

SWMP Section	Topic	Comment	Response
<b>Metropolitan Council Comments</b>			
1.1	MS4 Permit	According to section 1.1, "this SWMP serves to further define the goals of the City's NPDES MS4 Permit and associated Stormwater Pollution Prevention Program (SWPPP) by merging these similar yet separate programs into one document." The MPCA re-issued the MS4 General Permit in November, 2020. The city's SWPPP and this plan should be reviewed to determine if any changes are needed to meet the conditions of the reissued permit.	Revised. Chapter 4, Chapter 5, and the implementation table (previously Table 24, now Table 26) have been revised to meet the conditions of the reissued MS4 General Permit.
5.2.6	Regulatory Program	Regulatory program states that the city has adopted engineering design standards for stormwater management. These standards (or a summary of them) should be included in the plan.	Revised. A web link to the City's municipal code and Engineering Design Standards for Stormwater Management document was added to section 5.2.6.
5.4	Implementation	Table 24 includes actions corresponding to the objectives identified in Chapter 4. (Issues, Goals, and Objectives). According to the plan, the table is a comprehensive list of implementation activities that may or may not be budgeted, depending on available funding. This table provides a good foundation for plan implementation, but Minnesota Rules Chapter 8410 requires a capital improvement program in local water plans that extends through the term of the plan. The city's larger comprehensive plan update includes a 5-year (2019-2023) Capital Improvement Program (CIP). This CIP includes projects listed under the heading "Surface Water Fund." The city should consider adding these projects, and the highest priority implementation actions for the subsequent five years, to the plan to form the CIP required for this SWMP. We realize it may be difficult or unrealistic to plan so far in advance, but technically this is what is required by the Rule. High priority projects included in the CIP, even if funding has not been approved or identified for them, likely have a better chance of being implemented if additional funds become available at some point.	Revised. A capital improvement plan table (Table 27) was added to Chapter 5, section 5.4. The CIP in the Comprehensive Plan will be replaced with the latest CIP that includes the Surface Water Fund items in Table 27.
<b>VLAWMO Comments</b>			
2.3.4	Intercommunity Flows	Table 2: Discharge Rates to Neighboring Communities: would data from VLAWMO's automated samplers along Lambert Creek be useful in updating missing data in this table? <a href="https://monitormywatershed.org/browse/">https://monitormywatershed.org/browse/</a>	The automated samplers do not appear to tie storm events (2-, 10-, and 100-yr events) to flows; therefore, missing data in Table 2 is not able to be updated at this time.
5.2.2	Lake, Stream, and Wetland Management	High quality lakes are specified, and Goose Lake is specified under impaired waters, but could also be accompanied with the phrase of "identified problem area" to match the category of identifying problem areas outlined in the MN statute.	Revised. The first paragraph in Chapter 4 has been revised to be consistent with the language in MN Rule Part 8410.0160.
5.2.6	Regulatory Program	The City's stormwater ordinance and corresponding Engineering Design Standards for Stormwater Management, adopted in 2015, regulate erosion control and stormwater management for land disturbing activities. The City's design standards define requirements for: VLAWMO updated our water management policy in 2016 and was adopted by each of our cities and township, because VLAWMO is not a permitting agency, are the Cities Stormwater rules and adopted official controls consistent with the VLAWMO 2016 update?	Revised to include WMO plans. Language was also included in section 3.2.4, objectives 6.1 and 6.2 in Table 20 (Chapter 5) and Table 26.
4.1.3	Stormwater Runoff Management Past Projects	For the public works building green roof, VLAWMO contributed grant funds in partnership with WBL for this project, in addition to the funding that is listed.	Revised. Language has been added to include the VLAWMO grant.
4.7.1	Pollution Prevention, Operations, and Maintenance Polices, Goals, and Objectives	Table 19: Concerning Central Middle School maintenance, VAC truck cleaning is a foundational part of the ongoing maintenance and would be a welcome addition in this part of the table.	Revised. Language has been added to clarify that the City's maintenance role is to maintain the sumps and underground pipe using the vac truck.
