

#	Commenter-- Organization	Commenter-- Person	Comment	Comment Type	October 10th draft page #	CRWD Response
1	Citizen Advisory Committee		The CAC supports of the draft plan as written subject to consideration of the following comments:	General	n/a	No response necessary
2	Citizen Advisory Committee		Move the Glossary and Acronyms to the main body not appendices	Editorial	n/a	The District will make this change in the next draft of the WMP
3	Citizen Advisory Committee		Include a context map putting CRWD in perspective of State of MN	Editorial	2	The District will make this change in the next draft of the WMP
4	Citizen Advisory Committee		Indicate adjacent WMOs on maps	Editorial	multiple	The District will make this change in the next draft of the WMP
5	Citizen Advisory Committee		Include objective measures of achievement of goals	Policy	multiple	The evaluation section of the plan will be clarified.
6	Citizen Advisory Committee		Ensure issues, goals, and implementation items are adequate to cover the CCLRT and other large scale redevelopment project.	Initiative	multiple	The District will address this issue in the next draft of the WMP
7	Citizen Advisory Committee		Consider a specific issue statement and goals of the impact of large scale redevelopment opportunities to maximize water quality improvement generally, not limited to the bounds of the project.	Policy	27	The District will address this issue in the next draft of the WMP
8	Citizen Advisory Committee		Recognize that there are various levels of partnership on water issues with neighboring and overlapping organizations.	Policy	multiple	A statement to this effect will be included on pages 15-16
9	Citizen Advisory Committee		Note authority for funding under 103B on page 27	Technical	27	The District will make this change in the next draft of the WMP
10	BWSR	Melissa Lewis	We found the Plan to be well-written and comprehensive.	General	n/a	No response necessary
11	BWSR	Melissa Lewis	Land and Water Resource Summary - we recommend providing cross-reference to the appropriate page(s) in the appendices for each section of this chapter.	Editorial	multiple	The District will make this change in the next draft of the WMP
12	BWSR	Melissa Lewis	Land and Water Resource Summary - We also recommend include a description in the text or a location on the map for the Mississippi River reference sites mentioned in Table 2 on page 12.	Technical	12	The District will make this change in the next draft of the WMP
13	BWSR	Melissa Lewis	Implementation Plan - Additional description(s) and cross-references are needed throughout this chapter to describe how the implementation section and the appendices interact.	Editorial	multiple	The District will make this change in the next draft of the WMP
14	BWSR	Melissa Lewis	Implementation Plan - We suggest including a table of contents to this section or adding page numbers to the table on page 34.	Editorial	34	The District will make this change in the next draft of the WMP
15	BWSR	Melissa Lewis	Implementation Plan - Page 34: In consideration of the plan's link to the annual budget, we recommend including a commitment in the plan to posting the annual approved budget on the district's website.	Initiative	34	This is has been standard practice for the District. The District will make this change in the next draft of the WMP
16	BWSR	Melissa Lewis	Implementation Plan - Page 35: The description on this page of existing or core and new activities is inconsistent with the terminology in the tables in the rest of the section which refer to program/project initiatives and planning initiatives. Consistent terminology is recommended. Additionally, referring to 'existing initiatives' within each Program/Project Initiatives is somewhat confusing; we suggest referring to the bullet point lists as existing 'activities' or 'actions'.	Editorial	multiple	The District will address this issue in the next draft of the WMP
17	BWSR	Melissa Lewis	Implementation Plan - Stewardship Grant - Further description of the grant program is needed to clarify the intent and outline the program processes. The information on the District's website does provide this description; however, the information must be included in the plan.	Initiative	45	The District will make this change in the next draft of the WMP
18	BWSR	Melissa Lewis	Implementation Plan - Monitoring & Data Assessment - provide a cross-reference the appropriate section of Appendix A for further detail on the monitoring program.	Editorial	47	The District will make this change in the next draft of the WMP
19	BWSR	Melissa Lewis	Implementation Plan - Education & Outreach - The note on the table indicates that planned initiatives take the place of program initiatives; however, the text includes a bulleted list of ongoing program initiatives. Additionally, the Education Plan referred to in this section must be included either in the Plan or on the District website.	Initiative	50	The District will make this change in the next draft of the WMP
20	BWSR	Melissa Lewis	Implementation Plan - GIS, page 63, Initiative E - Suggest including a brief description or reference to the statutory process for boundary changes; see MN S 103B.215 and 103D.251.	Initiative	63	The District will make this change in the next draft of the WMP
21	BWSR	Melissa Lewis	Implementation Plan - Wetland, Stream, & Ecosystem Restoration - Planning (page 78), and Implementation (pg 96) - Page numbers 78 and 79 are repeated. Reference is needed in this section as to where to find the Technical Memorandums referred to in these categories and we suggest cross-reference to Appendices C and D.	Editorial	multiple	The District will make this change in the next draft of the WMP
22	BWSR	Melissa Lewis	Implementation Plan - Mississippi River Subwatershed - in addition to the description, we suggest providing reference to a figure where this subwatershed or these subwatersheds are identified.	Technical	98	The District will make this change in the next draft of the WMP
23	BWSR	Melissa Lewis	Implementation Plan - Shoreline and Streambank Restoration - the table indicates no funding for Project Initiatives; however, the text identifies existing initiatives.	Initiative	multiple	This issue will be clarified in the next draft of the WMP
24	BWSR	Melissa Lewis	Implementation Plan - Trout Brook Subwatershed BMPs - reference as to where to find the Trout Brook CIP is needed and reference to the district website for updates on this project is recommended.	Editorial	94	The District will make this change in the next draft of the WMP

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25	BWSR	Melissa Lewis	Implementation Plan - Stormwater Impact Fund Implementation (pg 99) - either additional information outlining the program processes or the Stormwater Impact Fund Implementation Plan adopted by the managers must be included in the plan.	Initiative	99	The District will make this change in the next draft of the WMP
26	BWSR	Melissa Lewis	Implementation Plan - Special Projects and Grants - Further information on the grant program is needed in the plan to clarify the intent and outline the program processes.	Initiative	100	The District will make this change in the next draft of the WMP
27	BWSR	Melissa Lewis	Implementation Plan - Debt Service - when will the text to be included in the section be determined?	Initiative	102	The District will add the missing text in the next draft of the WMP
28	BWSR	Melissa Lewis	Implementation Plan Table - The table is cut off by the binder; recommend including wider margin.	Editorial	multiple	The District will address this issue in the next draft of the WMP
29	BWSR	Melissa Lewis	Implementation Plan Table - The headers "CRWD Cost Share", "One-Time CRWD Cost", and "Annual/Maint. CRWD Cost" are unclear.	Technical	multiple	The District will address this issue in the next draft of the WMP
30	BWSR	Melissa Lewis	Watershed District Administration- LWMPs must be <u>adopted</u> within two years of BWSR approval of the CRWD plan, not just submitted to the District.	Technical	106	The District will make this change in the next draft of the WMP
31	BWSR	Melissa Lewis	Watershed District Administration-The Watershed Plan must indicate the year it extends to; this is typically included in the Amendments section.	Technical	111	The District will make this change in the next draft of the WMP
