

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

27	MN Board of Water and Soil Resources	Section 2 - Goals	Goal Measurability	In general, many of the goals as stated are not very measurable. The specific lake water quality goals being better but still needing work. The current goal statements mention what the District intends to do but not what it expects to accomplish, when (i.e. during the 10-yr Plan life, long term) and what will be the expected result of accomplishing the goal. Please revise all goal statements so they are more measurable.	The District will add measurable outputs (e.g. numeric criteria) to the plan goals and/or implementation plan table where feasible. These measurable outputs will be used to evaluate the District's progress in achieving its goals. Note that some goals relate to partner activities where the measurable outputs will be driven by partner priorities, opportunities, and schedule - this may limit the estimation of measurable outputs. The specific lake water quality goals come directly from highly-vetted lake management plans with two of them developed within the past year. Instead of establishing arbitrary targets that are not based on science and have not been reviewed by our partners, the District will strive to achieve the lake management goals within the 10-year plan timeframe.	High	Yes
28	MN Board of Water and Soil Resources	Section 2 - Goals	Goal Measurability	The term "make progress towards something" isn't really measurable unless the statement also defines how much progress will be made and when it will be made by.	The District will remove the phrase "make progress towards something" and strive to achieve the goals within the 10-year timeframe.	High	Yes
29	MN Board of Water and Soil Resources	Section 2 - Goals	Goal Measurability	To help with the goal statements we suggest that the draft progress evaluation/assessment form mentioned in the comment on 3.8.2 be developed first based on the current goals. This in coordination with the Section 2.10 Goal Measurability and Measurable Outputs identified in Table 3-5, should help in the development of measurable goal statements.	The District will more clearly correlate the implementation outputs (included in Table 3-5) with the goals that they address through example tracking spreadsheets. The District will develop a sample tracking spreadsheet for one resource-based goal and one organization goal. The District intends to use this format to estimate progress towards goals and biennial self assessment.	High	Yes
30	MN Board of Water and Soil Resources	Section 2.1	Issue Identification	The District should be commended on the thorough process and stakeholder engagement they went through to identify issues and develop issue statements for the eight resource issue areas developed.	Thank you.	No Change	NA
31	MN Board of Water and Soil Resources	Section 2.8; page 46	Lake Management Plans	Page 46, last sentence mentions that the District has developed individual lake management plans. A list of these completed Plans and links to their location on the District website needs to be provided.	The lake management plans are referenced with links in the References section as well as the appropriate sections of the Land and Water Resource Inventory Appendix. Hyperlinks to the lake management plans will be provided if available on District and/or partner websites.	Low	Yes
32	MN Board of Water and Soil Resources	Section 2.8; page 49	Water Quality Goals	There are no goals identified for Little Crosby Lake. Is there a reason for that? Since the District is monitoring the lake it seems reasonable to assume that the District must have some 10-yr and long-term goals for the lake.	Specific goals for Little Crosby Lake are not included in the Plan because resource-specific goals were not identified in the development of the 2012 Crosby Lake Management Plan. Goals for Little Crosby Lake may be considered during the planned update to the Crosby Lake Management Plan (Fund #317C).	Medium	No
33	MN Board of Water and Soil Resources	Section 2.3; WQ-4	Water Quality Goals	WQ-4, Loeb Lake is already significantly better than the shallow lake standards, why isn't the goal something more stringent than the state standards, which would result in maintaining existing water quality?	Goal WQ-4 states that the District will manage Loeb Lake to "maintain or improve water quality." Thus, while numeric targets reference MPCA shallow lake standards for regulatory consistency, the District will evaluate water quality data and prioritize action relative to existing water quality. This approach will be defined in the updated Loeb Lake Management Plan (activity 315A).	Medium	No
34	MN Board of Water and Soil Resources	Section 2.4; FL-1	Flood Risk Goals	There are two FL-1 goals identified.	Goals will be renumbered.	Low	Yes
35	MN Board of Water and Soil Resources	Section 2.9; Page 67	Organization Issues	#6 on page 67 states that "All District Goals cannot be achieved due to insufficient funding". Has the District determined how much it would cost to achieve all District goals? If so, this would be good information to provide.	The District has not estimated the cost of fully achieving all goals. The issue statement reflects the reality that some in-resource water quality goals have timelines longer than this Plan, some goals are dependent on partner action/resources, and the likelihood some unforeseen issues will arise requiring re-allocation of resources. The issue statement will be revised to state: All District goals cannot be fully achieved due to insufficient funding.  We also note that the numbering of issues on page 67 is incorrect. We will renumber the five issues starting with #1.	Low	Yes
36	MN Board of Water and Soil Resources	Section 2.10	Goal Measurability	This section needs some more detail and explanation as to how the District will measure progress towards its goals.	The text will be revised to note the correlation of goals to measurable outputs included in the implementation table, and to reference the sample tables that more directly correlate goals to applicable actions/outputs (see also responses to BWSR comments on Section 2).	High	Yes
37	MN Board of Water and Soil Resources	Section 2.11	Goal Measurability	We are not exactly sure of the difference between indicators and outcomes and why one can only be used for quantitative goals and the other for qualitative goals. The terminology doesn't seem to be consistently used between this section, the goal statements and the implementation Table 3-5. Regardless, if using indicators or outcomes to measure progress towards goals then they should be incorporated into the goals statements and the goal should identify what the indicator or output will be for that goal at the 10-yr life of the plan and if possible long term.	The text of Section 2.11 will be revised to maintain consistency with the identification of "outputs" and/or "indicators" in Table 3-5.  See also response to BWSR comments on Section 2 related to goal measurability.	High	Yes
38	MN Board of Water and Soil Resources	Section 3.1; Page 71	Implementation Plan	The first paragraph on page 71 indicates that the District has already completed many planning/study projects and capital improvement projects (we assume this is referring to feasibility or design studies) but in the plan only one (Como Lake Management Plan) is identified and linked to in the Plan. Since these studies are the basis for proposed implementation projects for this plan, it is highly recommended that they be called out in the plan in a table and that a link to their location on the District website be provided. Then the District should establish a procedure to update the table and formally adopt new implementation related studies into the plan (most likely through the minor amendment process). Having this information in the Plan and linked to on the website will make the information easier to find for the reader and make for stronger future grant applications.	Links to existing lake management plans are included in the Land and Water Resources Appendix and will be added to Section 2.3. Many of the feasibility studies are intended for internal/partner use and are not currently hosted on the District website. Where applicable and feasible, links to associated studies will be provided in the implementation section.	Medium	Yes