Chapter 5	Implementation	As related to the Birch Lake subwatershed, consider including additional funding to pursue subwatershed raingarden projects or other stormwater runoff projects to proactively protect Birch Lake in partnership with VLAWMO. This could be including (but not limited to) partnership with VLAWMO's Cost share program and /or exploring a possible partnership with Ramsey County and VLAWMO related to the proposed Otter Lake Road project.	Revised. Added objective 2.13 "Birch Lake subwatershed retrofit projects" has been added to Table 15 (Chapter 4) and Table 26 (Chapter 5)
Chapter 5	Implementation	As related to the Ditch 13 subwatershed, consider partnership to investigate the feasibility of retrofitting the Whitaker Park wetland stormwater treatment facility.	Revised. Objective 2.9 "Partner with VLAWMO to investigate the feasibility of retrofitting the Whitaker Park wetland stormwater treatment facility" has been added to Table 15 (Chapter 4) and Table 26 (Chapter 5)

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Chapter 5	Implementation	As related to the Goose Lake Subwatershed, the City and VLAWMO are currently partnering on implementation of East Goose Lake ALM stakeholder engagement and planning activities. Depending on timing for completion and consideration of the ALM engagement and planning work, the City may wish to consider additional "placeholder" funding for item 2.2 in table "Collaborate with VLAWMO on the implementation of adaptive lake management programs and projects". This additional funding could be considered a "placeholder" until the completion and Council consideration of the East Goose ALM engagement and planning phase. As was presented to the Council in Oct. 2020, the rough draft 3-5 year estimated range of costs for possible City partnership for implementation of the four ALM management category is \$207,000 - \$355,000 (which does not assume partnership on fish management).	Revised. See objective 2.1 and 2.2, Table 15 (Chapter 4) and Table 26 (Chapter 5)
4.2.1	Impaired waters	Table 10. Gem Lake was delisted; this could be updated in the impaired waters table (Note it is updated in Table 11)	Revised. A footer was added to Table 10 noting that Gem Lake was delisted in 2018.
2.7.1	Lakes and Wetlands	VLAWMO data shows Birch Lake with a max depth = 7.4 ft, surface area = 125 acres, and subcatchment area = 647 acres. VLAWMO data for East Goose shows East Goose as 120 acres (surface area) and West Goose as 25 acres (surface area). If this information is updated in the final version of the plan, it should also be updated in Table 5 on p. 31.	Revised
2.8.2	Rare Plants and Animals	Table 7: Additional species reported in WBL include: Mussels: Pyganodon grandis, Lampsilis siliquoidea, Pyganodon lacustris; and a Caddisfly: Limnephilus secludens	Revised.
4.3.2	Natural Resources Management and Recreation - Policies, Goals, and Objectives	Table 15: Upland habitat restoration projects with potential could include Rotary Park Nature Preserve on Birch Lake. Amur maple and Honeysuckle control could be added, and maintenance of previous prairie species would improve existing habitat. (Maintenance plan included in section 3.11)	Revised. Added Rotary Nature Preserve to objective 3.5 in Table 17 (Chapter 4) and Table 26 (Chapter 5)
4.3.2	Natural Resources Management and Recreation - Policies, Goals, and Objectives	Table 15: Consider adding ongoing support for invasive species removal maintenance with VLAWMO at 4th and Otter.	Revised - added objective 3.10 and 3.17 in Table 17 (Chapter 4) and Table 26 (Chapter 5)
Chapter 4	Public Education	Table 17: A component of the new November, 2020 permit that isn't apparent in the draft WBL water plan is "consideration should be given to low-income residents, people of color, and nonnative English speaking residents." The MPCA provides an environmental justice resource for helping to identify these areas. Documents to help review new permit guidelines are available through VLAWMO or MPCA.	Revised. Language was added to objective 5.1 in Table 19 and Table 26.

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<b>VBWD Comments</b>			
2	Physical Setting	The Physical Setting chapter does a nice job of including some background information along with City-specific data to provide some context for readers who may not have a technical background.	Noted. Thank you for your comment.
