul>	<ul style="list-style-type: none"><li>- Existing wetland buffer requirements may not be sufficient to protect wetlands from water quality impacts</li></ul>	<ul style="list-style-type: none"><li>- Many WMOs have buffer requirements according to wetland classification (MnRAM or similar):</li><li>- <b>BCWMC</b>, <b>RWMWD</b> - 75/50/25 feet average buffer for wetlands classified as Preserve/Manage 1/Manage 2 or 3</li><li>- <b>BDWMO</b> - cities define based on classification but not less than 16.5 feet</li><li>- <b>VBWD</b>, <b>CRWD</b> - 25 foot buffer around wetlands</li><li>- <b>VRWJPO</b> - 50/40/30/25 feet average buffer for wetlands classified as Preserve/Manage 1/Manage 2/Manage 3</li></ul>
Invasive Species	<ul style="list-style-type: none"><li>- The 2011 Plan does not address invasive species</li><li>- WMO has hosted county staff to discuss invasive species management actions and grant opportunities</li></ul>	<ul style="list-style-type: none"><li>- Member city roles in invasive species management vary</li></ul>	<ul style="list-style-type: none"><li>- MDNR is lead state agency for invasive species management</li><li>- Funding to address invasive species is also administered by counties</li></ul>	<ul style="list-style-type: none"><li>- WMO may seek to document invasive species issues and define WMO's role in the 2021 Plan</li></ul>	<ul style="list-style-type: none"><li>- <b>BCWMC</b> - requires limited monitoring for cities; defines WMO role as primarily support</li><li>- <b>BDWMO</b> - 2012 Plan does not address AIS</li><li>- <b>CRWD</b> - performs invasive species management for District natural resource projects</li><li>- <b>VBWD</b> - defines technical support role and funding role if there is a demonstrated water quality impact</li></ul>
Groundwater	<ul style="list-style-type: none"><li>- Policies in Section 5.6.3 encourage member cities to use infiltration BMPs, encourage infiltration, and promote groundwater issue awareness.</li><li>- Section 5.6.3-D requires cities to maintain records of SSTs and prohibit installation where sewer exists.</li></ul>	<ul style="list-style-type: none"><li>- Member cities maintain Wellhead Protection Plans, as required.</li></ul>	<ul style="list-style-type: none"><li>- Minnesota Department of Health implements wellhead protection program, requires wellhead protection plans of member cities.</li><li>- Minnesota Rules 7080-7083 regulate SSTs</li><li>- County actions and expectations for partners are identified in the 2020 Dakota County Groundwater Plan (draft)</li></ul>	<ul style="list-style-type: none"><li>- Current policies do not specifically define role of WMO and may miss opportunities.</li></ul>	<ul style="list-style-type: none"><li>- Most WMO and WD Plans include roles to support County and MDNR in actions to address groundwater issues.</li><li>- <b>BCWMC</b> - reviews MDNR groundwater permits within 1,000 feet of Bassett Creek</li><li>- <b>BDWMO</b> - similar to LMRWMO (encourage infiltration through member cities); supports Dakota County GW Plan</li><li>- <b>VBWD</b> - performs groundwater level monitoring; considers potential groundwater impacts in permit review</li></ul>
Permitting/ Regulation	<ul style="list-style-type: none"><li>- WMO does not implement a permitting program (Section 1.2)</li><li>- WMO may review local land use or development at the request of member cities (Section 1.3)</li><li>- WMO reviews local plans to ensure local controls are consistent with WMO policies and requirements</li><li>- WMO policies require local controls to require runoff control plans (Section 5.2.3-M) and erosion control plans (Section 5.7.3-B)</li></ul>	<ul style="list-style-type: none"><li>- Member cities regulate development and redevelopment activity through their own local permitting process</li></ul>	<ul style="list-style-type: none"><li>- Activities disturbing one acre or more are subject to the MN NPDES construction stormwater permit requirements (administered by the MPCA)</li><li>- BWSR requires WMOs to identify a process to evaluate implementation of local controls (MN Rules 8410.0105)</li></ul>	<ul style="list-style-type: none"><li>- WMO should assess whether the current regulatory framework is adequate to achieve WMO and local goals</li><li>- WMO may consider possible roles to assist cities in increasing regulatory consistency and/or efficiency</li><li>- WMO may consider process to evaluate city implementation of local controls</li></ul>	<ul style="list-style-type: none"><li>- <b>BCWMC</b> - WMO reviews projects meeting specific criteria, WMO approval is required before cities issue permits</li><li>- <b>BDWMO</b> - Cities implement permit programs that meet WMO performance standards</li><li>- <b>CRWD</b>/<b>RWMWD</b>/<b>VBWD</b> - District reviews projects for conformance with District rules and issues permits (cities may assume permitting roles, but rarely do)</li><li>- <b>VRWJPO</b> - WMO reviews projects meeting some criteria; permits are issues by WMO, or by cities if the city has adopted all WMO rules and standards</li></ul>

