

Table 1. Summary of Formal Comments on the LMRWMO draft Watershed Management Plan and Responses - Approved by LMRWMO Board 10/12/2022

Number	Entity	Comment	Response to Comment	Edit Planned?
1	BWSR	Section 1.2.5 Authority Granted by the Joint Powers Agreement. While not a component of the main section of the Plan (Appendix A), we recommend review of the LMRWMO Joint Powers Agreement at least once every ten years. This schedule will ensure continued commitment among the member cities and provide increased predictability for implementation.	The LMRWMO Board of Managers reviewed the Joint Powers Agreement (JPA) in 2022 and approved minor changes. The LMRWMO may revisit the JPA in 2023 to better document the LMRWMO's "Allowable Flow Method" documentation. The language of implementation item AD-6 will be revised to note that the Board of Managers will revisit the JPA for updates at least every 10 years.	Yes
2	BWSR	Section 4.1.1 Water Quality Goals. Water quality goals are provided for surface waters and listed in the table within G1. Multiple lakes have goals that do not currently meet the MPCA standard which is also the LMRWMO goal including Lake Augusta which requires significant pollutant reductions (Referenced data from Table 2-6). If the goal stated is not reasonable to accomplish within the Plan timeline, an interim 10-year goal should be provided.	<p>The LMRWMO intends to establish lake water quality goals equal to current water quality (if better than MPCA standards) or equal to MPCA standards (for those parameters not currently meeting MPCA standards). The water quality goals established for Lake Augusta in Goal G.1 are set at the applicable MPCA standards. The chlorophyll-a goal for Sunfish Lake was incorrectly stated as 19 ug/L, which is greater than the applicable MPCA standard of 14 ug/L. The Sunfish Lake chlorophyll-a goal will be revised to be 14 ug/L consistent with the MPCA standard.</p> <p>The LMRWMO is currently completing a study of Lake Augusta but it is not yet complete. Without additional data, the LMRWMO is not confident in establishing an interim goal. The LMRWMO prefers to use the MPCA standard as the 10-year goal, with the understanding that this may need to be revised pending additional monitoring and/or modeling data.</p>	Yes
3	BWSR	Section 4.3 Ecological Health. How will the LMRWMO measure its progress for the Ecological Health goals? The goals and many of the strategies include language such as 'promote', 'collaborate' and 'support'. While these efforts are beneficial, the LMRWMO should identify a more defined way to gauge progress.	<p>The Ecological Health goals will be revised to include target metrics where appropriate, including:</p> <ul style="list-style-type: none"> - G7: referencing the measurable water quality goal G1 in goal G7 - G7: adding a target of 10 shoreline projects(City, LMRWMO, and/or cost share) to be completed over 10 years - G8: add a target of incorporating habitat benefits into 2 city/WMO projects over 10 years 	Yes
4	Metropolitan Council	The Plan should better define regulatory waterbodies and regulatory watersheds. The regulatory waterbodies/watersheds seem to be only shown in Figure2-3 and Figure 4-1, and their description and management is split between sections 3.4.1 (stormwater runoff and pollutant loading) and Policy 4.1.3 P2 (water quality policies). The Plan would be more straightforward and easier to understand if the differences between priority waterbodies, Priority level 1 lakes, Priority level 2 lakes and regulatory waterbodies were clarified.	Section 3.3 of the Plan describes the process of determining level 1 and level 2 priority lakes. This section will be revised to clarify the difference in management activities for each priority level (referencing the implementation section, where appropriate). Section 3.3 will also be revised to describe the regulatory watersheds as an additional consideration and reference other sections of the Plan, as appropriate.	Yes
5	Minnesota Dept. of Transportation	Page viii: Acronyms: MnDOT is not listed in the acronym table, though in its first mention in the plan in Section 2.7.6 the acronym is used and then carried out throughout the remainder of the plan. We suggest inclusion in the acronym table to be consistent with other state agencies as listed.	Minnesota Department of Transportation will be added to the list of acronyms.	Yes
6	Minnesota Dept. of Transportation	Section 2.7.6 Stormwater Systems: Page 2-41, the first paragraph makes reference to Highway 110. In 2018, MnDOT renamed this Highway and it is now Highway 62. Please remove references to Highway 110 and replace it with them with its current designation.	Descriptions and figure depictions of Highway 110 will be updated to reference the current name as Highway 62.	Yes
