

| Agency | Name | Agency Comment | VLAWMO Response |
|---------------------------------|---------------|---|--|
| Board of Water & Soil Resources | Mary Peterson | About this Plan: (Duplicated Page # used-i) The summary of the Table of Contents listed on this page should be formatted/labeled the same as the final detailed TOC you use for the plan on the next page. (Page i). This section could also be combined with the "Introduction" section (see comment below). | We will make sure the TOC is correct. |
| Board of Water & Soil Resources | Mary Peterson | Table of Contents: Number/labels seem to be missing. After revisions based on 60-day comments, this should be reviewed for accuracy with the draft Plan and revised as needed. | |
| Board of Water & Soil Resources | Mary Peterson | Executive Summary: The executive summary should stand by itself for the purpose of summarizing the Plan as per MR8410.0050 "Executive Summary". | We have separated the Executive Summary from the Water Plan so that it can be a stand alone item and have made adjustments to ensure it meets MR8410.0050. |
| Board of Water & Soil Resources | Mary Peterson | Executive Summary - Page ii: The map (Figure 1) used seems to feature the communities which would align with the information in Table 1. A suggestion would be to break up the second paragraph and move the map closer to this information. You could then begin a new subject paragraph when describing the WMO governance and operations. Or you could use a map that features the water resources in the executive summary. | |
| Board of Water & Soil Resources | Mary Peterson | Executive Summary - Page vi: The arrows illustration is confusing in this section as there are no "strategies" highlighted in the Goals and Major Actions section. Strategies are mentioned on Page 4. | |
| Board of Water & Soil Resources | Mary Peterson | Executive Summary - Page viii: Recommend using language consistent with MR 8410.0105 Subp. 9 Local Water Plans B. and MR 8410.0160 Subp. 6 Adoption and implementation when referring to Local Water Plan Updates. You can also review the "Highlight of Changes" dated Dec. 1, 2015 http://www.bwsr.mn.us/planning/metro/Highlights of Changes to Minnesota Rules.pdf for additional ways to word this. This section should also include any changes in responsibilities from the previous plan. | |
| Board of Water & Soil Resources | Mary Peterson | Introduction: You may want to consider combining the "About the Plan" and the "Introduction" sections as they seem to overlap purposes in the Plan. A general walk through describing the Plan Format (referenced by the Table of Contents labels) would be helpful for the reader to find things better in the Plan. Consider including this toward the end of the Introduction section. | We will look into this to make it clearer and less redundant. |
| Board of Water & Soil Resources | Mary Peterson | Page 3: I noted that the issue identification and assessment requirements are touched on in the "Plan Framework and Use" section. You may want to use the "Introduction" to highlight your public participation and use of the TAC or CAC during this process. If there are inconsistencies of the Plan goals with review agency expectations and goals as per MR8410.0045 they can be noted here. | We will look into updating this and ensure it is consistent with Minnesota Rules. |
| Board of Water & Soil Resources | Mary Peterson | Plan Framework and Use: The transition from the Introduction to this Section and to the next proceeding sections seem to run together. This makes it difficult to stay focused on where one is at in the Plan without frequently referencing the Table of Contents subcategories. Once all comments are in, you may want to consider reorganizing the reformat or labeling of the sections based on the Table of Content labels for easier reading and reference. You may also want to consider breaking out the goals/strategies from this Section into its own Section. | We will look into making this clearer. |
| Board of Water & Soil Resources | Mary Peterson | Page 4, 2nd paragraph: VLAWMO's subwatershed basis and core activities is mentioned for the first time and should be defined or referenced where in the Plan these core activities are explained. Unless one is familiar with the WMO approach or Plan, it is difficult to know what this is trying to say. | Thank you - we will make adjustments to reflect this. |
| Board of Water & Soil Resources | Mary Peterson | Page 5, 1st paragraph: A comprehensive of stakeholders as referenced in E & O Plan? Please provide a link and add it to the reference pages 51-53. | The E & O Plan is currently going through extensive updates and we will have it available on the VLAWMO website. We will make sure to include a link. |
| Board of Water & Soil Resources | Mary Peterson | Page 6, Goal 1-1: Providing a map in this section when referring to impaired waters/lakes would be helpful. | We will add this. |
| Board of Water & Soil Resources | Mary Peterson | Page 6, Strategy 1-1-1: When referring to TMDL Studies be sure to provide a link or a reference in the Reference Section. | We will make sure this is done. |

| Agency | Name | Agency Comment | VLAWMO Response |
|---------------------------------|---------------|---|--|
| Board of Water & Soil Resources | Mary Peterson | Page 7, Strategy 1-1-4: Recommend meeting or communicating more than once per year. If it's already being done through the TEC than note that as a function/responsibility on Page 3. If not, consider rewording this to say communicate "regularly" to address "topics" identified. (Page 10, Strategy 3-1-1 refers to facilitate meetings. Use of "regularly" in 3-1-2 conflicts with at least once a year.) You should take credit for the coordination you are already doing. | We will make adjustments to the language to be consistent throughout the Plan. |