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Subject	LMRWMO Activities (Section references refer to the 2011 Plan)	Member City Activities	External Agency/Organization Requirements/ Expectations	Potential Gap	Activities of Other WMOs
Performance Standards	<ul style="list-style-type: none"> <li>- WMO implements performance standards through policies (Section 5)</li> <li>- Performance standards (briefly) for new and redevelopment include: <ul style="list-style-type: none"> <li>- Minimum building elevations at least 1 foot above 100-year water level</li> <li>- Runoff rates not greater than existing for 100-year event and either 5-year or 10-year event (for projects &gt; 1 acre)</li> <li>- At least 50% total phosphorus removal from runoff (for projects &gt;1 acre)</li> <li>- Minimum of 15 foot buffer around streams, lakes, and wetlands</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>- Member cities implement performance standards through local controls (e.g., ordinances, local water plan, permit review) that are intended to be as, or more, restrictive than WMO performance standards.</li> </ul>	<ul style="list-style-type: none"> <li>- Activities disturbing one acre or more are subject to the performance standards included in the MN NPDES construction stormwater permit requirements (administered by the MPCA)</li> <li>- Areas within the Mississippi River Recreational Corridor may be subject to additional performance standards (guidance by MDNR?)</li> </ul>	<ul style="list-style-type: none"> <li>- Current WMO performance standards may not be sufficient to achieve water quality goals</li> <li>- Current WMO performance standards are not consistent with NPDES construction permit language</li> <li>- Current local water quality performance standards are not consistent with WMO performance standards (although the intent is met by all cities)</li> <li>- Several WMO performance standards "encourage" or "promote" practices without a means of audit</li> <li>- Triggers for performance standards vary among member cities</li> </ul>	<ul style="list-style-type: none"> <li>- Several WMOs have adopted water quality performance standards based on, or similar to, the volume reduction guidance included in the MPCA's Minimal Impact Design Standards (MIDS) guidance, including: <b><u>BCWMC, VBWD, CRWD, RWMWD, VRWJPO</u></b> (with some modification)</li> <li>- Most WMOs have similar rate control performance standards requiring no increase from current conditions for select events up to the 100-year event</li> <li>- Several WMOs require minimum building elevations greater than 1 foot above the 100-year water surface: <b><u>RWMWD, BCWMC, VBWD</u></b></li> <li>- <b><u>BDWMO</u></b> - has similar minimum building elevations and wetland buffer standards; requires cities to maintain or strengthen existing water quality performance standards</li> <li>- See above for wetland buffer performance standards</li> </ul>
City MS4 Permits	<ul style="list-style-type: none"> <li>- The WMO is not an MS4 and is not required to obtain MS4 permit coverage</li> <li>- Section 2.10 summarizes the MS4 program</li> <li>- WMO strategies include developing educational material (Section 4.1-I) and trainings (Section 5.7.2-C) to assist cities in meeting MS4 permit requirements</li> <li>- WMO participates in Metro Watershed Partners, which provides educational material to cities</li> </ul>	<ul style="list-style-type: none"> <li>- Cities in the WMO are required to obtain MS4 permit coverage and implement Storm Water Pollution Prevention Programs (SWPPPs)</li> </ul>	<ul style="list-style-type: none"> <li>- The MPCA administers the NODES MS4 program and Minnesota and requires cities in the WMO to obtain permit coverage</li> </ul>	<ul style="list-style-type: none"> <li>- There may be unrealized opportunities for the WMO to assist member cities in meeting MS4 permit requirements</li> <li>- The pending update to the MS4 general permit may place additional responsibilities on cities</li> </ul>	<ul style="list-style-type: none"> <li>- <b><u>CRWD</u></b>: draft 2020 plan includes actions to coordinate MS4-required maintenance activity with cities</li> <li>- <b><u>RWMWD</u></b>: assists cities in maintenance-related MS4 activities</li> <li>- <b><u>LRWMO</u></b>: funds education materials that are distributed by cities to comply with MS4 permits</li> </ul>