2.3.3	Stormwater Infrastructure	Section 2.3.3 states "Because this rapid expansion occurred prior to the passage of the Wetland Conservation Act of 1991, some of the smaller wetlands and lakes receiving stormwater were regraded as part of development." It is unclear if this statement means that some wetlands were completely developed (e.g., filled), utilized as components of the stormwater system (e.g., receiving untreated stormwater), or both. Consider revising the Plan text to clarify.	Revised
2.3.3	Public Ditches	Although the public ditch authorities are noted later in the Plan, consider identifying the public ditch authorities in Section 2.3.3 also.	Revised
2.3.5	Floodplains	This section must be revised to note that the VBWD has evaluated flood risk and estimated 100-year water surface elevations within the Silver Lake watershed.	Revised
2.6	Climate Data	Section 2.6 notes that National Oceanic and Atmospheric Administration's (NOAA) Atlas 14, Volume 8, supersedes Technical Paper 40 as a referenced for rainfall frequency estimates. Consider noting that the City's regulatory program uses Atlas 14 as the basis for project review.	Revised
3.2.3	VBWD	This section accurately identifies the VBWD's regulatory and permitting authority within the City, as well as the VBWD's role as the local governmental unit for implementing the Wetland Conservation Act. However, we recommend removing reference to the VBWD's role as public ditch authority, as there are no public ditches within the area of the city located within the VBWD.	Revised. The reference to VBWD as the ditch authority in section 3.2.3 has been deleted.
4	Stakeholder Engagement	The first page of Chapter 4 describes several activities the City used to solicit stakeholder input during Plan development. We appreciate the City's many efforts to gathering resident, business, and other stakeholder input to assist in identifying issues.	Noted. Thank you for your comment.
4.6.1	Floodplain Management	Section 4.6.1 notes that there is concern that FEMA flood insurance rate maps may contain outdated information. This section should be updated to note that the VBWD has performed more recent hydrologic and hydraulic modeling of the Silver Lake watershed and estimated 100-year flood elevations.	Revised
5.2.1	Volume Reduction	Table 21 summarizes volume reduction banking totals through 2020. Consider presenting this information for the area tributary to the VBWD, if known.	We do not have a volume reduction bank with VBWD
5.2.1	Stormwater Runoff Management	This section describes watershed district hydrologic and hydraulic modeling updates to reflect recent climate data. The VBWD has updated its hydrologic and hydraulic modeling of the Silver Lake watershed since the adoption of its 2015 watershed management plan. The modeling was performed using a continuous precipitation record dating back to 1949, from which the 100-year event has been extrapolated using statistical methods. This information is provided for future reference - no edit is	Revised. This language has been added to section 5.2.1 - Climate Adaptation.
5.2.6	Regulatory Program	We appreciate that the City explicitly states the intent for the VBWD to retain permitting authority within the part of the City within VBWD jurisdiction.	Noted. Thank you for your comment.
5.2.6	Floodplain Management	Section 5.2.6 notes that the City floodplain regulations apply within the Floodplain Overlay District, which includes FEMA-mapped floodplains. This section further notes that the RCWD has worked with cities to submit modeling results to FEMA. This section must be revised to note that the VBWD has performed H&H modeling for the Silver Lake watershed and established 100-year water surface elevations that are referenced by the VBWD Rules and permit program.	Revised
5.2.7	Stormwater Related Maintenances Agreements	Section 5.2.7 notes that the City has entered into several stormwater maintenance agreements. The text implies that in some cases, the City agrees to maintain privately-owned stormwater infrastructure. Consider more explicitly stating that owners of private stormwater infrastructure are responsible for its maintenance unless otherwise addressed by a maintenance agreement.	Revised
<b>RCWD Comments</b>			
1.1	Purpose	The RCWD Board of Managers adopted the District's 2020 Watershed Management Plan on April 8, 2020. Please update the plan year to 2020-2029	Revised
1.2.1	State Statutes and Rules	Minnesota Rule 7090, last paragraph, first sentence (& Chapters 5.2, 5.2.2 & 5.2.6): The MPCA recently reissued the MS4 permit on November 16, 2020, which covers the years 2020-2025. Please update the years listed any past tense language and evaluate/update if the City's plan and SWPPP need revisions to meet the requirements of the reissued permit.	Revised

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2.3.3	Drainage System, Public Ditches	a) First paragraph, last sentence: Please revise sentence to “Today, these ditches no longer serve agricultural land and function as the outlet for stormwater runoff.”	Revised
		b) Similar to Chapter 5.2.7, please add that the watershed management organizations are the drainage authorities for these public drainage systems within the City or see RCWD comment 26 (a)	Revised
		c) County Ditch 11: Please revise second sentence to “RCD 11 starts on the south side of Highway 96 and generally flows north through a culvert under Highway 96, then northwest into Bald Eagle Lake in White Bear Township.”	Revised
2.3.4	Intercommunity flows	The RCWD model was recently updated throughout the District which has modified the current intercommunity flows. Please use the updated rates in the enclosed table and add a brief statement on the City’s measures for managing these flows, such as “The City will ensure these rates do not increase through the implementation of its policies and ordinances and reliance on watershed district rules.”	Revised. Language has been added and Table 2 flow rates have been revised.
