

# Sunrise River WMO

## 3<sup>rd</sup> Generation Watershed Management Plan

### 60-day comment period

## Comments received and SRWMO responses

Topic	Comment	SRWMO Response
<b>Comments from Metropolitan Council</b> (letter from William Moore dated 8-19-09)		
All	“The Plan is consistent with the Council’s Water Resources Management Policy Plan.”	Comment acknowledged. No changes needed.
Performance Standards	“The Council commends the watershed for setting up a technical advisory committee (TAC) consisting of agency staff, cities and township impacted by the proposed plan amendment standards to provide upfront input on the development of the watershed plan.”	This compliment is appreciated.
Priorities	“The plan has identified seven priority areas: water quality, septic systems, education, aquatic invasive plants, funding, sewers, and lakeshore restoration. These priority areas are addressed in the plan’s 10 year action plan. The plan also details activities of the WMO as well as activities of member cities. In order for this plan to be successful and protect water quality in this area the various action items need to be accomplished. The plan does outline an oversight mechanism it plans to assure compliance with the plan.”	Comment acknowledged. No changes needed.
<b>Comments from MN Pollution Control Agency</b> (letter from Glenn Skuta dated 9-29-09)		
Impaired waters	“The updated plan does discuss impaired waters, however they are mentioned under the lake or stream descriptions. Although this is helpful, it may be more useful to include a table with the impairments earlier in Chapter 2.”	The summary table of impaired waters you provided in your letter has been added to Chapter 2 (Resource Inventory).
Impaired waters	“Addressing impaired waters in watershed plans is voluntary, however, the MPCA strongly encourages watershed organizations to consider how their plan address impaired waters available on the MPCA’s web site at:...” “It is suggested that the Plan: 1. Include a list of impaired waters and types of impairments.	1. Table with impaired waters and types of impairments has been added to Chapter 2. 2. The Anoka Conservation District submitted a 303(d) list comment letter to the MPCA on October 19, 2009 asking that the impaired designation of these ditch segments be reconsidered. The letter provides information that should aid the MPCA in determining if low DO and pH are natural. We anticipate feedback from

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	<p>2. Page 39, Priorities, WQ, and Bullet #5: Since there is a concern that dissolved oxygen in some streams within the WMO may be naturally low, it might be useful to include that within the next few years more monitoring is needed. This could help determine if those conditions are naturally occurring, and if so, a request could be made for delisting. A follow up with the MCPA Professional Judgement Team could be helpful to determine what monitoring is needed.</p> <p>3. Page 39, Priorities, WQ: Include a bullet indicating that work will be done to reduce nutrients within the WMO for not only local waters, but reductions will also benefit the Sunrise River and Lake St. Croix. It should also be stated that the Lake St. Croix TMDL is currently underway which will assign allocations and percent reductions for nutrients to watershed in the basin; this includes the Sunrise River Watershed. Once the TMDL and the implementation plan are approved, increased funding sources will be available to implement BMPs throughout the WMO and the Sunrise Watershed. (Include this in the goals section as well.)</p> <p>4. Consider adding that the issue of protection of waters of high importance. This could include waters that are not assessed, waters that have no current TMDLs underway, or areas currently meeting the water quality standard. Addressing protection in this Plan could give the WMO some priority for Clean Water Partnership (CWP) protection funding.</p> <p>5. Page 43, Chapter 4, Priority Topic #1 WQ; It is mentioned to work with the St. Croix Basin Team to reduce phosphorus by 20 percent in the basin. There is mention, also of 20% reduction in the Sunrise Watershed. This number may actually be determined to be greater than 20% for the Sunrise. It would be better to mention that efforts will be made to achieve the necessary reductions required by the Lake St. Croix TMDL, and any future TMDLs in the Sunrise River Watershed. The Sunrise River is a major contributor of phosphorus to Lake St. Croix.</p> <p>6. Page 58, Martin and Typo Lakes TMDL: Change the end date to mid to late 2010. Timing will depend on EPA's turnaround</p>	<p>MPCA before our plan is finalized, and will update our plan accordingly.</p> <p>3. We added a statement to the SRWMO Board's priorities for impaired waters recognizing that our watershed contributes to downstream impairments of the Sunrise and St. Croix Rivers. In our goals and actions for water quality we added implementing projects and practices recommended in the Lake St. Croix TMDL. We now will be working on three "nested" TMDLs including Martin and Typo Lakes, Sunrise River, and Lake St. Croix; our focus is on the first because it benefits all the others.</p> <p>4. Our plan had a priorities statement that included both impaired waters and protection. We have split that statement. The priorities statement for protection is:  "Maintaining good conditions in non-impaired waterbodies is important. Coon Lake has good water quality, but there is some concern about declining water quality. Island Lake is of good quality. Fawn Lake is of exceptional quality."</p> <p>5. It seems that long and short term goals are appropriate. In the short term will strive for 20% phosphorus reductions, which is a lofty goal given the magnitude of loading that is occurring. In the longer term we hope to achieve the TMDL goals. Preliminary TMDL goals are for massive reductions and will be exceedingly difficult. We feel it is important to have a 20% goal as an achievable stepping stone. The draft has been changed to reflect this approach.</p> <p>6. The change has been made.</p>

