

**Minnehaha Creek Watershed District Draft 2018-2027 Water Management Plan
60-Day Review Comments and Responses**

Commenter List

Category	Name/Organization
Agency	Metropolitan Council
Agency	Minneapolis Park and Recreation Board (MPRB)
Agency	MN Board of Water and Soil Resources (BWSR)
Agency	MN Department of Natural Resources (DNR)
Agency	MN Department of Transportation (MnDOT)
Agency	MN Pollution Control Agency (MPCA)
Agency	Three Rivers Park District (TRPD)
City	City of Chanhassen
City	City of Edina
City	City of Excelsior
City	City of Hopkins
City	City of Independence
City	City of Minneapolis
City	City of Minnetrista
City	City of Mound
City	City of Plymouth
City	City of Shorewood
City	City of St. Bonifacius
City	City of St. Louis Park
City	City of Long Lake
City	City of Minnetonka
City	City of Victoria
County/SWCD	Carver County Water Management Organization (WMO)
County/SWCD	Hennepin County Environment and Energy
Neighboring WMO	Pioneer-Sarah Creek Water Management Commission (WMC)
Resident/Group	Dave Oltmans (CAC Member)
Resident/Group	East Calhoun Community Organization
Resident/Group	John Pierson (Area Partnership for Pierson Lake Enhancement)
Resident/Group	Lake Zumbra-Sunny Association
Resident/Group	MCWD Citizen Advisory Committee (CAC)
Resident/Group	Nancy Rose (Friends of Bass Lake)
Resident/Group	Richard Nyquist (CAC Member)
Resident/Group	Steve Mohn (CAC Member)

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1	General	The District should be commended for an inclusive planning process with a high level of engagement. We also note the accomplishments the District has made with its current plan and as a leader in water resources management.	BWSR	Thank you for your comment.
2	General	The District should benefit from its recent internal strategic assessment by placing an emphasis on areas where the District can provide the greatest benefits. We support the District's recent change in its implementation approach to maintain a sustained focus in specific subwatersheds to best capitalize on momentum and as a means to realize increased and measurable outcomes.	BWSR	Thank you for your comment.
3	General	We support the District's use of the new E-Grade and agree that it will better represent the health and functions of the resources.	BWSR	Thank you for your comment.
4	General	There is inconsistency in the text and tables for the duration of the Plan. For example page 27 states 2017-26 and Table 3.19 states 2018-2027.	BWSR	Thank you. This will be corrected to 2018-2027.
5	General	The District has identified four strategic goals to provide direction on its efforts. The water quality goal referenced is the State standard, but the measureable goal for water quantity in each subwatershed is unclear.	BWSR	The District's quantity goals watershed-wide (from Table 3.2) are to (1) maintain or reduce existing flows to decrease negative effects of SW runoff and bounce from existing and proposed development, and (2) provide low flow augmentation to surface waters. Progress toward these goals will be measured and tracked using the metrics defined in Table 3.3. As the Plan discusses, over the planning period the District will pursue a priority subwatershed approach in which a planning process coordinated with local interests will result in an implementation program to address subwatershed-specific issues and priorities articulated in the Plan. The implementation program will include a monitoring plan designed to measure outcomes from projects and other implementation actions with respect to all relevant District goals, including quantity goals. When an individual project is pursued, whether under the implementation plan, outside of a priority subwatershed, or otherwise on an opportunity basis, a component of the design will be a statement of project targets and a performance monitoring plan specifically oriented toward those Plan goals toward which the project is intended to make progress. The District's biannual assessment of progress toward its measurable goals (8410.0150, subp 3.E) will review all measurement over the preceding biennium to evaluate cumulative performance of District implementation actions during the planning period.
6	General	For resources where the State standard may not be achievable within the timeframe of this Plan, the Plan should identify its 10-year goal.	BWSR	The District agrees on the importance of establishing clear goals and metrics to measure effectiveness. At the same time, the District's approach is one in which the implementation program is given definite form through collaborative planning and feasibility work on a subwatershed basis, and the specific order of project implementation is substantially opportunity driven. This means a great deal of uncertainty in prescribing a precise timeline for when specific water quality gains will be achieved, which makes the effort of limited utility. For this reason, the District's approach with this Plan has been to use the state standards as its ultimate goals, set clear priorities for the 10-year Plan cycle, and define metrics for tracking progress. The District will add phosphorus load reduction estimates for the specific capital projects that are currently identified in its focal geographies. To provide further transparency and accountability, the District would like to work with BWSR to develop a framework for goal-setting and progress tracking through the annual reporting process.
7	General	We recognize the District's interest in identifying Thriving Communities as a strategic goal and hope the significance of understanding the greater role cities and counties can play within the urban/suburban environment will lead to additional support and coordination.	BWSR	Thank you for your comment.
8	General	We find the Plan provides a thorough background of District history, land and water resources and individual subwatershed information.	BWSR	Thank you for your comment.
9	General	The Citizen Advisory Committee expresses its support for the MCWD's draft WMP and its approach of partnership and integrated planning, focused implementation, and responsiveness to opportunities	CAC	Thank you for your support of the District's approach and draft Plan.

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10	General	<p>On behalf of the Carver County Water Management Organization (CCWMO), I am pleased to write this letter in support of the District's WMP. The CCWMO appreciated the opportunity to participate in the development of the WMP through the District's Technical Advisory Committee. The plan provides a strong framework for implementing the District's goals of protecting and improving water quality, managing water quantity, and restoring ecological integrity. As an organization that shares the mission of protecting surface and groundwater resources on a regional basis, we find value in the District's approach of working in partnership with public and private entities to implement the plan, as well as the District's efforts to make measurable improvement in areas of high need while remaining responsive to opportunities throughout the District.</p> <p>The CCWMO also participated in the development of the Six Mile Creek-Halsted Bay (SMCHB) Subwatershed Plan as a member of the SMCHB Partnership. Over 60% of the SMCHB Subwatershed is located within Carver County, including the City of Victoria, Laketown Township, and Carver Park Reserve. The CCWMO values the District's emphasis on developing a science-based strategy to address major factors affecting water quality within the subwatershed, while seeking to partner with other public agencies to implement solutions. In adopting the SMCHB resolution of support on April 18, 2017, the County Board acknowledged the District and County's ongoing partnership to implement the priorities outlined in the SMCHB Subwatershed Plan. Carver County has also recognized the partnership with the District as it works towards the adoption of a financing agreement between the County and District in order to support the SMCHB plan implementation.</p> <p>Though the jurisdictions of the two watershed organizations (the CCWMO and the District) are distinct, water resources within the District's boundary are of concern to Carver County policy makers and residents, and the CCWMO recognizes the District is a good steward to these resources. The District and CCWMO frequently coordinate on a number of water quality issues of shared interest, including carp management, high water concerns, and permitting coordination along the boundary between the two organizations. The County looks forward to our continued collaboration in the future.</p>	Carver County WMO	Thank you for your support of the District's approach and draft Plan.
11	General	The City of Chanhassen is encouraged and supportive of the new Plan and the "Balanced Urban Ecology" approach. It provides a strong framework for collaboration and partnership between MCWD and the City of Chanhassen in all areas of local water resource management. The City looks forward to developing a coordination plan and combined set of goals with MCWD.	Chanhassen	Thank you for your support of the District's approach.
12	General	In keeping with the direction of the new Plan the City of Chanhassen requests that: (1) MCWD rules reflect the direction and guidance in the 2017 Plan; (2) MCWD continue to be cognizant of rules that create significant increase in municipal variance requests and apply the Balanced Urban Ecology approach when resolving potential issues; (3) MCWD rules are consistent between neighboring WD/WMOs	Chanhassen	No rule revisions are being made as part of this Plan update. The District will consider opportunities for future rule revisions to improve clarity, streamline administration, promote partnerships, and improve consistency across organizations. The District will conduct a separate community engagement process for any future rule revisions.
13	General	We would like to recognize all of the great work the District is doing and the thought put into this draft plan. We appreciated the opportunity to work with the District during the plan development process and believe this plan forms a strong framework for the District to implement its goals of preserving and improving water quality, managing water quantity, the restoration and maintenance of ecological integrity, and promotion of how water resources create thriving communities, throughout the next 10 years. The plan is consistent with DNR priorities and incorporates a robust implementation plan with substantial funding and resources allocated to address identified issues.	DNR	Thank you for your comment.
14	General	The District focus on a Balanced Urban Ecology policy and the development of the E-grade program to measure ecosystem health will help the pursuit of these goals. They are a great example of the District continuing to refine and improve, not only a protector of water resources, but as a facilitator of protection efforts by others too. We appreciate the strong focus on integrating land use planning and management with water resource management, and the recognition that having healthy waters is dependent on having healthy watersheds.	DNR	Thank you for your comment.
15	General	It would be worth incorporating a brief discussion about shoreland management, particularly the use of PUDs by communities to protect sensitive resources areas as well as the roles of MCWD, communities, and the DNR. The District should consult DNR if they'd like help crafting that language. In some cases, developing communities in sensitive subwatersheds, such as Victoria and Halstead Bay, don't have zoning code that is compliant with state standards. Shoreland standards are vital to the protection of green spaces and in reducing pollutant runoff to public waters. The District might be interested in noting that Natural Environment Lakes get greater setbacks, resulting in better protection.	DNR	Reference to the state shoreland management law is included in Appendix A: Local Water Plan Requirements on page 576. The section states that the Local Government Unit (LGU) is required to describe its legal role and responsibility under the law as well as its compliance status. This will provide an opportunity for the District and cities to discuss shoreland management through the Local Water Plan review process.
16	General	Please double check watershed maps for areas that have been recently developed. The are maps for St. Joe area map and perhaps Wasserman may need updating.	DNR	The 2016 Metropolitan Land Use data came out around the same time that the draft Plan was distributed for comment. The land use figures and tables will be updated with the 2016 data now that it is available.

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17	General	We recognize the refreshed approach of the plan which prioritizes partnerships with member communities to integrate policy, planning, and implementation in order to leverage the environmental, social, and economic value created when built and natural systems are in harmony. The partnerships, strategic focus, and flexibility to be opportunistic are appreciated, and the overall tone of the plan is one of collaboration to accomplish our shared goals of clean water and resilient communities. In many ways, the plan is memorializing a way that MCWD already does business. The Balanced Urban Ecology policy approach is demonstrated through early coordination and co-planning with the current master planning project in Edina’s Arden Park.	Edina	Thank you for your support of the District's approach.
18	General	The plan should include a schedule to update the 2003 Hydrologic, Hydraulic, and Pollutant Loading Study (HHPLS). Keeping a calibrated and up-to-date hydraulic model will strengthen policy and implementation efforts in providing flood protection services. Regional resources like Minnehaha Creek directly and indirectly influence local flood issues. Managing flood protection services requires comprehensive, strategic, watershed-wide co planning. This is an approach emphasized in the plan update, yet it falls short with regard to flood resilience data acquisition and planning. Cities can’t do flood resilience alone; it takes a watershed approach.	Edina	The District continues to update and calibrate its model (e.g. updated for Atlas 14) for use as a regional flood prediction model. Cities are welcome to take portions of the model and add detail for use at a local scale. The District will continue to discuss with cities how it can best serve as a technical resource for flood prediction and management.
19	General	On behalf of the Environmental Quality Board (EQB), I am pleased to write this letter in support of the District’s WMP.	EQB	Thank you for your support of the District's Plan.
20	General	The City is in the process of updating the Local Water Plan and will collaborate with the District throughout the process. The City will make sure to implement the required items stated in the District’s Watershed Plan.	Excelsior, Minnetrista, and Shorewood	Thank you for your comment.
21	General	The City requests that the District includes maps for each subwatershed showing the FEMA elevation and the District 100-year flood elevations by water body. It might also be useful to include text discussing the reasons for the change and the requirements of the District which differ from the requirements imposed by FEMA.	Excelsior, Minnetrista, and Shorewood	The District uses its updated XP-SWMM model to establish 100-year elevations for regulatory and project purposes. This model has been accepted by FEMA, which has used it to publish updated flood maps. As far as we are aware, there are no discrepancies between the modeled elevations and the flood map elevations. Where there are unnumbered zones, the District uses its model to predict the 100 year elevation, as is standard engineering practice. Where an applicant requests a revision to the model to more accurately reflect local conditions, the District does allow their engineer to submit an updated model. Given the scale of the maps in the Plan, it would be difficult to discern elevations. This information can be made available upon request.
22	General	The City requests that the District consider additional filtration credit for enhance filtration technology (i.e. iron enhanced sand filters, cartridge technology that can achieve greater than 50% TP removal).	Excelsior, Minnetrista, and Shorewood	See response to comment #12. To clarify, the 50 percent credit for filtration practices is related to volume abstraction, not phosphorus removal.
23	General	The City suggests that the District place a greater emphasis on funding flood control/mitigation projects. It seems that the emphasis for the CIP is for water quality or volume reduction for smaller events.	Excelsior, Minnetrista, and Shorewood	As is the case for all program areas related to its water resource authority, the District has considered its role in flood control in the context of the roles of other public authorities and specifically local units of government (LGUs). In general, the District considers LGUs to have primacy with respect to regional flood prevention and management by virtue of their roles in land use planning and development regulation, as owner and operator of stormwater conveyance infrastructure, and as the implementing authority for the National Flood Insurance Program and the state floodplain management program (Minn Rules 6120). The District’s primary roles related to flood management are: (1) management of the Lake Minnetonka/Minnehaha Creek regional conveyance system through the operation of Grays Bay Dam; (2) providing cities and the public with flood prediction data using our Hydraulic and Hydrologic model; (3) preserving local flood storage volume by regulating floodplain fill during development permitting; and (4) implementing and promoting stormwater management practices to address pollutant loading, prevent local peak flow increase and provide for volume reduction. The District will continue to serve as a technical resource to assist LGUs in identifying solutions to local flooding issues. Through this involvement, and pursuant to the goals and priorities identified in its subwatershed plans, the District may choose to partner in a flood control/mitigation project. An explanation of the District's role related to flood control will be added to section 3.4.
24	General	Is the District planning on updating the current permitting rules during this Watershed Plan update?	Excelsior, Minnetrista, and Shorewood	See response to comment #12.