39	MN Board of Water and Soil Resources	Section 3.1	Cost Summary	We appreciate the estimated cost summary by program provided in Table 3-2.	Thank you.	No Change	NA

40	MN Board of Water and Soil Resources	Section 3.2	Prioritization and Targeting	Page 74 second paragraph indicates that activities classified as "critical" may not be implemented during the 10-yr life of the plan. Why is this the case?	The Plan indicates that activities may not be completed during the Plan period, but does not specifically identify critical activities. It included all classifications. Reasons for not completing activities may include limitations discovered during feasibility studies, partner availability, funding constraints, and others. Critical activities, based on their ranking, will be pursued above other activities, but are not immune to the above reasons that can delay completion.	Low	No
41	MN Board of Water and Soil Resources	Section 3.2	Prioritization and Targeting	Page 74 third paragraph. FYI, abandonment of a project identified in the Implementation Plan would likely require a plan amendment.	Noted.	No Change	NA
42	MN Board of Water and Soil Resources	Section 3.2	Prioritization and Targeting	Page 74 bottom of page, list of targeted geographic areas. Please try to clarify if these are listed in order of priority.	The text will be revised to note that these are "equally important" geographic priority areas.	Low	Yes
43	MN Board of Water and Soil Resources	Section 3.3	Action 101D	Remove the word "minor" from the last sentence as any amendment resulting from the evaluations might require a regular amendment.	The word "minor" will be removed to reflect the possibility of a regular amendment process.	Low	Yes
44	MN Board of Water and Soil Resources	Section 3.4.1	Activity 208E	Please identify what triggers the periodic evaluation of District rules.	Examples of potential triggers will be noted in the text and may include: - Updates to state or partners standards (e.g., MIDS, MS4 permit) - Request of partners - Monitoring and/or study results (e.g., TMDLs) - Updated information about rainfall trends	Low	Yes
45	MN Board of Water and Soil Resources	Section 3.4.2	Grants Program	Very nice summary of the District Grant and Cost Share Program.	Thank you.	No Change	NA
46	MN Board of Water and Soil Resources	Section 3.4.4	Activity 220A	How often will the District evaluate this program and against what criteria?	The District developed and approved a Communications and Engagement Plan in early 2020. The plan outlines the goals, strategies, tactics and measurements for different C&E related activities, which has been incorporated into the District WMP. Similar to other District program and project initiatives, we will conduct a bi-annual assessment and will use the measurable goals and outputs as the criteria for evaluating the program.	High	No
47	MN Board of Water and Soil Resources	Section 3.4.5	Activity 222	Identify when will the facility management program be developed?	The District currently manages and maintains a number of infrastructure facilities and BMPs. We will bring this work under one program at the start of implementation of this Plan and will be developed over time. The narrative of Fund #222 will be revised to note that this activity is "beginning in 2021."	Low	Yes
48	MN Board of Water and Soil Resources	Section 3.5	300/400 Level Activities	Several of the proposed projects and studies state that the District will provide support. However, the level and type of support is not described.	Where applicable, text will be revised to note technical and/or financial support. Financial support is reflected in the cost estimates included in the implementation table.	Low	Yes
49	MN Board of Water and Soil Resources	Section 3.5.4	Activity 315E/415E	FYI, adding a new CIP will require a Plan amendment.	Noted. The District has included known and reasonably anticipated CIPs in this Plan. CIPs identified by future studies may be added via amendment if the District intends to complete them during this Plan period.	No Change	NA
50	MN Board of Water and Soil Resources	Section 3.8.2	Progress Assessment	The first paragraph, second sentence discusses the format of the evaluation, and does a fairly good job of describing the evaluation. However, the plan really needs at least an example of what the evaluation form might look like, consistent with the description. This form would also help in understanding the proposed measurable goals and how they relate to the implementation activities.	A sample goal assessment form will be developed for resource-based goal tracking and it will be included in the Plan.	High	Yes
51	MN Board of Water and Soil Resources	Section 3.9	Plan Amendments and Updates	We noted that the District mentions that they anticipate only significant changes or additions etc. will prompt the District to seek a Plan amendment. We want to make sure that the District is aware that 8410.0140 Subp. 1a. allows for certain changes to the Plan that do not require an amendment. We also suggest that the District consult with their BWSR Representative regarding any potential changes or amendment to the Plan for input as to the recommended process to follow.	Noted. Thank you.	No Change	NA
52	MN Board of Water and Soil Resources	Section 3.10.2	Local Water Management Plans	Several of the links to Minnesota Rules 8410 did not work. Also, when making reference to portions of Minnesota Rule 8410 please include the complete reference to the section being referred to.	Links to MN Rules 8410 will be revised. Where appropriate, section specific references to MN Rule 8410.XXXX will be made (note that some references are intended to refer to the overall document, versus specific sections).	Low	Yes
53	MN Board of Water and Soil Resources	Section 3.10.3	Local Water Management Plans	This section needs to include the schedule for implementation of local plans called for in M.R. 8410.0105 Subp.9.B. requiring all local water plans to be adopted not less than two years before the local comprehensive plan is due. Extensions to local comprehensive plan due dates do not alter the schedule. It also needs to include 8410.0160 Subp. 6 for adoption and implementation of local plan.	This section will be revised to include the referenced schedule.	Low	Yes
54	MN Board of Water and Soil Resources	Table 3.5	Implementation Table	Table 3.5 is nicely laid out, concise yet still providing the information needed. It was also very helpful having the previously provided summary descriptions for the various implementation activities organized by program/fund number.	Thank you.	No Change	NA
55	MN Board of Water and Soil Resources	Table 3.5	Implementation Table	For the first column heading is "Fund" the correct title? Table 3-3 identifies it as program Number.	This column will be titled "Program Number/Fund"	Low	Yes