2.7.1	Lakes and Wetlands	White Bear Lake, second paragraph, second sentence: The two outlet pipes do not quite extend all the way under Highway 96 and instead discharge to a stormwater pond adjacent to the Ramsey County beach parking lot, which flows through a drainage channel and into the RCD 11 system. Please revise.	Revised
3.2.2	Rice Creek Watershed District	a) Second sentence: The RCWD currently covers approximately 186 square miles; please update. For consistency with the other WMO descriptions please add the communities that RCWD covers, which include Arden Hills, Birchwood Village, Blaine, Centerville, Circle Pines, Columbia Heights, Columbus, Dellwood, Falcon Heights, Forest Lake, Fridley, Grant, Hugo, Lauderdale, Lexington, Lino Lakes, Mahtomedi, May Township, Mounds View, New Brighton, Roseville, Saint Anthony, Scandia, Shoreview, Spring Lake Park, White Bear Lake, White Bear Township, and Willernie.	Revised
		b) Third sentence: Please add “local government unit (LGU)” after “WCA” and revise “ditch authority” to either “drainage authority” or “drainage authority for MS 103E public drainage systems” for clarity.	Revised
3.3.1	Ramsey County	last sentence: Please revise to “The SWCD also provides free technical assistance and cost share funds for water quality and habitat restoration projects in the County, and in partnership with RCWD and RWMWD assists with the implementation of the Districts’ cost share programs.”	Revised
3.4.5	Washington Conservation District	Last sentence: Please revise to “The WCD also provides technical assistance and cost share funds for projects that protect land and water in the County, and in partnership with RCWD, RWMWD, and VBWD assists with the implementation of the Districts’ cost share programs.”	Revised
4.1.1	Stormwater Runoff Management Issues, Stormwater Runoff Rate and Volume	last paragraph, last sentence: The City may wish to consider adding to Table 9 or Chapter 5 that the City could participate in a future State Water Reuse Clean Water Fund expanded workgroup to stay informed on any proposed stormwater reuse regulation.	Revised. Language added to Table 9 and Table 26
4.1.3	Lions Park Pervious Parking Lot	last sentence: Please revise to “Through its regulatory program, the Rice Creek Watershed District approved a water quality treatment volume of 5,130 cubic feet that the City can use as credit for a future project.”	Revised
4.1.3	Boatworks Commons Stormwater Reuse System	third sentence: The irrigation system was not part of the RCWD permit requirements. The RCWD permit requirements were met with the underground infiltration system. Please revise, such as by removing this sentence or relocating it to the fourth sentence in discussion of the underground infiltration system.	Revised
4.1.3	2018 and 2019 Raingardens	last sentence: Please revise “and committed” to “and are committed” for clarity that the residents are currently responsible for the operation and maintenance.	Revised

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4.2.1	Lake, Stream, and Wetland Management Issues, Impaired Waters, Table 10.	a) The MPCA's 2020 Draft Impaired Waters list contains a target completion year for a Priebe Lake TMDL of 2024 and the Statewide TMDL for Mercury was approved in 2007; please update.	Revised
		b) Please add Clearwater Creek's impairments which are benthic macroinvertebrate bioassessments, fish bioassessments, and dissolved oxygen. The MPCA 2020 Draft Impaired Waters list contains a target completion year for a TMDL to be 2024. If a policy is added to Table 13 the objectives could be similar to #2.4 and the Bald Eagle Lake objectives.	Revised. Clearwater Creek added to Table 10 and objective 2.4.