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25	General	The City suggests that existing land use figures use the 2016 Metropolitan Land Use data, rather than the 2010 data.	Excelsior, Minnetrista, and Shorewood	The 2016 shapefiles came out around the same time that the draft Plan was distributed for comment. The land use figures and tables will be updated with the 2016 data now that it is available.
26	General	County staff participated at various stages in the development of the Plan and as a member of the Technical Advisory Committee. Our staff has reviewed the plan and feels that the proposed will help protect and restore MCWD's water resources, and will help to achieve the County's goals of keeping the waters clean and healthy, fostering effective partnerships, motivating environmental stewardship, and protecting natural resources. We commend MCWD for emphasizing partnership, and concur that close collaboration, open communication, and integrated planning are absolutely critical to meeting water resource objectives. There are many opportunities for Hennepin County and MCWD to work together to better meet the goals of both organizations. We look forward to working with the District early and often under the exciting shift in approach that this Plan represents.	Hennepin County	Thank you for your support of the District's approach.
27	General	Balanced Urban Ecology policy & Thriving Communities– Hennepin County deeply appreciates this integrated approach to water resource and land use planning, and the identification of Thriving Communities as a strategic goal of the MCWD. It is incumbent upon the County to balance many priorities, including of course providing access to healthy natural areas. We do this in service to our residents, and in the interest of continuing to provide a great diversity of experiences and lifestyle options to suit all of our residents. Healthy natural areas are a critical component to any thriving community, and a thriving community can contribute to healthy natural areas. This policy will lead to the integration of protection and improvement of water resources into other functions and necessities of urban life and infrastructure, drastically increasing the potential positive impact to water resources and Hennepin County's communities.	Hennepin County	Thank you for your support of the District's approach.
28	General	Focal geographies – Hennepin County is eager to partner with MCWD on your priority resources in a way that adds value to your efforts and accomplishes our shared goals for the county's water resources.	Hennepin County	Thank you for your comment.
29	General	Responsiveness to opportunities – Hennepin County applauds your intention to remain responsive to opportunities as they arise. We suspect that many such opportunities are likely to arise in conjunction with county capital project and we welcome early and frequent collaboration to identify those opportunities.	Hennepin County	Thank you for your comment.
30	General	I applaud the exemplary work that the MCWD does to protect and improve waters and natural resources in Hennepin County and beyond, as well as the immense amount of work that has been involved in not only drafting this Plan, but the organizational assessment and reflection that is behind this exciting new approach. We look forward to working with you under this plan and talking in more detail about the focus of future collaboration between Hennepin County and the Minnehaha Creek Watershed District.	Hennepin County	Thank you for your comment.
31	General	Hopkins expresses support for the District's draft WMP and its approach of partnership and integrated planning, focused implementation, and responsiveness to opportunities; and, Hopkins will continue coordination of its policies, plans, and investments with the District to maximize public benefit.	Hopkins	Thank you for your support of the District's approach and draft Plan.
32	General	City of Independence expresses support for the District's draft WMP and its approach of partnership and integrated planning, focused implementation, and responsiveness to opportunities; and Independence will work to coordinate its policies, plans, and investments with the District to maximize public benefit.	Independence	Thank you for your support of the District's approach and draft Plan.

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33	General	<p>On behalf of the City of Long Lake, I am pleased to write this letter in support of the District's WMP. The City has participated in the development of the District's 2018-2027 Watershed Management Plan through its Policy Advisory Committee and subwatershed meetings. Through this process, the City has been pleased with the District's emphasis on working in partnership with communities to align goals and investments. The City also supports the District's efforts to focus its limited resources to make measurable improvement in areas of high need while remaining responsive to opportunities throughout the District.</p> <p>The City and District have partnered on numerous water quality and natural resource improvements in the past, including stormwater management at Nelson Lakeside Park, and the recently completed Long Lake Creek Corridor Improvement - Phase II restoration project. The latter, which restored a former Metropolitan Council wastewater treatment facility, is a great example of multiple agencies partnering to improve natural resources while enhancing community access to open space.</p> <p>We are proud of what we have accomplished through collaboration with the District and look forward to carrying that success forward with the research and planning efforts that are presently underway in the Long Lake subwatershed. This multi-City partnership - one that is rooted in the collective efforts of the City, District, neighboring communities and local lake association groups - is critical in making progress towards improving Long Lake and the Long Lake subwatershed. The City recognizes the importance of protecting and improving Long Lake for both upstream and downstream neighbors and looks forward to our continued collaboration in the future.</p>	Long Lake	Thank you for your support of the District's approach and draft Plan.
34	General	The Plan puts forth a good roadmap to protect water resources within your district and is consistent with Council policies outlined in the Council's 2040 Water Resources Policy Plan (Policy Plan).	Met Council	Thank you for your comment.
35	General	Consistent with the Council's policy, staff commends the MCWD for preparation of a plan that includes a clear inventory of land and water resources, the inclusion of local and regional partners in the discussion of priority issues and opportunities, and a clear statement of goals and policies. Council staff were encouraged to see MCWD plan for the future watershed changes with the Balanced Urban Ecology lens. Council staff agree that development needs to be achieved through a process that values both the natural and built worlds and that a holistic method is of paramount importance. Additionally, the E-Grade System is a novel approach to water management and resource allocation. Council staff are heartened by this science-based evaluation and are curious to see how it furthers the efforts of MCWD. Finally, the amount of effort and time invested in the stakeholder input process was very impressive. Council staff are confident that the strengthened partnerships developed with local stakeholders will result in better stakeholder communication, continued use and refinement of the watershed plan, and beneficial outcomes for all parties.	Met Council	Thank you for your comment.
36	General	Minneapolis staff has appreciated the opportunity to participate in the MCWD Comprehensive Plan Technical Advisory Committee and are supportive of the direction that this plan has taken in emphasizing collaboration and partnership with local communities. Our review of the draft found it to be aligned with the cooperative approach MCWD has promoted through the development of the plan, a notable and positive shift in tone from the District's 2007 Comprehensive Plan. City staff is in strong agreement with the integration of land use planning, natural resources protection, and water management.	Minneapolis	Thank you for your support of the District's approach.
37	General	Flood control should be prioritized and discussed in greater detail within the plan. Flooding is a continuing hazard within the District and with the increased intensity and frequency of storm events projected in the future there is a greater need to understand the impacts that flooding has in the creek, lakes, and connected municipal infrastructure. Flooding is a costly and disruptive issue that has real negative water quality impacts that will continue to be a problem into the future. The District's roles and responsibilities on this issue should be identified clearly and in detail within the plan and the District's future Capital Improvement Plans should reflect the importance of this issue.	Minneapolis	See response to comment #23.

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38	General	The District should not focus on prioritizing implementation efforts based on potential land use development and redevelopment activity. The District's rules provide water quality benefits during the development process and development/redevelopment under those rules will occur with or without the District's participation. There are many parts of the district that are unlikely to ever redevelop that have identified flooding issues or have little to no existing water quality treatment before discharging to a receiving water. The District should recognize the value in and prioritize acting in areas where there would be no change without the District as a partner.	Minneapolis	<p>MCWD appreciates this comment and values the City of Minneapolis as a partner in planning and implementing programs to effectively manage water resources in ways that enhance social and economic value. Pursuant to a March 28, 2017 Memorandum of Understanding (MOU) between MCWD, the City, and the Minneapolis Park and Recreation Board (MPRB), these three agencies recognized "that their mutual goals are best achieved through integrated land and water resource planning" and memorialized their commitment to partnering to "integrate goals and plans for the natural and built environments".</p> <p>This MOU recognizes that changes in the landscape are not restricted solely to (re)development, but encompass transportation and infrastructure, parks, trails and open space, etc. Accordingly the MOU maps a workplan for the three partners with a goal of coordinating and aligning policies, plans and capital improvements that integrate natural resource goals across disciplines – finding the intersection between natural resource objectives and transportation and infrastructure, development and redevelopment, and parks, trails and open space.</p> <p>To facilitate the workflow identified in this MOU, which acknowledges the City's flood mitigation priorities, the District has retained a consultant team through a Request for Qualifications (RFQ) and work scoping process that the City participated in with the MPRB. Through this work, opportunities to improve the ecology of Minnehaha Creek and manage regional stormwater will be identified. The consultant team will work with the District, City, and MPRB to identify where these opportunities intersect with other planning efforts and programmed investments (e.g. regional park planning, trail improvements, flood mitigation planning). This work will be coordinated directly with the work the City is leading regarding priority flood mitigation area 29/30.</p>
39	General	The District needs to work with a professional web designer to make the Plan more user friendly as an electronic document. As it is formatted now it is very difficult to navigate. External links within the text should be formatted to open in a new window and not redirect from the Plan itself.	Minneapolis	It is important to the District that its stakeholders have a satisfactory user experience on the website. We are exploring options for an update of the District website in the future to improve functionality, including the display of lengthy documents like the Plan. In the meantime, we will improve navigation of the Plan and shorten load times by adding links to the Table of Contents and hosting the document on Google Drive.
40	General	There are several links within the plan to external documents and sites that are not functional that should be addressed.	Minneapolis	Thank you. This will be fixed.
41	General	The terms "shallow lake" and "deep lake" are used throughout the plan. Please provide the technical definition of these terms that you are using to apply to the lakes throughout the Plan.	Minneapolis	MCWD uses the technical definition set forth by the MPCA. See MPCA 2016 Guidance Manual for Assessing the Quality of Minnesota Surface Waters for Determination of Impairment, specifically page 55, Appendix D. (https://www.pca.state.mn.us/sites/default/files/wq-iw1-04i.pdf). The District will include the technical definition in the Plan.
42	General	Does the District have a comprehensive list of best management practices (BMPs) that the District manages and operates? Could this information be made available to cities?	Minneapolis	Yes, the District maintains an Operations and Maintenance Manual for all of its projects and land holdings. It can be made available upon request.
43	General	The City of Minneapolis supports the policy direction of the MCWD's Comprehensive Plan and look forward to putting this plan into action in the coming years.	Minneapolis	Thank you for your comment.
44	General	Regarding waste load allocations (WLA), a specific section of the plan should be dedicated to discuss how this occurs, and how credit is distributed for projects. From the most recent TAC meeting, the MPCA crediting system for WLA only extends to the city in which the improvement occurs. In the City's opinion, this has severe consequences for any city located outside of a significant water quality improvement installed by the watershed district; specifically, this creates issues in reporting progress on waterbodies that have goals established through a TMDL that are downstream of water quality improvements. From the discussion in the most recent TAC meeting, the District disagrees with the MPCA's position. The City supports comments or action from the District in an effort to change this policy established by the MPCA.	Minnetonka	<p>The District adopted and implements a policy (Resolution 13-062) that describes how credits for District water quality improvement projects will be allocated to local government units (LGUs) for the purpose of TMDL reporting. Under this policy, credit first is allocated to any partners in project funding and to meet any WLA assigned directly to the District. Remaining credit then is distributed to LGUs within the drainage area of the impaired water, in proportion to their TMDL-assigned WLAs. This policy was incorporated into both the Minnehaha Creek-Lake Hiawatha TMDL and the MCWD Upper Watershed TMDL. The District's adoption of this policy followed discussion with and support from MPCA staff.</p> <p>The District agrees that a policy of limiting credit to the LGU where a project is located would tend to constrain mutual support among LGUs for both District and LGU water quality programs that will benefit common receiving waters. The District will incorporate a more explicit reference to policy 13-062 in the Plan and will work with the MPCA to encourage a policy change at the state level to allow for consistency in credit distribution.</p>
45	General	The City agrees with and is supportive of the District's collaborative and partnership focused efforts of the current comprehensive plan, while moving away from the prescriptive nature of the previous comprehensive plan.	Minnetonka	Thank you for your support of the District's approach.
46	General	The City of Mound expresses support for the District's draft WMP and its approach of partnership and integrated planning, focused implementation, and responsiveness to opportunities. The City will work to coordinate its policies, plans, and investments with the District to maximize public benefit.	Mound	Thank you for your support of the District's approach and draft Plan.
47	General	The MPCA watershed program supports your overall approach of prioritizing certain watersheds for this plan cycle, being open to opportunities in other watersheds and working more collaboratively with local partners.	MPCA	Thank you for your support of the District's approach.