56	MN Board of Water and Soil Resources	Table 3.5	Implementation Table	The "Measurable Outputs" column really contains the "measures" or "metrics" used to measure progress towards goals and implementation activities. It doesn't really identify the quantity that is needed towards the established goals. This may need to be changed depending on how our previous comments pertaining to the need for measurable goals are addressed. Also, the District might want to revisit the measurable output chosen by comparing against the program/project summary and the related goal. For example, 208-G the project is to develop a Stormwater rule that applies to sites less than an acre. Yet the measurable output is # of permits approved, and volume retained annually. So wouldn't the measurable output be the adoption of the new rule?	The District will review outputs for measurability relative to the associated action and make changes as needed to ensure that the outputs are correlated to program/project activity and goal.  Where possible, the District will identify the intended number, or range of numbers, to be achieved within the 10-year Plan life in the "outputs" column.  Note that some goals relate to partner activities where the measurable outputs will be driven by partner priorities, opportunities, and schedule - this may limit the estimation of measurable outputs.	High	Yes

57	MN Board of Water and Soil Resources	Table 3.5	Implementation Table	Suggest using the Program number and letter in the first column, when identifying projects in the table. (i.e. use 101-A rather than just A).	This column will be revised to include the number and letter.	Low	Yes
58	MN Board of Water and Soil Resources	Table 3.6	Implementation and Goals	Table 3-6 is a useful table. Was it intended to be named the same as Table 3-5?	The table name will be revised to Table 3-6.	Low	Yes
59	MN Board of Water and Soil Resources	Appendix A		The cover of the document with the appendices should identify the other appendices that are included in the document in addition to Appendix-A.	This will be revised in future drafts.	Low	Yes
60	MN Board of Water and Soil Resources	Appendix A	Water Quality	Provide information on water quality trends per 8410.0060 Subpart 1, F. Knowing the water quality trend (positive or negative) can help on deciding when there is an issue that needs to be dealt with.	Discussion of water quality data will be revised to include assessment of trends (improving, stable, or declining).	Medium	Yes
61	Barb Thoman	Pages 12, 14, 60, 62, 79, 86, 89, 109	Chloride	I strongly support the District in undertaking a major effort toward chloride reduction. I believe chloride pollution could cause the next silent spring. I am encouraged that the District will be developing a watershed-specific chloride management plan but I hope the timeline can be greatly accelerated. You propose to take 1-3 years to develop a plan, after which (in years 4 and 5) you would develop reduction strategies (page 79). We can't wait this long. As part of the District's chloride reduction effort, I hope you will: - Set a goal of 100% participation in Smart Salt training by City public works staff - Partner with municipalities (as you propose to do on page 82) to help them purchase more sophisticated winter maintenance equipment - Encourage the city of Saint Paul to adopt an ordinance requiring all public and private sector winter maintenance applicators that operate in the city to be Smart Salt trained and certified. - Undertake an extensive public education program using the informative materials you have developed (partner with SPRWS)	Thank you. The District agrees with you about the urgency of watershed-wide chloride plan and will start developing a chloride plan in 2021 and anticipates completion in late 2021/early 2022. It will take approximately a year to year and a half to complete. We will consider if and how some implementation strategies could be implemented on an accelerated timeline during chloride plan development. Also the District will consider the potential strategies noted in your comment when developing the chloride management plan.	Medium	No
62	Barb Thoman	Pages 10, 11, 35, 41, 42	Impervious area	There are a number of policy changes that would have dramatic impacts in reducing impervious surface in the city of St. Paul: - Support the city of Saint Paul when it proposes to reduce parking minimums and institute maximums. - An incentive program to convert underutilized parking to rain gardens? - Could commercial property owners be charged an annual impervious surface fee? - St Paul has boulevards that are asphalt. This practice should be prohibited. - Could the District suggest St. Paul prohibit end of alley homes from constructing driveways to the street (vs alley)? - Could driveways over a certain size, be required to be permeable? - Could you work with cities to help made the case for narrower roadways?	Thank you for your suggestions on policy changes to reduce imperviousness. Please note that the District currently offers grant funds for reduction in impervious surfaces. As we update our Stewardship Grant Program, we will consider targeting promotion to sites with underutilized parking lots and will list this as a consideration in our plan (Fund #210B). Regarding the other comments, the District will keep your suggestions in mind during relevant conversations with District city staff.	Medium	Yes
63	Barb Thoman	Pages 12, 13, 85	Pollutant Source Control	I strongly support the District's plans to develop efforts to address trash getting into the stormwater system and into lakes, rivers, and wetlands. As you note on page 85, the Adopt a Storm Drain program could be expanded. Could more frequent street sweeping be done? The deteriorating condition of the streets in Saint Paul contributes to excess sediment getting into storm drains in my neighborhood.	The District plans to work with cities to identify pollutant loading hot spots for targeted source control (e.g., street sweeping), see activity 305F.	Medium	No
64	Barb Thoman	Pages 26, 27, 100	Bring the water Back	Such exciting ideas about daylighting streams in this section!	Thank you.	No Change	NA
65	Capitol River Council	General	Urban BMPs	I would be interested in knowing if there are ways to look at Downtown and identify places where it could be feasible to install conservation practices that would provide benefits for water quality and / or surface water management. I'm sure it's difficult due to the mix of landowners in Downtown (including public sector entities and very large companies that are based in other states).	Downtown is challenging due to the mix of landowners as noted but also because its fully built out with few open spaces and tight ROW corridors with many underground utilities. The District will continue to seek out public-private partnership opportunities to address water resource management in the Downtown area.	Medium	No
66	Capitol River Council	General	Urban BMPs	Are pollinator-friendly plants only valuable in a relatively large space, like a rain garden on a residential lot or boulevard? Are there opportunities for native plantings in parks or balcony spaces?	There is value in planting container gardens with native plants. These small areas serve as important components of a habitat corridor between larger greenspaces with native plants in the area (e.g. Bruce Vento Sanctuary, Swede Hollow, Crosby Farm Park). The District will continue to partner with St. Paul Parks and Recreation and its other partners to consider improvement opportunities in parks and other public spaces in Downtown. The District offers Stewardship Grants available to property management companies and residents for raingarden projects that include native and pollinator friendly plants.	Low	No
67	Gloria Dei Church	General	Community equity	The update suggestions include responding to underserved communities with non-traditional partnerships to spread the message of water quality. That effort could very well provide the safe spaces called for in the plan. In a time of cultural challenge, we would love to see more green spaces and rain gardens like ours: healing places of beauty that make our world a healthier place. These spaces often do more than filter our water - they afford places of repose and recreation and nurture a return of wildlife long gone from our urban sites.	The District agrees with your comments that rain gardens and greenspaces offer more benefits than water quality. The themes of the 2020 Plan, including quality of life, recreation and community equity and engaging underrepresented groups, speak to those benefits as mentioned. As we plan and implement future projects and activities throughout the District, we will be keeping those in mind and promoting them to our partners and stakeholders.	No Change	NA