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	time and when we get the TMDL in final form.	
Funding	“Funding for TMDL studies and implementation plans may be available through the MPCA...”	The information is appreciated. We plan to pursue funding partnerships.
Data	“We encourage the watershed to visit [the MPCA’s Environmental Data Access] site for water quality monitoring data...”	The information is appreciated.
Septic Systems	<p>“The Plan identifies that data from surveys and permit reviews, in addition to other evidence that indicates septic compliance levels are low. It is suggested that that Plan:</p> <ol style="list-style-type: none"> <li>1. Include a list, chart, or map indicating non-compliant septic systems or at least the number of systems.</li> <li>2. List the LGUs in the WMO and the year their septic ordinances were adopted. Also include what they are doing to track and/or ensure maintenance and upgrade of non-complying systems.</li> <li>3. Identify potential funding opportunities that should be looked into, such as Clean Water Partnership Loans, Ag BMP funds, and other potential sources.”</li> </ol>	<ol style="list-style-type: none"> <li>1. Good data to fulfill this request is not available. Estimates of non-compliant systems are available through annual SSTS reports from municipalities to MPCA but they do not break out portions in- and outside of the WMO. Moreover, it does not identify neighborhoods with disproportionate problems or individual properties. Also, these are only estimates. We are more concerned about the non-compliant septic systems that we don’t know about than those that are already identified and being addressed. Implementation of newly-revised MN Rules 7080-7082 will identify these.</li> <li>2. The first table in Chapter 6 (Impact on Local Government lists the status of septic ordinances and shows that all are in need of updates to comply with 2008 updates to Minnesota Rules 7080-7082. We will add the following to our discussion of this topic: “Three communities track individual septic system maintenance through a database and send individual maintenance reminders. Linwood has paper records and sends community-wide maintenance reminders, but without a database does not actively track compliance.”</li> <li>3. The implementation plan table that describes tasks lists funding options, but did not include Clean Water Partnership Loans. It has been added.</li> </ol>
Wetlands	<p>“The wetland inventory (Map N. 11) describes the location and type of wetlands that will be impacted by this project. The SRWMO could use more information in the plan detailing the functions of the wetlands identified. The Plan includes a copy of the SRWMO’s wetland standards, which are used for guidance when projects are occurring within the WMO. Also included in these standards are the requirement for a wetland delineation and classification on all projects meeting the requirements of the SRWMO’s Wetland Standard.”</p>	Detailed information about the functions of each wetland are not available. Given that our area is 50% wetlands and lakes, we find it best to compile wetland functions information on a case-by-case basis as projects are proposed that might have impacts. Our Wetland Standards lay out the procedure. Within the plan, comparing Maps 8, 9, 10, and 11 provides the reader a way to generally determine which wetlands are also significant natural areas, host rare species, or are public waters. The wetlands map differentiates wetland types.
Water Quality Standards	“The SRWMO did not mention Minn. R. 7050 within the draft document; however the plan adheres to the Minn. R. 8410 requirements. Providing that all 7050 rules are met under the	Upon follow-up communications, your staff provided this clarification to your comment: “...something in the document indicating that the WMO will continue to monitor and assess waters of