| Board of Water & Soil Resources | Mary Peterson | Page 9, Strategy 2-3-1: Need a reference to the Ed. And Outreach Plan. | The E & O Plan is currently going through extensive updates and we will have it available on the VLAWMO website. We will make sure to include a link. |
| Board of Water & Soil Resources | Mary Peterson | Page 9, Strategy 2-2-3: Need a reference to the NE Metro Groundwater Plan. | It will be added. |
| Board of Water & Soil Resources | Mary Peterson | Page 11, Strategy 3-4-1: Not sure what this means. Include link or reference for the 2014 Annual Report. | We will make this clearer and add an appropriate link. |
| Board of Water & Soil Resources | Mary Peterson | Page 13, Priority Issue 6: May want to mention what the WMO standard is for development/redevelopment. Are MS4 using MIDS? More or less? What is considered excessive? | We will clarify this. |
| Board of Water & Soil Resources | Mary Peterson | Page 13, Strategy 6-1-3: Is a repeat of part of Strategy 6-6-1. | We will fix this. |
| Board of Water & Soil Resources | Mary Peterson | VLAWMO Core Activities: The WMO purpose is repeated for the 3rd time and seems redundant. Consider removing this or referencing the Introduction for the purpose. | We will remove the redundancy. |
| Board of Water & Soil Resources | Mary Peterson | Page 14: Figure 3 is noted as figure 3.1 in text. Figure 5 is noted as figure 3.2 in text. | This will be corrected in the final version. |
| Board of Water & Soil Resources | Mary Peterson | Page 14: Consistent labeling of SLMP, Subwatershed Plan or Subwatershed targeted activities should be used throughout the Plan. | We will ensure consistency. |
| Board of Water & Soil Resources | Mary Peterson | Page 15, Figure 4: VLAWMO Organizational Chart could be moved to the Introduction to line up with Page 3. | We will look into doing this. |
| Board of Water & Soil Resources | Mary Peterson | Page 16, Figure 5: VLAWMO budget figure 5 could include \$ amounts with the % to recognize the local capacity. | We didn't include the dollar amounts since the annual budget changes from year to year. We will add a note to the figure's caption that the % is based on 2015 dollars. |
| Board of Water & Soil Resources | Mary Peterson | Page 16, 3.1 - Monitoring and Studies: Consider explaining where one could find this robust data and analysis. Is it in the reference section? | We will clarify this. |
| Board of Water & Soil Resources | Mary Peterson | Page 21: Table 3 is labeled 3.1 in the text. | This will be corrected in the final version. |
| Board of Water & Soil Resources | Mary Peterson | Page 21, 3-2: Reference where to find the Education and Outreach Plan (2015). | The E & O Plan is currently going through extensive updates and we will have it available on the VLAWMO website. We will make sure to include a link. |
| Board of Water & Soil Resources | Mary Peterson | Page 23, 1st paragraph: Assisting MS4s ranked highest in survey. This supports taking out the reference of meeting at least annually from the Plan as it contradicts the importance of this priority. | We will adjust our language throughout the Plan to say we will meet regularly rather than annually. We are aiming to have at least one annual meeting with each MS4 at more of an Administrative level devoted to discussing projects and programs and how the WMO can partner with them. There would be regular interactions throughout the year beyond this. |
| Board of Water & Soil Resources | Mary Peterson | Page 25: Again, the Ed. And Outreach Plan is referred to in the text but doesn't have a link or included in the reference page. | The E & O Plan is currently going through extensive updates and we will have it available on the VLAWMO website. We will make sure to include a link. |
| Board of Water & Soil Resources | Mary Peterson | Page 26, 4th paragraph: This CIP approach doesn't seem to meet MR 8410.0105 Subp. 2 Capital Improvement Program (CIP). Please review this subpart to ensure that the Plan explains the CIPs which will be conducted through this Plan or the WMO approved Local Water Plan process. Evaluating existing CIP implementation every two years and determining need for amendments may be in order. | Thank you for this comment. We will make adjustments to the Plan to meet MR 8410.0105. |
| Board of Water & Soil Resources | Mary Peterson | Page 27, 1st paragraph: VLAWMO Water Policy is referenced but where is it located. | It is located on the VLAWMO website. It will be updated by mid-2017 so we didn't include it as an appendix with the Plan. A link to the Water Policy will be in the reference section of the Plan. |

| Agency | Name | Agency Comment | VLAWMO Response |
|---------------------------------|---------------|--|--|
| Board of Water & Soil Resources | Mary Peterson | Subwatershed Targeted Activities: This section and the "Core Activities" section seem to fit together as the Plan Implementation section. The Table 4 referred to in this section also includes the Core Activities section. Maybe it should be referred to in both of the sections or maybe combined these two section under an Implementation Section? | We will look into this. |
| Board of Water & Soil Resources | Mary Peterson | Page 28, 1st paragraph: Figure 9 should come before Table 4 because it shows up in the text first. Figure 9 also references information in the Appendix B "Inventory and Assessment" in this paragraph. | This will be corrected in the final version. |
| Board of Water & Soil Resources | Mary Peterson | Page 28: Figure 8 is not referred to in the text. Confusing. Should be labeled at the end of the 2nd paragraph. | This will be corrected in the final version. |
| Board of Water & Soil Resources | Mary Peterson | Page 28: Consider adding a paragraph that explains the format of the subwatershed targeted activities to better lead into these activities. For example, define the management approach using the Monitor, Protect, and Restore labeling you use in the subwatershed targeted activities page. | We will better define this and explain it in the Plan. |