68	Community Comment	General	General	Very detailed plan with goals, explanations, background info, maps, charts etc. Thorough complete plan. If questions should arise as time goes on, the plan allows opportunity to check back and see data used to set goals, plan and guidelines for implementation.	Thank you.	No Change	NA
69	Community Comment	General	General	Looks well thought out and comprehensive. I generally agree with the issues identified and goals established, no major concerns.	Thank you.	No Change	NA
70	Community Comment	General	General	While I could not review the entire plan, I do appreciate items/programs 211H, 211I, and 211J	Thank you.	No Change	NA

71	Community Comment	General	Community equity	I reviewed the plan to find details about equity goals and how CRWD planned to implement these goals. I am glad to see them stated, but I know real outcomes in this area require deep organizational commitment. I encourage CRWD to make sure that diversity goals are not just on a plan, but worked into each level of the orgs work.	The District appreciates your comment and agrees that a deep organizational commitment is required in diversity and equity work. To that end, the District has recently completed a diversity and equity implementation plan to embed the goals, objectives and actions of the diversity and equity strategic plan into the different areas and levels of our work and help guide staff in its implementation.	High	No
72	Community Comment	General	BMP Maintenance	More often than not, I am amazed by CRWD implementation of projects and I have a high degree of trust that the WD is doing right by installing BMP's throughout my city, county and district. However, I find the maintenance of these installations can be lacking in rain garden/meadow areas. It isn't really enough to expect your grantee, or contracted entity who are not horticulturists or gardeners by training, to have success in maintaining these plantings. My suggestion is that CRWD also support these new landscapers through training, programming and supplies. If boulevard raingardens or highly visible installations like the infiltration pond at Hmongtown Market look terrible, or don't actually function, then motive for others to install their own will flounder. Individual gardeners and property owners need support to understand plants, soil and water best practices. I encourage CRWD to bolster that side of their programming, not just installing new gardens.	The District agrees with you that it is not enough to expect grantees to maintain rain gardens. Two years ago, the District began conducting annual rain garden maintenance workshops for grantees and other interested property owners. Last year, we revamped our grant inspection and maintenance outreach program to make it more efficient and useful for the District and grantees. We inspect grantee projects from the past five years on an annual basis and then biannually until year 10. We offer maintenance site visits, technical assistance and in some cases where warranted, financial resources, to assist BMP owners. The District will continue to evaluate and improve our efforts in BMP maintenance as we recognize that this is a growing need in our community. We are investing in this effort in Fund #210C.	High	No

CAC Comments on CRWD Draft WMP 60-Day Review Version  
30-Jul-20

Comment No.	Commenter	Section/ Page	Topic	Comment	Response	Significance	Change Will Be Made
1	#1	1.2.3	Partnerships	The importance of partnerships and commitment to equity are apparent, but I felt that “working with partners” is an overused phrase and that the commitment to equity concept needs clarification.	The phrase "working with partners" was included in many goals because we sought to make it clear that the District is not the lead organization of those goals or that it would require more than the District to succeed in accomplishing the goal. Since the drafting of the goals, we have identified partner roles - lead or partner in the implementation. With that said, we will review the use of the phrase and eliminate where it makes sense.	Low	Yes
2	#1	3.7	Funding	There is almost no attention to prudent fiscal management, which seems especially important as tax bases may erode and budgets of governmental partners, businesses and residents become increasingly under stress.	The District conducts sound and prudent financial management during its annual budgeting and working planning, which is based on the District's needs and requirements and external economic factors. The District uses its annual tax levy and property tax impacts as a measure of being fiscally prudent and responsible. We have historically and will continue to be sensitive to our government partners, businesses and residents as we set the annual tax levy. We will add this text to the plan.	High	Yes
3	#1	2.5	Wetland Management	The map of historic wetlands shows them as quite expansive. But there's no explicit followup: Are they gone forever or will there be specific initiatives that attempt to restore or take advantage of them? Or do they limit what can be done to treat stormwater, for example by limiting infiltration because the water table is close to the surface?	The map of historic wetlands is useful in the following ways: 1) understand underlying soil and groundwater conditions; 2) help explain drainage issues; 3) indicate potential opportunities for re-creating wetlands. We will add a comment about how we plan to use this information in Sec. 2.5.	Medium	Yes
4	#1	NA	Executive Summary	The Executive Summary should provide a solid basis for informing the public about the District. Probably written last, it should not read as an afterthought and be capable of standing alone. It should be carefully reviewed to ensure that all major themes are clearly captured and communicated that it can stand alone as its own document.	We will review and edit closely the Executive Summary after all the other plan changes have been made.	Medium	Yes
5	#1	1.1	Introduction	This is a forward looking document but a stronger expression of completed and ongoing work would be useful. The Introduction includes a short description of projects since 2010 but this section could and should be stronger. A map or two, table with permits or inspections/year, or something about historical staffing and budget seems needed to communicate growth and impact. Also, consider including something about the many awards CRWD has received for its work.	We will highlight regulatory program, communications and engagement, and other program accomplishments over the past 10 years to the existing list of accomplishments and include a statement about the many awards CRWD has received for its work.	Medium	Yes