32	BWSR	Melissa Lewis	Watershed District Administration-The plan does not identify the source of CRWD's funding; i.e. will all programs and projects be financed through a district-wide ad valorem levy?	Policy	112	The District include this information in the next draft of the WMP
33	BWSR	Melissa Lewis	Watershed District Administration-Under the Amendments to Plan section on page 111, remove "Board" from C.	Technical	111	The District will make this change in the next draft of the WMP
34	BWSR	Melissa Lewis	Appendix A - The page numbers for the figures are incorrect and the page breaks are in random locations. Additionally, a number of the figures are cut off by the binding and figure 4 is repeated.	Editorial	multiple	The District will address this issue in the next draft of the WMP
35	BWSR	Melissa Lewis	Appendix D - Wetland Management Plan - Overall, the purpose and intent of this Appendix and the connection to the overall Plan is vague, wetland goals and strategies are scattered throughout the Appendix, and how this plan will be implemented is not clear. To address these issues we recommend the following: incorporating goals currently in the appendix into the Issues & Goals chapter of the Plan; revising the appendix to focus on the wetland assessment methods and results and including a section that more clearly discusses how the results will be used to accomplish the goals; and finally incorporating or cross-referencing specific initiatives or activities into the Implementation chapter of the Plan. Additional recommendations for revisions to this Appendix are attached and do not need formal response.	Initiative	multiple	The District will make these changes in the next draft of the WMP
36	Met Council	William Moore	The plan is an excellent example of how to manage the challenges of a fully developed urban watershed.	General	multiple	No response necessary
37	Met Council	William Moore	The plan is consistent with the Council's <i>Water Resources Management Policy Plan</i> .	General	multiple	No response necessary
38	Met Council	William Moore	The implementation section of the plan details a number of programs and projects to be accomplished by the CRWD as well as its various partners. The estimated cost of these various programs and projects totals almost \$44 million over the next ten years. By implementing these programs and projects the water resources o the District as well as downstream water resources should be protected.	General	multiple	No response necessary
39	MPCA	Glenn Skuta	Page 20, Goal 4.1.a and 4.1.b - The phosphorus-related goals for the two lakes are very different from each other. It may be clearer if the goals for Como Lake and Lake McCarrons were either the same or at least similar in nature. The general public may find it easier to relate to the goals for the lakes if they are similar and can make comparisons between the two.	Technical	20	The two water quality goals were developed through extensive public and stakeholder involvement during the creation of Lake Management Plans. The District will work to ensure these are readily understood.
40	MPCA	Glenn Skuta	Page 20, Goal 4.1 - This set of goals does not include goals for Loeb Lake or Crosby Lake. Are goals to be developed for these two lakes at a later time?	Policy	20	The numeric standards for these two lakes will be determined during the WMP duration.
41	MPCA	Glenn Skuta	Page 20 and 21, Goals 4.1.f, 4.2.d and 4.3.b - Goal 4.1.f states "Eliminate illicit discharges..." Goals 4.2.d and 2.3.b state "Develop a program to identify and eliminate illicit discharges..." Is there a reason Goal 4.1.f does not include development of a program similar to Goals 4.2.d ad 4.3.b?	Policy	20	This issue will be clarified in the next draft of the WMP
42	MPCA	Glenn Skuta	Page 21, Goal 5.1 - While this set of goals includes important flood plain work, it does not include any goals regarding the reestablishment of lost flood plain. It is recommended that a goal be included that focuses on the reestablishment of flood plain area that has been lost.	Policy	21	The District will make this change in the next draft of the WMP
43	MPCA	Glenn Skuta	The concept of "Bringing Water Back to St. Paul" is an exciting one. Please notes, as discussed during the Technical Advisory committee meeting, MPCA staff may have concerns with your proposed Stream Corridor Restoration Plan. The "day-lighting" of underground stormwater conveyance systems may have regulatory implications. Please contact Dale Thompson, MPCA Stormwater program, to discuss your proposed project in more detail and for a regulatory applicability review of your proposed project, prior to commencement.	Technical	multiple	The District would expect all newly created water resources to be subject to all applicable water quality regulation. The District would have a goal of these new water resources achieve all applicable standards.
44	Ramsey County	Terry Noonan	The WMP is very thorough and well-organized, reflecting the activities and growth of the District over the last ten years.	General	multiple	No response necessary
45	Ramsey County	Terry Noonan	The County and the Ramsey Conservation District have participated in existing initiatives such as water quality monitoring of Como, McCarrons, Loeb and Crosby Lakes, TMDL or other studies for District lakes and the Mississippi River, rules TAC, shoreline restoration projects, Center/Rice St. subwatershed analysis, and the well sealing cost share and stewardship grant programs.	Technical	multiple	The District looks forward to continued cooperation with Ramsey County and RCD on the initiatives listed.

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46	Ramsey County	Terry Noonan	Annual funding by the District of the Ramsey County Groundwater Plan initiatives and other groundwater studies are proposed. This is important for overall funding of the County Groundwater Plan, which is in final review by the Board of Water and Soil Resources and the County.	Initiative	40	No response necessary
47	Ramsey County	Terry Noonan	The implementation initiatives section of the WMP identifies many new projects. In Section 301 Shoreline and Strembank Assessment and Maintenance, the Ramsey Conservation District should be added as partners in the Loeb and Crosby Lakes Shoreline Restoration – planning projects.	Initiative	Imp Table	The District will make these changes in the next draft of the WMP
48	Ramsey County	Terry Noonan	In the Como Lake Subwatershed section, the WMP identifies an internal loading study and management, with the County identified as the lead partner. There is some lack of clarity related to this project because the WMP identifies the CRWD cost-share as 100%. County does not have the financial resources to be the lead partner for this project, but can participate by providing water quality data and participation on the project technical panel.	Initiative	68	This issue will be clarified in the next draft of the WMP
49	Ramsey County	Terry Noonan	Invasive species monitoring and management through the Ramsey County Cooperative Weed Management Association (RCCWMA), as organized by the Ramsey Conservation District, is an identified project for both Como Lake and McCarrons Lake; however, the future status of the RCCWMA is in doubt due to funding limitations.	Initiative	multiple	No response necessary
50	Ramsey County	Terry Noonan	In the Trout Brook Subwatershed section of the implementation initiatives, the Center/Rice subwatershed analysis is an existing initiative of ongoing interest to the County.	Initiative	78	The District will ensure the County is listed as a partner for this initiative
51	Ramsey County	Terry Noonan	The implementation initiatives section of the WMP identifies many capital improvement projects for the ten-year period. Under Como Lake Subwatershed BMPs, the upgrading of pumps in Gottfried's Pit is identified as a 2014-16 project with 50% District funding. Implementation of this project is expected in 2010 utilizing alternative surplus CIP funds as well as cost share contributions from Roseville, Falcon Hts. and the County.	Initiative	89	This issue will be clarified in the next draft of the WMP
52	Ramsey County	Terry Noonan	In the McCarrons Lake Subwatershed BMPs, adding pervious pavement to the boat launch parking area is identified as a 2014-16 project with 50% District funding in cooperation with the County	General	91	No response necessary