		c) Recommend revising "Rice Creek" to "Rice Creek from Long Lake to Locke Lake" for clarity.	Location is included in the notes at the bottom of Table 10
4.2.2	Lake, Stream, and Wetland Management Policies, Goals, and Objectives	a) Table 13&24: Objective 2.5: Please revise to specify the school district.	Revised
		b) Table 13&24: Objective 2.15: Please add "with RCWD" to "explore opportunities."	Revised
4.3.3	Lions Park Lakeshore Restoration	third sentence (& Chapter 5.2.4): Recommend revising "Ramsey Conservation District" to their current name of Ramsey County Soil and Water Conservation Division for consistency.	Revised
4.3.3	Priebe Lake Restoration Project	first sentence: The Ramsey County Soil and Water Conservation Division was formerly the "Ramsey Conservation District"; please revise.	Revised
4.4.1	Groundwater Management Issues	White Bear Lake box: Recommend also including a link or reference to the related USGS studies and the DNR's protective elevation for the lake of 922 feet.	The DNR analysis appears to be more recent than the USGS study, and uses an updated model. We chose to link only to the most recent data.
4.4.1	Groundwater Management Issues, Groundwater Quality	fourth paragraph, last part of the last sentence: Please revise to "avoid constructing infiltration practices if infiltration may mobilize the contaminants at these locations" to be consistent with MPCA guidance.	Revised
4.5.2	Public Education and Participation Policies, Goals, and Objectives,	Table 17, Objective 5.13: Please update "RCD" to Ramsey County "SWCD	Revised
4.6.1	Regulatory Program Issues:	Please more clearly indicate what the City has. For example, at the end of the paragraphs in this chapter, instead of stating these programs "must include an ordinance and procedures" the City could state "the City's construction site runoff control program includes an ordinance and procedures for site plan review, etc."	Revised. Chapter 5. Implementation describes the ordinances in detail. A reference to Table 23 in section 5.2.6 that lists all official controls related to stormwater management and water resource protection was added to 4.6.1. The suggested language in this comment was included in section 5.2.6.
4.6.2	Regulatory Program Policies, Goals, and Objectives	Table 18, Objective 6.22 (& Table 24 #6.22): Please clearly indicate the WMO's are the WCA LGUs within the City.	Revised
5.2.1	Stormwater Runoff Management, Stormwater Rate and Volume Control	fourth paragraph, fourth sentence: Please revise "buy down" to "use its credits on future projects."	Revised
5.2.4	Groundwater Management, Groundwater Quantity	fourth paragraph: Please clarify if since 2018 the MN DNR requires identification of conservation projects or if it was a past requirement.	Revised
5.2.5	Public Education and Participation	third paragraph, third sentence: Per section 17.3 of the 2020 MS4 permit, MS4s are required to host an annual opportunity for the public to provide input on their SWPPP, which can still specifically be a public meeting to satisfy the requirement. Please revise.	Revised

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5.2.6	Regulatory Program	a) Official Controls, Table 23: Please add links to the City's erosion control, floodplain, and shoreline ordinance webpages or include copies of the ordinances in the appendix of this plan. Please also link or include a copy of the City's Engineering Design Standards for Stormwater Management in the appendix of this plan.	Revised. A web link to the City's municipal code and Engineering Design Standards for Stormwater Management document was added to section 5.2.6.
		b) Wetland Management, third paragraph, third sentence: Recommend revising this sentence to "The City continues to defer administration of the WCA to the water management organizations" to reflect the current roles more closely.	Revised
5.2.7	Pollution Prevention, Operations, and Maintenance	a) City-owned Stormwater Facilities, second paragraph: Please see the second part of RCWD comment 6(b) or recommend relocating this second paragraph to Chapter 2.3.3 to avoid any confusion on which entities have jurisdiction.	Revised
		b) Winter Street Maintenance Program: The City may also be interested in attending MPCA's Smart Salting trainings, some of which are available online. This could be added as an option to this section and/or Chapter 4.7.2 table 19 and the Implementation Plan Table 24.	Revised. Our winter street maintenance personnel recently attended this training.