7	Minnesota Dept. of Transportation	Figures 2-3, 2-4, 2-5, 2-6, 2-7, 2-8, 2-9, 2-10, 2-11, 2-12, 2-14, 2-15, 2-16, 2-17, 2-18, 2-19, 2-20, 2-21, 3-2: There are references to Highway 110 and Highway156 on each of these figures. As mentioned, Highway 100 was redesignated to Highway 62 in 2018. Highway 156 was turned back to Dakota County in 2020, and is now designated as County Road 56. Please revise the figures to refer to the current road designations.	Descriptions and figure depictions of Highway 110 will be updated to reference the current name as Highway 62.	Yes

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8	Minnesota Dept. of Transportation	Figure 2-16: It is not clear if MnDOT storm sewer and culverts are represented on this figure. For the purposes of this plan, no changes are necessary. MnDOT will share its culvert and storm sewer data on request from partners like the LMRWMO. In order to obtain this information, you may contact either the current MS4 Engineer, Jason Swenson at 651-234-7539 or jason.swenson@state.mn.us or the MS4 Asset Management Specialist, Adam Schramka, at 651-234-7544 or adam.schramka@state.mn.us.	Stormsewer data presented in Figure 2-16 was provided by member cities. MnDOT infrastructure may be included to the extent that it is included in city datasets. The LMRWMO and member cities will contact MnDOT staff, as needed, to obtain MnDOT storm sewer data.	No
9	City of St. Paul	<i>Letter of support contains no comments requiring LMRWMO response.</i>	Thank you for your participation throughout the Plan development process.	No
10	Dakota County	Dakota County is supportive of the LMRWMO Plan placing a high priority on addressing Thompson Lake's nutrient and chloride impairments. The County appreciates continued education efforts, funding, and projects implemented via Dakota SWCD's Landscaping for Clean Water Program and larger Capital Improvement Projects led by the LMRWMO.	Thank you. The LMRWMO looks forward to continued cooperation with Dakota County to address Thompson Lake impairments.	No
11	Dakota County	Dakota County supports continued collaborative efforts to conduct annual in-lake chloride monitoring of Thompson Lake. Further, the County hopes to continue to collaborate with the LMRWMO through offering Smart Salt trainings for public works staff, maintenance professionals, and property managers to reduce chloride impacts to both surface and groundwater.	The LMRWMO will seek opportunities to collaborate with Dakota County to advertise and promote smart salt trainings. Strategy 7 under the "water quality strategies" will be revised to reference these opportunities.	No
12	Dakota County	Dakota County is supportive of the WMO's proposed ½ acre stormwater management trigger for projects within the Lake Augusta and Thompson Lake subwatersheds. The County recognizes that given the highly developed nature of these subwatersheds, a redevelopment standard (as opposed to new development only) is appropriate to address existing stormwater management issues in these priority subwatersheds. The County suggests revising the regulatory trigger to ½ acre of new or redeveloped impervious surface instead of soil or land disturbance.	The LMRWMO Board of Managers considered different trigger options (including 1/2 acre of new or redeveloped impervious area) and sought feedback from member cities. Ultimately, the Board of Managers approved the 1/2 acre of disturbance threshold for a limited area (i.e., "regulatory watersheds") as it applies to a broad range of smaller sites that may be mostly impervious while still falling below a 1/2 acre imperviousness.	No
13	Dakota County	Dakota County recognizes that groundwater protection is not a high priority for the LMRWMO. However, the County encourages the LMRWMO and member cities to consult with the County on issues relating to contaminated properties and how stormwater may mobilize contaminants into groundwater. The MPCA has recently added guidance within the Minnesota Stormwater Manual with a checklist on assessing contamination when siting stormwater management BMPs, and County staff can assist with assessing contaminated properties.	The LMRWMO appreciates the interest of Dakota County in collaborating to address contaminated properties and will encourage member cities to leverage Dakota County's expertise and services.	No