| Board of Water & Soil Resources | Mary Peterson | Page 29 & 30: These pages seem to be missing from the Plan. | This will be corrected in the final version. |
| Board of Water & Soil Resources | Mary Peterson | Page 31, Table 4: This table is hard to read. Consider a two pager or a foldout? Also, making sure this Table is referred to in both the Core Activities and Subwatershed Activities would be helpful. Consider explaining the Plan layout in the Introduction of About the Plan section. | We will make this easier to read. |
| Board of Water & Soil Resources | Mary Peterson | Page 34, Birch Lake: The targeted activities are not on Table 4. Is that table supposed to be a list of all the activities or just selected ones? | Some activities fall within the Core Activities section of the budget. We will look into making this clearer. |
| Board of Water & Soil Resources | Mary Peterson | Planning and Administration: Table 4 is referenced here but is out of order. This should be relocated to where it is referenced or provide a page #. Roles and responsibilities are not included in this table as depicted. | This will be corrected in the final version. |
| Board of Water & Soil Resources | Mary Peterson | Page 46, 1st paragraph: Add "in Table 5 below" in the text as a reference to table. | This will be corrected in the final version. |
| Board of Water & Soil Resources | Mary Peterson | Page 47, 5-2: Results need to be included in the annual activity report at a minimum of every two years as required by MS 8410.0150 Subp. 3. | We will ensure the language reflects this. |
| Board of Water & Soil Resources | Mary Peterson | Impact on Local Government: Table 6 - current LWP status - What about North Oaks? What's the plan for WMO approval? | The date for North Oaks was an error and has been corrected. We will also include a checklist that will be used to review the LWPs for WMO approval. |
| Board of Water & Soil Resources | Mary Peterson | The Plan needs information an Operation and Maintenance program and responsible party as per MR 8410.0102, Subp. 3. | Thank you - we will include this information. |
| Board of Water & Soil Resources | Mary Peterson | References should be accurately noted throughout the text of the Plan. | Noted - we will update this. |
| Board of Water & Soil Resources | Mary Peterson | Acronym Section: Consider relocating the List of Acronyms after the Table of Contents and before the Executive Summary. | Noted - we will update this. |
| Board of Water & Soil Resources | Mary Peterson | Definition Section: Could also be relocated after the Acronym Section and Before the Executive Summary. | Noted - we will update this. |
| Board of Water & Soil Resources | Mary Peterson | Appendix B: Reference this in text in Plan wher appropriate and note in Introduction. | Noted - we will update this. |
| Board of Water & Soil Resources | Mary Peterson | Education & Outreach Plan: Recognizing that this Plan is intended to be an evolving document throughout the 10 Year Watershed Management Plan, consider labeling as Appendix C and included in the Table of Contents. | The EO Plan is currently being updated extensively at this time. We prefer to not include the EO Plan as an Appendix due to the fact that it would cause us to do an amendment to the Plan shortly after our approval later this year. We hope to have it fully updated and approved by our Board by the Fall of 2016 and we will have it available on our website for anyone to read. We will include language in the Plan stating that both the EO Plan and the Water Policy are being updated and will be available on the VLAWMO website |

| Agency | Name | Agency Comment | VLAWMO Response |
|---------------------------------|----------------|--|---|
| Board of Water & Soil Resources | Mary Peterson | JPA: BWSR Staff will review the JPA when submitted with the 90 day review period. | The JPA is currently being ratified by our respective local partners and will be included with the final draft of the Plan. |
| City of North Oaks | Mike Robertson | Rather than waiting two more years, consider delisting Gilfillan Lake from the impaired waters list if 2016 measurements show that it has met all water quality standards. | 2015 monitoring data indicates nutrient levels have risen with chlorophyll-a currently not meeting state standards and TP barely meeting state standards. Further years of monitoring will be necessary to ensure Gilfillan's water quality is staying within state standards before we pursue removing it from the Impaired Waters List. |
| City of North Oaks | Mike Robertson | Consider participating in a pilot program with St. Paul Water if a chemical or biological agent is found that is effective against zebra mussels. | Thank you for your comment. |
| City of White Bear Lake | Brent Thompson | General Comment: There does not appear to be any mention of the concepts of resiliency and climate change, which may be important going into the future. | Thank you for the comment. We feel it is incorporated within many of our strategies. We will be adding a sentence within Priority 6 - Localized Flooding to address climate resiliency as well. |
| City of White Bear Lake | Brent Thompson | Page vi: The addition of the arrows at the top of the page indicating how one flows to the next is very helpful. | Thank you. We hoped for the exact response. |
| City of White Bear Lake | Brent Thompson | Page vi: Make sure all goals in the Plan Framework section are the same as the goals listed here. | We will make sure of that. |
| City of White Bear Lake | Brent Thompson | Page vii: What are Major Actions? How do they relate to priorities, goals and strategies? | We will better define this and explain it in the Plan. |