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	8410, the SRWMO will meet the MPCA rule requirements. The SRMWO is encouraged to verify that all 7050 rules are met and include this information in future plans.”	the state to ensure they are not violating their set standards. Basically ensuring or determining if waters within the WMO are achieving the set standards in 7050, and what they will do in the next ten years to do that...so basically mention 7050 and what they will do to ensure wq standards are being met or protected.” We have modified our action statement to do this.
Stormwater	“The requirements and items outlined in this [stormwater] standard appear to be comprehensive and complete.... The infiltration requirements outlined in the standard follow very closely the requirements of the Construction Permit. It is suggested that the Plan: 1. Include information detailing the impacts of runoff and stormwater on water quality. 2. Include a schedule indicating the necessary time for adoption of proposed stormwater standards, and other activities.”	1. The first paragraph of the stormwater standards provides this information. 2. Chapter 7, Plan Amendments and Local Water Plans, Local Water Plan section, outlines the following timeline for adopting local water plans and updating ordinances: “Member municipalities must update their Local Surface Water Management Plans to be consistent with this plan within 2 years of SRWMO adoption and update ordinances within 180 days thereafter (MN Statutes 103B.235 subd. 4). The WMO will review and approve these plans (MN Statutes 103B.235 subd. 3) and ordinances required by the SRWMO Plan.”
Water Quality Monitoring Plan	“It would be useful to include a copy of the monitoring plan as an appendix, along with a schedule for monitoring, and what parameters will be collected. Also reference any quality assurance documents that are used to ensure proper measures are used during monitoring.”	We chose to incorporate the monitoring plan into our implementation plan tables because that is the most frequently viewed part of the plan, assuring this information stays to the forefront.  Our implementation plan has been modified to reference MPCA standard operating procedures on your website that serve as quality assurance documents.
General	“Overall, the Plan looks very good, and the Anoka Conservation District should be commended for their effort.”	This compliment is appreciated.
<b>Comments from City of Columbus</b> (letter from Elizabeth Mursko 9-29-09)		
Budget Estimations	“Table 26 on page 71 provides the estimated financial contribution anticipated from each member community; however it does not match the budget proposal sent to the City of Columbus for Budget 2010 (discussed previously with Jamie Schurbon on telephone and received follow up email for Budget 2010).”	We have revised this table to be consistent with the 2010 budget submitted to, and ratified by, the member communities in early 2009.
Stormwater	“Page 45 [goals and policies] refers to man-made storm water ponds. The City of Columbus does not have the ponds currently mapped. We would recommend an extension be included in the plan form the 2012 compliance date to 2014.”	You reference the policy that member communities inspect storm water treatment basins by 2012 and again at least 5 year intervals. This will go hand-in-hand with the requirement to map these storm water facilities. We understand that East Bethel and Ham Lake have maps, Columbus has begun mapping, and Linwood has not begun. Given that 2010 budgets and work capacity are already set, we expect progress to begin in 2011. We agree that extending the timeline to 2014 is reasonable. The policy and Table 24 have

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		been revised.
Stormwater Standards	<p>“Page 2 [of the stormwater standards] states that mill and overly projects paving of existing gravel roads are exempt from storm water performance standards. We strongly support this exemption as these projects are the type of projects the City will mostly likely encounter in this watershed. We believe that paving roads reduces the environmental impact as it will eliminate the gravel in the ditches and overall dust issues.”</p>	<p>We, and our technical advisory committee, agree with you. No changes.</p>
<p><b>Comments from City of East Bethel (letter from Craig Jochum 10-15-09)</b></p>		
Resource Inventory – Lakes	<p>“The Ordinary High Water Level reported in Chapter 1, Table 10 for Rice Lake appears to be the elevation for Rice Lake in Lino Lakes, not East Bethel. The ID number for Rice Lake in Lino Lakes is 2-8P.”</p>	<p>The error has been corrected.</p>
Storm Water Standards	<p>“In Table 1 of the Stormwater Standards, open space in good condition lists a grass cover &lt;75%; we believe this grass cover should be &gt;75%.”</p>	<p>The error has been corrected.</p>
Changes Needed to City Local Water Plan	<p>“Changes in the Sunrise River Watershed Management Plan will require the following revisions to the East Bethel Water Management Plan.:</p> <ol style="list-style-type: none"> <li>1. The following policies need to be added to the Water Quality section of the East Bethel Water Management Plan:               <ol style="list-style-type: none"> <li>a. PUD’s and conservation development designs are encouraged for parcels containing, or are adjacent to, waterbodies, high quality wetlands, and natural communities.</li> <li>b. Discharge of waters from dewatering projects should be through some form of treatment that removes solids and other pollutants, and in a manner that maximizes groundwater recharge without causing damage to public or private properties.</li> </ol> </li> <li>2. In accordance with Table 25 in Chapter 6 of the Sunrise River Plan, the following East Bethel ordinances need to be updated:               <ol style="list-style-type: none"> <li>a. Septic system ordinance</li> <li>b. Stormwater ordinance</li> <li>c. Wetland ordinance</li> </ol> </li> <li>3. The following policies need to be added to the Water Quantity section of the East Bethel Water Management Plan:               <ol style="list-style-type: none"> <li>a. Where practical, stormwater conveyors shall not discharge directly into streams or lakes without at least primary sedimentation in natural or man-made basins.</li> <li>b. Require stormwater discharge volume control in new developments and redevelopment to be protective against future flooding problems.</li> </ol> </li> <li>4. The following policy needs to be added to the Wetland section of the East Bethel Water Management Plan:               <ol style="list-style-type: none"> <li>a. Consider wetland biotic communities when</li> </ol> </li> </ol>	<p>Thank you for your thorough review.</p>