6	#1	1.2.3	Community equity and engaging underrepresented groups	The treatment of equity is important but at times seems somewhat superficial. The geography of race and poverty are discussed in the introduction and areas of concentration cited as underserved “due to prior District work” on high impact areas. This almost implies negligence, though that's certainly not what is meant. Moreover, what's meant by “underserved?” Visit Como any day of the week and you'll find that users are disproportionately African-American, Hmong, and other minorities that are likely to live in areas identified as “underserved.”	The District understands the need and importance to better explain and clarify the language about diversity, equity and the areas underserved by the District and to minimize negative inferences. When we refer to underserved, we are referring to “underserved by the District” and to the fewer structural and non-structural BMP projects in the central and eastern portions of our watershed that overlap with higher concentrations of black, indigenous, and people of color and people with lower household incomes. While there are some large-scale BMPs in these underserved areas (e.g., Willow Reserve, Trout Brook Nature Sanctuary, and Green Line), our BMP tracking data shows that there are far fewer residential/neighborhood scale BMP projects constructed via our Stewardship Grant Program. We seek to implement more smaller scale BMP projects on individual sites and neighborhoods in the central and eastern portions of the District that will serve BIPOC in their neighborhoods.	High	Yes
7	#1	1.2.3	Community equity and engaging underrepresented groups	Race and poverty are noted as important factors in targeting east side watersheds, but there's not much direct reference regarding how they affect opportunities or exposure to environmental risks. We show where contaminated sites are identified by the PCA. Do they affect who's impacted and/or how that might affect our decisions? Will we invest in mitigating contaminated sites?	We will add language that explains how race, ethnicity and poverty may affect financial abilities, awareness, time and property ownership for implementing or engaging in clean water activities. The map of potential pollutant sources is found in Sec. 2.3, page 44. This map is useful during the feasibility and site investigation phase of sites for clean water projects. We will add a statement in the plan about how this information is used. During the 10-year timeframe of the plan, we will not be investing in mitigating contaminated sites. It is a broader environmental issue beyond water that the State and others are better equipped to lead and coordinate multiple partners from different topics and sectors.	High	Yes
8	#1	3.7	Funding	The absence of any serious discussion of historic budget growth and its impact on the levy, especially as we project another decade of growth, seems to ignore one of the basic tenets of good planning: “Hope for the best but plan for the worst.” As important as our work may be, we need to consider how to sustain that work during an economic downturn.	See response to comment #2.	High	Yes
9	#1	NA	Executive Summary	P9 – Blue background meant to highlight themes should be deleted. It's an important list but it stands out as though it were separate from the text following “These include:” I found myself skipping past it to look for the list following the colon	Agree, we will remove the blue background.	Low	Yes
10	#1	NA	Executive Summary	P9 – This is the first place that “underserved” is used. I'm struck by the conflation of community equity and engaging underrepresented groups. If “community” is defined by geography rather than demographics then they are two different things. How are we going to measure “level of service?”	The District is defining "community" by both geography and demographics. Nearly three years ago, the District analyzed the distribution of Stewardship Grant funded BMPs and found that they were less in the central and eastern portions of our watershed. Then we overlaid information about race, ethnicity, and income in the District to the Stewardship Grant BMP map and found that areas of racially concentrated poverty correspond with the central and eastern portions of our watershed that lack Stewardship Grant funded BMPs and fewer large scale BMPs. To illustrate this point, we will update Figure 1-7, the District ACP50 map, to include the distribution of Stewardship Grant Projects. The District will measure success of our efforts by identifying # of projects in the central and eastern portions of the watershed, determining grant participant demographics via voluntary surveys, types and numbers of non-traditional methods for promotion, and surveying interested residents who end up not adopting BMPs on the reasons why they did not participate in the grant program.	High	Yes
11	#1	NA	Executive Summary	P11 – Last bullet reference to underserved followed by “due primarily to District work focused on . . .” This issue is important but poorly communicated. This wording is extracted from text that appears later and needs to be changed so as not to imply blame on other priorities. I don't have a suggestion other than an easy fix would be to put a period after underserved.	We will update the text accordingly based on responses to comments #6 and #10.	High	Yes
12	#1	NA	Executive Summary	P12 – “Manage District lakes as ecologically healthy lakes” is a misleading expression. Most are not ecologically healthy lakes, as we show later. This might be more aptly expressed as something like “Manage District lakes to improve and then sustain their ecological health.”	Agree, we will make this change.	Medium	Yes
13	#1	1.1.2	District History	P21 – Green background for sections of text, similar to the blue background used on P9, is a distraction from the formatting conventions used in the rest of the document, where section heads and figures are highlighted by background color.	Agree, we will remove the green background.	Low	Yes
14	#1	1.2.3	Community equity and engaging underrepresented groups	P29 – Need date for map.	Agree, a date will be added to the map.	Low	Yes

Comment No.	Commenter	Section/ Page	Topic	Comment	Response	Significance	Change Will Be Made
15	#1	1.2.3	Community equity and engaging underrepresented groups	P30 – “Underserved due to prior District work focused on high-impact projects located in limited areas.” This is repeated many times, as mentioned elsewhere. As elsewhere, “underserved” is not really defined and could have many meanings; attribution using “due to . . .” is vastly oversimplified and should be expressed in some other way.	We will update the text accordingly based on responses to comments #6 and #10.	High	Yes
16	#1	1.2.3	Climate change and community resiliency	P35 – “The District is uniquely positioned . . .” is presumptuous. This appears in a number of places and should be changed to “well positioned.”	Agree, we will make the change as suggested.	Low	Yes
17	#1	1.2.3	Partnerships	P36 – “uniquely positioned” should be changed – perhaps to The District is committed to convening stakeholders . . . .”	Agree, we will make the change as suggested.	Low	Yes
18	#1	1.2.3	Adaptive management	P37 – Diagram is useful but labeling doesn’t correspond to text to its left. Make them compatible without a need to translate terminology.	We will change text to reflect the labels in the diagram.	Low	Yes
19	#1	2.2	Built environment	P40 – Narrative referring to Fig 2-2 identifies landmarks not obvious on the map, notably BNSF.	We will add railroads to Figure 2-2.	Low	Yes
20	#1	2.2	Built environment	P42 – “The District is tracking several large-scale redevelopment opportunities . . . .” This would be a good place for a sidebar that identifies some of the most important. This is especially true for those in the “underserved” East Side areas.	We will provide a list of the large-scale redevelopment projects that we currently are of, which include Ford Redevelopment Site, Sears Redevelopment Site, Great River Passage Projects, Towerside and Creative Enterprise Zone innovation districts. These projects are also identified in the implementation plan section.	Low	Yes
21	#1	2.3	Water quality issues and goals	P44 – Figure 2-4 is very interesting. Can we say anything here about attention to “underserved” areas?	The District does not plan to address broader environmental pollutant sources within the target areas of the watershed. This map serves as a guide for potential pollutant sources as we identify projects and other opportunities.	Low	No