Education Program	<ul style="list-style-type: none"> <li>- WMO performs project-related education as needed</li> <li>- WMO participates in Metro Watershed Partners (~Section 5.8.2-B)</li> <li>- The WMO currently sponsors 2(?) Master Water Stewards and plans to sponsor more</li> <li>- The WMO maintains its website as source of information (Section 5.8.2-C)</li> <li>- The WMO hosts tours of resources and BMPs</li> <li>- The WMO hosts presentations at Board meetings</li> </ul>	<ul style="list-style-type: none"> <li>- Member cities distribute educational material through newsletters, social, and other media</li> <li>- Member cities complete education components of MS4 program</li> </ul>	<ul style="list-style-type: none"> <li>- Cities perform education components required by MS4 permit</li> <li>- 2016 BWSR PRAP noted the need for a new Board member training plan</li> </ul>	<ul style="list-style-type: none"> <li>- Opportunities to engage Master Water Stewards in Plan implementation</li> <li>- Board member training program</li> <li>- March 2019 Education workshop results identify potential new education activities to be implemented in updated Plan</li> </ul>	<ul style="list-style-type: none"> <li>- Varies based on presence/absence of WMO staff</li> <li>- <b><u>BCWMC</u></b> - original content (e.g., videos) on website and links to other resources</li> <li>- <b><u>BDWMO</u></b> - activities carried out in partnership with SWCD, member cities</li> <li>- <b><u>CRWD/NMCWD/RWMWD</u></b> - education staff develop and implement education programs</li> <li>- <b><u>VBWD</u></b> - outsources some activities to East Metro Water Resources Education Program</li> </ul>
Public Engagement	<ul style="list-style-type: none"> <li>- The WMO uses volunteers to support resource monitoring (Section 5.8.2-D)</li> <li>- The WMO supports landscaping for clean water (Section 5.8.2-E)</li> <li>- Section 5.9.2-F notes that the WMO will initiate a Citizen Advisory Committee</li> <li>- The WMO currently sponsors 2(?) Master Water Stewards and plans to sponsor more</li> </ul>	<ul style="list-style-type: none"> <li>- Some cities have staff with environmentally-related public engagement duties</li> <li>- Some cities have committees addressing environmental issues.</li> </ul>	<ul style="list-style-type: none"> <li>- Cities perform public engagement as required by MS4 permit</li> </ul>	<ul style="list-style-type: none"> <li>- The WMO has not established a permanent CAC</li> <li>- Opportunities to engage Master Water Stewards in Plan implementation</li> <li>- March 2019 Education workshop results identify potential new engagement strategies to be implemented in updated Plan</li> </ul>	<ul style="list-style-type: none"> <li>- Varies based on presence/absence of WMO staff</li> <li>- <b><u>BCWMC</u></b> - Volunteers assist in water quality monitoring</li> <li>- <b><u>BDWMO</u></b> - Engagement activities primarily carried out by member cities and SWCD, website has links to other material</li> <li>- <b><u>CRWD</u></b> - implements a CAC and volunteer recognition program.</li> <li>- <b><u>VBWD</u></b> - outsources some activities to East Metro Water Resources Education Program</li> </ul>
Administration	<ul style="list-style-type: none"> <li>- Administrative services are provided by Dakota SWCD</li> <li>- Technical services are provided by consultants</li> <li>- The WMO does not maintain staff</li> </ul>	<ul style="list-style-type: none"> <li>- City technical staff provide services to assist in WMO activities through engineering, public works, and environmental departments</li> </ul>	<ul style="list-style-type: none"> <li>- BWSR requires that WMO Plans consider the adequacy of existing programs (including staffing) to address issues</li> </ul>	<ul style="list-style-type: none"> <li>- WMO should evaluate whether current staffing is adequate</li> <li>- There may be opportunities for shared services (e.g., education coordinator)</li> </ul>	<ul style="list-style-type: none"> <li>- <b><u>BDWMO, BCWMC</u></b> - similar to LRMWMO; staff limited to contracted Administrator, technical services provided by consultants</li> <li>- <b><u>LRWMO</u></b> - Board performs administration role, contracts recording and technical services</li> <li>- <b><u>VBWD</u></b> - consultant serves Administrative and technical roles; contracted education services</li> <li>- <b><u>CRWD, RWMWD</u></b> - full time administrator, &gt;10 staff</li> <li>- <b><u>NMCWD, RPBCWD</u></b> - full time administrator, a few staff</li> </ul>
Technical Advisory Committee (TAC)	<ul style="list-style-type: none"> <li>- Member city technical staff attend regular board meetings and provide input</li> <li>- WMO does not meet with technical staff from non-city cooperators (e.g., DNR, MPCA) on a regular basis</li> </ul>	<ul style="list-style-type: none"> <li>- Member city staff frequently attend Board meetings and participate freely</li> </ul>	<ul style="list-style-type: none"> <li>- MN Rules 8410.0045 requires the WMO to provide opportunity for technical advisory input on Plan development</li> </ul>	<ul style="list-style-type: none"> <li>- There may be opportunities for an ongoing technical advisory committee that meets regularly to discuss issues relevant to the WMO</li> </ul>	<ul style="list-style-type: none"> <li>- <b><u>BCWMC</u></b> - TAC is convened as needed to address individual initiatives</li> <li>- <b><u>LRWMO</u></b> - TAC convened for Plan development, city staff attend Board meetings</li> <li>- <b><u>VBWD</u></b> - TAC convened for Plan development</li> <li>- <b><u>CRWD, RWMWD</u></b> - TAC meets semi-regularly</li> </ul>