14	Dakota County	Dakota County recognizes the significant impacts of sedimentation and erosion via stormwater outfalls and supports the LMRWMO's proposed Mississippi River Direct Drainage Outfall Assessment.	The LMRWMO looks forward to opportunities to address this issue in collaboration with Dakota County.	No
15	Dakota County	Dakota County would like to congratulate the LMRWMO and all partners in addressing the Sunfish Lake TMDL and delisting from the Impaired Waters List.	Thank you.	No
16	City of Sunfish Lake	2.4.1.3 Water Quality Policies, P1 – The proposed update to the LMRWMO plan uses the water quality volume calculation language from the 2020 MS4 permit for linear and nonlinear projects. However, the MS4 permit includes additional language for linear projects that are unable to provide the full water quality volume within the existing right-of-way a reasonable attempt to obtain additional right-of-way, easement, or other permission to treat the stormwater during the project planning process must be made. It goes on to say if additional right-of-way, easements, or other permission cannot be obtained, owners of construction activity must maximize the treatment of the water quality volume prior to discharge from the MS4. The City would request similar language for linear projects unable to obtain right-of-way or easement be added to the LMRWMO policy to be consistent with the MS4 permit.	Water quality policy 1 will be revised to specifically include the additional language for linear projects or reference the MS4 permit language regarding linear projects.	Yes

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17	City of Sunfish Lake	Table 4-1 notes that the City of Sunfish Lake's volume control standard is 1.1 inches of runoff from net new (i.e. increased) impervious surfaces however, the City's Engineering Guidelines (dated November 2018) note the volume control requirement is 1.0 inches of runoff from the new impervious surfaces for development and 1.0 inches of runoff from the new and/or fully reconstructed impervious surfaces for redevelopment. It is requested the table be updated to reflect the City's Engineering Guidelines.	Table 4-1 will be revised to reflect that the City of Sunfish Lake volume control standard is 1.0 inches of runoff for new and/or redeveloped impervious surface.	Yes
18	City of Sunfish Lake	The city would like to increase opportunities to improve water quality in Hornbeam Lake to keep it off the MN Impaired Waters list. The city would like to continue partnering on improvements in Sunfish Lake to keep the lake delisted.	The Plan identifies Hornbeam Lake as a Priority Level 1 lake. As such, the LMRWMO supports continued CAMP monitoring to identify potential degrading trends in Hornbeam Lake. Additional projects and studies are not planned at this time.	No
19	City of Sunfish Lake	The city would like to increase opportunities to improve water quality in Sunfish Lake. Implementation item 6.1.2 of the City's 2018 Comprehensive Stormwater Management Plan identified a potential partnership with LMRWMO to apply a herbicide treatment for curly leaf pondweed to Sunfish Lake.	The LMRWMO thanks the residents of Sunfish Lake for their cooperation in water quality improvement efforts (e.g., alum treatment) leading to the removal of Sunfish Lake from the impaired waters list. The LMRWMO will provide technical and administrative support (e.g., grant application review) for aquatic plant management activities pursued by member cities or lake associations. The Plan text will be revised to note this support; specific City/partner-led projects will be omitted from the implementation schedule unless the Board determines a more active LMRWMO role is warranted in the future.	Yes
20	MPCA	<i>MPCA comment letter includes updated reference links for various Plan sections.</i>	Thank you. Links to MPCA references will be included and/or updated throughout the Plan.	Yes
21	City of West St. Paul	4.1.3 Water Quality Policies, P1 – The city's current ordinance allows lessor stormwater volume control practices for linear projects where right-of-way is lacking, in line with the MS4 permit. The proposed update to the LMRWMO plan uses the water quality volume calculation language from the 2020 MS4 permit for linear and non-linear projects. However, the MS4 permit includes additional language for linear projects that are unable to provide the full water quality volume within the existing right-of-way a reasonable attempt to obtain additional right-of-way, easement, or other permission to treat the stormwater during the project planning process must be made. It goes on to say if additional right-of-way, easements, or other permission cannot be obtained, owners of construction activity must maximize the treatment of the water quality volume prior to discharge from the MS4. The City would request similar language for linear projects unable to obtain right-of-way or easement be added to the LMRWMO policy to be consistent with the MS4 permit.	Water quality policy 1 will be revised to specifically include the additional language for linear projects or reference the MS4 permit language regarding linear projects.	Yes