6.1	Formal Plan Review and Adoption	last paragraph, last sentence: Please revise to "Upon approval of the SWMP by the watershed management organizations, the City Council must formally consider and adopt the final SWMP through a Council Action within 120 days of approval."	Revised
Figure 8		Please add a few more flow arrows to include the areas that flow into White Bear Lake.	Revised
Figure 10		The colors used to differentiate between apron, catch basin, and manholes are unclear. Please increase the contrast between the symbols. If the City owns any stormwater ponds, please include these on the figure and legend. If the information is available, please also add pipe sizes to this figure.	Revised. Apron, catch basin, and manholes are different colors. The City does not own any constructed stormwater ponds. Pipe sizes were not added to the figure because the map would have too much information and would be difficult to read.
Table 24	Implementation Plan	Please add an estimated schedule for project #1.6, which could be the same as project #1.1.	Revised
		If the City is still interested in the idea of pursuing pervious/permeable alleys, RCWD encourages the City to include the potential project in this plan with RCWD as a possible partner and funding source, especially in Implementation Plan Table 24 to improve the likelihood of receiving grants.	Revised
All	All	comments 1-46: misc formatting comments.	Revised

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<b>Washington County - SWMP related comments from six month Comp Plan review</b>			
	Groundwater	Minnesota State Statute 103b.235 subdivision 3 states that Local Water Management Plans, identified in White Bear Lake's Comprehensive Plan as the Surface Water Management Plan (SWMP), must be submitted to a county for review if the county has a state approved and locally adopted groundwater plan. The county's most recent groundwater plan was adopted on September 23, 2014. The Washington County 2014-2024 Groundwater Plan has the goal to "manage the quality and quantity of groundwater in Washington County to protect health and ensure sufficient supplies of clean water to support human uses and natural ecosystems." Please submit your Water Management Plan to the county for review.	Complete. The SWMP was submitted to Washington County for review. No comments were received.
	Groundwater	The County is encouraged by the city's proactive approach to water conservation practices. Please consider listing Washington County as a potential partner on future water conservation projects and practices.	Complete. Table 26 lists Washington County as a partner for water conservation related implementation items.
<b>DNR - SWMP related comments from six month Comp Plan review</b>			
	NHIS Rare Species Database	<p>We appreciate the discussion of native habitat in the plan. For further conservation planning and to ensure compliance with the Minnesota endangered species laws, the DNR encourages communities to check the NHIS Rare Features Data for known occurrences of state-listed species. The NHIS Rare Features Data contains nonpublic data and can only be accessed by submitting a License Agreement Application Form for a GIS shapefile or by submitting a NHIS Data Request Form for a database printout. Both of these forms are available at the NHIS webpage. Consider adding a discussion of what the city can do to preserve the species and preserve their habitat into the future (see section below on more policies to protect wildlife).</p> <p>For instance, one of the species that shows up in White Bear Lake in the Rare Features database is Blanding's Turtles (<i>Emys blandingii</i>). The DNR's Blanding's Turtle fact sheet describes the habitat use and life history of this species. The fact sheet also provides two lists of recommendations for avoiding and minimizing impacts to this rare information about the type of habitat that may harbor these turtles.</p> <p>Blanding's turtles use upland areas up to and over a mile distant from wetlands, as well as wetlands. Uplands are used for nesting, basking, periods of dormancy, and traveling between wetlands. Because of the tendency to travel long distances over land, Blanding's Turtles regularly travel across roads and are therefore susceptible to collisions with vehicles. Any added mortality can be detrimental to populations of Blanding's turtles, as these turtles have a low reproduction rate that depends upon a high survival rate to maintain population levels. Other factors believed to contribute to the decline of this species include wetland drainage and degradation, and loss of upland habitat to development.</p> <p>For more information on the biology, habitat use, and conservation measures of these rare species, please visit the DNR Rare Species Guide. NHIS training includes rules for using/displaying nonpublic data in public documents.</p>	Revised. Table 7 in Chapter 2 lists the animals, plants, and ecosystems within the City of White Bear Lake identified in the NHIS. Objective 3.6 was added to Table 26 as an action item to identify and preserve the habitat of species listed in the NHIS. Added language to Chapter 5, section 5.2.3.