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	<p>evaluating water level fluctuation (bounce) in wetlands.</p> <ol style="list-style-type: none"> <li>5. Minor changes to Section 5.2 of the East Bethel Water Management Plan will be required to comply with the Sunrise River Stormwater Performance Standards.</li> <li>6. Table 2 in Appendix C which outlines the Infiltration Rates for Hydrologic Soil Groups needs to be added to the East Bethel Water Management Plan.</li> <li>7. Text from Appendix C regarding maintenance plans and agreements for infiltration areas will need to be added to the East Bethel Water Management Plan.</li> <li>8. Text needs to be added to the East Bethel Water Management Plan which requires easements over areas inundated by a 100-year storm event and maintenance access.</li> <li>9. Minor changes to Section 5.1 of the East Bethel Water Management Plan will be required to comply with the Sunrise River Wetland Standards.</li> <li>10. The applicable buffer notes from Appendix C of the Sunrise River Plan need to be added to the East Bethel Ordinance.</li> <li>11. Appendix C states that the first half inch of runoff from new impervious surfaces must be infiltrated. It indicates that for government projects infiltration can be made off-site if not practical on-site. This requirement could add significant costs to street reconstruction projects. There is not typically sufficient area to provide for infiltration.</li> </ol>	
<b>Comments from Minnesota Dept of Natural Resources</b> (letter from Charlotte Cohn 10-16-09)		
General	<p>“Generally, this draft Third Generation Sunrise River Watershed Management Plan is mostly complete and well written and well-prepared. The DNR notes and acknowledges the effort expended on this Draft Plan. The content of the Draft Plan has gathered and compiled a substantial amount of background information. Particularly effective is the Implementation Section in Chapter 5.0 which includes specific action plans for a number of projects and programs and which also includes estimated costs and timetables. Also important is that the Sunrise River Watershed Management Organization intends to become an active participant in the St. Croix Basin Team and plans to adopt the 20% phosphorus reduction goal which has been set by this Basin Team for the entire Sunrise River watershed; this 20% phosphorus reduction goal is an important resource management activity for the Department.</p> <p>The DNR also notes that the Draft Watershed Management also includes new performance standards for stormwater volume control and “Better Site Design,” as well as standards for wetland buffers and pretreatment of stormwater discharges to wetlands. These</p>	These positive remarks are appreciated.