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48	General	<p>The primary area of the plan in which the MPCA watershed program would like to see improvement is goal setting and progress tracking. We particularly would like to see a more full and, where possible, more quantitative accounting of what you intend/hope to accomplish over this 10-year plan cycle relative to what is ultimately needed or desired. Specifically, for many waterbodies you have water quality or ecological goals. Some of these have TMDLs in which we have jointly invested much time and resources. In many cases these TMDLs (as well as your own studies) provide the overall load reduction needed (e.g., pounds of phosphorus) to reach water quality targets, which you generally have shown in the plan CIP tables. However, the outcomes listed in these tables lack specificity regarding how much of the total needed load reduction that you intend or are willing to address during the 10-year plan cycle. How much of the overall 400 pounds of phosphorus needed reduction, say, for such-and-such lake will/may be addressed in the next ten years? 100%? 25%? 2%? Without this information one cannot tell how effective the actions will be, how cost-effective the actions are or for how long it will take to reach the ultimate targets. While some waterbodies do not have specific load reductions established, there are other quantitative measures to use to gauge progress or to measure against: water quality concentration, E-Grade or other score, percentage of overall needed acres/stream miles restored, etc.</p>	MPCA	See responses to comments #5 and 6.
49	General	<p>The Minneapolis Park and Recreation Board (MPRB) has had the opportunity to partner with the Minnehaha Creek Watershed District (District) on a range of projects, and as a result is pleased to offer this letter of support for the District's update of its Ten-Year Comprehensive Water Resources Management Plan. The plan reflects positively on the MPRB's goals of perpetuating the ecologic and natural resources present within the Minneapolis park system, but also parallels our philosophy of collaboration with other agencies to achieve projects aligned with common goals, policies, and vision.</p> <p>The work accomplished by our agencies is noteworthy. More significant is the work anticipated in the coming years—creek restoration and master planning within the Minnehaha Parkway Regional Trail, conditions related to groundwater pumping at Hiawatha Golf Course, and realignment of Minnehaha Creek through Meadowbrook Golf Course. Each of these projects has been accomplished through the partnering philosophy demonstrated in the District's Comprehensive Plan update.</p> <p>The MPRB is pleased to offer this letter of support for the District's Comprehensive Plan. Many of our parks and trails focus on the city's lakes and streams and the experiences people have with them. We look forward to the important and ongoing work of enhancing these resources and shepherding improvements that perpetuate natural resources and great recreation experiences—in collaboration with the District.</p>	MPRB	Thank you for your support of the District's approach and draft Plan.
50	General	Plan has many references to shallow lakes, please clarify by adding a definition for what depth constitutes a shallow lake and regulatory implications.	MPRB	See response to comment #41.
51	General	Flood control should specifically be mentioned and District's roles and responsibilities should be identified clearly and in detail.	MPRB	See response to comment #23.
52	General	The MCWD may want to acknowledge in the plan that there are NRHP eligible or listed areas/properties in the watershed which require review by SHPO for state and federal funded projects and all USACE projects (which include all of the MPRB land in the Grand Rounds).	MPRB	The District is aware of this but does not feel it needs to be noted in the Plan.
53	General	The Balanced Urban Ecology approach leads me to recall "holistic" thinking of almost a decade ago, which had almost no impact on practices here. Implementation will need greater internal collaborations within LGUs than I see here, and much greater information exchange internally and with the District than exists now. Appendix A communications, when realized, will certainly result in better outcomes. Kudos to you all for undertaking that transformation.	Nancy Rose (Friends of Bass Lake)	Thank you for your comment.
54	General	The main table of contents includes a List of Studies at page 259; the Volume 3 Table of Contents has it at page 280, and that is where it is.	Nancy Rose (Friends of Bass Lake)	Thank you. This will be corrected.
55	General	Page numbers for the beginning of each volume could be handy for users, ie. Volume 1 - page 11, Volume 2 - 35, Volume 3 - 287.	Nancy Rose (Friends of Bass Lake)	This is provided in the table of contents.
56	General	Pursuant to MN Rule 8410 and MS 103B.231, the plan is quite thorough and compliant.	Pioneer-Sarah Creek WMC	Thank you for your comment.
57	General	This plan establishes a positive framework for improvements and partnerships for the next 10 years and there is strong potential this plan will result in resource improvements. I appreciate being a part of this process and wish to extend my gratitude for the significant effort implemented by the District with your leadership during development of this plan.	Plymouth	Thank you for your comment.

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#	Section	Comment	Commenter	Response
58	General	It's hard (not obvious how to use the map zoom feature) to navigate on maps (when zooming in for detail), e.g. Water Bodies by Type map.	Richard Nyquist (CAC Member)	The District will take this into consideration when deciding how to make the Plan available electronically.
59	General	St. Louis Park expresses support for the District's draft WMP and its approach of partnership and integrated planning, focused implementation, and responsiveness to opportunities. The City will continue coordination of its policies, plans, and investments with the District to maximize public benefit. The City will review each proposed capital improvement project within the city individually before committing funding.	St. Louis Park	Thank you for your support of the District's approach and draft Plan.
60	General	Volume 2 is intended to provide MCWD and partners with information needed to guide the implementation planning process (Section 3.4.1 page 297). Based on long term monitoring data, the MCWD can prioritize water quality issues based on the degree of water quality impairments (Section 3.4.3 page 301). The MCWD collects a lot of monitoring data that wasn't necessarily presented in portions of section 2 of the document. There could be more detail provided when data is available.	TRPD	Summary monitoring data are provided in the plan to provide background and context to the implementation plan. The District's annual hydrodata reports and other specialized reports are the media the District uses to provide more detail and interpretation.
61	General	The Park District appreciates and supports integrating water and land use planning as part of Balanced Urban Ecology program, emphasizing partnerships versus regulatory activities, and allowing flexibility for capital projects.	TRPD	Thank you for your support of the District's approach.
62	General	Area for improvement or additional clarification: Addressing the Advisory Committee or how this group assists in management decisions.	TRPD	There were three advisory committees involved in the development of this Plan. One is the Citizen Advisory Committee (CAC) which is an annually appointed group of citizen volunteers that meet monthly to provide advice and recommendations on watershed issues at the direction of the MCWD Board of Managers. The CAC is referenced on pages 313 and 345 of the Plan. The District also solicited volunteers to serve on a Technical Advisory Committee and Policy Advisory Committee to assist in the development of the Plan. More detail on all three of these committees and their role in Plan development is provided in Appendix B.
63	General	Area for improvement or additional clarification: Consistently and correcting referring to "Carver Park Reserve" (not Carver County Park Reserve or Carver Regional Park Reserve).	TRPD	Thank you. This will be corrected.
64	General	Area for improvement or additional clarification: Utilizing partnership agreements or similar instruments to specify partner organization/agency contributions to projects rather than Resolutions of Support.	TRPD	The District routinely uses partnership agreements and memorandums of understanding for this purpose.
65	General	The City of Victoria expresses support for the District's draft WMP and its approach of partnership and integrated planning, focused implementation, and responsiveness to opportunities. The City will work to coordinate its policies, plans, and investments with the District to maximize public benefit.	Victoria	Thank you for your support of the District's approach and draft Plan.
66	Acknowledgements	Since it's a draft, if they can correct Shawn's first name for the 6 mile advisory committee.	St. Bonifacius	Thank you. This will be corrected.
67	2	A summary of E-Grades would be helpful to know where improvement and protection is being sought for each subwatershed and would provide a starting point for assessment.	BWSR	Thank you for your feedback. The E-Grade Program is still under development, and the metrics have been selected and monitoring data obtained for the first three test subwatersheds. The District is still developing the scoring system and how that will be presented. Until that has been established and undergone technical review, the District is hesitant to present the collected data until it can be done within that context. When that is completed, the plan will be amended to incorporate the results, and will include a summary table as suggested.
68	2.1.2	The plan description of E-grade is elusive. Clarify how MCWD intends to keep the metric simple, transparent, objective, and relevant. Define what upland units will be graded. Define the monitoring frequency and parameters that are part of E-grade and which will be a separate effort – the current layout disperses E-grade parameters across many pages, mixed in with parameters for anchor sites or sites monitored by others.	Edina	Thank you for your feedback. The E-Grade program is still in development, including the Uplands portion. The District is working to develop an outreach plan to provide additional information and clarity to communities as the program is developed. The District will then work to develop clear and simple public reports for each subwatershed as the assessments are completed and will update the Plan with the information. Tables will be added to Volume 2 to provide clarity on the monitoring frequency and parameters that are part of E-grade.
69	2.1.2	Section 2.1.2: The City suggests that the District provides additional information regarding the E-Grade program and what the expectations will be for the Cities. How will the Cities need to be involved? What will happen when the focus groups are completed?	Excelsior, Minnetrista, and Shorewood	The E-Grade Program will not require any additional effort by the cities, rather, it is information that cities can use to better understand the ecological health of the resources in the community and how land use decisions affects that. The District will be using E-Grade as a tool to help focus its efforts on protecting and improving the overall ecological health of the watershed and as one of our tools to prioritize our resources.
70	2.1.2	Heading on Table 2.7 is split off from the rest of the table (pages 50-51).	Met Council	Thank you. This will be corrected.
71	2.1.2	Citizen monitoring programs are effective and efficient ways to gather surface water information. The Council commends the MCWD for previous participation in our Citizen Assisted Monitoring Program for lakes, and would encourage continued participation to increase MCWD lake coverage. Additionally, the University of Minnesota Extension has created a training program to educate citizens about AIS plant identification and reporting practices (https://www.maisrc.umn.edu/ais-detector). This may assist MCWD with the identified AIS priority issues and opportunities.	Met Council	Thank you for your feedback. There is value in the Council's Citizen Assisted Monitoring Program for lakes, and the District will continue to support others working with the Council's programs. However, through the District's recent strategic planning process, the monitoring priorities have shifted for the District. There will be no reduction in coverage on our major lakes, and the plan is to assess the smaller lakes through our E-Grade assessment program. MCWD currently has a volunteer monitoring program for AIS, and has prepared an AIS detectors' guide that has been made available for other agencies to publish, and portions of which have been used by the U of M Extension's new AIS volunteer program.