22	#1	2.3	Water quality goals	P49 – WQ1 through WQ4 all use boilerplate language “Manage ____ Lake as an ecologically healthy ____ lake and make progress towards . . . .” Except for Loeb and McCarrons, none of them is yet an ecologically healthy lake so there needs to be more to those statements. For Como, for example: “Establish Como Lake as an ecologically shallow lake” or “Manage the transition of Como Lake to an ecologically SL . . . .” Something similar for Crosby. McCarrons and Loeb are fine.	We will change the text for Como and Crosby to “Establish _ lake as an ecologically shallow lake	Medium	Yes
23	#1	2.3	Water quality goals	P50 – WQ7,8,9,11 all repeat “Work with partners to . . . .” Why is this needed? The document clearly states the commitment to work with partners to achieve CRWD goals. Using this language for these goals suggests that we do not work with partners to achieve other goals. Dropping the language takes nothing away from the goal.	We will remove the phrasing “Work with partners....” It was originally added to the goal statements to indicate that the District was not working independently on those goals and/or leading the efforts to achieve those goals. The current draft identifies lead and support role for CRWD and its partners on implementation activities listed in Table 3-5.	Low	Yes
24	#1	2.4	Water Quantity Goals	Pp51-52 – Does map show 7.44” floodplains or 10+” floodplains? Which do we plan for? If we’re still working off of old floodplain estimates, then we’re already behind the 8 ball.	The 100-year floodplain presented in Figure 2-7 reflects the Atlas 14 100-year event (7.44 inches). The 500-year floodplain is also presented and corresponds to a precipitation depth of approximately 10.5 inches. Floodplain mapping is presented based on the Atlas 14 100-year event as that is the current performance standards referenced in District Rules and local and state regulations. Goal FL-5 notes that the District will design projects with consideration of future climate and precipitation trends.	Medium	No
25	#1	2.5	Ecosystem issues and goals	P56 – Historic resources map shows extensive historic wetlands. Do they affect our thinking about issues and/or opportunities related to those areas?	Yes, see response to comment #3.	No Change	NA
26	#1	2.5	Ecosystem issues and goals	P57 – EH1 and EH3 language assumes that Como and Crosby are already ecologically healthy as noted on P49.	Duly noted, we will make similar changes to these goals as done for the lake water quality goals. See response to comment #22.	Low	Yes
27	#1	2.7	Regulation	P62 – R2 through R8 start with “Work with ____ partners . . . .” Is that needed, as described above?	In this section, we will keep the phrasing “work with partners” because its important for our partners to see that we will be working closely with them on stormwater regulation updates, coordination efforts, and new potential requirements.	Medium	No
28	#1	2.7	Regulation	P62 – This is a good place to show staff inspecting a project site. However, consider finding a photo that doesn’t show staff discussing a client’s broken hand – that’s not how compliance should work.	We will replace the photo with a different inspection photo.	Low	Yes
29	#1	2.8	Infrastructure Management	P64 – Last sentence is very confusing. Edit for clarity.	We will change the last sentence to the following, “The District will explore opportunities to coordinate inspection and maintenance of BMPs to ensure continued BMP functionality and performance over their life spans. Coordinated efforts will improve efficiency and reduce costs of inspecting and maintaining BMPs.”	Low	Yes
30	#1	2.8	Infrastructure Management	P65 – IM5 is repeated twice. Renumber and also drop the “Work with partners” phrase.	We will make the suggested change.	Low	Yes
31	#1	2.9	Funding	P67 – “Fiscal Health” should be identified as an issue.	Comment has been noted and we believe fiscal health will be addressed in Sec. 3.7 with the response to comment #2.	High	Yes
32	#1	3.2	Prioritization and Targeting	P75 – Five targeted watersheds are highlighted. Say something about the rest of the district so the rest of us don’t feel neglected.	We will add the following statement, “Selection of high priority areas for targeting District work does not preclude work in other areas of the watershed. The District will continue to pursue opportunities to implement water and natural resource programs and projects throughout the watershed especially where and when partners anticipate activities complementary to District goals.”	Low	Yes
33	#1	3.7	Funding	P112 – This is one of those places where contingency planning for economic/fiscal risk is identified and discussed. Basic math: Increasing the tax levy (total raised) when total property values continue to increase doesn’t dramatically affect the tax rate; increasing the levy during periods when tax bases decline can cause a dramatic increase in the tax rate.	Refer to our response on comment #2.	High	Yes
34	#2	NA	NA	Minor grammatical errors that were not identified as part of this review but could easily be corrected to ensure the document reads well throughout	We will review the plan for minor edits.	Low	Yes
35	#2	NA	NA	Acknowledgements/Certifications (pg. 2): Hyperlinks to project-specific information on the list of Clean Water Land and Legacy funded projects	Good suggestion. We will add hyperlinks to the CWF projects.	Low	Yes
36	#2	NA	Executive Summary	Executive Summary (pg 8): Would be helpful to label the area of downtown St. Paul since it’s highly impervious, since other large areas like U of M/State Fair are called out.	We will label Downtown Saint Paul on the map.	Low	Yes
37	#2	NA	Executive Summary	‘Notable Plan Goals’ under Water Quality category (pg 12)—Chloride reduction refers only to Como Lake- Is there a reason for this?	Como Lake is the only lake in the District listed as impaired for chloride. While it is the only waterbody in the District that has a measurable goal for chloride, the District has identified District-wide chloride reduction goal and chloride-reduction implementation activities.	No Change	NA
38	#2	1.1.2	District History	Introduction (pg 22)- last paragraph: Include a link to ‘Protecting, Managing, and Improving the Waters...’—can’t remember if this is a document or a video?	It is a document that if it gets posted on our website, we will provide a hyperlink.	Low	No
39	#2	1.2.2	Plan Development	Section 1.2.2 (pg. 24)- Provide links to the other implementation plans listed as complete in 2019-2020 if readily available	We will add hyperlinks if those completed reports are available online.	Low	Yes
40	#2	2.5	Ecosystem issues and goals	Section 2.5 Ecosystem Health Goals- Has any analysis been done with regard to maintaining/reestablishing wildlife corridors?	An analysis on establishing and maintaining wildlife corridors has not been conducted.	Low	No
41	#2	3.4.2	Grants Program	Section 3.4.2- Might be interesting for readers if there is a link to the map of previously installed grant projects or reference to it available on the website	Our website does not currently have a map of previously installed grants. It was not included in the website redesign. However we will update Figure 1-7 to include the distribution of Stewardship Grant funded projects.	Low	Yes
42	#2	NA	NA	List of Abbreviations (pg. 6): Verify the intent is for ‘SWPPP’ to refer to Stormwater Pollution Prevention Program or alternatively Plan which the MPCA uses.	We verified that SWPPP refers to Stormwater Pollution Prevention Plan.	Low	No
43	#2	2.2	Built environment	Section 2.2 – define impervious/imperviousness for the average resident	We will add definitions for impervious/imperviousness.	Low	Yes

Comment No.	Commenter	Section/ Page	Topic	Comment	Response	Significance	Change Will Be Made