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Subject	LMRWMO Activities (Section references refer to the 2011 Plan)	Member City Activities	External Agency/Organization Requirements/ Expectations	Potential Gap	Activities of Other WMOs
Funding	<div>- WMO is funded by member city contributions defined in JPA</div> <div>- Watershed Based Implementation Funding (WBIF) provides a source of new funding to be coordinated with other WMOs</div> <div>- WMO applies for grant funding for WMO and/or City projects</div>	<div>- Member cities contribute funds to WMO</div> <div>- Member cities fund local projects (utilizing grants where applicable)</div>	<div>- BWSR may review planned activities relative to past and anticipated funding levels (i.e., does the WMO have sufficient resources to complete its planned implementation)</div>	<div>- There are potential funding mechanisms not currently used by the WMO (e.g., special taxing districts)</div> <div>- Outcomes of WBIF implementation are not yet well understood</div>	<div>- <b>BDWMO, LRRWMO</b> - similar to LMRWMO</div> <div>- <b>BCWMC</b> - funding varies based on annual budget, coordinated with Hennepin County</div> <div>- <b>Watershed Districts</b> use direct taxing authority</div>
Self Assessment of Performance/ Progress (BWSR Reporting)	<div>- Page 5-2 of the Plan identifies the following purpose: Assess performance of the WMO and member cities toward achieving the goals stated in the Plan</div> <div>- The WMO submits an annual activity report to BWSR</div> <div>- BWSR performed a Level II PRAP (2016) including an assessment of Plan accomplishments, including interim assessment of implementation program progress</div>	<div>-Cities submit annual MS4 reports to the MPC</div>	<div>- MN Rules 8410.0105 require biennial assessment of WMO progress towards measurable goals (identified in BWSR comment letter)</div> <div>- 2016 PRAP recommended a strategic planning effort to assess the WMO's ability to comply with MN Rules 8410.0105 (Recommendation #5)</div>	<div>- Current WMO reporting does not include quantitative assessment of progress towards measurable goals and may not meet the intent of MN Rules 8410.0105</div> <div>- Existing WMO goals are generally qualitative and lack measureable components</div>	<div><b>RWMWD</b> - identifies "signs of success" to assess progress towards goals</div> <div><b>CRWD</b> - correlates individual implementation items with one or more goals to establish correlation; implementation program identifies "measurable outputs" associated with each activity</div> <div><b>PLSLWD</b> - includes "dashboards" for resource goals to track quantifiable progress towards goals (e.g., lbs of watershed TP load reduction)</div> <div><b>VRWJPO</b> - reports progress of implementation actions, as well as defined "outcomes" correlated to each goal</div> <div><b>Other WMOs</b> - existing Plans pre-date renewed emphasis and generally do not explicitly correlate activities to goals</div>
Measurable Goals	<div>- Section 5 of the 2011 Plan includes WMO goals. Goals address: water quantity, water quality, recreation and habitat, wetlands, groundwater, erosion and sedimentation, public participation and education, and administration</div> <div>- Goals in Section 5 are not specifically measureable, and generally identify "direction" (i.e., increase, decrease, minimize) vs. amount</div> <div>- WRAPS includes water quality targets for select waterbodies in the watershed</div>	<div>- Member city local water plans include goals addressing many of the same topics as the WMO Plan</div>	<div>- 2016 PRAP recommended further use of the "prioritized, targeted, and measurable" as criteria for WMO goals and objectives (Recommendation #1)</div> <div>- BWSR and MPCA comment letters identified the need for measurable goals</div>	<div>- Current WMO goals are not explicitly measurable, limiting the ability of the WMO to assess progress biennially and determine overall success/effectiveness</div>	<div><b>CRWD</b> - most recent Plan update includes measureable goals for priority resources (e.g., watershed TP load reductions, macrophyte performance standards, volume reductions); non-resource based goals maintain qualitative elements</div> <div><b>PLSLWD</b> - 2020 plan includes quantitative goals for water quality, flood reduction, and aquatic invasive species only; the Plan does not include "goals", measurable or qualitative for other issue areas (e.g., administration, education, etc). Measures are identified for each goal.</div> <div><b>Other WMOs/WDs</b> - existing plans pre-date increased emphasis on goal measurability; goals are often qualitative or non-numeric</div>