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#	Section	Comment	Commenter	Response
72	2.1.2	Table references in the text of section 2.1.2 are not correct.	Met Council, MPRB, TRPD	Thank you. This will be corrected.
73	2.1.2	Page 48/49, Table 2.5: Windsor Lake is not located within the Lake Minnetonka Subwatershed; it is located within the Minnehaha Creek Subwatershed.	Minneapolis	Thank you. This will be corrected.
74	2.1.2	Page 48/49, Table 2.5: Diamond Lake and Grass Lake are both classified as wetlands.	Minneapolis/MPRB	Thank you for your comment. The table will be corrected to list both Diamond and Grass Lake as wetlands.
75	2.1.2	Table 2.5. Please review which lakes are designated shallow and which are not. Powderhorn Lake is shallow. It is unclear what purpose the shallow designation has without explanation in the text.	MPRB	Thank you for your comment. The table will be corrected to list Powderhorn as a shallow lake. Lakes are designated shallow or deep because shallow lakes function differently than deep lakes. The MPCA recognizing this difference and assigns different eutrophication standards to deep and shallow lakes. Also, with the District's E-Grade program, different metrics are used to assess shallow and deep lakes.
76	2.1.2	Consider mentioning existence of historic WOMP data for creek if a goal is cataloging all existing data on the creek. MPRB also periodically runs a station at Xerxes Ave.	MPRB	Thank you for your comment. Reference to the WOMP data will be added to the Minnehaha Creek subwatershed section.
77	2.1.2	If volunteer monitoring is mentioned, the long-term MPRB level monitoring program should be noted.	MPRB	Thank you for your comment. Reference to the MPRB level monitoring program will be added to the Minnehaha Creek subwatershed section.
78	2.1.2	If volunteer AIS monitoring is documented, should also mention TRPD and MPRB monitoring of AIS and early detection monitoring.	MPRB	Thank you for your comment. Reference to these monitoring programs will be added.
79	2.1.2	Please add mention of long-term MPRB piezometric well monitoring.	MPRB	Thank you for your comment. Reference to MPRB piezometric well monitoring will be added to the Minnehaha Creek subwatershed section.
80	2.1.2	Section 2.1 In the section of Monitoring Locations, Frequency, and Parameters on pages 47-53. The frequency of monitoring for the different programs doesn't seem to be included for several of the sections. For example, Lake Vegetation Community Surveys – how frequent are the surveys completed – Spring, Summer, and/or Fall? Just one survey per year?	TRPD	Thank you for your comment. The section will be revised to include the monitoring frequency of the different monitoring programs.
81	2.1.2	Section 2.1 Monitoring Locations, Frequency, and Parameters – Streams within MCWD Monitored by other Agencies – page 51 – The City of Plymouth plans to monitor the Gleason Lake Inlet stream station in collaboration with Three Rivers Park District from 2017-2019.	TRPD	The section will be revised to note TRPD's involvement.
82	2.1.2	Section 2.1 Monitoring Locations, Frequency, and Parameters – Groundwater monitoring – Three Rivers Park District is working with MNDNR on installing ground water monitoring wells at Carver Park Reserve. Also – there is no mention on how frequent ground water monitoring will occur.	TRPD	The section will be revised to note the planned addition of monitoring wells at Carver Park Reserve. Since the monitoring is conducted by the DNR, interested parties should contact the DNR for information on monitoring frequency.
83	2.1.2	Section 2.1 Page 52 – Groundwater Monitoring - TRPD is working with the MDNR to install a groundwater monitoring well nest at Carver Park Reserve.	TRPD	See response to comment #83.
84	2.1.2	Section 2.1 Monitoring Locations, Frequency, and Parameters – Wetland Vegetation Community Surveys and Soils Analysis – page 53 – The section should indicate whether these surveys are for emergent or submergent vegetation or both.	TRPD	The section will be revised to note that the wetland surveys are for both emergent and submergent vegetation.
85	2.1.3	Section 2.1.3: Is the District considering an update to the Functional Assessment of Wetlands since the last updated was completed in 2003?	Excelsior, Minnetrista, and Shorewood	A comprehensive update to the FAW is not planned at this time. The E-Grade assessment supplements the FAW with a Rapid Floristic Quality Assessment (RFQA), a tool developed by the MPCA to provide a detailed assessment of the variability and quality of vegetation in wetlands. It is focused on evaluating ecological conditions and biologic integrity. Because it is data collection-intensive, it is not practical to re-evaluate the 3,200+ wetlands in the District.
86	2.2	Section 2.2 Watershed Overview – There is reference to a hydrologic and legal boundary throughout the document – The document should elaborate or explain the difference between the hydrologic and legal boundary, and when these different boundaries become relevant for specific activities, monitoring, or management of resources.	TRPD	Thank you. This will be clarified in the Plan.
87	2.2.4	For page 60 of the plan, consider adding links to DNR webpages to provide additional information on the state Public Waters and Floodplain programs. The links to these webpages are: http://www.dnr.state.mn.us/waters/watermgmt_section/pwi/maps.html and http://www.dnr.state.mn.us/waters/watermgmt_section/floodplain/index.html	DNR	Thank you. These links will be added.
88	2.2.4	Page 58, Ditches: Provide more specific information on how the ditches that the MCWD is responsible for will be managed, operated, and maintained.	Minneapolis	The District's intended management of its eight public drainage systems is described in subsection 3.5.7, "Project Maintenance and Land Management." In all cases, the District will fulfill its obligation under the drainage code, Minnesota Statutes chapter 103E, to inspect its systems periodically and to maintain those systems pursuant to the procedures and standards of the code. As to those systems that serve as, or have been replaced by, urban stormwater conveyances, the District will retain the prerogative to consider system abandonment as the code provides or, in consultation with the affected municipality, transfer the system to the municipality for formal incorporation into its municipal stormwater system.

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#	Section	Comment	Commenter	Response
89	2.2.4	Ditch locations should be clarified particularly Ditch 14 and ditch 17 and "other ditch" leaving Lake Harriet since they end far from receiving waters.	MPRB	All the ditch locations except JD #2 were digitized from as-builts obtained from Hennepin County. Those are the only records the District has, and they constitute the legal location of the ditches. Ditches 14 and 17 appear to have been constructed around 1908, and there has been considerable land alteration since that time. Both are mostly converted to storm sewer. The District has a ditch inventory report that can be provided upon request. The "other ditches" shown on Figure 2.5 are not public ditches as defined under Minnesota Statutes chapter 103E and will be removed from this map for clarity.
90	2.2.4	Consider adding a map with all public ditches with authority clarified for each.	MPRB	Figure 2.5 shows all the county ditches within the MCWD, and as stated on page 59, the District is the Ditch Authority for all of them. The "other ditches" shown on Figure 2.5 are not public ditches as defined under Minnesota Statutes chapter 103E and will be removed from this map for clarity.
91	2.2.4	Ditch is a legal term, should be defined in the text where it is used as such, and should be in glossary.	MPRB	Subsection contains a definition of "ditch" as follows: "The term 'ditch' as used here generally refers to a public drainage system established under Minnesota Statutes Chapter 103E." Subsection 3.5.7 contains a similar statement. However, this definition appears at the end of subsection 2.2.4. The District will make the text more prominent and expand on it slightly.
92	2.2.4	Document would be clearer with another paragraph on legal status of different types of ditches and ditch authority added.	MPRB	The text at subsection 3.5.7 does provide a further description of the District's eight public drainage systems and differentiates between altered natural watercourses in the less developed western part of the watershed and public ditches in the fully developed urban area that have been replaced by storm sewers or a combination of storm sewers and open channel. These drainage systems all have the same status under the drainage code, Minnesota Statutes Chapter 103E, though the code contains criteria and procedures by which the status of a system may be altered by abandonment or transfer. The District will expand the discussion at subsection 2.2.4 to provide greater clarity.
93	2.2.4	Please add a reference to the 1987 Manual since this is the basis used for WCA regulation and 404 regulations. Cowardin classification is a landscape type; the 1987 ACOE Manual defines what a wetland is legally.	MPRB	Reference to the 1987 ACOE Manual will be added to this section.
94	2.2.4	Section 2.2.4 Water Resources – Wetlands – page 59 - The MNDNR has completed updating the National Wetland Inventory in 2013. This should be updated in the document.	TRPD	The section states that the DNR has updated Hennepin and Carver county NWI using 2010 and 2011 imagery. The sentence will be revised to indicate that the statewide update is complete.
95	2.2.4	Section 2.2.4 Water Resources – Public Waters – page 60 - This section should define public waters for unincorporated (>10 acres) and incorporated (>2.5 acres) areas.	TRPD	A definition will be added to this section.
96	2.3	Trends are provided within each subwatershed, but it is unclear which parameters the trend is measuring.	BWSR	See response to comment #97.
97	2.3	The Water Quality section of each subwatershed inventory contain tables with a heading of "Trend." It is unclear to Council staff as to what type of trend or statistical analysis was completed. Further explanation of this information would increase the reader's understanding.	Met Council	Thank you for your comment. These sections will be revised to more clearly indicate the parameters the trends are measuring and the type of statistical analysis completed.
98	2.3	The amount of information in the subwatershed inventories is impressive, and staff see the value of dividing the watershed inventory into subunits. However, staff would encourage the creation of a summary table of the E-grade information within each subwatershed section and an overall E-grade summary table for the entire watershed. Staff acknowledge that much of the data is not yet available, but still think there would be value in this effort.	Met Council	See response to comment #67.
99	2.3.3	The secchi value for Gleason Lake in Table 2.30 has multiple decimals.	Met Council	Thank you. This will be corrected.
100	2.3.3	Page 103: paragraphs 2 and 5 are almost the exact same text.	Plymouth	Thank you. The text will be revised to remove redundant statements.
101	2.3.3	Page 103: last paragraph "not" should be changed to "no."	Plymouth	Thank you. This will be corrected.
102	2.3.3	Page 113: the City has a fish survey posted on the City website dated October 2011 for Gleason Lake if interested.	Plymouth	Thank you for making us aware of this data. Reference to the survey will be added to this section.
103	2.3.4	Section 2.3.4 Lake Minnetonka Subwatershed – page 120 – include years for infestation of Eurasian watermilfoil (1987?) and zebra mussels (?).	TRPD	Thank you for your comment. Years of infestation will be noted.
104	2.3.4	Section 2.3.4 Lake Minnetonka Subwatershed – Water Quality – Lakes – page 128 – Isn't Forest Lake considered a bay of Lake Minnetonka due to channel connectivity? Is this because it was a separate lake at one time and then connected to Lake Minnetonka at a later time.	TRPD	Forest Lake is considered by the MPCA to be a separate basin for assessment purposes, just like the big bays.
105	2.3.4	Section 2.3.4 Lake Minnetonka Subwatershed – Water Quality – Streams – page 130 – There is reference to table 2.44 in the second paragraph that appears incorrect – it should be Table 2.38.	TRPD	Thank you. This will be corrected.
106	2.3.4	Section 2.3.4 Lake Minnetonka Subwatershed – Water Quality – Groundwater – page 133 – Since this subwatershed has ground water sensitive areas, is there any ground water monitoring wells located in the subwatershed and does MCWD plan on having ground water monitoring wells installed?	TRPD	Many of the subwatersheds have groundwater-sensitive areas. The District does not undertake groundwater elevation or water quality monitoring, but refers to data taken by the DNR and other agencies. There are three DNR wells in the Lake Minnetonka subwatershed, three in Minnehaha Creek, and one in the Six Mile Marsh subwatershed. The MCWD does not plan to install or monitor any additional wells at this time.
107	2.3.4	Section 2.3.4 Lake Minnetonka Subwatershed – Water Quantity – page 138 – Is there a section that pertains to Water Quantity. Only one paragraph in the document was found regarding water quality.	TRPD	Thank you for your comment. The District will consider making the Water Quantity sections more robust.
108	2.3.4	Section 2.3.4 Lake Minnetonka Subwatershed – Ecological Integrity – page 138 – Provide an estimated timeline as to when the ecological integrity will be evaluated.	TRPD	The schedule for E-Grade monitoring and reports is included on page 47.