| City of White Bear Lake | Brent Thompson | Page vii: At the end of the third paragraph the term "course corrections" is used. We think there could be a better way to state this. | Thank you for the comment. We will consider a better term, possibly "strategy adjustments." |
| City of White Bear Lake | Brent Thompson | Page 4: The second paragraph is confusing. We're unsure of the intent of this paragraph. | Thank you for the comment. We will consider rewriting. |
| City of White Bear Lake | Brent Thompson | Page 5: In the fourth paragraph we recommend striking the last two sentences beginning with "The capacity to meet our goals...". The Priority Issues are already listed in the text box so it's unnecessary to state them in the body of the document. | Thank you for the comment. We will consider rewriting. |
| City of White Bear Lake | Brent Thompson | Page 6: Strategy 1-1-1, the second bullet states that "Current trends indicate these lakes may meet standards with existing practices." This is good news that the trends are in this direction. By when are they expected to meet standards? | The monitoring data indicates that both Gem Lake and Gilfillan Lake are meeting or nearly meeting standards. If they are consistently meeting standards for the next 1-2 years, we will discuss delisting the lakes with the MN Pollution Control Agency. |
| City of White Bear Lake | Brent Thompson | Page 7: As part of Goal 1-1, are there or should there be programs to work with private landowners or businesses regarding good housekeeping measures to support load reductions? | Thank you for the comment. This could be something that is part of our Education and Outreach Plan. We will explore this topic as we update this. |
| City of White Bear Lake | Brent Thompson | Page 8: Strategy 2-1-1, the reference to MIDS guidelines was deleted from the previous draft. Why? | It was deleted because VLAWMO hasn't officially updated the Water Policy to reflect MIDS. We hope to have it updated by the end of 2016. We needed the language to reflect our current information. |
| City of White Bear Lake | Brent Thompson | Page 8: Strategy 2-1-3 - we are unsure what this means or how its relevant. | Thank you for the comment. We will consider rewriting. |
| City of White Bear Lake | Brent Thompson | Page 9: Strategy 2-1-4, in the last sentence "VLAWMO targets..." what are 'selected practices' and how is this sentence relevant to the strategy? | We have moved this strategy from Priority 2 to Priority 1 because it fits better under surface water management. Selected practices are currently defined as publicly funded projects. We will make sure it is clearer in the |
| City of White Bear Lake | Brent Thompson | Page 9: Goal 2-2. Consider monitoring groundwater in collaboration with other agencies. | Thank you for the comment. If a project relates to groundwater monitoring, such as the water table wells associated with the Whitaker Pond bacterial work, we will share that information with the appropriate MS4. |
| City of White Bear Lake | Brent Thompson | Page 9: Strategy 2-2-2. How does testing private wells fit into this goal? This seems to be outside VLAWMO's jurisdiction as wells are regulated by the MDH. | Thank you for the comment. Because VLAWMO has two communities that use private wells, we feel it is important to encourage testing. We realize it outside our jurisdiction, we feel encouraging testing is worthwhile. |
| City of White Bear Lake | Brent Thompson | Page 10: Strategy 3-1-1, after "municipal education program" add 'for various target audiences'. | We will make the adjustment. |
| City of White Bear Lake | Brent Thompson | Page 10: Strategy 3-3-3 includes the acronym CLMP. Is this defined somewhere? | The acronym is listed in the acronym list but we will be sure that it is spelled out the first time it is mentioned in the Plan. |
| City of White Bear Lake | Brent Thompson | Page 13: Priority Issue 6. Development of climate adaptation strategies may be important in this section. | We have added a sentence with strategy 6-1-1 that mentions climate resiliency and as we stated previously, we feel many of our strategies already incorporate this issue. |

| Agency | Name | Agency Comment | VLAWMO Response |
|-------------------------|----------------|---|---|
| City of White Bear Lake | Brent Thompson | Page 13: Strategy 6-1-2. Instead of "geopolitical" use "municipal". Has a hydraulic and hydrologic model of the entire watershed been completed? If so, does the Plan reference this model and its findings? If not, is there intention to prepare a model and when? We feel that with Atlas 14 rainfall data, there could be some new and expanded areas of potential flooding concern not currently identified. | We will change "geopolitical" to "municipal". We do not have H & H modeling of the watershed. At this point, we do not have plans to prepare a model. We reference Atlas 14 data in Appendix B of the Plan and understand that the potential for flooding concerns may change over time and we will plan accordingly and appropriately. |
| City of White Bear Lake | Brent Thompson | Page 13: Strategy 6-1-4. Instead of "complain" use "report issues". | We will make the adjustment. |
| City of White Bear Lake | Brent Thompson | Page 13: Strategy 6-1-5. After "shallow groundwater recharge" add 'and protect groundwater recharge areas'. | We will make the adjustment. |
| City of White Bear Lake | Brent Thompson | Page 14: Figure 3.1 is now Figure 3. Figure 3.2 is now Figure 5. | We will make the correction. |
| City of White Bear Lake | Brent Thompson | Page 15: The box on Regulatory Program lists "Audit development plans for consistency with Policy". What policy is this referring to? | This is referring to the Water Policy, available on the VLAWMO website. |
| City of White Bear Lake | Brent Thompson | Page 19: Table 2 has a ** footnote, but the reference doesn't show up anywhere in the table. | This will be corrected in the final version. |
| City of White Bear Lake | Brent Thompson | Page 20: Table 3.2 is now Table 3. | This will be corrected in the final version. |