WMO/WD Abbreviations:

BCWMC	Bassett Creek Watershed Management Commission
BDWMO	Black Dog Watershed Management Organization
CRWD	Capitol Region Watershed District
LRRWMO	Lower Rum River Watershed District
NMCWD	Nine Mile Creek Watershed District
PLSLWD	Prior Lake Spring Lake Watershed District
RWMWD	Ramsey-Washington Metro Watershed District
RPBCWD	Rily Purgatory Bluff Creek Watershed District
VBWD	Valley Branch Watershed District
VRWJPO	Vermillion River Watershed Joint Powers Organization



July 14, 2020

Mark Doneux  
Administrator  
Capitol Region Watershed District  
595 Aldine Street  
Saint Paul, MN 55104

**RE: Draft Capitol Region Watershed District 2021 - 2030 Watershed Management Plan Formal  
60-Day Review by State and Local Agencies**

Mr. Doneux,

Thank you for the opportunity to respond to the Draft CRWD Watershed Management Plan. As the CRWD is aware, the Lower Mississippi River Watershed Management Organization (LMRWMO) Board of Managers previously notified the CRWD Board and staff of their opposition to the CRWD planned “St. Paul West Side water management exploration” implementation item as noted in the previous version of the implementation plan, version 4, dated 12-2-19, which stated:

*Item 370B – St. Paul West Side water management exploration*

*(The CRWD will) Work with partners to evaluate current water management in Saint Paul’s West Side and explore expanding District boundaries to include the West Side. The West Side is located in the Lower Mississippi (River) Watershed Management Organization and it is the only section of Saint Paul not within a watershed district.*

As you are aware, the current version of the implementation plan item (below) contains revised language relating to this topic, which is still planned and to be funded at over \$63,000.

*Saint Paul Watershed Governance Exploration – 370F*

*City of Saint Paul staff and its Interagency Work Group have discussed how to implement stormwater management requirements consistently across the City and how watershed district rules and services do not apply to the West Side neighborhood. The City, with support from the District, shall continue exploring the merits and considerations of this topic and work with all agencies involved to further assess possible scenarios. The City's Joint Powers Agreement for water governance relating to the West Side runs through 2023.*

Given the impact that this topic has on the LMRWMO, the LMRWMO has the following comments:

- The LMRWMO is supportive of the City of Saint Paul's current efforts to implement jurisdiction-wide stormwater management requirements as it relates to private development and public capital improvements. It is the LMRWMO's understanding that consistent application of requirements across the entirety of Saint Paul is a goal of the CRWD and the City. The above, coupled with the existing services already provided by the LMRWMO including: grant administration, public education efforts, landscaping for clean water programs, etc. should address the concerns of CRWD without a jurisdictional boundary change.
- The LMRWMO has not been asked to be involved in any interagency work group discussions on how to implement stormwater management requirements consistently across the City of Saint Paul. Should these conversations continue, the LMRWMO requests that all affected Watershed Management Organizations and Watershed Districts which intersect the City of Saint Paul are included in discussions and evaluation of varying watershed management requirements.
- The LMRWMO is hopeful that the CRWD will revise its intent to no longer facilitate the annexation of the West Side of St. Paul into the CRWD through over \$63,000 in funding for the mentioned technical memorandum.
- The LMRWMO is opposed to a governance or boundary change when the current LMRWMO/CRWD boundary is aligned with hydrologic boundaries, common sense intercommunity flow boundaries and agreements, and resource-based concerns.
- Modifying watershed boundaries to include an entire City under a Watershed District does not constitute a resource-based concern. This situation occurs across many metro Cities and the LMRWMO does not see any issues that would necessitate such a change.
- The LMRWMO Board and Joint Powers Agreement establishing the LMRWMO, which has been in effect since 1985, serves as a valuable conduit for collaboration among the LMRWMO member Cities with unique intercommunity drainage and stormwater issues, including the City of Saint Paul.
- The LMRWMO reiterates that it is not within the purview of adjacent Metro Watershed Organizations such as CRWD to evaluate water resource management outside their own boundaries. MN State Statute 103B dictates that responsibility and authority to be with the Minnesota Board of Water and Soil Resources.
- The LMRWMO remains open to shared information and collaboration with CRWD if opportunities or shared resource concerns arise.

Attached is the LMRWMO's previous response letter for reference.

Sincerely,

*Sharon Lencowski*

Chair, Board of Managers  
Lower Mississippi River Watershed Management Organization

Cc. Melissa King - MN Board of Water & Soil Resources, Board Conservationist  
Steve Christopher - Board of Water & Soil Resources, Board Conservationist  
Anna Eleria - CRWD Planning, Projects, & Grants Division Manager





January 15, 2020

Joseph Collins  
President, Board of Managers  
Capitol Region Watershed District  
595 Aldine Street  
Saint Paul, MN 55104

**RE: Response to Capitol Region Watershed District Draft Implementation Plan Item**

The Lower Mississippi River Watershed Management Organization (LMRWMO) Board of Managers was recently notified that the Capitol Region Watershed District (CRWD) has drafted an implementation plan, version 4, dated 12-2-19, which includes the following item:

*Item 370B – St. Paul West Side water management exploration*

*“(The CRWD will) Work with partners to evaluate current water management in Saint Paul’s West Side and explore expanding District boundaries to include the West Side. The West Side is located in the Lower Mississippi (River) Watershed Management Organization and it is the only section of Saint Paul not within a watershed district.”*

The LMRWMO Board discussed this topic at their January 8, 2020 meeting. Given the impact that this topic has on the LMRWMO, the LMRWMO Board moved to inform the CRWD Board of Managers that they are in opposition to the above implementation item. The LMRWMO Board is in opposition to the CRWD exploring the annexation of the West Side of Saint Paul and modifying the LMRWMO/CRWD boundary for the following reasons:

- The LMRWMO Board is opposed to a governance or boundary change when the current LMRWMO/ CRWD boundary is aligned with hydrologic boundaries, common sense intercommunity flow boundaries, and resource-based concerns.
- Modifying watershed boundaries for the purpose of including an entire City under a Watershed District does not constitute a resource-based concern and the LMRWMO Board does not see any issues that would necessitate such a change.
- The LMRWMO Board and Joint Powers Agreement establishing the LMRWMO, which has been in effect since 1985, serves as a valuable conduit for collaboration among the LMRWMO member Cities with unique intercommunity drainage and stormwater issues, including the City of Saint Paul.

- The LMRWMO Board believes it is not within the purview of adjacent Metro Watershed Management Organizations to evaluate water resource management outside their own boundaries. MN State Statute 103B dictates that responsibility and authority to be with the Minnesota Board of Water and Soil Resources.
- The LMRWMO remains open to shared information and collaboration with CRWD if opportunities or resource concerns arise.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sharon Lencowski".

Sharon Lencowski  
Chair, Board of Managers  
Lower Mississippi River Watershed Management Organization

Cc. Melissa King - MN Board of Water & Soil Resources, Board Conservationist  
Mark Doneux - CRWD Administrator  
Anna Eleria - CRWD Planning, Projects, & Grants Division Manager