53	Ramsey County	Terry Noonan	Various projects related to wetland restoration activities identify the Ramsey Conservation District as a partner. A total of \$3.7 M is identified for Stream Corridor Restoration – Implementation during the ten-year WMP.	Initiative	96	No response necessary
54	Ramsey County	Terry Noonan	A highlighted proposed CIP project, for which the County is not identified as a partner, is a green office building and campus for the District with an estimated cost of \$2.985 M and construction in the period 2014-16.	Initiative	101	No response necessary
55	Ramsey Conservation District	Geoff Nash	My compliments on a well conceived Plan.	General	n/a	No response necessary
56	Ramsey Conservation District	Geoff Nash	11.1.d, pg. 28 In sentence: "Maintain active membership in the Ramsey County Groundwater Commission" (replace "Commission" with "Partnership").	Technical	28	The District will make this change in the next draft of the WMP
57	Ramsey Conservation District	Geoff Nash	201-GW Protection, pg. 39 <input type="checkbox"/> the term "unused" wells instead of "abandoned" is preferred by the MDH and others.	Technical	39	The District will make this change in the next draft of the WMP
58	Ramsey Conservation District	Geoff Nash	201-GW Protection, pg. 39 <input type="checkbox"/> Program Initiative A, 2nd sentence: typo "roll" should be "role".	Editorial	39	The District will make this change in the next draft of the WMP
59	Ramsey Conservation District	Geoff Nash	201-GW Protection, pg. 39 <input type="checkbox"/> Program Initiative B, pg. 40: consider inclusion of the following statement: "Findings from related Ramsey County Groundwater Protection Plan initiatives may augment a CRWD Surficial Groundwater and Soil Contamination Assessment. I am referring to the initiatives in the County GW Plan that would investigate the 80 unpermitted MPCA dumpsites, as well as the 264 Ramsey County dumpsites. The assessment you refer to could include this information for dumpsites in your District.	Initiative	40	This reference will be added to the next draft of the WMP
60	Ramsey Conservation District	Geoff Nash	220-Education/Outreach, pg. 50 and 1.1.b, page 18 <input type="checkbox"/> RCD is eager to cooperate in providing groundwater related education/outreach activities.	Initiative	multiple	The District will ensure the RCD is listed as a partner for this initiative
61	Ramsey Conservation District	Geoff Nash	G. Alternative (Non- <input type="checkbox"/> Infiltration) Volume Reduction BMP Guidance, Pg. 56 <input type="checkbox"/> Consider mentioning stormwater reuse as an option.	Initiative	56	The District will make this change in the next draft of the WMP
62	Ramsey Conservation District	Geoff Nash	Appendix A-47 Top line: "Figure 13 shows all industrial stormwater sites within the District." It appears that Figure 13 shows water appropriations within the District, not industrial stormwater sites.	Editorial	A-47	The District will address this issue in the next draft of the WMP

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63	Ramsey Conservation District	Geoff Nash	Appendix A-54 to A-65 Spacing issues	Editorial	multiple	The District will address this issue in the next draft of the WMP
64	Ramsey Conservation District	Geoff Nash	Appendix A-81, 2nd paragraph Spacing issue	Editorial	multiple	The District will address this issue in the next draft of the WMP
65	Ramsey Conservation District	Geoff Nash	Appendix A-84 □ It would be clearer if this section was titled “Groundwater Elevation Monitoring” to differentiate it from the next section “Groundwater Quality Monitoring”.	Technical	A-84	The District will make this change in the next draft of the WMP
66	Ramsey Conservation District	Geoff Nash	Appendix A-84 □ This section mentions “One shallow Quaternary groundwater well is part of the Minnesota Department of Natural Resources (MN DNR) Observation Well network...”. Two additional DNR observation wells currently monitored monthly by the Ramsey Conservation District are present in the Capitol Region Watershed District and should be mentioned in the Plan. These are: o DNR Well ID no. 62002, MDH ID no. 200105, St. Peter aquifer o DNR Well ID no. 62034, MDH ID no. 244360, St. Peter aquifer	Technical	A-84	The District will make this change in the next draft of the WMP
67	Ramsey Conservation District	Geoff Nash	Appendix D-3 3rd from last paragraph, line 5: Typo, remove extra comma.	Editorial	D-3	The District will make this change in the next draft of the WMP
68	Ramsey Conservation District	Geoff Nash	Appendix D-6 Groundwater interaction: Assessment of groundwater dependent natural resources is a valuable program.	Initiative	D-6	No response necessary
69	City of Lauderdale	Heather Butkowski	I have no comments	General	na	No response necessary
70	City of Maplewood	Steve Kummer	“Green Infrastructure” seems to be a theme throughout the District’s WMP. How does the District define “green infrastructure?”	Technical	multiple	The District will more formally define green infrastructure in the next draft of the WMP
71	City of Maplewood	Steve Kummer	p. 27-28: The City of Maplewood has the Capitol Heights area streets (residential neighborhood between Larpenteur and Roselawn) on its capital improvement plan for 2011. Given Goal #11 and previous experience in our dealings with the District on the reconstruction of Mississippi Street, Sloan Street and Skillman Avenue in 2007, we sincerely hope that CRWD follows through with a spirit of cooperation and partnership funding and assisting in the design of a portion of the improvements on our future neighborhood improvement projects in the area.	Policy	27	The District intends to continue cooperative efforts with all of its partners.
72	City of Maplewood	Steve Kummer	Related to the spirit of cooperation is the issue of pumping of the Edgerton Ponds (no-outlet at the low point of Edgerton between Larpenteur and Roselawn) and the cooperation of the District with the City of Maplewood and the Ramsey-Washington Metro Watershed on designing a permanent solution to this ongoing problem. It is a solution that will beneficially impact all three entities.	Initiative	79	This issue is identified on Page 79 (Initiative 320K)
73	City of Maplewood	Steve Kummer	The Ramsey-Washington Metro Watershed District recently has expressed an interest in becoming more involved in the educational aspects of Maplewood’s capital improvement program, which usually involves the construction of either neighborhood storm water BMP’s or individual BMP’s (for example, rain gardens) for homeowners. This may include involvement in neighborhood meetings, commission meetings and plan review sessions that the City holds for its residents.	Initiative	multiple	This is the type of work that could be accomplished through the proposed education initiatives.
74	City of Maplewood	Steve Kummer	p. 29: Goals 16. The City of Maplewood as part of the last comprehensive planning cycle now has a Surface Water Management Plan and is moving forward with the revision of several revisions to ordinances, including a new Wetland Protection ordinance and Slope Protection ordinance. We hope that the District would adopt rules complementing Maplewood ordinances. Municipal involvement, either through our local commissions for city staff, is essential in this process to make sure that rules do not conflict and bureaucratic hoops are reduced for future development and redevelopment. Working through the TAC is an acceptable means for coordinating rules and regulations.	Initiative	29	All rule revisions will be discussed in detail with all District stakeholders prior to adoption. These discussions will also include the barriers and benefits of various implementation approaches.
75	City of Maplewood	Steve Kummer	p. 30: On Goal 16.1.c, I would emphasize “work with District partners” rather than enacting District rules for achieving volume reduction on sites less than an acre. The City of Maplewood, through its engineering department and available ordinances, regulates these issues on a case-by-case basis and is fully capable of enforcing its policies and ordinances related to this practice. Again, the City intends to address this issue further as a result of analyses completed as part of the surface water management plan and the non-degradation protocols.	Policy	30	All rule revisions will be discussed in detail with all District stakeholders prior to adoption. These discussions will also include the barriers and benefits of various implementation approaches.