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	<p>are effective provisions to this Draft Plan.</p> <p>The SRWMO’s proposal for sanitary sewer districts and community septic systems at key locations are beneficial goals with the likelihood for positive outcomes.”</p>	
<p>Chapter 2 – Resource Inventory and Assessment</p>	<p>“In the Resource Inventory and Assessment in the Draft Watershed Management Plan, the section addressing Natural Land Cover (Chapter 2.0, Resource Inventory and Assessment, Natural Land Cover, Pages 6 to 8) refers to ecologically significant areas that are included on Map 8 (Significant Natural Areas), but does not include an explanation or definition of these areas. The DNR recommends that the Watershed Management Plan be revised to include language similar to the following short descriptions about Sites of Biodiversity Significance and Regionally Significant Ecological Areas (RSEA).</p> <p><u>Sites of Biodiversity Significance</u> - the Minnesota County Biological Survey (MCBS) has identified several Sites of Biodiversity Significance within the Sunrise River watershed boundary. Sites of Biodiversity Significance have varying levels of native biodiversity and are ranked based on the relative significance of this biodiversity at a statewide level. Factors taken into account during the ranking process include the number of rare species documented within the site, the quality of the native plant communities in the site, the size of the site, and the context of the site within the landscape (please see <a href="http://files.dnr.state.mn.us/eco/mcbs/biodiversity_significance_ranking.pdf">http://files.dnr.state.mn.us/eco/mcbs/biodiversity_significance_ranking.pdf</a>). The sites within the watershed boundary contain a wide variety of native plant communities (i.e., shown in Table 3, Natural Communities in the Sunrise River Watershed), and 19% (8,642 acres) of the watershed area consists of high quality native plant communities.</p> <p><u>Regionally Significant Ecological Areas (RSEA)</u> - the watershed boundary also contains several Regionally Significant Ecological Areas (RSEA). The DNR’s Central Region (in partnership with the Metropolitan Council in the seven-county metropolitan area), identified these ecologically significant terrestrial and</p>	<p>These additions have been made. Thank you for providing appropriate text.</p>

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	<p>wetland areas by conducting a landscape-scale assessment based on the size and shape of the ecological area, land cover within the ecological area, adjacent land cover/use, and connectivity to other ecological areas. The purpose of the data is to inform regional scale land use decisions, especially as it relates to balancing development and natural resource protection.</p> <p>In addition, more information regarding the MCBS Sites of Biodiversity, the MCBS Native Plant Communities, and Regionally Significant Ecological Areas can be found at the following DNR websites:  <a href="http://www.dnr.state.mn.us/eco/mcbs/biodiversity_guidelines.html">http://www.dnr.state.mn.us/eco/mcbs/biodiversity_guidelines.html</a>  <a href="http://www.dnr.state.mn.us/npc/index.html">http://www.dnr.state.mn.us/npc/index.html</a>  <a href="http://www.dnr.state.mn.us/rsea/index.html">http://www.dnr.state.mn.us/rsea/index.html</a>”</p>	
Chapter 2 – Resource Inventory and Assessment	<p>“Also in the description of Natural Land Cover, the table description for Table 3, entitled Natural Communities in the Sunrise River Watershed (Page 7) is not accurate and should be reworded to read: “[t]he information was derived from a GIS database (MCBS Native Plant Communities) provided by the Division of Ecological Resources, Minnesota Department of Natural Resources.”</p>	The update has been made. Thank you for providing appropriate text.
Chapter 2 – Resource Inventory and Assessment	<p>‘References to the DNR’s Natural Heritage Program are no longer correct. For clarity and accuracy, in the first sentence on Page 8, the language in the Plan should replace “MN DNR Natural Heritage Program” with the language “MN DNR Division of Ecological Resources.”</p>	The update has been made. Thank you for providing appropriate text.
Chapter 2 – Resource Inventory and Assessment	<p>“In this description and discussion of Natural Land Cover, the DNR emphasizes that most of the Sunrise River Watershed is within a DNR-designated Blanding’s Turtle Priority Area. These areas are relied upon to maintain the species’ security within Minnesota, and the DNR considers these areas to be of the highest priority for Blanding’s turtle research and management activities. The DNR recommends that the Watershed Management Plan could be revised to include additional language regarding these priority areas. For your assistance, we are including with this comment letter a Blanding’s turtle fact sheet (which the SRWMO should refer to) for additional recommendations on avoiding and</p>	<p>We added the following paragraph:                      “Most of the Sunrise River Watershed is within a DNR-designated Blanding’s Turtle Priority Area. These areas are relied upon to maintain the species’ security within Minnesota, and the DNR considers these areas to be of the highest priority for Blanding’s turtle research and management activities. Appendix D is a fact sheet about Blanding’s turtles. Impacts to these rare turtle’s habitat should be avoided whenever possible.”                      The fact sheet has been added as an appendix.</p>