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#	Section	Comment	Commenter	Response
109	2.3.4	Section 2.3.4 Lake Minnetonka Subwatershed – Recreation – page 143 – Expand on what the two Three Rivers Park District Regional Parks in the subwatershed has to offer (i.e. boat accesses, swimming ponds, trails, etc.).	TRPD	This section is intended to provide a brief overview of parks, trails, and other recreational features within the subwatershed. Interested readers can go to the TRPD website for more information on specific park amenities.
110	2.3.6	Table 2.57 has “Imp SD” in the Trend column. SD is not defined.	Met Council	Thank you. This will be corrected.
111	2.3.8	Figures 2.73, 2.74, 2.75, and 2.77 show Diamond Lake and Pearl Park as lakes. Pearl is a park and Diamond is some type of wetland; I would say a Type 5 with open water.	Dave Oltmans (CAC Member)	Thank you. The figures will be revised.
112	2.3.8	Pg 221 under Habitat Diversity it states that there is no data on macro invertebrates. Diamond Lake has been monitored for macro invertebrates by the WHEP program for at least five years.	Dave Oltmans (CAC Member)	Thank you for your comment. Reference to the WHEP data will be added.
113	2.3.8	Page 211 groundwater section erroneously uses the term ‘sensitivity’ instead of ‘supply’ to describe Drinking Water Supply Management Areas (DWSMAs). This typo and the entire paragraph require modification to be contextually correct. Additionally, wellhead protection areas (WHPAs) are those surface and subsurface areas surrounding a public water supply well or well field that supplies a public water system. The paragraph seems to incorrectly imply that WHPAs are only initiated in moderate to high vulnerability areas. As is, the section implies a different intention and application of the data and should be corrected. Similar text is also in the subwatershed section on page 452.	Edina	Thank you for your comment. The section should use the term "Supply" instead of "Sensitivity" and will be revised. Areas within the DWSMA are rated as to their sensitivity, and that is what is being referred to. All areas within a DWSMA should be treated with caution, but those parts that are of higher sensitivity would be especially vulnerable.
114	2.3.8	Page 219, Figure 2.75: The legend is incomplete.	Minneapolis, MPRB	Thank you. This will be corrected.
115	2.3.8	Windsor Lake is currently not included in the Subwatershed Inventory for the Minnehaha Creek Subwatershed. The city conducts routine water quality sampling on this lake, however, does not have the capacity to conduct E-grade level assessments. Please add Windsor Lake to the Minnehaha Creek Subwatershed lake assessments.	Minnetonka	Thank you for your comment. Windsor Lake will be added to this section. The District will consider adding Windsor Lake to the list for E-Grade assessment. Generally, if a waterbody is being used for stormwater treatment, it will not get an E-Grade assessment.
116	2.3.8	Powderhorn is only occasionally pumped to the Mississippi. (also page 450)	MPRB	The purpose of this statement is simply to clarify that it does not drain to Minnehaha Creek.
117	2.3.8	Clarify classification of Diamond Lake, as its status changed during the 9-lakes TMDL evaluation. Grass Lake (now classified as a wetland) may also be needed on this table. Also, should Diamond be removed? Clarification is needed.	MPRB	Diamond Lake and Grass Lake are both classified as wetlands. This will be clarified in the text, maps, and tables.
118	2.3.8	Clarify impairment status language. Chloride impairment is not dependent on lake status.	MPRB	Thank you for your comment. This section will be revised to improve clarity.
119	2.3.8	Add clarification that Diamond Lake is considered a wetland, as this waterbody may need re-evaluation of phosphorus goals.	MPRB	See response to comment #117.
120	2.3.8	Table 2.64 - Please clarify by adding which months are included in Summer averages.	MPRB	MCWD uses the definition of summer months set forth by the MPCA (June-September). This will be noted in the Plan.
121	2.3.8	Table 2.64 - Please clarify by noting how the trends determined, and their significance level. It appears that some trends noted contradict most recent MCWD trend analysis, please confirm with WQ staff.	MPRB	Thank you for your comment. More information will be added on how trends were determined.
122	2.3.8	Paragraph 4. Clarify reference to 30 mg/L as a standard and the reference to Table 2.65. It is unclear as to what standard 30mg/L is referring to and what parameter is meeting this standard. There is a lot of information in this paragraph; more detail could be added for clarity.	MPRB	Thank you for your comment. The reference to 30 mg/L is the TSS standard for rivers in central ecoregion. The paragraph will be revised to improve clarity.
123	2.3.8	Clarify if lake monitoring locations are intended to indicate actual locations, as actual locations are not consistently noted. Add a monitoring location symbol to Powderhorn, since it is also monitored.	MPRB	The monitoring locations shown on the map are approximate. A monitoring location will be added for Powderhorn.
124	2.3.8	Clarify wetlands from lakes, Diamond Lake (wetland) and Pearl Park wetland don't look any different from lakes. Grass Lake (wetland) is not shown on the map.	MPRB	Thank you. The figures will be revised.
125	2.3.8	The aquatic vegetation FQI for Nokomis is stated to be both poor and degraded. Please correct. Depending on definitions and cutoffs of the scoring system, or years evaluated, MPRB may disagree with the assessment of Lakes Harriet and Hiawatha.	MPRB	The aquatic vegetation FQI score is degraded. Thank you for catching this error. The FQI scores for Lake Hiawatha and Lake Harriet were computed from the 2015 surveys. The definition of the vegetation FQI and the scoring breakdown can be found in the E-Grade Lakes Technical Report which is available upon request.
126	2.3.8	Recreation and other features map. Water access at Nokomis, Calhoun, and Harriet is missing. Harriet SE beach is missing and Harriet North Beach is placed incorrectly. Calhoun Thomas Beach is missing, and a misplaced beach symbol is placed at the boat Access. Cedar South and East Beaches are missing. Canoe access points also exist at Brownie, Cedar, Calhoun, Isles, Harriet, and Nokomis Lakes.	MPRB	Water access locations are a combination of data sources. Minneapolis fishing pier and beach data are from MPRB from the 2007 plan. Other data was compiled from Hennepin and Carver Counties, TRPD, the DNR, and city official beach data. If MPRB has an updated shapefile they would like to provide, the District can update that figure.
127	2.3.8	Grass Lake and Diamond Lake status should be defined clearly. Status of both waterbodies has changed within the last 10 year period.	MPRB	See response to comment #117.
128	2.3.8	Grass Lake is shown on one map but not the other, Diamond Lake is noted as a lake rather than a wetland on 2.71. Since both lakes have changed status due to better information, the plan should be clear on current definitions of these waterbodies.	MPRB	Thank you. The figures will be revised.
129	2.3.9	Footnote in text on page 234.	Met Council	Thank you. This will be removed.

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#	Section	Comment	Commenter	Response
130	2.3.9	Section 2.3.9 Painter Creek Subwatershed – Water Quality – Lakes – page 232 – The state standards are mentioned for the water quality parameters for various sections throughout the document. Maybe provide a separate section that identifies the water quality standards for lakes and streams so the state standards don't have to be mentioned or repeated every section. There is a lot of redundancy on identifying the state standards throughout the document.	TRPD	Thank you for the suggestion. While it does result in some redundancy, the intent is for readers to be able to go to a specific subwatershed of interest and get the information they need without having to refer to a separate section.
131	2.3.9	Section 2.3.9 Painter Creek Subwatershed – Ecological Integrity – There are major portions of the document that currently do not have data and have become redundant in defining biodiversity, habitat diversity connectivity, and water quality. The document also doesn't elaborate in some of the sections when there is available data. Example - Streams – Hydrology Indicators - page 238 – There is continuous stream flow data available that could be provided to identify trends with charts and graphs on this section. This is an opportunity to provide more information when data is available, and would be applicable for other sections of the document.	TRPD	The eleven subwatersheds were defined by hydrology - land area that drained to a particular resource of pour point - but many are quite similar in terms of land cover, topography, development, etc. and thus the general issues and conditions are quite similar. One of the reasons the District has undertaken E-Grade is to better understand conditions, collecting more data than we had in the past and viewing it through a different lens. As we work through all the subwatersheds, the unique issues and opportunities in each will be more apparent. Where available summary monitoring data are provided in the plan to provide background and context to the implementation plan. The annual hydrodata report and other specialized reports are the media the District uses to provide more detail and interpretation.
132	2.3.10	Section 2.3.10 Schutz Lake Subwatershed – Water Quality – Lakes – page 248 – Show historic annual data (i.e. histogram) for TP, Chl-a, and Secchi relative to the state standard. There are several lakes in the document that are close to the state standard. It would be interesting to see how frequently or what years that some of these lakes exceed or are below the state standard. It is also useful in identifying potential trends in water quality data. This comment applies to other portions of the document where data is available.	TRPD	Please refer to the District's annual hydrodata reports for this information. They are available on the District website at: http://www.minnehahacreek.org/data-center .
133	2.3.11	Page 274 Reference to Six Mile Creek Subwatershed E - Grade reports in 2018. Will this comprehensive plan be completed before or after the report is available?	TRPD	The Plan will be adopted before the E-Grade report is completed. Volume 2 of the Plan will be updated periodically throughout the Plan cycle to incorporate new data.
134	3	How will the District determine if it has been successful working within a focal geography and what factors will be used to determine any subsequent areas?	BWSR	The goal with the District's focused implementation approach is to achieve significant measurable benefit in areas of high need. As noted in response to comment #6, estimating specific targets for what will be achieved across the subwatershed over a 10-year period is challenging. However, the District will add phosphorus load reduction estimates for the specific capital projects that are currently identified within its focal geographies. These estimates will continue to be refined as projects move into feasibility and design. The factors used to determine priority areas are outlined in section 3.4.3.
135	3	Upland Implementation Options – Implementation options and priorities for upland areas of subwatersheds are somewhat vague. We commend the level of detail in implementation plans, and encourage MCWD to put a similar level of effort into understanding the issues, drivers, and strategies required in upland areas as planning resources allow.	Hennepin County	The Plan is designed to allow the District to remain flexible to respond to opportunities that align with the goals and priorities established in the Plan. More detailed assessment of BMP locations, types, and cost-benefit will be done as part of project feasibility within focal geographies and elsewhere as opportunities are identified.
136	3	Map legends in Volume 3 have many watershed boundaries listed as Painter Creek when they are not Painter Creek Watershed.	Met Council	Thank you. This will be corrected.
137	3	In the implementation plan under many waterbodies altered wetlands are listed as having been converted from a nutrient sink to a source of nutrient impairments. This is due to the ditching and drainage of wetlands with the soil being degraded and conveyed via stormwater. We are not aware of any study that has concluded this. Please list source of information in the plan.	MnDOT	It is well established in the scientific literature that wetland hydrology is an important factor in a wetland's ability to improve water quality by acting as a sink (Carter 1997). More recently, wetland research has recognized that hydrologically altered wetlands can act as transformers or sources of nutrients (Aldous et al. 2005; Bruland et al. 2003; Fisher and Acreman 2004; Gabriel et al. 2008), particularly phosphorus. Further our experience in Six Mile Marsh demonstrated that wetlands can act as transformers, settling particulate P and releasing dissolved P (Wenck 2017). These references will be added to the plan.
138	3	For internal loads along with channel and wetland sources, you have identified the reductions and implementation techniques for load decreases quite well. However, for load reductions from the upland areas of the watersheds, your plan generalizes the issues and opportunities available to you. Specific management techniques and implementation strategies appear to be quite limited in the upland areas. Since these areas constitute the majority of pollutant loads in many of your subwatersheds, the focus should be concentrated on the land use in those areas and the retrofit opportunities that exist within them. Opportunities in the watershed uplands can only be identified and prioritized if an assessment of these area are developed and analyzed on a cost/benefit basis for load reduction. Toward that end, we would recommend the District utilize some of their resources to pursue subwatershed retrofit assessments to clarify and specify opportunities for best management practices in their storm water management plan.	Pioneer-Sarah Creek WMC	See response to comment #135.