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76	City of Maplewood	Steve Kummer	p. 30: Goals 16. As a policy, the City of Maplewood does not issue permits until all requirements are met. This includes permitting from watershed districts. Keep in mind that the City has the authority to place stipulations on developments through City Council conditions. It is perfectly acceptable for the Watershed to informally request city staff to consider placing certain conditions on the developer through the conditional use permitting or building permit processes.	Initiative	30	No response necessary
77	City of Maplewood	Steve Kummer	p. 30: Goals 16. Communication between intergovernmental units tends to become "siloed" between the directors and heads of each unit. The City of Maplewood would like to see more coordination between different classes of employees within each government unit. For example, those involved with erosion control inspections would coordinate with the City's grading inspector on sediment and erosion control violations.	Policy	30	This District will continue to work to determine the most effective way to communicate and cooperate with the District's partners.
78	City of Maplewood	Steve Kummer	p. 30: Goal 16.3.b. Elaborate on "addressing inconsistencies in consultation with the TAC." Make these goals more specific. For example, what are the inconsistencies and can the District improve communication with members of the TAC? What other methods can the District communicate with local cities within the Watershed?	Policy	30	This issue will be clarified in the next draft of the WMP
79	City of St. Paul	Anne Hunt	The City believes that this Plan can be a catalyst for further collaboration with the City to eliminate duplication and to leverage joint resources to protect our critical water resources. The City is committed to continuing to be a leader in the implementation of green infrastructure and innovative stormwater management.	General	n/a	No response necessary
80	City of St. Paul	Anne Hunt	To pursue this collaboration, the City's Water Resource Work Group, a standing City interdepartmental committee formed by Council Resolution in 2008, has established the attached water resource management interagency collaboration process. The City requests that the CRWD Plan formally incorporate this interagency collaboration process for proposed programs or projects that are located within City right-of-way or on City property, effecting City programs or requiring City operation or maintenance. It is expected that this framework would be followed as a prerequisite for gaining City support or proposed relevant projects and programs in the Plan.	Policy	multiple	The District will provide all information and timely updates on projects of mutual concern and will attend and participate in the City's WRWG. The District can not commit to consensus based decision-making and will not include the City proposed interagency collaboration process in the WMP. However, the District is interested in a mutually agreed upon process for efficiently dealing with projects, studies and issues of mutual concern to be included in the revised WMP.
81	City of St. Paul	Anne Hunt	1. The Plan should further leverage joint resources and minimizing duplication on mutual projects - This Plan proposes costs in excess of \$43 million dollars of which approximately 90 percent is coming from the tax payers within the City of Saint Paul. At the same time, the City is seeing a drastic increase in its own costs to implement responsibilities related to both watershed rules and MPCA regulations. The City's costs include, but are not limited to, spending over \$1.5 million annually to construct volume control practices to comply with watershed district rules street reconstruction projects. With this significant burden on our mutual tax payers and the many proposed located within the City, the Plan should formally incorporate the interagency collaboration process as attached to minimize duplication and define specific roles in areas of joint authority and responsibilities.	Policy	multiple	The District has recently submitted and reviewed its 2010 workplan with the City and hopes the City would reciprocate by supplying its Water Quality Initiatives workplan to ensure efficient use of our joint resources and eliminate any duplication of effort. See also response to Comment #80.
82	City of St. Paul	Anne Hunt	2. Proposed Subwatershed Management Plans require additional collaboration so CRWD projects do not preclude or limit City's obligations and programs - Several of the proposed subwatershed studies identified in the Plan duplicate the City's ongoing initiative to inventory citywide volume control opportunities and conduct subwatershed based water quality modeling. To avoid unnecessary public expenditures due to duplication and to prevent projects that would preclude or limit the opportunity for the City to use the same areas for meeting the City's water resource management obligations, each of the proposed subwatershed management plans located in the City must be implemented through the interagency collaboration process described in the attachment.	Policy	multiple	Potential project identified through subwatershed analysis could be implemented by the City, the District or others. The WMP will be revised to clarify this issue. See also response to Comment #80.
83	City of St. Paul	Anne Hunt	3. All minor and "internal" amendments should be implemented through interagency collaboration process - The proposed Plan identifies an "internal (CRWD) process for plan amendments". This section appears to allow for the CRWD subwatershed planning process to serve as a substitute process or the required Plan amendment process. This is problematic given that the current Plan language would allow projects under these amendments to be implemented by the CRWD without any opportunity for City consensus or formal agreement. The Plan Amendment section should be revised to clearly identify that any minor amendments or internal CRWD amendments that involve projects that are located on City ROW or property, directly effect an existing City program or would likely involment City operation or maintenance should be implemented through the water resources management interagency collaboration process.	Policy	multiple	All projects in the WMP (including ones in future plan amendments) would not be implemented without City (or other landowner) approval and a formal agreement. The WMP will be revised to clarify this issue. See also response to Comment #80.
84	City of St. Paul	Anne Hunt	Based on staff review of the Draft Plan and given that many of the comments from the City's July 31, 2009 comment letter and the interagency CRWD and City planning workshop on August 30, 2009 did not result in significant text changes to the draft Plan, we offer the following summary on unresolved issues for your consideration. These unresolved issues are in addition to the comments referenced above.	Policy	multiple	As indicated in the District's August 13, 2009 letter to Phil Belfiori, the District will consider the comments from the August 30th workshop after 60-day review period within the context of all comments received prior to making revisions of the Watershed Management Plan.

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85	City of St. Paul	Anne Hunt	A. The City has not been invited to collaborate on any portion of the CRWD Total Maximum Daily Load (TMDL) study and implementation plan for Como Lake. The standards developed as part of this TMDL study are required to be incorporated into the City's stormwater permit. The previously developed 2002 Como Lake Strategic Management Plan was not developed with any understanding at the time that it would be revised without City input into a document that will directly impose legally binding requirements on the City through its stormwater permit.	Policy	multiple	The City was directly involved in drafting the 2002 Como Lake Management Plan. This effort will simply convert the Como Lake Plan into a TMDL so that the District and others could be eligible for Clean Water Legacy Grant funds. The District will review the conversion of the Como Lake Strategic Management Plan to a TMDL with the affected MS4s in February 2010. Completion of TMDL for all impaired waters is required by the federal Clean Water Act. Upon approval by U.S. EPA the load reductions in the implementation plan of the TMDL would need to be accounted for in each MS4s NPDES permit.
86	City of St. Paul	Anne Hunt	B. The Watershed approach and the TMDL and NPDES compliance sections should be revised to identify CRWD compliance for the portion of the Trout Brook system that the District manages. The City will be the lead all on other projects for NPDES and TMDL compliance in the other remaining areas of the City in collaboration with the watershed organizations.	Policy	multiple	The District will clarify this issue in the next draft of the WMP.