22	City of West St. Paul	4.1.3 Water Quality Policies, P2 – The City's current ordinance requires stormwater management for projects with 1 acre or more of disturbance. The updated plan proposes permanent water quality treatment for projects that disturb ½ acre or more if more than half the parcel is located within a watershed tributary to LMRWMO Regulatory Waterbodies. A portion of West St. Paul, including a stretch of Robert Street with commercial lots, would be included in this area and the City would be required to administer different requirements at different locations throughout the City. This is a concern for the City of West St. Paul as this is not consistent with the MPCA MS4 general permit and could create situations where neighboring properties are held to different standards.	The LMRWMO Board of Managers note the city's concern and will be monitoring the implementation of the new water quality standard following Plan adoption. Cities can choose to implement the regulatory waterbody standard city-wide to allow for more consistency in permitting.	No
23	City of West St. Paul	Table 4-1 – The table notes that the City of West St. Paul's buffer requirement for wetlands is a minimum 30 feet however the City's Local Surface Water Management Plan notes a minimum 15 feet in Policy 8.2 of Section 3. It is requested Table 4-1 be updated to reflect the City's current standard.	Table 4-1 will be revised to reflect the City's current buffer standard.	Yes

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24	City of West St. Paul	The City looks forward to opportunities to partner on studies and projects with the LMRWMO including those focused on Thompson Lake and Dodd Road.	The LMRWMO looks forward to further cooperation with the City of West St. Paul.	No
25	City of South St. Paul	Request that you add the MS4 permit exemption language for linear projects to your policies.	Water quality policy 1 will be revised to specifically include the additional language for linear projects or reference the MS4 permit language regarding linear projects.	Yes
26	City of South St. Paul	Table 5.1 LMRMO Implementation Schedule lists Concord Street for BMPs associated with street projects. This can be removed as the Concord Project is under construction and nearing completion.	Noted. The implementation table will be revised accordingly.	Yes
27	Dakota County SWCD	Under the Studies Category, Item S-3 and S-10 there is reference to conducting Subwatershed Assessments for Rogers Lake and Thompson Lake. The SWCD may be able to partner with the LMRWMO on these two assessments and leverage funds. It is difficult to predict what funding may become available for these two studies, but listing the SWCD as a Partner would advance our commitment to the effort of accelerating implementation of BMPs.	The LMRWMO appreciates past cooperative efforts of Dakota County SWCD and looks forward to future cooperative opportunities. The SWCD will be added as a potential partner for items S-3 and S-10.	Yes
28	Dakota County SWCD	Similar to the comment above, under the Projects category, Items P-2 to P-11, if listed as a Partner the SWCD can advance our ability to seek funds and assist with the installation of small to medium sized BMPs for stormwater quality within these priority areas. Having this reference in your Plan is important if we attempt to secure grant funds.	The SCWD will be added as a partner to the projects and programs, as appropriate.	Yes
29	Dakota County SWCD	Under the Monitoring Category, Item MN-1, MN-2, M-3 there is the ability to list the SWCD as a Partner. We currently provide water monitoring tasks to the LMRWMO.	The SWCD will be listed as a partner for the appropriate monitoring items.	Yes
30	Dakota County SWCD	Under the Administration Category, Item AD-1, AD-3 and potentially others, the SWCD is not listed as a Partner. We have been providing Administrative services to the LMRWMO under the last two watershed management plans and hope to continue to partner and provide these services.	The SWCD will be listed as a partner for the appropriate administrative items.	Yes