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#	Section	Comment	Commenter	Response
139	3	<p>There is no mention of the MCWD’s rules and regulations. The document should point out that these rules and regulations are an important component to ensure the protection of the various water resources within the watershed.</p> <p>The TMDL documents provide guidance for the development of management and implementation of projects to improve water quality for those resources that are impaired. The Implementation Volume 3 document does a good job of pointing this out. However, the document could do a better job with providing direction and guidance on how to protect the lakes that are currently meeting state standards. The document mentions that there are several lakes in the watershed that are on the “tipping point” of becoming impaired. These lakes will need to be protected to ensure that they don’t become impaired. This is where implementing the MCWD’s rules and regulations has importance to ensure any potential degradation to these lakes. WRAPS documents prepared as part of the TMDL process should also mentioned to provide further protection to those lakes that are currently meeting standards.</p>	TRPD	<p>Thank you for your comment. The District's permitting program is described in Section 3.5.3 and is a critical piece of the District overall strategy. Several of the subwatershed plans include "Watershed Protection" as a priority management strategy and describe the need to minimize impacts from development. No WRAPS documents have been completed for lakes in the MCWD to date.</p>
140	3	<p>There is no or very little mention of the impacts of aquatic invasive species (with the exception of carp) on the ecological integrity for each subwatershed. The presence of aquatic invasive species can have detrimental impacts on the ecological integrity of an aquatic ecosystem. There is no mention of the extensive monitoring and research efforts that the MCWD expends to assist with the potential future management of aquatic invasive species.</p> <p>In particular, curlyleaf pondweed has the potential of impacting the ecological integrity of the aquatic ecosystem, but has also been documented as having water quality impacts. However, CLP is not even mentioned as a potential driver impacting water quality. There has been past management efforts to control curlyleaf pondweed on Gleason Lake, and there were also water quality improvements that corresponded with the control of curlyleaf pondweed. The majority of the curlyleaf pondweed treatments in the state have not resulted in the delisting of a particular impaired water resource. However, the implementation of an individual management strategy (with the exception of alum treatments) listed in the document won’t reduce loading enough to delist an impaired water resource either. It is the collective use of all of the management strategies available that eventually will lead to the delisting of an impaired lake. The control of curlyleaf pondweed has been identified as management strategy in other TMDL documents – especially for shallow lakes. It should be mentioned for some of the lakes that curlyleaf pondweed is a driver impacting water quality and the control of curlyleaf pondweed could be a potential management strategy to improve water quality as well as ecological integrity.</p>	TRPD	<p>Thank you for your comment. The drivers listed in the Plan are those that the MCWD identifies as the major drivers in each system that may require management action. Curlyleaf Pondweed is present in many waterbodies, and is certainly providing some impact to ecological integrity in some waterbodies. However, the District does not believe it is a major driver on a systems level, but maybe something that is addressed as a specific driver for specific waterbodies in a system as diagnostic assessments are performed. The District will consider adding more detail about AIS impacts specific to each subwatershed throughout the Plan.</p> <p>Please note: The monitoring and research efforts of MCWD are identified in the "AIS Early Detection Surveys" section on page 53 and capture the anticipated extent of future management of AIS. Curly-leaf pondweed in Gleason Lake is noted on page 376 as "present and has been managed in the past." References to the Gleason Lake Curly-Leaf Pondweed Study are shown on pages 55 and 281.</p>
141	3	<p>It should be pointed out that shallow lakes within the watershed should be managed towards a plant dominated system in order to improve water quality conditions.</p>	TRPD	<p>We agree that shallow lakes should be managed for the clear water, plant dominated state. However, this level of detail for lake goals is more appropriate in individual lake management plans.</p>
142	3.3	<p>Page 296, District Goals: Is this bulleted list of goals in a hierarchy or is there an equal emphasis between the goals. If there is a preference, it should be clarified how this preference was determined.</p>	Minneapolis	<p>No, the list of goals is not intended to be hierarchical.</p>
143	3.3	<p>Is the bulleted list of District Goals ordered hierarchically? Is emphasis equal between these goals? Any weighting of goals could be explained for clarity of decision-making.</p>	MPRB	<p>No, the list of goals is not intended to be hierarchical.</p>
144	3.4.1	<p>MPRB is in strong agreement with integration of land use planning, natural resources protection, and water management.</p>	MPRB	<p>Thank you for your comment.</p>
145	3.4.1	<p>MPRB is in strong agreement with acknowledgement of water quantity issues including flooding as well as water scarcity.</p>	MPRB	<p>Thank you for your comment.</p>
146	3.4.1	<p>MPRB is in strong agreement with the acknowledgement that finding balance between the built and natural environmental is vital to preserving and enhancing existing natural areas.</p>	MPRB	<p>Thank you for your comment.</p>
147	3.4.2	<p>Section 3.4.2: The District lists annual meetings with cities as a mechanism to incorporating land use changes. Is this meeting going to be a mandatory?</p>	Excelsior, Minnetrista, and Shorewood	<p>The meeting is not mandatory but is encouraged as part of the overall coordination plan between the City and District.</p>
148	3.4.3	<p>Section 3.4.3: The City suggests that the District consider adding CIP items from local plans into the Watershed Management Plan CIP to better align coordination efforts.</p>	Excelsior, Minnetrista, and Shorewood	<p>The District will look for cities to involve the District in project development before it would consider incorporating any specific city or partnered project in its CIP. The District has included opportunity-driven stormwater management projects for each subwatershed in its CIP under which the District could undertake projects in partnership with a city. The District can also provide support for partner projects through its grant program or by providing technical assistance or other support. In general, the water planning rules (Minn. Rules 8410) intend that the District and its LGUs each maintain an implementation program and CIP table in their respective water plans (see Minn. Rules 8410.0160, subpart 3.E(5) and (6) for local plans). The District believes that the coordination of District and LGU planning and implementation that is the foundation of this WMP will serve the purpose of maintaining alignment and is more sensible than a District attempt to update and maintain an implementation program or CIP table that incorporates the current capital program of the District’s 29 cities and townships.</p>

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149	3.4.4	MPRB looks forward to working with MCWD and other project partners to restore damage from the 2014 flood along the creek as well as work together on the Minnehaha Creek Subwatershed focus area.	MPRB	Thank you for your comment.
150	3.4.7	Figure 3.47: This section mentions five water resource management units within Six Mile Watershed, however, this figure only labels four of them. The City requests that this is updated to include all five unit.	Minnetrista	Thank you. The figure will be revised.
151	3.5.2	MPRB appreciates the MCWD monitoring program and the history of collaboration between our organizations. In particular, it has been helpful to MPRB to draw on the expertise of MCWD staff on AIS early detection monitoring, AIS research, and common carp research.	MPRB	Thank you for your comment.
152	3.5.4	The Education and Communications program purpose describes a desire to engage citizens in clean water practices through the Master Water Stewards (MWS) program. As the MCWD continues to train cohorts of MWS, the district should consider how to engage this group after commencement. The City recognizes the value of fostering master water stewards – engaging the public on water resources issues is an important part of building a culture of clean water and resilient communities. The City encourages MCWD to thoughtfully consider the lifecycle of a MWS participant beyond training and work in partnership with cities and the Freshwater Society to make the program meaningful and sustainable.	Edina	The MCWD is making continuous improvements to the Master Water Stewards program to ensure its long-term success. These improvements include providing Stewards with continuing education and training opportunities, offering new activities for them to hone and expand their skills, maintaining regular communication, keeping them connected through recognition and networking events, pursuing a stronger relationship between Stewards with lake/neighborhood associations, and improving the overall management of the program to incentivize and facilitate Stewards' community service work across the watershed.
153	3.5.5	On page 315, the Plan notes that some large scale improvements are not considered a "physical improvement with an extended life" and therefore are not in the Capital Improvement Program. We would recommend coordination with BWSR to ensure that newly identified projects do not require an amendment to this Plan.	BWSR	When the characterization of an improvement as a capital project or a program activity is uncertain, the District will coordinate with BWSR to confirm the proper classification of the improvement and the need for a plan amendment.
154	3.5.5	Section 3.5.5: The City would like the District to consider including environmental projects in the CIP. These environmental projects such as wetland restorations and rough fish management are still opportunities to partner with Cities and promote the District's goals of water quality and volume reduction.	Excelsior, Minnetrista, and Shorewood	The purpose of this language (first bullet on page 315) is to clarify which activities are statutorily defined as "capital projects." By both statute and District policy, activities that meet this statutory definition are subject to a specific set of procedural requirements and Board findings before the District may spend levied tax funds for project design and construction. The District will still undertake activities such as vegetation restoration and carp management. Within priority subwatersheds, these activities will arise from coordinated planning and identified within an implementation program in the same manner as capital projects. Otherwise, they may arise pursuant to coordination with cities and other stakeholders on an opportunity basis. But they are considered as program activities rather than "capital projects" and are not subject to the procedural requirements outlined in subsection 3.5.5.
155	3.5.5	MPRB appreciates the MCWD's approach to maintenance of capital projects and MCWD's role as a mediator where projects are complex and cross jurisdictions.	MPRB	Thank you for your comment.
156	3.5.8	The District's cost share structure will have a different approach in this plan versus the Third Generation Plan. The District should identify guidelines for Cities to keep citizens engaged such as clustered homeowner projects or focused efforts on large non-profit lands with impervious cover.	BWSR	See response to comment #157.
157	3.5.8	The Incentive Programs appears to be moving away from homeowner grants in favor of projects that apply dollars more efficiently to accomplish clean water and resiliency goals. Clarify how technical assistance to homeowners would change under this program shift.	Edina	<p>Following a strategic review of its programs, the District determined that the most effective uses of its grant program are to fund projects that achieve significant water quality benefit (Opportunity Grants) and projects that improve water quality while educating large numbers of people (Stewardship Grants). Grants for individual homeowners can be more efficiently administered at a city scale, and the District can help support communities that are interested in developing such a program.</p> <p>The District provides several other resources to homeowners, local business owners and others who are interested in building stormwater best management practices (BMPs) on their property. The District hosts workshops throughout the year on topics including rain garden construction and maintenance, rain barrels, lawn care and proper salt use in the winter months. It also hosts tours and presentations on shoreline gardens and has supported the publication of a guide to help homeowners design and build vegetated shorelines. The District provides educational resources on its website, including those offered by a statewide consortium of water resource organizations called Blue Thumb.</p> <p>The District is funding the creation of a program to train Master Water Stewards and other interested citizens on how to maintain stormwater best management practices. These people will help homeowners understand how to keep their raingardens and other BMP's functioning effectively at little or no cost to the homeowner. The District is also continuing to fund Master Water Stewards' capstone projects, including rain gardens, permeable paver landscaping, shoreline gardens and other BMP's. Residents who enroll in the Master Water Stewards program will receive District-funded training in clean water practices.</p>
158	3.5.8	The City sees value in the outreach programs aimed at engaging homeowners and local business owners through cost-share grants. The City would like to see this funding program re-established with the upcoming plan.	Minnetonka	See response to comment #157.