87	City of St. Paul	Anne Hunt	A. The proposed stream corridor restoration projects appear to be the foundation of CRWD's "Bring Water Back to St. Paul" initiative. It also appears that the majority of the proposed corridors are within transportation or recreational corridor managed by one or more City Departments and/or areas where the City has already conducted some level of storm water analysis or planning initiatives - for example the Central Corridor and Ford Plant Site.	Technical	multiple	The District previously requested the documents referenced in August 2009 and were unable to obtain them from the City. Please provide the analysis and planning documents referenced by March 1, 2010 to be included by reference in the next draft of the WMP. If these are not public documents made available to the District we will be unable to incorporate them into the WMP
88	City of St. Paul	Anne Hunt	Further discussion is needed on the stream corridor restoration priority ranking system indentified in Plan. Staff was not involved in the development of the "opportunity or constructability rankings" and would consider inclusion of these items in Plan as premature. The potential sites and project areas listed in the priority table should be discussed as possible concept areas only and not include a priority ranking at this time.	Technical	C-5	The stream corridor restoration plan including the priority ranking were reviewed at TAC meeting #5 (July 21, 2009) for the WMP and input was solicited. The City's comments are noted in the meeting summary found in Appendix E of the draft WMP (page E-36) and have been incorporated into the Stream Corridor Restoration Plan. The District would welcome any additional input on the "opportunity or constructability rankings" that the City may have.
89	City of St. Paul	Anne Hunt	The City also has several concerns related to the feasibility of several proposed corridors. These include both practical considerations regarding attempts to integrate new steam corridors with the existing land uses and transportation networks, as well as concerns over how these efforts will relate to existing City plans and ongoing planning efforts. The Plan text should be clarified to state that each feasibility study and resulting project will be developed through the interagency collaboration based process as described in attached letter.	Initiative	multiple	See response to Comment #80.
90	City of St. Paul	Anne Hunt	The City has concerns about the potential that the proposed streams restoration areas could become additional permitted water bodies for which the City would be responsible for meeting water quality standards. The Plan should clearly identify permitting implications of each proposed corridor, the possible maintenance challenges and life cycle costs.	Initiative	C-4	The District would expect all newly created water resources to be subject to all applicable water quality regulation. The District would have a goal of these new water resources achieve all applicable standards. The elements considered in the feasibility studies for these restoration projects is currently listed in Appendix C (page C-2). This issue will be more clearly documented in the next draft of the WMP.
91	City of St. Paul	Anne Hunt	Several of the proposed specific projects identified in the Como 3 subwatershed were not agreed to by staff and previous comments indicate several unresolved issues. These projects include, but are not limited to, the Orchard Recreation Center underground infiltration project and the rain gardens proposed at Orchard Ave and Argyle/Van Slyke. Please review plan language to refer to these projects as possible projects rather than CIP's. These specific projects will require further discussion with City staff through he consensus based process (see attachment) before being identified as a specific CIP projects in Plan, which would not require a major Plan amendment.	Initiative	multiple	The District will work to resolve the issues identified by City staff with the Como 3 subwatershed analysis and include those changes in the next draft of the WMP. See also response to Comment #80.
92	City of St. Paul	Anne Hunt	The City is concerned about the language in the Plan regarding the proposed additional requirements on existing discharges to wetlands. Most of the wetlands in the City serve in a flood control and system relief capacity. This function would need to be preserved or replaced as it is part of the City's existing infrastructure.	Initiative	multiple	All rule revisions will be discussed in detail with all District stakeholders through the Technical Advisory Committee prior to adoption.

#	Commenter-- Organization	Commenter-- Person	Comment	Comment Type	October 10th draft page #	CRWD Response
93	City of St. Paul	Anne Hunt	Please revise CRWD mapping and wetland assessment to be consistent with the City's wetland inventory for basins constructed in low areas and that are currently functioning as stormwater ponds.	Technical	multiple	The District believes the inventory in the District's Wetland Management Plan is consistent with the City's inventory. This will be verified prior to the next draft of the WMP.
94	City of St. Paul	Anne Hunt	As discussed as the August workshop, the CRWD wetland protection programs as proposed should identify the existing duplication of roles within the City. The City looks forward to working with the CRWD to identify mutual roles and responsibilities and more efficiently partner on these programs.	Policy	multiple	The City's Wetland Management Plan is not complete or has not been provided to the District. Please provide the City's Wetland Management Plan to the District by March 1, 2010 so any duplication of efforts can be identified and the City's Plan can be incorporated into the District's Plan.
95	City of St. Paul	Anne Hunt	The City requests that the Plan language related to stormwater management for large scale redevelopment sites, such as the Central Corridor be revised to state that CRWD redevelopment initiatives and storm water management approaches require close consensus based collaboration with the City Water Resource Work Group and other relevant staff.	Initiative	multiple	See response to Comment #80.
96	City of St. Paul	Anne Hunt	It would be expected that text related to the proposed green infrastructure incentive program, green infrastructure barrier assessment, and evaluation of green regulatory framework be revised to directly reference a consensus based approach (attached) working closely with the City's Water Resource Work Group and the City's existing green building policies and programs.	Initiative	multiple	See response to Comment #80.
97	City of St. Paul	Anne Hunt	Given the potential magnitude of impacts to development, economic activity, and land use planning and regulatory authority, the City does not feel it is the role of CRWD to suggest regulation of "existing" sites without significant input from the City through a consensus-based, collaborative decision making process. A similar concern exists regarding the potential regulation of small sites (less than 1 acre) through existing or new rules. While the City shares CRWD's large objective of protection of water resources, it also recognizes the need to balance this objective with the need to maintain a competitive climate for development of economic activity and jobs for Saint Paul residents.	Policy	n/a	Initiative 228L is the process of determining methods to achieve stormwater management on existing sites, including but not limited to regulation. Should regulation be determined to be the preferred method of achieving stormwater management on existing and small sites, the District will complete a SONAR to ensure the issues identified in this comment are addressed.
98	City of St. Paul	Nancy Homans	The City also is looking forward to developing this framework to collaborate on a number of other innovative green stormwater projects located both adjacent to the Central Corridor (but not within project construction boundary) and located in other strategic areas including, but not limited to, projects identified in the Draft CRWD 2010 Watershed Management Plan.	General	n/a	No response necessary
99	City of St. Paul	Nancy Homans	To pursue this critical interagency collaboration on these projects, the City's Water Resource Working Group (which is a standing City interdepartmental committee formed by Council resolution in 2008) has established the attached interagency collaboration process. This process establishes a consensus-based framework for partnering on green infrastructure and storm water projects located in City ROW, on city owned property, affecting an existing City programs, or involving City operation or maintenance. It is expected that this framework would be jointly coordinated by City Working Group members and Watershed District staff and would be a prerequisite for gaining future City support on proposed projects.	Policy	multiple	See response to Comment #80.
100	City of St. Paul	Nancy Homans	To ensure timely feedback on proposed projects, the City Working Group has proposed the following open meeting dates. The CRWD staff is invited to attend these regularly scheduled interagency meeting at 2:30 pm on every 1st Tuesday of each month when relevant projects or programs are being considered.	Policy	multiple	See response to Comment #80.
101	City of St. Paul	Nancy Homans	Step 1: CRWD or RWMWD, other stakeholder group and City staff share initial vision and purpose for project and discuss ideas for collaboration Anticipated Actions: 1. Consensus on goals and vision of project 2. Determination of level and extent of partnership 3. Consensus on consultant selection 4. Consensus of if project/BMP preclude or limit the opportunity for using the same areas for meeting the City's water resource management obligations and implementing existing City programs.	Policy	multiple	See response to Comment #80.