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	minimizing impacts to this rare turtle.”	
Chapter 2 – Resource Inventory and Assessment	“Table 4 in the Draft Plan is the list and status of Rare Species in the Sunrise River Watershed. The list of species shown in the table appears incomplete. The Watershed Management Plan should identify when the Rare Features Database was obtained from the DNR and/or include the date listed in the ‘UPDATE’ field of the database. If this date is more than one year old, a data update should be requested from the DNR.”	We are in the process of obtaining updated data from your staff. We intend to make the changes you suggest.
Chapter 2 – Resource Inventory and Assessment	“In the Draft Plan, Map 8 is the map of Significant Natural Areas and Map 9 is the map of Rare Species and Archaeological Sites. These two maps should identify the dates when the data was obtained from the DNR. For your information, the layers for Map 8 and the Rare Features Data portrayed on Map 9 are continually updated as new information becomes available. Therefore, it is important to include the date of the GIS shapefiles that were used to create these maps. Then specifically relating to Map 9, the language in the legend that reads “source for rare species is the Minnesota DNR Natural Heritage Program” should be replaced with “source for rare species is the Minnesota DNR Division of Ecological Resources.”	We are in the process of obtaining updated data from your staff. We intend to make the changes you suggest.
Chapter 2 – Resource Inventory and Assessment	“This chapter discusses lakes within the Sunrise River Watershed and Table 10 (on Page 19) shows the lake classifications, management designations, and ordinary high water (OHW) elevations for lakes within the watershed. To improve the accuracy and clarity of this table, we recommend that Column 5 be changed from “MN DNR Mgmt Classification” to “MN DNR Fisheries Management Classification.” This change in terms is more representative of the classifications presented in this table. In addition, Column 8 should be changed from “MN DNR Lake Class” to MN DNR Shoreland Lake Classification since the classifications provided in the table for the lakes are the Shoreland Lake Classifications. The DNR also recommends that there should be a footnote to explain and clarify the use of the abbreviation “NA.” “NA” as used in this table should refer to information or data that is “not available” rather than “not applicable” which is often the meaning of “NA.” Please note that some of the information shown in Table 10 for Rice Lake is	The suggested changes have been made.

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	<p>not accurate and should be revised to reflect that the number for the OHW level is not correct and for accuracy it would be more effective to express the OHW level as “NA” (i.e., not available, particularly since the DNR has not established an OHW for this lake). Map 10 in the Draft Plan is a map of DNR Public Waters. This map is not completely accurate since some DNR Public Watercourses are not shown as such. Typo Creek, the West Branch of the Sunrise River, and the channel connecting Linwood, Island, and Martin Lakes should be added and color-coded as DNR Public Waters.”</p>	
<p>Chapter 2 – Resource Inventory and Assessment  Water Quality – boat motor resuspension</p>	<p>“The descriptions and summaries of individual lakes are included in this section of the Draft Watershed Management Plan. Regarding Typo Lake, the Draft Plan recognizes internal loading as the largest single nutrient source to Typo Lake. However the Draft Plan does not refer to resuspension of sediments resulting from outboard motor operation as a cause of resuspension. The DNR experience is that outboard motors can resuspend sediments in depths as great as ten feet. In addition and regarding Martin Lake which is a shallow lake, the Draft Plan does not refer to the possibility of resuspended sediments as a source of degradation for Martin Lake. The DNR suggests and recommends there could be additional discussion in this Plan regarding the extent to which resuspended sediments have been considered as a source of nutrients for Martin Lake.</p> <p>The DNR’s experience is that local units of government with the authority to enact surface use ordinances have do so to regulate the size and speed of boats and motors, and type of watercraft, on local lakes and streams. Surface use ordinances provide another resources management tool available to the SRWMO and its member local governmental units to improve water quality in the watershed.”</p>	<p>We have investigated the issue of sediment resuspension in both lakes as part of a TMDL study. We’ve found boat resuspension is dwarfed by other water quality concerns; for this reason we do not highlight it in our plan. In Typo Lake resuspension is due to rough fish and wind. Motorized watercraft are rare on the lake. In more than 80 weekday visits to the lake Anoka Conservation District staff have never seen a motor boat on the water. In the past (&gt;10 yrs ago) there was a water ski course on Typo Lake, but water quality did not improve when it ended. Martin Lake has more boat activity, but it is small compared to other sources of phosphorus and suspended solids.</p> <p>On the other hand, boat resuspension as a concern for Linwood Lake and our plan mentions this. A future TMDL study may confirm it is an actual issue, and not just perceived, and result in action.</p>
<p>Chapter 3, Assessment of Problems  Infiltration</p>	<p>“The Assessment of Problems is discussed and addressed in Chapter 3.0 of the Draft Plan. The DNR supports the SRWMO’s recognition that infiltration is especially well suited for the Anoka Sand Plain (i.e., refer to Page 39). The DNR also concurs that stormwater treatment basins need periodic maintenance (i.e., refer to Page 45).”</p>	<p>Your support on these issues is appreciated.</p>
<p>Chapter 3,</p>	<p>“Regarding the Water Quality problem</p>	<p>The Anoka Conservation District submitted a 303(d)</p>