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159	3.5.8	MPRB recognizes the value of partnership projects and early public agency coordination on projects; however, the MCWD has the opportunity to greatly add value when a project occurs which would not have happened without MCWD action. A strategy for seeking out projects that would not happen without MCWD support would strengthen the plan further.	MPRB	<p>MCWD appreciates this comment and values the Minneapolis Park and Recreation Board (MPRB) as a partner in planning and implementing programs to effectively manage water resources in ways that enhance social and economic value. Pursuant to a March 28, 2017 Memorandum of Understanding (MOU) between MCWD, the City of Minneapolis, and the MPRB, these three agencies recognized “that their mutual goals are best achieved through integrated land and water resource planning” and memorialized their commitment to partnering to “integrate goals and plans for the natural and built environments”.</p> <p>This MOU recognizes that changes in the landscape are not restricted solely to (re)development, but encompass transportation and infrastructure, parks, trails and open space, etc. Accordingly, the MOU maps a workplan for the three partners with a goal of coordinating and aligning policies, plans and capital improvements that integrate natural resource goals across disciplines – finding the intersection between natural resource objectives and transportation and infrastructure, development and redevelopment, and parks, trails, and open space.</p> <p>To facilitate the workflow identified in this MOU, the District has retained a consultant team through a Request for Qualifications (RFQ) and work scoping process that the MPRB participated in with the City. Through this RFQ and work scoping process, the District and MPRB have agreed to utilize the same consultant team to do preliminary design for FEMA streambank repairs and creek corridor planning (to be led by the District) and regional park master planning for the Minnehaha Creek Regional Trail (to be led by the MPRB).</p> <p>Through this work, opportunities to improve the ecology of Minnehaha Creek while considering recreation and infrastructure improvements will be identified. The consultant team will work with the District, MPRB, and City to identify where these opportunities intersect with other planning efforts and programmed investments (e.g. regional park planning, trail improvements, flood mitigation planning). This collaborative planning will result in the development of a strategic long-term multi-jurisdictional capital improvement plan (CIP).</p>
160	3.6.4	Section 3.6.4: The City would like additional clarification regarding the review process for the Local Water Plans (i.e. what’s the iteration process, how many times the plan is required to be submitted after initial comments are received).	Excelsior, Minnetrista, and Shorewood	There is no set number of iterations required. Typically, the District will review the Plan, and if any items are missing or lack sufficient detail, the District will send a letter outlining the changes needed. Generally, these items can be addressed with the next submittal. The District is happy to meet with cities to discuss any District comments to help expedite the process.
161	3.7	The metrics identified within Table 3.3 should allow the District to regularly assess its progress and continue to make quantifiable improvements.	BWSR	Thank you for your comment.
162	3.7	Page 340, Table 3.2: Consider clearly stating flood control goals and targets.	Minneapolis, MPRB	See response to comment #23.
163	3.7	On page 340 table 3.2, the second water quality goal lists a target of no net increase in volume or rate of storm water runoff. It is hard to meet both of these conditions. Given the limits of what can be built and the unpredictable nature of storms there will be runoff.	MnDOT	The District's Rules are written so that development and redevelopment should <i>on average</i> result in no <i>net</i> increase in rate and volume. The District recognizes that there are sites where this is not always feasible. The standard of no net increase in volume is consistent with NPDES MS4 Permit requirements.
164	3.7	Given its leadership role in the watershed, it would be appropriate for the MCWD to go beyond accounting for only its own initiated projects and also track the reductions done among all the parties subject to WLAs relative to the needed reductions. This need not be an involved undertaking as this may be accomplished with a spreadsheet or simple database approach. Further, MS4s should already be tracking their own progress for MPCA annual reporting purposes so it should mainly be a matter of requesting and managing this data.	MPCA	The District agrees and is planning to request this information to provide more comprehensive tracking of progress toward TMDL goals. This will be noted in Section 3.7.
165	3.8	Please check for formatting within Section 3.8 Plan Amendments as there are statute symbols.	BWSR	Thank you. These will be removed.
166	3.8	Section 3.8: Will the District be updating their CIP every year as part of this Watershed Plan and coordinating with Cities for additional projects to be added?	Excelsior, Minnetrista, and Shorewood	Yes, the District will continue its current practice of annually updating and distributing its CIP to the cities and counties for review and comment. This process is described in Section 3.5.5 (page 316).
167	3.9	Section 3.9: The figures for all subwatersheds are labeled as the Painter Creek Subwatershed Boundary.	Excelsior, Minnetrista, MPRB, and Shorewood	Thank you. This will be corrected.
168	3.9	Area for improvement or additional clarification: Highlighting a bullet-point concise list and then dive into details when referencing “Implementation Priorities” within each subwatershed.	TRPD	Thank you for the suggestion. The Implementation Priorities section is synthesized into approximately one page for each subwatershed. The District will consider if there are ways to further synthesize into a list or table format without losing important context.

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169	3.9	Volume 3 section was written very well. However, there is a lot of redundancy that is common among the different subwatershed plans that might be able to become more concise.	TRPD	Thank you for the suggestion. While it does result in some redundancy, the subwatershed plans are intended to serve largely as stand-alone documents that readers can use without having to refer to other sections for explanation.
170	3.9.1	Section 3.9.1: The City will include listed issues and implementation activities for Christmas Lake during the Local Water Plan update. The City suggests including additional projects besides volume and load reduction types in the CIP.	Shorewood	Section 3.4.3 of the Plan explains the District's framework for establishing its implementation priorities based on consideration of resource needs and opportunities. Based on the current assessment of needs and opportunities within the Christmas Lake Subwatershed, the District feels that the proposed implementation plan is appropriate. The District is positioned, through its opportunity-driven stormwater management projects, grants, technical assistance, and other services to respond to opportunities within the subwatershed. And as described on page 357, should a larger more concentrated scale of project implementation be determined to be needed in this subwatershed in the future, the District would undertake a planning process to better define project needs and amend the Plan accordingly.
171	3.9.2	Section 3.9.2: The City will include listed issues and implementation activities for Dutch Lake during the Local Water Plan update. The City suggests including additional projects besides volume and load reduction types in the CIP.	Minnetrista	Section 3.4.3 of the Plan explains the District's framework for establishing its implementation priorities based on consideration of resource needs and opportunities. Based on the current assessment of needs and opportunities within the Dutch Lake Subwatershed, the District feels that the proposed implementation plan is appropriate. The District is positioned, through its opportunity-driven stormwater management projects, grants, technical assistance, and other services to respond to opportunities within the subwatershed. And as described on page 372, should a larger more concentrated scale of project implementation be determined to be needed in this subwatershed in the future, the District would undertake a planning process to better define project needs and amend the Plan accordingly.
172	3.9.3	Page 337: Figure 3.11. City records indicate Hadley Lake drains to the south-southwest and drainage on the southwest corner of County Road 101 and County Road 6 flows west and eventually reaches Hadley.	Plymouth	Thank you for noting this. There is an error with the drainage areas on this map that will be corrected.
173	3.9.3	Section 3.9.3 Gleason Lake Subwatershed Plan – Stormwater runoff – page 395 – The comment “impervious cover, altered drainage, and stormwater runoff within a watershed increases, the quality of lakes, streams, and wetlands decreases” is not necessarily a correct statement. Land use change from agricultural to urban provides an opportunity to implement BMP that can potentially improve water quality. This emphasizes the importance of the MCWD's rules and regulations.	TRPD	The sentence begins with the word "generally" in acknowledgement that there are exceptions. The District's Stormwater Management rule accounts for these cases of conversion of agricultural to urban land use by requiring no net increase in phosphorus loading from the site as modeled in a meadow condition.
174	3.9.4	Section 3.9.4: The City suggests specifying in the CIP the City that the District would like to partner with for each project and how much of the TMDL credit the City will get for any TP reductions.	Excelsior, Minnetrista, and Shorewood	The District is open to partnering with any interested parties. Specific credit amounts cannot be estimated ahead of project feasibility and would depend on the partnership and funding arrangement. The District has a policy (Resolution 13-062) that describes how credits for District water quality improvement projects will be allocated to local government units (LGUs) for the purpose of TMDL reporting (see response to comment #43). This policy will be incorporated by reference into the Plan.
175	3.9.4	There are no legends on the Minnetonka maps.	Met Council	Thank you. This will be corrected.
176	3.9.8	ECCO requests that the Watershed Management Plan specifically reference the Chain of Lakes Regional Park: Calhoun/Bde Maka Ska Master Plans' Natural Resource Recommendation found in the document (Chapter 3) and incorporate the following recommendations into the plan: <ul style="list-style-type: none"> • Maintain and improve water quality in Lake Calhoun/Bde Maka Ska and Lake Harriet. • Consider stormwater management in all new development and redevelopment in the Chain of Lakes, including use of Best Management Practices to reduce runoff and retain and treat stormwater, and green infrastructure solutions where feasible and in harmony with other park uses. • Reduce and repair erosion along the shorelines, while maintaining views and adequate access from the parkways and trails. • Increase efforts to prevent and control invasive species, both terrestrial and aquatic. • Protect, maintain, and enhance existing native plant communities. Increase pollinator-friendly native plantings and habitat. • Regarding vegetation: Using the master plan as a base, develop and implement a treeplanting plan for the parks in consultation with Forestry and Water and Natural Resources staff. Replant heritage native trees as they age and die out. Strive for a no net loss of trees in project areas. In manicured landscapes, plant trees and vegetation that preserve views and the open space designated for recreation as well as providing sun and shade options for park users. Plant species-appropriate natural areas and landscapes (e.g. in oak savannah restoration areas, eliminate non-oaks and restore savannah groundcover). 	East Calhoun Community Organization	Thank you for your comments. The District will add reference to the Master Plan. However, the District Plan is not intended to get into this level of detail for individual waterbodies.
177	3.9.8	Page 448, Minnehaha Creek Subwatershed Plan: Several flood areas exist within this subwatershed, flood control should be mentioned as a management strategy.	Minneapolis, MPRB	See response to comment #22.
178	3.9.8	Please add reference to the Nokomis Weir adding protection from invasive species.	MPRB	Thank you. This will be added.
179	3.9.8	Paragraph 2, please clarify that the water that drains to the Chain of Lakes is not only water from City of Minneapolis.	MPRB	Thank you. This will be reworded to improve clarity.
180	3.9.8	Although Powderhorn was delisted for nutrients in the previous evaluation period, MPRB requests that this lake be evaluated for nutrient reduction due to more recent data.	MPRB	This sentence will be reworded to improve clarity. Page 206 of the Plan states that recent water quality data for Powderhorn Lake indicate that it could be evaluated for re-listing. The District will coordinate with MPRB and the MPCA during the next update to the Impaired Waters List to have this evaluated.

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181	3.9.8	Last paragraph. Regarding channel evaluation of Minnehaha Creek in 2012. A caveat should be added here that the condition assessment does not include any damage from 2014 flooding.	MPRB	A sentence will be added about the additional assessment that was completed following the 2014 flooding. The District's 2014 Flood Report will also be added to the inventory of studies in Section 2.4.
182	3.9.8	Figures do not show Grass Lake as part of the subwatershed, but figures in section 2 do include Grass Lake in the subwatershed.	MPRB	The reason for the discrepancy is that Grass Lake falls within the District's legal boundary but is outside of its hydrologic boundary. The District will look to either revise its maps for consistency or provide an explanation for the discrepancy.
183	3.9.8	Consider mentioning that springs and seeps also exist in the creek corridor. Creek Corridor groundwater seeps are important to identify so that they can be separated from occasional seeps generated by water main breaks.	MPRB	On page 211, under the groundwater section, it is noted that there are springs and seeps in the Minnehaha Gorge. This will be expanded to note that there are also some seeps in the Creek corridor, and hydrologic modeling shows that for parts of its length it is a gaining stream with significant groundwater input.
184	3.9.8	Consider adding a map of the major weir and/or control structures and noting their ownership and maintenance responsibility.	MPRB	The District does not have all the necessary information to provide a comprehensive inventory of structures and their ownership and maintenance responsibility. An inventory of the location of structures on the major streams in the watershed can be found in the District's Stream Assessment Report.
185	3.9.8	First sentence under heading "Drivers" is confusing. Clarity in this paragraph is important because although many drivers are natural, they are influenced by human factors (e.g., a storm is natural, but the "flashy" effect in the creek is human caused). The paragraph does not introduce the next concept of issues, and needs additional clarification.	MPRB	Thank you for the suggestion. The District recognizes that there are multiple ways to characterize issues and drivers and has tried to define how it is characterizing them for the purposes of this Plan as clearly as possible. The section acknowledges that many of the drivers are human-caused.
186	3.9.8	2nd paragraph under stormwater runoff mentions toxic pollutants, herbicides, and pesticides. If the plan is going to address emerging contaminants, this concept should be called out and explained in a separate section so that there is clarity on issue identification, regulation, and mitigation strategy. It is unclear what the goals are when mentioning these issues in an isolated way.	MPRB	This statement is part of a general characterization of issues associated with stormwater runoff. The District does not monitor or directly manage for these contaminants.
187	3.9.8	Sentences on internal loading control. Consider mentioning that internal loading controls have a lifespan that varies by lake, is dependent on treatment level, and treatment may need to be revisited at some time in the future.	MPRB	Additional information on internal load management techniques is included on page 463. Given the variety of techniques available and the variety of factors affecting their success, we have decided not to revise as recommended.
188	3.9.8	Stream Channel restoration section or other section in this chapter should note scour and issues caused by the 2014 flood and the existence of historic elements like WPA walls that add complexity to stream restoration and management.	MPRB	The WPA walls are noted under the Issue Identification portion on page 453. Specific mention of the 2014 flood damage and assessment will be added to this section.
189	3.9.8	Consider defining biomanipulation as a technique to reduce internal loading and adding biomanipulation to the first paragraph under Internal Sediment Phosphorus Control.	MPRB	Note that the stressor is specifically sediment load control, not internal load generally. While we agree that biomanipulation is an important aspect of shallow lake management, its links to internal phosphorus loading are indirect. Biomanipulation can reduce sediment resuspension resulting in less total phosphorus in the water column. However, these processes and links to algal production are poorly understood. Rather, we prefer to focus on sediment chemistry as a driver of internal load and focus on biomanipulation as a lake restoration technique. For example, in Big Muskego Lake, sediment phosphorus release significantly increased following drawdown suggesting the short-term impacts may be negative. Drawdown was critical in restoring the lake, however, it would be considered a failure as an internal phosphorus loading project. Based on this understanding, we prefer to leave biomanipulation as a lake restoration technique.
190	3.9.8	Possible omission identified: Figure 3.97 – Natural Resource Features are incomplete. The map key does not identify all colored shading (specifically green and yellow) used on the map.	Richard Nyquist (CAC Member)	Thank you. This will be fixed.
191	3.9.9	Section 3.9.9: The City suggests labeling Painter Creek on the figures for reference.	Excelsior and Minnetrista	Thank you for the suggestion. The maps in the subwatershed plans (Section 3.9) were intentionally designed to be clean and simple, and for this reason, have limited layers and labels. We will try to modify the maps to make the stream channel more apparent. The figures in Volume 2 provide more detail and show the creek alignment more clearly.
192	3.9.9	Section 3.9.9: The City suggests listing potential partners, specifically cities, that the District would like to partner with on their CIP items.	Excelsior, Minnetrista, and Shorewood	See response to comment #174.
193	3.9.9	Section 3.9.9 Painter Creek Subwatershed Plan – It should be noted that Katrina was classified as a wetland thus not having to meet shallow lake state standards. Also, Maple Plain may have historically discharged sewage into Katrina causing poor water quality conditions. In order to improve the water quality of Katrina, the water body needs to be managed from an algal dominated to plant dominated system.	TRPD	The wetland classification is noted on pages 231 and 486.
194	3.9.11	MCWD 10 Year Plan fails to mention the terrible impact that one active farming unit is having on the quality of Pierson Lake. This is especially troublesome when the lake is the head waters for the six mile creek.	John Pierson (Area Partnership for Pierson Lake Enhancement)	The District appreciates and shares your concern about the preservation and restoration of the headwaters of Six Mile Creek. It is for this reason that the Pierson Lake headwaters restoration is identified as a priority project in the implementation plan on page 554. Within this project description, it states that 85% of the nutrient pollution is attributed to the drainage area north of the Lake, indicating the importance of this opportunity. The inventory of studies in Section 2.4 will also be revised to include the analysis that was completed for this ditch.