102	City of St. Paul	Nancy Homans	Step 2: Review of Concept Plans and Preliminary Construction Plans Anticipated Actions: 1. Consensus on aligning stormwater/streetscaping and landscaping features 2. Consensus on technical and engineering comments on BMP's	Policy	multiple	See response to Comment #80.
103	MNDOT	Beth Neuendorf	Page i. Please correct the reference to the Board of Water and Soil Resources; it is incorrectly shown as the Board of Soil and Water Resources.	Editorial	i	The District will make this change in the next draft of the WMP
104	MNDOT	Beth Neuendorf	Page 2, Figure 1 and Page 4, Figure 2: These figures need to be updated to show the Mn/DOT stormwater ponds on I-35E and TH 51. Maps showing the locations of the Mn/DOT stormwater ponds were sent on July 30, 2009 during previous comments.	Technical	2	The District will make this change in the next draft of the WMP

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105	MNDOT	Beth Neuendorf	Page 3. Acronyms of PFOS and PCBs should first be spelled out. These acronyms are fully spelled out on page 19 of the report, which is out of sequence with when they are introduced. Acronyms of TP and TKN should also first be spelled out. In this context, having acronyms provided as an appendix is not useful.	Editorial	3	The District will make this change in the next draft of the WMP
106	MNDOT	Beth Neuendorf	Page 9. Please correct the reference to United States Geological Survey; it is incorrectly shown as the United States Geologic Services.	Editorial	9	The District will make this change in the next draft of the WMP
107	MNDOT	Beth Neuendorf	Page 10. Figure 5 should indicate the location of monitoring at Ford Dam and Lamberts Landing, as the two sites are included in Table 2.	Editorial	10	The District will make this change in the next draft of the WMP
108	MNDOT	Beth Neuendorf	Page 12. Please address the following concerns regarding Table 2: a. What is meant by Mississippi River "reference site"? Often the term has a distinct meaning within the context of monitoring and water quality standards, usually to represent a desired target or non-affected condition.	Technical	12	The District will clarify this in the next draft of the WMP
109	MNDOT	Beth Neuendorf	Page 12. Please address the following concerns regarding Table 2: b. The table should indicate what agency performed the monitoring at Ford Dam and Lamberts Landing.	Technical	12	The District will make this change in the next draft of the WMP
110	MNDOT	Beth Neuendorf	Page 12. Please address the following concerns regarding Table 2: c. What is the period of record (and sample size) reflected in the Mississippi River Reference Sites? This information should be included in the table.	Technical	12	The District will make this change in the next draft of the WMP
111	MNDOT	Beth Neuendorf	Page 12. Please address the following concerns regarding Table 2: d. Are the data for CRWD Monitoring Sites representative of 2008 only (as indicated), or are the data reflective of broader temporal scale? Is the CRWD Monitoring Site data representative of a flow-weighted mean concentration, or just an average of storm event analytical results?	Technical	12	The District will clarify this in the next draft of the WMP
112	MNDOT	Beth Neuendorf	Page 12. Please address the following concerns regarding Table 2: e. TP and TSS values should be removed from the Mississippi River column.	Technical	12	The District is not clear on the rationale for this comment. The District will contact MNDOT to clarify this comment.
113	MNDOT	Beth Neuendorf	Page 12. Please address the following concerns regarding Table 2: f. Footnote "a" within Table 2 indicates the TP and TSS values represent ecoregion averages for minimally impact streams; the Mississippi River, because of its stream order, would likely invalidate the relevance of minimally impacted streams which are based on lesser-order systems. Footnote "e" references metals standards in the appendix; however, they are not presented in Appendix A.	Technical	12	The District will consider this change after further evaluation.
114	MNDOT	Beth Neuendorf	Page 12. Acronym of MS4 should first be spelled out. Also, the reader should be referred to the NPDES MS4 discussion in Appendix A.	Editorial	12	The District will make this change in the next draft of the WMP
115	MNDOT	Beth Neuendorf	Page 13. Acronym of TMDL should first be spelled out. This acronym is fully spelled out on page 19 of the report, which is out of sequence with when it is introduced.	Editorial	13	The District will make this change in the next draft of the WMP
116	MNDOT	Beth Neuendorf	Page 14. Second paragraph references Appendix E which is out of sequence because appendices B, C, and D are not yet referenced. Please revise labeling or sequencing in order to follow a logical progression.	Editorial	14	The District will address this issue in the next draft of the WMP
117	MNDOT	Beth Neuendorf	Page 17, Goal 1.1. Please consider revising the stated goal. As written, it is oddly worded and doesn't seem to have a clear subject included in the statement.	Editorial	17	The District attempted to keep this first goal as general and all-encompassing as possible. We will consider ways to improve clarity.
118	MNDOT	Beth Neuendorf	Page 20, Goal 3.1.a. Mn/DOT does not support participating in a multi-jurisdictional BMP management plan with an associated maintenance schedule for stormwater BMPs in the CRWD. Mn/DOT has drainage infrastructure in 36 watersheds within the Metro Area and if we were to participate in one, we would need to participate in all 36, which is too much. Mn/DOT has an MS4 SWPPP and complies with the conditions of the NPDES MS4 permit, including inspections and maintenance. Do privately owned stormwater BMPs exist in the District and if so, does this goal include those systems?	Policy	20	This goal would include all BMPs regardless of ownership.
119	MNDOT	Beth Neuendorf	Page 20, Goal 4.1.d. This effort seems to be redundant with the current TMDL assessment and remediation process. Why is this effort under consideration?	Policy	20	There are currently no impairments or required TMDLs for the pollutants listed in the CRWD. TMDL processes would not cover these pollutants.
120	MNDOT	Beth Neuendorf	Page 22, Goal 6.1.b. Will the identification process include an aspect to consider the presence of underground utilities, contaminated sites, high groundwater, DWSMA's, etc which may eliminate sites that would otherwise be considered conducive?	Initiative	22	These characteristics and others will be considered
121	MNDOT	Beth Neuendorf	Page 23. First paragraph indicates data will be used to calibrate the District's water quality loading model. Hasn't this model already been calibrated for past studies?	Technical	23	The District's models are regularly calibrated/recalibrated as additional data and information is obtained.
122	MNDOT	Beth Neuendorf	Page 23. Fifth paragraph references collecting data at major outfalls to the Mississippi River. What, specifically, does this include? Are these the four monitoring locations presented in Table 2?	Technical	23	The District will address this issue in the next draft of the WMP
123	MNDOT	Beth Neuendorf	Page 24, Goal 7.1.c. What does "baseline" mean to the District? In the context of ongoing variable (e.g., potentially changing climate, implementation of volume reduction techniques, etc.), quantifying a baseline condition can be quite challenging.	Technical	24	The District will address this issue in the next draft of the WMP

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124	MNDOT	Beth Neuendorf	Page 29, Issue 15. What does “state-of-the-art” mean to the District with respect to its rules? This phrase seems to suggest that vogue, or popular, techniques may be pursued in rule without necessary supporting science to justify regulations and benefits. How does the District envision interfacing with the Minimal Impact Design Standards (MIDS) effort currently being developed?	Policy	30	The District will clarify this issue in the next draft of the WMP. The District is keeping apprised of the MIDS process.