	Groundwater	Your community is within the North and East Metro Groundwater Management Area (GWMA), designated by the Minnesota DNR. The North and East Metro GWMA includes all of Washington County, and a portion of Anoka and Hennepin Counties. The GWMA Plan will guide the DNR's efforts to manage groundwater appropriately sustainably in this area over the next five years. The Plan establishes sustainability goals to help appropriation permit holders plan for their future water use and ensure groundwater supplies remain adequate to meet human needs while protecting lakes, streams and wetlands. White Bear Lake participates on the advisory team for the GWMA.	Complete. Groundwater objectives, including participation in the GWMA advisory team, is included in Chapter 4, Table 18.
	Native Species	The Comprehensive Plan could reinforce the city's pollinator-friendly resolution by discussing native plants and pollinators in multiple places in the documents, such as the land use, economic competitiveness and housing sections to encourage developers of private and public lands to use native flowers, grasses, shrubs and tree species. Plant lists and suggestions for native plants can be incorporated into: 1.) Proposed landscape guidelines to improve the aesthetics in for housing, commercial and industrial areas; 2.) Street tree planting plans; 3.) City gateway features; 4.) Along ponds and waterways; 5.) Small nature play areas in tot lots; 6.) Along the edges of ballfield complexes; and, 7.) Lakeshores.	Complete. In the SWMP, native plants for pollinator information and objectives are included in Chapter 4, Section 4.3 and 4.6; and Chapter 5, section 5.2.3 and 5.2.6.

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	Invasive Species	<p>The section describing invasive species contains useful information for city residents and developers. We suggest adding the Latin names as well as the common names. In that section, or in the implementation section, you could include a strategy to encourage citizens as well as staff to report invasive species {to} the county weed management coordinator. Species to consider adding to the list include: invasive European common reed, phragmites australis, which has been verified along the south lake shore {of White Bear Lake}.</p>	<p>Revised: The SWMP contains a table of common aquatic invasive species identified in the City (Chapter 4, Table 16), which includes European Common Reed. Scientific names have been added to the list. Added reporting language to objective 5.1 in Table 19 and 26.</p>
	Development and transportation policies to protect wildlife	<p>Consider adding policies that take wildlife into consideration in transportation and redevelopment projects. To enhance the health and diversity of wildlife populations, encourage developers of private and public lands to retain natural areas or restore them with native species after construction. One larger area is better than several small "islands" or patches; and connectivity of habitat is important. Animals such as frogs and turtles need to travel between wetlands and uplands throughout their life cycle. These considerations are especially relevant for redevelopment areas that are adjacent or between two wetlands. Consult DNR's Best Practices for protection of species and Roadways and Turtles Flyer for self-mitigating measures to incorporate into design and construction plans.</p> <p>Examples of more specific measures include:</p> <ul style="list-style-type: none"> <li>• Preventing entrapment and death of small animals especially reptiles and amphibians, by specifying biodegradable erosion control netting ('bio-netting' or 'natural netting' types (category 3N or 4N)), and specifically not allow plastic mesh netting;</li> <li>• Providing wider culverts or other passageways under paths, driveways and roads while still considering impacts to the floodplain;</li> <li>• Including a passage bench under bridge water crossings because typical bridge riprap can be a barrier to animal movement along streambanks;</li> <li>• Employing curb and storm water inlet designs that don't inadvertently direct small mammals and reptiles into the storm sewer. Installing "surmountable curbs" (Type D or S curbs) allows animals (e.g. turtles) to climb over and exit roadways. Traditional curbs/gutters tend to trap animals on the roadway. Another option is to install/create curb breaks every, say, 100 feet (especially important near wetlands);</li> <li>• Using smart salting practices to reduce impacts to downstream mussel beds, as well as other aquatic species; and,</li> <li>• Fencing could be installed near wetlands to help keep turtles off the road (fences that have a j-hook at each end are more effective than those that don't).</li> </ul>	<p>Revised. Language added to Chapter 4, Table 17 and Table 20; and Chapter 5, section 5.2.6.</p>