**TAC and Public Comments on Draft CRWD WMP 60-Day Version**  
**30-Jul-20**

Comment No.	Commenter	Section/ Page	Topic	Comment	Response	Significance	Change Will Be Made
1	Ramsey County	NA	Groundwater	Ramsey County is pleased to see there is mention of support of a county groundwater plan.	Thank you.	No Change	NA
2	Ramsey Soil and Water Conservation District	80	Grants and Cost Share	Consider including investment in pollinator habitats and native planting. Clean water grants cannot fund pollinator habitat without direct water quality benefit. Additional funding could support habitat corridors throughout the District.	Existing District cost share programs primarily focus on water quality improvement, however, native, pollinator friendly plants are incorporated into District-designed rain gardens and other natural resource projects. The District will consider this comment as we update the District grant programs for 2021. We will add this consideration to the program description #210A on page 81.	Low	Yes
3	Ramsey Soil and Water Conservation District	NA	Water Quality - Lake McCarrons	There is a need for partnership in addressing the recurring E. coli problem for Lake McCarrons and managing the large volume of geese that tend to congregate at this particular lake.	The District agrees with your comment and the draft WMP is set up to address the recurring E. coli issue. Goal WQ-2 references the Lake McCarrons Management Plan and notes the Districts intent to "Reduce other non-point source pollutants (e.g., bacteria, chloride, trash, sediment)." Action 313F (Shoreline Management Plan and Implementation) includes collaboration between the District and County to assess lakeshore conditions and develop buffers which should assist in reducing bacterial loading from geese.	Medium	No
4	Ramsey Soil and Water Conservation District	89	Groundwater	Page 89 identifies District support of a “more thorough well inventory.” Ramsey County has signed an agreement with the University of Minnesota to update the Ramsey County Geologic Atlas, which was set to begin in 2021 and will include an update of the well inventory.	Thank you.	No Change	NA
5	Ramsey Soil and Water Conservation District	NA	Como Lake	It would be nice to discuss establishing a more formal boat launch at Como Lake.	The District is interested in working with partners on Como Lake water-based recreation activities as indicated by Fund #305H - Water-based Recreational Activities Support. We would be open to this discussion of a formal boat launch if desired and initiated by partners.	Low	No
6	Saint Paul Port Authority	Executive Summary	Climate Change; Regulation	The incorporation of the effects of Climate Change in management planning and associated regulation is crucial to meet future water quality and sustainability goals. The Draft Plan does identify Climate Change in the Executive Summary as a Plan Theme, but does not speak to how increasing storm runoff, etc. might be incorporated in future policy or regulations. Some mention of incorporation plans would be helpful to regulated communities.	The District agrees with your comment and will include climate change trends, in particular, rainfall patterns as a consideration during the periodic District Rules Evaluation and Update (Fund #208E). In addition, several examples of how climate change may be addressed by the District are provided in the bullets on page 35. District work related to climate change noted in activity 3700 includes "research, planning, communications, and engagement."	Medium	Yes
7	Saint Paul Port Authority	79	Regulation	We commend the District’s commitment to streamline the permit process to minimize the duplication of NPDES and SWPPP permit application information and processing.	Thank you.	No Change	NA
8	Saint Paul Port Authority	79	Regulation	We remain concerned that smaller and smaller parcels are becoming subject to the District ’s regulations. We request that the District’s Plan include an exception such that a 10,000 square foot area of disturbance or more is the consistent threshold for both erosion control and stormwater management permitting requirements.  This change is necessary for our tenants who disturb soils, in excess of 10,000 square feet, in the process of performing dockwall maintenance and repairs (not site expansion or construction), at our river shipping operations, to not be required to continue to obtain District permits for potentially routine work covered by Department of Natural Resources and Army Corps of Engineers permits.	The District has noted SPPA's recommendation for future, potential land disturbance threshold. During the Rules evaluation (activity 208E), the District and its partners will consider and determine appropriate permit thresholds including greater than 10,000 square feet. We may also consider a general permit for maintenance and repairs of dockwalls and other shipping operations during our Rules Evaluation and Update. We note it in the narrative for activity #208E.	Medium	Yes
9	Saint Paul Port Authority	62	Regulation	We commend the district for establishing the Regulation Goals R-2, R-3, R-4, R-8, R-9 and R-10 (See Pg.62) as they are extremely important to continued redevelopment and construction across the city and region.	Thank you.	No Change	NA
10	City of Saint Paul	79	Regulation	Regarding regulation (208G), the city continues to evolve towards a green infrastructure program including robust local requirements for water quality and volume control on sites less than 1-acre. Our respective agencies have discussed this topic at great length over several years. We affirm our interest in collaborating on this topic to determine implementation strategies.	Thank you. The District looks forward to coordinating with the City of Saint Paul and other partners in evaluating potential updates to District Rules for sites less than 1 acre.	No Change	NA
11	City of Saint Paul	Action 370F	Saint Paul Watershed Governance Exploration	As it pertains to watershed governance (Fund #370F), the draft plan appropriately reflects the city’s discussions surrounding stormwater management and watershed options for our West Side neighborhood. This remains an on and off topic at the staff level, typically driven by circumstance. As such we respectfully request modifying the following sentence on page 108 to reflect that context by replacing the word “shall” with “may” or “expects to” or similar.	As this activity will be driven by the interests of the City, the District has made the requested change in activity language.	Low	Yes
12	City of Saint Paul	88	Infrastructure Management	Regarding infrastructure management (222), the city looks forward to engaging on this topic in the coming years, including establishing effective and efficient long-term approaches for publicly-owned systems. Specifically, we affirm our Sewer Utility Division’s support for the scope contemplated within 222C: CRWD’s evaluation and consideration of assuming ownership of the Como Lake overflow, Willow Reserve ponding area, Arlington-Jackson ponding area, and the last ½ mile of Trout Brook storm sewer.	Thank you. The District looks forward to coordinating with the City of Saint Paul in completing Fund #222C.	No Change	NA