125	MNDOT	Beth Neuendorf	Page 30, Goal 16.1.c. This effort may make sense for private developments, but it doesn’t for public agencies that have large infrastructure systems. It is difficult and costly and not very effective to maintain and inspect small systems scattered throughout the watersheds. This goal will be a big problem for Mn/DOT. If this goal moves forward, linear entities need to be exempt from this requirement.	Policy	30	All rule revisions will be discussed in detail with all District stakeholders prior to adoption.
126	MNDOT	Beth Neuendorf	Page 30, Goal 16.2.b. How does the District envision working towards this goal? Currently the MPCA is implementing an audit program of all MS4s, as required by EPA. In the interests of streamlining environmental documentation, it seems prudent to have only one agency with oversight on NPDES permit conditions. Please consider rephrasing this goal to narrow or clarify the scope/intent.	Policy	30	NPDES permits are one method to achieve goal 16.2.b. However, there is evidence of varying levels of effectiveness. This goal will likely be achieved by evaluating other more cooperative approaches, which would be evaluated during the timeline of the WMP.
127	MNDOT	Beth Neuendorf	Page 30, Goal 16.4.b. What does “coordinate” mean to the District with respect to TMDL load reduction efforts? In addition, page 57 of the draft Plan states the District could serve as the “aggregator” to assist MS4s in meeting TMDL requirements. The second paragraph of page 82 also discusses accounting of water quality treatment, as well as cost allocation. Do these various discussions represent the same concept? The use of different terminology presents a challenge to the reader to understand specifically what is being presented. How exactly does the District intend to interface within the TMDL process regarding load reductions?	Policy	30	This issue will be clarified in the next draft of the WMP
128	MNDOT	Beth Neuendorf	Page 44. Bulleted text states a permitting initiative is to “correlate monitoring data to permitted BMP, activities”. Page 47 states “the District intends to utilize monitoring data to evaluate the performance of its programs, standards, and BMPs.” How does this BMP monitoring relate to the District’s proposed coordination of TMDL load reductions?	Initiative	44	This issue will be clarified in the next draft of the WMP
129	MNDOT	Beth Neuendorf	Page 48. Subsection C, Source Assessment Monitoring, How would this tie into the land use-based monitoring from NURP or more detailed data by Dr. Pitt used to construct the WinSLAMM water quality model? What monitoring would the watershed do and how would you separate the various entities uses?	Initiative	48	This issue will be clarified in the next draft of the WMP
130	MNDOT	Beth Neuendorf	Page 56. We support this effort. It is badly needed.	Initiative	56	Please clarify which initiative on Page 56 is being referred to. The District will contact MNDOT to clarify this comment.
131	MNDOT	Beth Neuendorf	Page 57. Subsection I, Watershed Approach: MS4 & TMDL Compliance, item 3, references a web accessible map of all stormwater drainage networks. Mn/DOT does not desire web based sharing of our drainage networks due to security reasons, but does already share its’ electronic network map on an as needed basis for spill situations with the MPCA.	Initiative	57	The District was not referring to a public web-based map but one for use by all MS4s in the District. This will be clarified in the next draft of the WMP
132	MNDOT	Beth Neuendorf	Page 60, Section F: How will this tie into the MPCA’s current TMDL process?	Initiative	60	These would be District goals developed through a stakeholder process. This will be clarified in the next draft of the WMP
133	MNDOT	Beth Neuendorf	Page 61, Section L: How can the watershed district regulate and implement stormwater treatment on existing sites that are not undergoing redevelopment/reconstruction? Does the watershed district intend to fund these improvements?	Initiative	61	This initiative does not presuppose regulation. The initiative will evaluate with all stakeholders potential approaches to achieving treatment on existing sites, including but not limited to regulation.
134	MNDOT	Beth Neuendorf	Page 90 – Mn/DOT agrees that Ramsey County should include this structure in its’ current project proposed at TH 36 and Rice Street.	Initiative	90	No response necessary
135	MNDOT	Beth Neuendorf	Appendix A. Figure 4 appears twice (page A-13 and page A-15). Please correct.	Editorial	multiple	The District will make this change in the next draft of the WMP
136	MNDOT	Beth Neuendorf	Page A-14. Figure 5 should be re-labeled as “potential” drainage characteristics of soils.	Editorial	A-14	The District will make this change in the next draft of the WMP
137	MNDOT	Beth Neuendorf	Page A-24. Table 4 is labeled “...native plant communities” but Figure 7 (page A-25) is labeled “rare biological features.” The table and figure appear to present the same information. The labels should be standardized.	Technical	A-24	The District will address this issue in the next draft of the WMP
138	MNDOT	Beth Neuendorf	Page A-33. Mn/DOT STIP – To avoid confusion, please make sure CRWD isn’t listing projects that are not subject to district rules based on current rule criteria.	Technical	A-33	The list is attempting to document all significant construction projects within the District, regardless of the regulatory implications.
139	MNDOT	Beth Neuendorf	Page A-45. Section 3.8.1, first paragraph, third sentence inaccurately summarizes the goal of the MS4 program. The following is taken from MPCA factsheet (wq-sw1-04 • April 2008): “The primary goal of the MS4 general permit is to improve water quality by reducing pollutants in stormwater discharges. Specifically, the program aims to ensure proper management of stormwater discharges into waters of the state.” Please revise the statement to more accurately reflect the context of the statement, or remove the statement.	Technical	A-45	The District will address this issue in the next draft of the WMP
140	MNDOT	Beth Neuendorf	Page A-54. Section 4.1, first paragraph, fourth sentence seems to inaccurately attribute sources of sediment and nutrients in the Minnesota River. This statement should be revised. Refer to the MPCA document “Identifying sediment sources in the Minnesota River Basin” (June 2009), especially page 14, which observes that bluffs and ravines, rather than fields, are important sources of sediment in many regions of the basin.	Technical	A-54	The District will address this issue in the next draft of the WMP

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141	MNDOT	Beth Neuendorf	Page A-63 and A-64. Section 4.3.1. Please revise this section to be consistent with Minnesota Statute 103G.005, Subdivision 15. Use of the term "protected" waters is inaccurate. Appendix A, page A-67, Figure 17: This figure needs to be updated to show the Mn/DOT stormwater ponds on I-35E and TH 51. Maps showing the locations of the Mn/DOT stormwater ponds were sent on July 30, 2009 during previous comments.	Technical	A-63	The District will make this change in the next draft of the WMP
142	MNDOT	Beth Neuendorf	Appendix A, page A-67, Figure 17: This figure needs to be updated to show the Mn/DOT stormwater ponds on I-35E and TH 51. Maps showing the locations of the Mn/DOT stormwater ponds were sent on July 30, 2009 during previous comments.	Technical	A-67	The District will make this change in the next draft of the WMP
143	MNDOT	Beth Neuendorf	Page A-80, Section 4.6.2. Provide more information regarding how pollutant loads are calculated. (Note that a review of the 2008 Monitoring Report was not useful to find narrative explaining how loads are calculated.) Transparency is particularly important for this process because of the intended uses for water quality data as presented within the draft Watershed Management Plan.	Technical	A-80	The District will include additional detail on how the loading calculation is completed.