44	#2	2.2	Built environment	Runoff vs. Retention graph (pg. 28) shows an increase in the % runoff despite less recorded precip and more BMPs in the ground than previous years—What is the explanation for that? Should there be a short caption that explains the results?	Most years show approximately similar breakdown of runoff vs retention. There are several possible reasons for the annual variability. The most likely reason is the annual variability in storm intensities. Infiltration and storage BMPs retain an initial depth of precipitation, above which precipitation becomes runoff. A year with a lot of smaller storms will therefore generate a lower percent runoff than a year with fewer, more intense storms like 2018. Also, the data presented in Figure 1-5 is limited to the Trout Brook watershed and may not as representative of other areas of the District where more BMPs have been implemented.	Low	No
45	#2	3.5	Implementation plan	Implementation Plan section (Subwatershed Plans)- Briefly explain the nature and purpose of alum treatment in a “reader-friendly” way	We will add an explanation of alum to this section. Language may include: Alum (aluminum sulfate) is applied to lakes to reduce phosphorus being recycled inside of the lake. The treatment is expected to dramatically reduce algae growth and improve water clarity and quality. Alum is commonly used in drinking water treatment and has been a safe lake management tool for decades.	Low	Yes
46	#2	2.3	Water quality issues and goals	Section 2.3- Briefly explain the outcomes of sediment loading and how sediment contributes to observable impacts to water quality. This is done for TP most thoroughly, but many may not realize why sediment is an issue	We will explain the impacts of sediment loading, which includes poor water clarity that affects vegetation growth, sediment deposits onto stream and lake beds impacting aquatic habitat, and it is the substrate in which phosphorus and other pollutants bind to.	Medium	Yes
47	#3	NA	Executive Summary	p. 9 – Under “Community equity...” theme, add “and continue to be” after “...have been underserved.” Also the targeted groups – “residents in the central and eastern portions of the District, people of color, recent immigrants, young adults, and youth” – seem too limited. Not even the poorer residents who are discussed on p. 30 of the plan? Why recent and not all immigrants? Diversity and underrepresented groups include a lot more people. I think the plan needs to be carefully worded on this topic.	We will make the suggested change to add “and continue to be.” We will also eliminate “recent” in front of immigrants and add poor.	Low	Yes
48	#3	NA	Executive Summary	p. 9 – Under “Rain as a resource” theme, change “minimizing” to “reducing,” which I think more accurately reflects CRWD’s capabilities.	We will make the suggested change.	Low	Yes
49	#3	NA	Executive Summary	p. 10 – Under “Partnerships” theme, I’d like to see “individual residents” spelled out in the stakeholder list.	We will make the suggested change.	Low	Yes
50	#3	NA	Executive Summary	p. 11 – Under “Issues and Goals,” I’d like to see climate change given more emphasis than the mention in the third bullet. It could be a separate bullet point, “Impact of climate change and increasing awareness and knowledge of it.”	The third bullet is an issue statement and we frame those by listing the issue “effect” and then the “cause” of the issue. Climate change is a major reason for peak runoff rates and total runoff volumes. We do emphasize climate in one of the goals highlighted in the Executive Summary, “Adapt to changing climate by evaluating flood risk and designing District projects under present and future climate and precipitation trends. The District also has placed emphasis on climate change by identifying it as one of the plan themes that is described in the Executive Summary and Introduction.	Medium	No
51	#3	NA	Executive Summary	p. 14 – Under “Implementation Plan,” the fifth bullet would be improved if this was added to the end of the sentence: “and ease with which residents can communicate with the District.”	We will make the suggested change.	Low	Yes
52	#3	1.2.3/3.5.6	Plan Themes/Implementation Plan	pp. 26 and 99 – Both pictures of the Trout Brook Nature Center don’t give a sense of the scope of the project, which is impressive. Do you have a photo that shows more of the creek length, bridge, and path?	We have an aerial photograph of the Trout Brook Nature Sanctuary. We will use it on one of those pages.	Low	Yes
53	#3	1.2.3	Community equity and engaging underrepresented groups	p. 30 – Re. “Community equity...” I know that this is important to word most carefully and appropriately, but it seems that here or in another place it would be helpful to add the overall goal (something like “so that Watershed District residents of all racial and ethnic backgrounds, geographic areas within the Watershed, ages, abilities, and incomes will be served”).	Good point. We will add a sentence similar to what is suggested.	High	Yes
54	#3	2.8	Infrastructure Management	p. 63 – The colors in the key don’t seem to match those in the map.	We will fix the colors to ensure the map and legend colors match.	Low	Yes
55	#3	3.3	Implementation plan	p. 76 – I know this page was organized based on numbers in the budget, but the managers have a photo and are notably missing a paragraph of description of them.	We will include a brief description of the Board of Managers in the General Administration section.	Low	Yes
56	#3	3.5.10	Implementation plan	p. 107 – Where is the pictured Zero Abuse Project? At the Science Museum? It would be good to add that to the photo caption.	The Zero Abuse Project is located on Jackson Street in Downtown Saint Paul. We will add Downtown Saint Paul to the caption.	Low	Yes
57	#3	NA	General	This draft still needs a thorough copy editing, which I assume is in the works. Problems such as singular-plural errors, inconsistent use of serial commas, and missing periods tripped me up as I was reading.	We will have a copy editor review the revised draft plan after all other changes have been made.	Medium	Yes
58	#4	2	General	Section 2 - Watershed issues and goals. Each point (2.1, 2.2, 2.3, etc, is well described in the narrative. However, it might be worth editing the longer paragraphs to make them less dense, perhaps by using bullet points. It is a lot to read as a regular citizen, but might not be for more knowledgeable, technical readers.	We will review Section 2.0 and determine if and where to break up dense text.	Low	Yes
59	#4	NA	Executive Summary	In the Executive Summary, the text refers to Section 2, however the Table of Contents (TOC) doesn’t assign section numbers (I assumed it was Watershed Issues and Goals). Might be good to label it also as Section 2 in the TOC.	We will add Section numbers for the main sections.	Low	Yes
60	#4	3.5.11	Implementation plan	P. 110, Stormwater Impact Fund Implementation 470P: Confused as to why developers get to go ahead with projects if they don’t meet district rules.	To the maximum extent practicable, the District requires developers to meet volume reduction requirements on-site. If that is not practicable, there are a series of alternative sequencing steps in order of preference. Stormwater Impact Fund is the last alternative available. Rarely has this alternative been used. We will clarify that the SW impact fund is the last option in a series of options for meeting District Rules.	Medium	Yes
61	#4	Page 3-36	Executive Summary	P. 10: In subheading “Partnerships,” the word “cities” doesn’t need to be capitalized.	We will change “cities” to lowercase.	Low	Yes
62	#4	1.1.2	Plan history	P. 22: Caption doesn’t match the photo as there is no one petitioning in the photo.	We will change the caption to “Como Lake Pavilion”	Low	Yes