13	Minnesota Pollution Control Agency	Table 2-2	Water Quality Monitoring Data	The footnote number (3) indicates not enough E. coli samples are collected to determine exceedance of applicable water quality standards. The E. coli standard contains two parts. The first being E. coli levels may not exceed 126 organisms per 100 mL as geometric mean of not less than five samples representative of the condition with any calendar month. The second part of the standard states nor shall more than ten percent of all samples taken during any calendar month individually exceed 1,260 organism per 100 mL. There is no minimum number of samples required. While the District may not have collected five samples in a month, the very high values of the geometric mean listed in table 2-2 would indicate that exceedance of the 1,260 organisms per 100 mL had been exceeded more than 10% of the time. Therefore the column should be highlighted indicating that the levels exceed the water quality standard in the Mississippi River.	The table will be revised to reflect E. coli measurements as exceeding the acute water quality standard of 1260 organisms per mL regardless of the number of samples.	Low	Yes
14	Minnesota Pollution Control Agency	Table 2-2	Water Quality Monitoring Data	It should be also noted that footnote number (3) appears in the wrong column, as it appears in the “Lead” column when it refers to E. coli.	The footnote has been corrected.	Low	Yes
15	Lower Mississippi River WMO	Action 370F	Saint Paul Watershed Governance Exploration	The LMRWMO is supportive of the City of Saint Paul’s current efforts to implement jurisdiction wide stormwater management requirements as it relates to private development and public capital improvements. It is the LMRWMO’s understanding that consistent application of requirements across the entirety of Saint Paul is a goal of the CRWD and the City. Consistent regulation, coupled with the existing services already provided by the LMRWMO including: grant administration, public education efforts, landscaping for clean water programs, etc. should address the concerns of CRWD without a jurisdictional boundary change.	The District recognizes the LMRWMO's expectation that the intended benefits and opportunities afforded by Fund #370F may be achieved without a change in jurisdictional boundaries.	No Change	NA
16	Lower Mississippi River WMO	Action 370F	Saint Paul Watershed Governance Exploration	The LMRWMO has not been asked to be involved in any interagency work group discussions on how to implement stormwater management requirements consistently across the City of Saint Paul. Should these conversations continue, the LMRWMO requests that all affected Watershed Management Organizations and Watershed Districts which intersect the City of Saint Paul are included in discussions and evaluation of varying watershed management requirements.	As indicated in Fund #370F, the City, with support from the District, shall work with all agencies involved including LMRWMO and other affected WDs/WMOs in discussion and evaluation of watershed governance in Saint Paul's West Side neighborhood.	No Change	NA
17	Lower Mississippi River WMO	Action 370F	Saint Paul Watershed Governance Exploration	The LMRWMO is hopeful that the CRWD will revise its intent to no longer facilitate the annexation of the West Side of St. Paul into the CRWD through over \$63,000 in funding for the mentioned technical memorandum.	This activity (Fund #370F), as written, does not indicate an intent to annex the West Side area. The City, with District support, will engage all affected parties in assessing all possible options.	No Change	NA
18	Lower Mississippi River WMO	Action 370F	Saint Paul Watershed Governance Exploration	The LMRWMO is opposed to a governance or boundary change when the current LMRWMO/ CRWD boundary is aligned with hydrologic boundaries, common sense intercommunity flow boundaries and agreements, and resource-based concerns.	The District recognizes the LMRWMO's interest in maintaining a jurisdictional boundary consistent with hydrologic boundary.	No Change	NA
19	Lower Mississippi River WMO	Action 370F	Saint Paul Watershed Governance Exploration	Modifying watershed boundaries to include an entire City under a Watershed District does not constitute a resource-based concern. This situation occurs across many metro Cities and the LMRWMO does not see any issues that would necessitate such a change.	The District recognizes the LMRWMO's interest in maintaining a jurisdictional boundary consistent with hydrologic boundary.	No Change	NA
20	Lower Mississippi River WMO	Action 370F	Saint Paul Watershed Governance Exploration	The LMRWMO Board and Joint Powers Agreement establishing the LMRWMO, which has been in effect since 1985, serves as a valuable conduit for collaboration among the LMRWMO member Cities with unique intercommunity drainage and stormwater issues, including the City of Saint Paul.	Noted.	No Change	NA
21	Lower Mississippi River WMO	Action 370F	Saint Paul Watershed Governance Exploration	The LMRWMO reiterates that it is not within the purview of adjacent Metro Watershed Organizations such as CRWD to evaluate water resource management outside their own boundaries. MN State Statute 103B dictates that responsibility and authority to be with the Minnesota Board of Water and Soil Resources.	The District seeks to work with the City of Saint Paul in its evaluation of consistent city-wide water governance. We understand that any change in water management boundaries must be initiated by BWSR and subject to BWSR's process.	No Change	NA
22	Lower Mississippi River WMO	Action 370F	Saint Paul Watershed Governance Exploration	The LMRWMO remains open to shared information and collaboration with CRWD if opportunities or shared resource concerns arise.	Thank you. The District will continue to coordinate with the LMRWMO to address shared goals and resources.	No Change	NA
23	Metropolitan Council	NA	General	The District has developed an excellent plan for a fully developed urban watershed that is consistent with Council policies, and the Council’s Water Resources Policy Plan.	Thank you.	No Change	NA
24	MN Board of Water and Soil Resources	NA	General	In reviewing the Plan, we noted that several of the Hyperlinks did not work. For example, the links to the various appendices, links to some of the plan sections and some of the links to Minnesota Rules 8410. Please double check all links and fix any broken ones.	Hyperlinks will be fixed in future versions of the Plan.	Low	Yes
25	MN Board of Water and Soil Resources	Table of Contents	General	We appreciate the extra effort in providing the “Acknowledgements, Information on Clean Water Land and Legacy Amendment projects and the Abbreviations list.	Thank you.	No Change	NA
26	MN Board of Water and Soil Resources	Executive Summary	Executive Summary	Revise the Executive Summary as needed to be consistent with any revisions made to the main body of the plan as a result of the 60-day comments received.	The Executive Summary will be revised to reflect edits made throughout the remainder of the Plan document.	Medium	Yes