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#	Section	Comment	Commenter	Response
195	3.9.11	My only concern is that the Six-mile Creek Sub-watershed section never mentions that according to the 2014 Wenck report commissioned by the MCWD the drainage ditch puts over 2 dump trucks of sediment and 85% of the phosphorus load into Pierson Lake each year. The District has worked with the owners over the past 10 years to resolve the issue without success. While I understand the MCWD's position that they only work with willing landowners, it seems unconscionable for anyone to be responsible for 2 dump trucks of dirt going into the watershed's system and wrong for it not to be a goal of the watershed to resolve the issue in the next 10 years.	Steve Mohn (CAC Member)	See response to comment #194.
196	3.9.11	<p>Ridge Lands Inc, the Lake Zumbra-Sunny Lake & Home Association, expects that MCWD will work diligently with the Association to resolve identified and known water issues within our subwatershed and address new issues as they arise. These would include priority emphasis on: Water quality; Water level controls and flooding; Erosion Control; AIS Monitoring, Prevention and Inspections; and Habitat.</p> <p>Known Legacy Issue Needing Immediate Resolution - Water Level Control: Find a permanent solution and take a leadership role in rectifying the underlying flooding issues at Lake Zumbra-Sunny, resulting in elimination of the excessive level fluctuations, the back flowing, and extended draw down periods following cycles of heavy rainfall. Work with the Association, City of Victoria, Carver County and DNR to facilitate permitting of physical infrastructure and hydrologic changes required to normalize lake levels in a timely manner to prevent further flooding.</p>	Lake Zumbra-Sunny Association	<p>Thank you for your comments. We value the Zumbra Ridge Homeowners Association's (HOA) dedication to advancing water resource protection on Lake Zumbra and throughout the City of Victoria. The District understands that a primary concern of the HOA is flooding on Lake Zumbra. Since the 2014 high water event, the District has worked diligently to understand the system dynamics that lead to flood conditions and opportunities to alleviate those effects. Our work has included:</p> <ul style="list-style-type: none"> • Convening all agencies including Carver County, the Department of Natural Resources, the City of Victoria, and Three Rivers Park District to streamline efforts and facilitate information sharing across agencies; • Developing two rounds of technical analysis, first to model system dynamics creating the 2014 flood conditions and the second to identify a range of possible solutions and their downstream impacts; • Volunteering to provide permitting assistance and continued technical support on a solution advanced by the HOA and City of Victoria, with concurrence by Three Rivers Park District. <p>The District will continue to work with the HOA and its Partner agencies to advance a solution of your choosing. As we have discussed, advancing any solution will require continued coordination across this group of agencies.</p> <p>On September 11, 2017, the District had the opportunity to discuss your feedback on the Plan with you and Victoria City Council. At that meeting, the District sought to provide clarity as to how the priorities of the District were established over the two-year plan development process and discuss how the feedback pertaining to City policy would be prioritized given the established priorities outlined in the 2015 Memorandum of Understanding (MOU) between the District and City.</p> <p>A principal goal of the District's Plan was to prioritize those issues of highest concern District-wide in order to maximize our ability to meet the District's mission of protecting and improving land and water through the delivery of high impact capital projects. We sought to identify for each subwatershed the principal issues, drivers, and management strategies to maximize our return on investment. We also sought input from city and agency staff and policy makers across the District, including in the City of Victoria, to evaluate local planning initiatives and priorities so that communities could weigh in on how agencies will work together locally towards plan implementation. Unique to the Six Mile-Halsted Bay Subwatershed will be routine reengagement after plan adoption of all public agencies operating in the system in order to continually reevaluate priorities for capital investment.</p> <p>It was noted at the September 11 Council meeting that several of the submitted comments, including increasing our oversight in zoning and development review and assisting in developing plans and ordinances around specific water resource issues, would represent a substantial shift in policy between the City and District. It is our understanding at this time that the City will take a lead role in evaluating their policies related to several of these water and natural resource issues and will involve the District in those discussion as they see fit. Pursuant to the MOU, the District remains committed to continually improving the coordination between City and District to both improve water quality within the subwatershed and to implement programs and projects that integrate water resource and community goals.</p>
197	3.9.11	<p>Priority Issues requiring action - Water Quality: Identify sources, develop meaningful action plans, deliver solutions, and monitor for results in the Lakes presently targeted for TMDL, nutrient and sediment loading. Connected water bodies immediately upstream and downstream to Lake Zumbra-Sunny are of concern. These include: Stone Lake, East Auburn, and identified bridging wetlands. Define policies and practices to avoid health related water quality issues from contaminants such as bacteria, toxic blue green algae, biota, E. coli and mercury.</p> <p>Priority Issues requiring action - Erosion Control: Avoid continued erosion and aid MNDOT in the assessment of present erosion along the south edge of Highway 7, bordering the shoreline of Lake Zumbra-Sunny.</p> <p>Priority Issues requiring action - AIS Monitoring, Prevention and inspections: Prevent the spread of Zebra Mussel infestations within immediate proximity of Lake Zumbra-Sunny to area lakes such as Waconia, Minnetonka, Prior, Minnewashta and Christmas, which have Zebra Mussel infestations. Take measures to prevent introduction of Starry Stonewort to Lake Zumbra –Sunny. Known infestations are present in nearby Wright County lakes such as Koronis.</p> <p>Priority Issues requiring action - Ground Water: Aid the City in developing a comprehensive plan for groundwater protection in existing and planned annexation boundaries. Initially assisting the City in identification of areas of potential negative impact and concern.</p> <p>Priority Issues requiring action - Habitat: Continue to oversee impacts on fish and fish habitat, including AIS, culvert design, and infrastructure design and implementation. Continue to encourage and partake in research which characterizes and recognizes the impacts of AIS, culverts, water conveyances and infrastructure design on fish and other wildlife habitat. Provide educational materials and guidance on Carp controls and elimination in Lake Zumbra – Sunny.</p>	Lake Zumbra-Sunny Association	

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#	Section	Comment	Commenter	Response
198	3.9.11	<p>Area of Collaboration - Development and Zoning Changes: Develop with the City of Minnetrista new guidelines for the transition of Woodland Cove properties from agricultural to residential. The intent being protection against negative water related conditions from purchase through the transition period. While MCWD aided the City of Minnetrista in the structuring of Developer Agreements, which protect the City's natural assets during and following construction programs, these are inadequate. Not currently addressed with the existing Cove property owner in the Developers Agreement, is runoff occurring between now and actual commencement of construction, which could be a period of up or beyond ten years.</p> <p>To minimize further nutrient loading of Stone Lake and its downstream impact on other Six Mile Creek water bodies, the Lake Zumbra - Sunny Association asks MCWD to review with City of Minnetrista the Woodland Cove agreements. Review should focus on addressing today's downstream storm water runoff issues impacting Lake Zumbra - Sunny. Please include appropriate post construction covenants, regulations, and maintenance requirements for ongoing protection and preservation.</p> <p>Area of Collaboration - Education: Education and training for the Association in best practices and new techniques for water system improvements, including storm water runoff, catch pond, and rain water garden designs.</p>	Lake Zumbra-Sunny Association	See response to comments #196-197.
199	3.9.11	<p>Absent from the MCWD's Draft Plan are specific implementation plans, financial budgetary costs, and other resource estimates needed to respond to Lake Zumbra – Sunny's long established need for water level controls. We are seeking prescribed action plans and a full commitment from MCWD, not just a relisting in the 2017 10 year plan.</p> <p>The Association has continued research into root causes of our lake's flooding conditions and the financial impacts. We are prepared to collaboratively share our insights and shed new lights on the wildly fluctuating lake elevations with you. We can offer factual data and analyses to support our findings. We ask only an open minded, collaborative environment.</p> <p>Without your preliminary commitment of technical resources and funds to this 50 year problem, it is difficult for us to ascertain the sincerity of MCWD to its stated mission and goals.</p> <p>We welcome to an opportunity to discuss plans further. As with other Lake Associations, we are vested in the daily stewardship of our natural water resources. Aligning planning, regulatory and investment decisions to address our joint water resource goals will be the key to success.</p>	Lake Zumbra-Sunny Association	See response to comments #196-197.
200	3.9.11	Section 3.9.11 Six Mile-Halsted Bay Subwatershed (misspelled in document) – Ecological Integrity – Lakes and Streams – page 525 – Mentions Eurasian watermilfoil and curlyleaf pondweed impacting ecological integrity – Please add more of this throughout the document where it applies.	TRPD	The District will consider expanding mention of AIS throughout the Plan.
201	3.9.11	Section 3.9.11 Six Mile-Halsted Bay Subwatershed – Upper Carver Park Reserve – page 540 – Please indicate that monitoring efforts by the Three Rivers Park District will continue to ensure that there are no changes in water quality for those lakes currently meeting state standards.	TRPD	Reference to the TRPD monitoring efforts will be added.
202	3.10	This District should identify annual costs for Table 3.19	BWSR	See response to comment #203.
203	3.10	Staff were impressed by the level of effort put into the subwatershed implementation plans and, like the watershed inventories, sees the benefit of breaking the whole watershed into manageable subunits. However, staff would encourage the creation of a summary table of the CIP expenses by year in addition to Table 3.19. This would be a more transparent approach to identifying when and how CIP funds are allotted.	Met Council	Thank you for your comment. Table 3.17 lists the approximate annual budget for the District's capital improvement program. Many of the projects listed in Table 3.19 are opportunity-driven, so the specific year of implementation is not known and is listed as a range. In addition, higher cost projects are often levied over multiple years, financed, or supported through grants and partner funds. For these reasons, organizing Table 3.19 by year would not provide an accurate representation of annual CIP costs.