63	#4	1.2.3	Rain as a Resource	Figure 1.5 (p.28) – why was 2018 such a bad year for retaining precipitation?	The characteristics and timing of each storm have a large impact on the percent of runoff vs. retention. More intense storms may generate more runoff than less intense storms with a similar total precipitation depth. A year with a lot of large, intense storms (e.g., 2018) will generate a higher percent runoff than years with less intense storms but similar total precipitation. In 2018 there were 10 days with one inch or more of rain (versus an average of about 6.5 in the 9 prior years). Note that 2019 data (not presented in the 60-day draft but available for the final draft) indicates a runoff percent of approximately 60%, which is closer to the 2009-2017 average of about 50%.	Low	No
64	#4	Figure 1-6	Community equity and engaging underrepresented groups	P. 29: The colored dots in the legend could be bigger.	We will increase the size of the legend dots.	Low	Yes
65	#4	Table 3-5	Implementation plan table	P. 119-146, a brief explanation of these tables could be useful. Where are (L) and (P) defined?	The table is described in Sec. 3.2. It is missing the definitions of L and P. We will add that to the table description.	Low	Yes

Comment No.	Commenter	Section/ Page	Topic	Comment	Response	Significance	Change Will Be Made
66	#4	Table 3-5	Implementation plan table	When printing the tables, notice where the page breaks occur. For example, P.119, Table 3-5, I suggest moving the heading "Programs" and the line of the subheading "208 Regulatory Program" to P. 120, which is where the data is. Keep at least line A. Same with P. 149. Once the reader has already turned the page, it's better if the heading and subheading are there so they don't have to turn the page back. There's room to spare on P. 154 if you alter the formatting a bit to accommodate this suggestion.	We will make sure the heading and subheadings are printed at the top of each table page.	Low	Yes
67	#4	Table 3-6	Implementation plan table	Table 3-6: Put the notes (on P. 154) at the top of the table on P. 147 so reader knows ahead what the notes are.	Good suggestion. We will move the notes to the top of Table 3-6.	Low	Yes
68	#4	2.7/3.4.5	Goals and Implementation plan	Same photo on P. 61 and P.88 (Allianz Field). Might there be a different photo for one of the pages?	We will select a different photo for one of those pages.	Low	Yes
69	#5	NA	General	Have you considered adding a conclusion? Most government reports don't have one but I always thought it tied everything up well and was a good way for the reader to finish a report.	As noted, most government reports including watershed management plans do not include conclusions. MN State Statute does not require a conclusion section for watershed management plans. We anticipate that most readers will focus on the Executive Summary and Implementation Plan table so we will not include a conclusion section.	Medium	No
70	#5	3.7	Funding	Should the actual tax levy mill rate be included somewhere? Maybe it is but I missed it.	We do not intend to include our tax levy mill rate because it is unknown and poorly understood by the general public.	Medium	No
71	#5	1.2.3	Partnerships	I saw a lot of comments about working with the "partners" and "stakeholders," but unless I missed it didn't really see these defined. An exception is the tribes mentioned on page 60, but that's about it. Would it be worth having a paragraph more clearly defining who you mean?	We define partners and stakeholders in the Partnerships theme in section 1.2.3, page 36. We are going to remove the phrasing "working with partners" as described in response to comment #1. We also identify the types of partners for each implementation activity in Table 3-5.	Medium	No
72	#5	Section 2.3.2	Water Quality Goals	Several groups were shown in illustrations but never really explained. On page 11 is Frogtown Green, 17 is Urban Roots, 60 is Compass and what is the "bug bonanza" on pages 58 and 113?	Frogtown Green, Urban Roots, and Compas are local community groups who have received Partner Grant funding from the District. We will acknowledge them as Partner Grantees on page 3. Bug Bonanza is a macroinvertebrate and dragonfly sampling event for youth. We will replace the name of the event with this brief general description.	Low	Yes
73	#5	2.7	Regulation	P62 mentions a "small site" as being exempt but never defines quite what that is.	A small site is less than one acre and we will add this definition to page 61.	Low	Yes
74	#5	na	Executive Summary	Should you be more specific about who the "partners" and "stakeholders" actually are? Just a little done on page 60 with the tribes.	See response to comment #71.	Medium	Yes
75	#5	NA	Executive Summary	P11 - What is frogtown green?	Frogtown Green in a volunteer, resident-led organization that seeks to make the Frogtown neighborhood greener and healthier. See response to comment #72.	Medium	Yes
76	#5	NA	Executive Summary	P14 - Does public art tie in here?	On page 15, Public Art Saint Paul is mentioned. It is a local non-profit promoting, advocating and offering art in Saint Paul. See response to comment #72.	Low	Yes
77	#5	1.1	Introduction	P17 - Urban Roots. How about a list of organizations partnered with? Section 206 is vague here	Urban Roots is a community development services organization based in the East Side of Saint Paul. It offers youth environmental programs. See response to comment #72.	Low	Yes
78	#5	Section 2.3.2	Water Quality Goals	P60 - Compas is another unknown organization	Compas is an art education organization in Minnesota. See response to comment #72.	Low	Yes
79	#5	Section 2.3.2	Water Quantity Goals	P58 - What is bug bonanza? Also P113	We will replace Bug Bonanza with a general description of the event, which is a macroinvertebrate and dragon fly monitoring event for youth.	Low	Yes
80	#5	2.7	Regulation	P62 - what is a "small site"?	See response to comment #73	Low	Yes
81	#5	NA	Executive Summary	P6 - MNRRA defined on here, as not defined until 108	We will add MNRRA to the abbreviations list.	Low	Yes
82	#5	NA	Executive Summary	P6 - LWMP not defined till 117	We will add LWMP to the abbreviations list.	Low	Yes
83	#5	NA	General	P119 - How about a conclusion?	Conclusions are not typically provided in a watershed management plan. See response to comment #69.	Medium	No
84	#5	NA	Executive Summary	P14 - mentions "public art". Is that a group?	See response #76	Low	No
85	#5	NA	Acronyms	The definitions on page 6 are useful but miss MNRRA (page 108) and LWMP (page 117)	We will add those abbreviations to the list.	Low	Yes
86	#5	3.7	Funding	Should the actual tax levy mill rate be included somewhere? Maybe it is but I missed it.	See response to comment #70.	Low	No
87	#6	NA	Executive Summary	The last sentence on page 10.....the editor in me is looking for a colon after that sentence given the verbage "the following". Yet the colon seems awkward. Possible revision "This information helped to inform the watershed issues and goals." This leads to the headline of the next section.	Agree, we will make the change as suggested.	Low	Yes
88	#6	2.3	Water Quality	Add to the abbreviation list "TSS" as referred to on pg 48.	We will add TSS to the abbreviation list.	Low	Yes
89	#7	NA	General	In general I agree with the plan and the proposed work. Wonder if we can reduce the cost of things. I dislike raising the levy every year, just because we can. But that is not a discussion for this document.	Duly noted.	No Change	NA
90	#7	NA	Typos	Need to do a spellcheck as there are some typos (page 136 last line Swdede is misspelled).	We will review copy for typos.	Low	Yes
91	#7	NA	Abbreviations	Why does it list the full name of BWSR, define the abbreviation and then 2 pages later do it again? Page 112 and 114. It is in their list of abbreviations (pg 6).	We will make changes to define BWSR once and use its acronym afterwards.	Low	Yes