| City of White Bear Lake | Brent Thompson | Page 23: On the last bullet beginning "Regular Assessment..." the first sentence ends in "alignment with" - Alignment with what? | This will be corrected in the final version. |
| City of White Bear Lake | Brent Thompson | Page 24: Figure 4. The bottom line lists "Clean, healthy water to drink, irrigate with, and enjoy." Why is clean water important for irrigation? We feel 'irrigate with' should be stricken. | We will look into adjusting the language here. |
| City of White Bear Lake | Brent Thompson | Page 25: Capital Projects section states 'priority resources'. Is this defined somewhere? What makes a resource a priority? Also, will the impact to the priority resource be determined through monitoring or how will this be measured? | We will better define this and explain it in the Plan. |
| City of White Bear Lake | Brent Thompson | Page 25: Capital Program section states that programs will be prioritized based on their impact to the priority resource. How is this measured/determined? | As with the other comment regarding Capital Programs and Projects, we will include a definition for the term. |
| City of White Bear Lake | Brent Thompson | Page 26: The second paragraph states that BMPs can include "stormwater management that goes above requirements..." Which requirements is this referring to? | Either VLAWMO's water standards or the municipalities' rules are the requirements we are referring to. We can include this in the Plan. Our grant program will help put in BMPs that go above the existing standards and rules. |
| City of White Bear Lake | Brent Thompson | Page 28: We recommend striking the words "and based on science". Instead of "lines for" use 'boundaries in'. | The phrase "based on science" is used earlier in the Plan to indicate that we our actions will use data and science to help focus our efforts and make the best impact. We will adjust the "lines for" phrase. |
| City of White Bear Lake | Brent Thompson | Page 33: The first sentence uses the term "good water quality". How is 'good' defined? | We will better define this and explain it in the Plan. |
| City of White Bear Lake | Brent Thompson | Page 34: The last bullet of Monitoring states "during the implementation". Implementation of what? | We will rewrite - it was meant to say that we will evaluate the use of automated samplers through the 10 years of this Plan. |
| City of White Bear Lake | Brent Thompson | Page 35: Projects section lists working with White Bear Lake. To our knowledge, the City of White Bear Lake does not have any land that contributes runoff to Gem Lake. | Please see the TMDL report for Gem Lake (Appendix D) which assigns 8.3lbs/year load reduction for WBL. This is a relatively small portion of the load but it is still a valid activity to include working with the City where appropriate. |
| City of White Bear Lake | Brent Thompson | Page 38: The bottom section of the Issues box needs clarification. Since Goose Lake is impaired for nutrients, is it possible that Lambert Creek will experience the same excess loading in the future? | We will fix this and discuss the possibilities of the creek being impaired for nutrients. |
| City of White Bear Lake | Brent Thompson | Page 39: The first bullet discusses managing pet waste "along the creek". There is very little direct public access to the creek, so we are unsure how pets are getting there. | There are areas where pets can easily access the creek area or are within the subwatershed and leaving their waste to be washed down the stormdrains and into the creek. |
| City of White Bear Lake | Brent Thompson | Page 40: Near the end of the paragraph, change "E. Goose Lake loading" to 'East Goose Lake load reductions'. In the last sentence, change "East" to 'West'. | We will make the adjustment. |
| City of White Bear Lake | Brent Thompson | Page 41: Consider working with local businesses on Goose Lake to implement good housekeeping measures and volume/sediment reduction measures, possibly funded through the cost share program. | Thank you for the comment. This could be something that is part of our Education and Outreach Plan. We will explore this topic. |
| City of White Bear Lake | Brent Thompson | Page 49: The first paragraph states "...into conformance with the Board's Plan". Which board is this referring to? We think this should be the VLAWMO WMP. | You are correct. We will make this correction. |
| City of White Bear Lake | Brent Thompson | Appendix B - Page 57: Impaired Waters lists designated uses such as "...irrigation or industrial purposes." Are there really defined water quality standards for these uses? | Yes there are such designated uses. |

| Agency | Name | Agency Comment | VLAWMO Response |
|------------------------------------|----------------|---|---|
| City of White Bear Lake | Brent Thompson | General Comment: There is a great deal of technical information that was in the 2007 Plan which does not appear to be included in this plan, including wetland management, hydrologic models, monitoring data, potential pollutant sources, etc. Does that technical information exist elsewhere readily accessible by stakeholders? Was that information excluded for a reason? | The information is still part of the 2007 Plan which is available on the VLAWMO website. Some information was excluded due to the fact that it had not changed and therefore we felt it was redundant to be included in this Plan. Wetland management guidelines are in the VLAWMO Water Policy which is a separate document and available via the website. We are aiming to have an updated Water Policy by the end of 2016. |
| City of White Bear Lake | Brent Thompson | General Comment: All maps throughout the Plan should more clearly show municipal boundaries. | Thank you for the comment. We will make updates to the maps where we deem it appropriate. |