144	MNDOT	Beth Neuendorf	Page A-81, Section 4.6.2. Please include a literature reference to support the statement that street and highway runoff are significant contributors of metals.	Technical	A-81	The District will make this change in the next draft of the WMP
145	MNDOT	Beth Neuendorf	Page A-84, Section 4.8. Second paragraph notes there are 14 primary outlets from the district to the Mississippi River. However, page A-68 notes there are a total of 55 outlet pipes discharge to the river. How were these distinctions made? Please clarify the difference between a "primary outlet" and other outlet pipes.	Technical	A-84	The District will address this issue in the next draft of the WMP
146	MNDOT	Beth Neuendorf	Appendix D. Mn/DOT is the LGU administering WCA for wetlands on Mn/DOT right-of-way. Narrative within the Wetland Management Plan (i.e. Appendix D) should state this.	Technical	multiple	The District will make this change in the next draft of the WMP
147	MNDOT	Beth Neuendorf	Appendix D: Mn/DOT desires early input into any wetland rule revisions as suggested on pages D-10 through D-11. The Buffer Standards are fine as is. Mn/DOT needs to utilize the non-paved portion of its' right-of-way for snow storage in the winter and we have a Vegetated Roadside Management Plan for our roadsides that we follow during the remainder of the year. For safety, certain portions of the roadside are mowed. We cannot place buffer markers in our right-of-way as they are a hazard to the maintenance operations and flush mounts are not visible due to the surrounding vegetation.	Policy	D-10	All rule revisions will be discussed in detail with all District stakeholders prior to adoption.
148	MNDOT	Beth Neuendorf	Appendix D, page D-11, Pretreatment of stormwater runoff into wetlands: If the watershed is willing to sponsor capital improvement projects to improve existing runoff into wetlands that would be great. However, there isn't a funding source for Mn/DOT to implement pretreatment of existing runoff into wetlands.	Policy	D-11	All rule revisions will be discussed in detail with all District stakeholders prior to adoption, including barriers to implementation.
149	MNDOT	Beth Neuendorf	Appendix D, page D-15: Figure 1 – this figure needs to be corrected to show the stormwater ponds in black. Also, some of the Wetland Functions and Value Assessment Maps have been corrected to show the stormwater ponds and some have not. Please correct them all, so they match. My July 30, 2009, letter to the Capitol Region Watershed District included maps showing the location of the Mn/DOT stormwater ponds on I-35E and TH 51; please use these maps to correct and update your figures/maps.	Technical	D-15	The District will make this change in the next draft of the WMP
150	DNR	Charlotte Cohen	Generally, this Capitol Region Watershed District draft Watershed Management Plan is comprehensive and mostly complete. The MDNR has limited comments on this Draft Watershed Management Plan. The Department notes that the Capitol Region Watershed District's Technical Advisory Committee included representation from our agency.	General	n/a	No response necessary
151	DNR	Charlotte Cohen	On all overall basis, the MDNR concurs with the watershed approach used in the development of this Draft Watershed Management Plan. This watershed-based approach is apparent from the structure of the Draft Plan as well as from many of the individual implementation projects and capitol improvement projects identified in the Draft Plan.	General	n/a	No response necessary
152	DNR	Charlotte Cohen	The focus on the planned goal of bringing water back to St. Paul, by taking into consideration both the current hydrological challenges of bringing water back as well as managing the water resource with this emphasis, is anticipated to increase the success of these endeavors.	General	n/a	No response necessary
153	DNR	Charlotte Cohen	For your information and assistance, the Minnesota Department of Natural Resources has developed two sets of draft Guidelines which may be useful and informative as the Capitol Region Watershed District continues ahead with implementation palm projects and with capital improvement projects. One set of these draft Guidelines are draft MDNR Recommended Guidelines for Stream Bank Restoration Projects and the other set of Guidelines are draft MDNR General Guidelines for Lakeshore Restoration Projects. Both guidelines are Statewide Guidelines and not limited to the metropolitan area. (Please be aware that both documents are draft and preliminary versions and are not final documents.) The DNR is sending copies of these Guidelines to you with this comment letter so you are aware of the contents and may want to make use of information in the continued development of implementaion plan projects and capital improvement projects. The DNR's understanding is that the Capitol Region Watershed District may be already familiar with the General Guidelines for Lakeshore Restoration Projects as a number of lakeshore restoration projects have been successfully completed within the area of the Capitol Region watershed, with the lead and/or assistan	Technical	multiple	No response necessary

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154	Ramsey Conservation District	Tom Petersen	Over-all, I'm very impressed with the Revised CRWD Plan. Thank you for the emphasis on partnerships with local units of government. I'm sure the RCD can and will assist the CRWD achieve our mutual goals.	General	na	No response necessary
155	Ramsey Conservation District	Tom Petersen	My only specific comments are to: 1. Applaud the CRWD's goal to restore and enhance wetlands. Based on my research, I believe the CRWD may be the most impacted geography in Ramsey County as related to wetland loss. Anything and everything the CRWD can do to restore wetlands to the landscape will benefit the citizens and water resources. I recommend the CRWD, in cooperation with the RCD, investigate the feasibility of wetland restoration for State-wide/regional banking purposes. I hold that the CRWD can finance wetland restoration by selling selective wetland credits. I would aggressively seek lands for restoration, based on data the wetland plan, and proceed.	Initiative	multiple	No response necessary
156	Ramsey Conservation District	Tom Petersen	2. I recommend the CRWD work with the Ramsey county cooperative weed management assoc. to identify and manage invasive weed species throughout the watershed. The lead-agency for the Cooperative Weed Management assoc. is currently in a state of flux.	Initiative	multiple	No response necessary
157	Ramsey Conservation District	Tom Petersen	3. I sincerely hope that the CRWD and RCD can continue to partner for shoreline restoration and its long-term viability on both McCarron's and Como lakes. A continued partnership with the RCD for assisting the public to monitor and maintain and apply riparian buffer zones would be a positive step in ecosystem restoration.	Initiative	multiple	The District will ensure the RCD is listed as a partner for this initiative
158	Ramsey Conservation District	Tom Petersen	4. I recommend the CRWD partner with the RCD to further identify high-priority "catchment areas" within the watershed to seek Clean Water Legacy Partnership grant dollars.	Initiative	multiple	The District will ensure the RCD is listed as a partner for this initiative
159		Bill Barton	Last night during our 10 year plan review discussion when I asked if CRWD has an accounting of water use in the district I did not really hear a direct answer. Do we know how quantities of water use within the district boundaries compares and the status trends of our aquifers? I recommend the CRWD plan should have it's own goal / program to document district water use and aquifer status to further our mission of managing the water resources in the district. I do not believe a goal of partnering with other entities programs alone is sufficient.	Policy	22	The District believes that aquifer groundwater management is best accomplished on a scale larger than the watershed district and therefore thinks cooperating with other entities is the most effective way to protect groundwater. Met Council, Minnesota DNR, and Ramsey County all have statutory responsibilities relative to groundwater and the District will continue to support their efforts.
160		Bill Barton	I think the Cleveland Randolph groundwater study was a step in the right direction of better understanding our groundwater resources.	Initiative	39	No response necessary