| Metropolitan Council | Sam Paske | Appendix B, Page 30: Goose Lake <i>"The lake produces large amounts of algae each summer, due to high ChlA levels."</i> This statement seems incorrect; ChlA is an analytical indicator for algae, but it is not generally considered to be a cause of high algae levels. | Correct. We have re-written the sentence to more accurately reflect what was intended. |
| Metropolitan Council | Sam Paske | Appendix B, page 57: If there is not a site specific standard for Lambert Creek, the total phosphorus standard is $\leq 100 \mu\text{g/L}$, not $\leq 150 \mu\text{g/L}$. | This will be corrected in the final version. |
| Minnesota Pollution Control Agency | Teresa McDill | Since some of the impaired waters do not have a TMDL associated with them yet, please clarify the sentence, "Each MS4 was assigned a Waste Load Allocation (WLA) for VLAWMO's 303d impaired waters" (pg. 1). It may be helpful to reference Table 18 (Appendix B), or include this table on pg. 1. | We will make the adjustment. |
| Minnesota Pollution Control Agency | Teresa McDill | <i>Priority Issue 1</i> , (pg. 6) - It would be helpful to include what the impairments are for the water bodies listed in the first paragraph. | We will do this in the final plan |
| Minnesota Pollution Control Agency | Teresa McDill | The water quality goals included under <i>Priority 1: Threatened and impaired surface water and natural resources</i> (pgs. 6-8) are strong and measurable and the strategies included under each goal are prioritized in a meaningful, thoughtful way. We commend the VLAWMO for prioritizing implementation based on science, cost-benefit effectiveness, and input from partners and stakeholders. | Thank you. |
| Minnesota Pollution Control Agency | Teresa McDill | Goals 2-1 and 2-2 (pgs. 8-9) reference drinking water. There is discussion in the Plan about the St. Paul Regional Water Services, but it would be helpful to include a brief discussion in the Plan on additional drinking water resources (i.e. private wells) in VLAWMO. | We will do this in the final plan |
| Minnesota Pollution Control Agency | Teresa McDill | Table 2 (pg. 19) - The MPCA recommends taking a bottom sample and a surface sample for chloride in lakes with potential for stratification. <i>References provided for more information.</i> | With the exception of Gem Lake, none of the lakes VLAWMO collects chloride samples from would stratify. We will adjust sample collection methods for Gem Lake and reflect that in the Plan. |
| Minnesota Pollution Control Agency | Teresa McDill | Please reference the Twin Cities Metropolitan Area Chloride Management Plan (CMP) on pg. 34 under "Programs." The CMP is available at: https://www.pca.state.mn.us/water/road-salt-and-water-quality . Note that the CMP includes implementation strategies for watershed management organizations (see pgs. 68-70). | We will do this in the final plan |
| Minnesota Pollution Control Agency | Teresa McDill | Lambert Creek Subwatershed Targeted Activities (pg. 38) - Lambert Creek is not impaired for nutrients at this time, please remove "impaired for nutrients" in the "Issues box". This could be revised to "altered hydrology/altered habitat." | Thank you for this comment. We will make this adjustment in the final draft. |
| Minnesota Pollution Control Agency | Teresa McDill | Project Success (pg. 44): Please clarify the sentence, "The creek was completely shaded which hinders water quality." Shading lowers water temperatures and results in increased dissolved oxygen levels. Tree root systems also help stabilize the stream bank and prevent erosion. | We will do this in the final plan |
| Minnesota Pollution Control Agency | Teresa McDill | References (pg. 53) - Replace the reference for the VLAWMO TMDL and Protection Study with the final EPA approved report - found at: https://www.pca.state.mn.us/sites/default/files/wq-iw8-41e.pdf . Also remove reference to TMDL appendices are included in the TMDL report. | We will make this adjustment in the final draft. |

| Agency | Name | Agency Comment | VLAWMO Response |
|------------------------------------|------------------|--|---|
| Minnesota Pollution Control Agency | Teresa McDill | Appendix B (throughout): When describing water quality for each water body it would be more clear to describe the data as meeting or not meeting state standards, rather than saying below/within state standards, since some standards are based on multiple parameters (i.e. nutrients). | We will make this adjustment in the final draft. |
| Minnesota Pollution Control Agency | Teresa McDill | Appendix B (p. 44) - Please correct the state standard line for total phosphorus (TP) in the graph: "Lambert Creek Annual Average TP 2009-2015." Also note that the standard for river eutrophication in the Central Region is $\leq 100 \mu\text{g/L}$ TP, and is also based on chlorophyll-a, 5 day biological oxygen demand (BOD_5), and daily dissolved oxygen (DO) flux. | We will make this adjustment in the final draft. |
| Minnesota Pollution Control Agency | Teresa McDill | Appendix B (pg. 56) - Please correct the state standard line on Figure 13: "Lambert Creek Chloride Levels (2012-2015)." The chronic standard for chloride is $\leq 230 \text{ mg/L}$. | We will make this adjustment in the final draft. |
| Minnesota Pollution Control Agency | Teresa McDill | Appendix B (pg. 57) Table 16 - Please revise the following: include the deep lake standards (TP $\leq 40 \mu\text{g/L}$, chlorophyll-a $\leq 14 \text{ mg/L}$, SD $\geq 1.4\text{m}$). | We will make this adjustment in the final draft. |
| Minnesota Pollution Control Agency | Teresa McDill | Appendix B (pg. 57) Table 16 - Please revise the following: Include the chloride standard for deep and shallow lakes. | We will make this adjustment in the final draft. |
| Minnesota Pollution Control Agency | Teresa McDill | Appendix B (pg. 57) Table 16 - Please revise the following: Correct the MPCA eutrophication standards for rivers and streams in the Central Region (TP $\leq 100\mu\text{g/L}$, chlorophyll-a $\leq 18\text{mg/L}$, DO flux $\leq 3.5 \text{ mg/L}$, $\text{BOD}_5 \leq 2\text{mg/L}$) | We will make this adjustment in the final draft. |
| Minnesota Pollution Control Agency | Teresa McDill | Appendix B (pg. 57) Table 16 - Please revise the following: Correct the MPCA total suspended solids standard (TSS) to $\leq 30\text{mg/L}$. | We will make this adjustment in the final draft. |
| Minnesota Pollution Control Agency | Teresa McDill | We appreciate the incorporation of the findings and strategies from the VLAWMO TMDL and Protection Study and Implementation Plan. | Thank you |
| MN Department of Natural Resources | Jenifer Sorensen | Include clearly visible chapter numbers for each new chapter within the body of the document to provide a visual cue to the reader that a new chapter is beginning. Modifying the page header after the first page of the chapter, to distinguish the start of the chapter from the rest of the pages of the chapter, could also be a useful visual cue to guide readers as they move through the document. | We will make this adjustment in the final draft. |
| MN Department of Natural Resources | Jenifer Sorensen | Duplication of Figure 1 in the Executive Summary as Figure 2 in the Introduction was confusing to me. The Executive Summary should be a stand alone document and the rest of the report should be complete without the Executive Summary. There should be at least one paragraph for each chapter in the report after the Introduction and the Executive Summary should not contain information that is not also included in the body of the report. | Thank you for the comment. We have now separated the Exec Summary are are making changes to meet MR 8410. The description of each chapter is not necessarily a rule under MR 8410 but we will strive to make the document useful and clear. |
| MN Department of Natural Resources | Jenifer Sorensen | Language in the Executive Summary should align with the report. For example, the term "major actions" is used in the Executive Summary but nowhere else in the report. | Thank for the comment. We will review the plan and adjust accordingly. |
| MN Department of Natural Resources | Jenifer Sorensen | Acronyms need to be defined the first time they are used. For those acronyms that are not widely used, consider writing them out throughout the report. Terms and concepts unfamiliar to typical readers should be defined in the text when they are first introduced to provide context. Please incorporate plain language principles into the document during the upcoming revision. | We will make the appropriate adjustments. |
| MN Department of Natural Resources | Jenifer Sorensen | As a Drainage Authority, VLAWMO will have a role in the implementation of the Governor's buffer initiative. Please describe this role in the appropriate section of the Plan. | We will do this based on the information we have available at this time. |
| MN Department of Natural Resources | Jenifer Sorensen | Chapter 1: A graphic illustrating the chain of lakes used by SPRWS would help readers better understand the drinking water distribution system. | Thank you - we will provide this. |
| MN Department of Natural Resources | Jenifer Sorensen | Chapter 1: Subwatersheds within the WMO are discussed in subsequent chapters but there is no introductory narrative on the concept of subwatersheds and where their boundaries are located within the watershed. This information would be appropriate to include in the Introduction. | Thank you - we will incorporate this in the final draft. |
| MN Department of Natural Resources | Jenifer Sorensen | Chapter 2: Within the introduction to this chapter, consider describing the action steps and other evaluation tools after the introduction to the mission, priorities, goals, and strategies, to better | Thank you - we will incorporate this in the final draft. |

| Agency | Name | Agency Comment | VLAWMO Response |
|------------------------------------|------------------|--|---|
| MN Department of Natural Resources | Jenifer Sorensen | Chapter 2: The transition between the first part of this chapter and the goals and strategies under each priority is difficult to follow - the text goes from a broad introductory narrative to detailed specifics. This section of the report should be revised so that the meaning of each goal, strategy and action step is clear and grammatically correct. Consider moving this section of the report to its own chapter. | Thank you - we will look into doing this. |
| MN Department of Natural Resources | Jenifer Sorensen | Chapter 2: Action steps are described under the strategies but are not broken out. Consider creating a title for each strategy and listing the action steps below each strategy as bullets to break up the text and clarify the presentation. | Thank you - we will look into doing this. |
| MN Department of Natural Resources | Jenifer Sorensen | Chapter 2: Under Priority Issue 1, high value water resources are mentioned as requiring protection but are not defined within the report. | We will create a definition and include this in the Plan. |
| MN Department of Natural Resources | Jenifer Sorensen | Chapter 2: Please rewrite Strategy 2-1-3 and Strategy 2-1-4 (pages 8-9) so that their meanings are clear. | We have rewritten Strategy 2-1-3. Strategy 2-1-4 has been rewritten and is now Strategy 1-3-3 which seems to be a better fit for it. |
| MN Department of Natural Resources | Jenifer Sorensen | Chapter 2: The same text is included for both Strategy 2-2-3 and Strategy 2-3-3. Does this same strategy need to be listed under two different goals? | It does not need to be under both goals. We have kept it under 2-3-3. |
| MN Department of Natural Resources | Jenifer Sorensen | Chapter 2: Consider renaming Priority Issue 5 to Aquatic Invasive Species Management since the goals and strategies under this priority all focus on AIS. If the purpose of this priority issue is to also manage terrestrial invasive species, please add this to the goals and strategies. | We will address this in the final draft. |
| MN Department of Natural Resources | Jenifer Sorensen | Chapter 2: As a goal under Priority Issue 5, has VLAWMO considered conducting an inventory of ash forest resources within the watershed? Emerald Ash Borer is a serious invasive tree pest that has a significant potential to impact existing ash trees. | This is more an urban forestry issue. We would support our Cities pursuing this venture. The City of North Oaks is doing this already. |
| MN Department of Natural Resources | Jenifer Sorensen | Chapter 3: There is no reference or narrative in the text for Figure 4. | We will make this adjustment in the final draft. |
| MN Department of Natural Resources | Jenifer Sorensen | Chapter 3: Provide a summary description of VLAWMO's data collection and analysis program under Section 3.1. | We will make this adjustment in the final draft. |
| MN Department of Natural Resources | Jenifer Sorensen | Chapter 3: Will the changes to the monitoring program be finalized before the Plan is finalized (red bold and strike outs shown in Table 2)? If so, please rewrite the text to update this information. | Yes, the changes will be finalized and the table will reflect that. |
| MN Department of Natural Resources | Jenifer Sorensen | Chapter 3: Under Section 3.2, please discuss how the survey ranked the educational priorities before describing the educational programs so that it is clear that the programs are listed in order of rank. | We are re-writing this section and removing the information regarding the survey since it was an informal survey and are updating our education program now that we have a new staff person hired. |
| MN Department of Natural Resources | Jenifer Sorensen | Chapter 4: The map in Figure 9 shows six numbered watersheds. The management plans that follow are not in the same number order as how the subwatersheds are numbered in Figure 9, which I found confusing. Connecting the numbering of the subwatershed plans to the map would help orient readers as to where each subwatershed is located and what waterbodies are being discussed. | Thank you for the comment. We will address this in the final draft. |
| MN Department of Natural Resources | Jenifer Sorensen | Chapter 4: Please expand on how VLAWMO will conduct annual reviews for each lake. What will be the metrics used to determine ratings for each category so that ratings for each category so that ratings for each year can be directly compared? | We will include more information on this in the final plan. |
| MN Department of Natural Resources | Jenifer Sorensen | As part of its vegetation restoration efforts, has VLAWMO considered mapping greenways within the watershed with the goal of prioritizing land preservation efforts and vegetation management (such as buckthorn eradication)? | Thank for the comment. We share the same sentiment and hope to approach this conversation in the future. |
| Ramsey County Public Works | Molly Churchich | Page 7, Strategy 1-2-4: "Water Policy" is identified in the first sentence. Where is this document that is referenced? I did not see it in the Appendix. | The Water Policy is available on the VLAWMO website. It is not included with the Plan as it is a document that will be updated by the end of 2017. We prefer to keep it as a separate document accessible via our website rather than part of the Plan to reduce the need to write Amendments for the Plan. We will make an effort to clearly state this in the Plan and to state where people can find the VLAWMO Water Policy on our website. |
| Ramsey County Public Works | Molly Churchich | Page 23, Section 3.2 - The second bullet on page 23 notes "Watershed literacy" while the second bullet on page 22 notes "environmentally literate". Consider unifying terms to be consistent and for clarity if these terms reference the same goal. i.e. revise to either watershed literacy or environmentally literate. | We will make this adjustment in the final draft. |

| Agency | Name | Agency Comment | VLAWMO Response | |
|----------------------------|-----------------|---|--|--|
| Ramsey County Public Works | Molly Churchich | Page 23, Section 3.2 - The fifth bullet's first sentence seems incomplete. What is it trying to convey? | We will make this adjustment in the final draft. | |
| Ramsey County Public Works | Molly Churchich | Page 25, Section 3.3 - In the Capital Projects section, the fourth sentence needs the word "thorough" replaced with "through". | We will make this adjustment in the final draft. | |
| Ramsey County Public Works | Molly Churchich | Page 25, Section 3.3 - In the Capital Projects section, what types of BMPs will be tracked in relation to land area coverage? Will underground stormwater treatment areas be included or surface stormwater treatment areas only? Is tracking the amount of land related to quantifying area dedicated to BMPs or quantifying the drainage area treated by each BMP? | We will track the nutrient removals (TP & TSS) for BMPs that receive public funding. We will make that clear in the Plan. | |
| Ramsey County Public Works | Molly Churchich | Page 35, Section 4.2 - A general comment related to Hoffman Road is that the road was resurfaced in 2013 and no improvements are planned within the next 10 years. Ramsey County ROW Permitting may be a good resource for partnership, in the instances where VLAWMO may not be notified of a project, as county ROW staff receive developer's plans along Hoffman Road. | The intention for the Hoffman Road redevelopment statement is in reference to buildings that may be redeveloped, rather than the road itself, although if any work is done in the future, we would like to be part of the discussion regarding any water quality improvements. | |