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<p>Assessment of Problems</p> <p>Impaired Waters</p>	<p>assessment in this section of the Draft Watershed Management Plan, in the discussion related to impaired waters (Page 39), the Draft Plan does not provide sufficient information to support the conclusion that low dissolved oxygen in the referenced stream reaches is due to low flow rather than to an impaired condition. The DNR suggests that this paragraph should be revised or rephrased to acquire additional information or to further evaluate the referenced stream reaches to determine whether low flow or some other factor is the primary cause for low dissolved oxygen.”</p>	<p>list comment letter to the MPCA on October 19, 2009 asking that the impaired designation of these ditch segments be reconsidered. The letter provides information that should aid the MPCA in determining if low DO and pH are natural. We anticipate feedback from MPCA before our plan is finalized, and will update our plan accordingly.</p>
<p>Chapter 4, Goals, Policies, and Actions</p> <p>Erosion Control</p>	<p>“The Goals, Policies, and Actions for the SRWMO are described and discussed in this chapter of the Draft Watershed Management Plan. These Goals, Policies, and Actions include priority issues and problems, along with goals for each priority issue as well as policies and an action plan to address the goals.</p> <p>Water quality is discussed and according to the Draft Plan “[e]rosion from construction projects shall be managed through the” Minnesota Pollution Control Agency’s (MPCA’s) National Pollutant Discharge Elimination System (NPDES) “ ... rules, especially the MPCA construction stormwater permit for projects” greater than one acre. However, in the Assessment of Problems regarding Construction Site Management (Chapter 3.0, Assessment of Problems, Page 38, Item 7.a.), the Draft Plan states that “[p]oor construction site management is too common and can result in erosion and other water quality impacts.” The assumption is presented suggesting that the construction site practices or management referred to as poor may have occurred and may be occurring despite attempts to implement the MPCA’s NPDES rules at some level. Thus it appears that even with the proposed water quality policy identified on Page 44 (i.e., managing erosion from construction projects through the MPCA’s NPDES rules), the same construction site management problem identified in the Assessment of Problems (Chapter 3.0, Assessment of Problems, Page 38, Item 7.a.) could continue to result. The DNR’s experience has shown that construction site managers propose to implement what are referred to as “Best Management Practices” or</p>	<p>You are correct that, despite the regulatory measures, some erosion problems can still occur. This is not unique to our watershed, and might more correctly be a criticism of the regulatory programs. In our watershed, this is a minor problem and not determined to be a high priority. The comment you refer to in our plan (“poor construction site management is too common...”) was received by just one resident and during our public input meeting it received only one vote out of 40 cast. Even that vote indicated it as a 3<sup>rd</sup> or 4<sup>th</sup> level priority. Nonetheless, it concerns us and is the reason that our plan draws attention to this issue. For our part, the SRWMO seeks to reduce problems by:</p> <ul style="list-style-type: none"> <li>(a) specifying regulatory expectations to member municipalities and verifying that these are carried out,</li> <li>(b) providing a forum to hear resident concerns, which the WMO can pursue if found valid,</li> <li>(c) including erosion control successes and failures in tours that we host for municipal officials,</li> <li>(d) educational publications.</li> </ul> <p>We appreciate your offer to provide more information about particularly effective BMPs. We’ve talked with your staff and together we have not been able to locate a source that seems more comprehensive than those already referenced.</p>

Topic	Comment	SRWMO Response
	<p>“BMPs.” However, we note there are a wide variety of erosion control techniques that may fall under the description of BMPs, and that in some situations construction sites plan to or are implementing not necessarily best management practices but only minimal erosion control measures. The DNR recommends and encourages local units of government to become familiar with the more complete array of erosion control techniques available so they are in a situation to implement in fact the “best management” practices rather than focus on more minimal erosion control practices. As the Watershed Management Plan is being revised and completed, the DNR is willing and available to provide additional information to the Anoka Conservation District regarding particularly effective erosion control techniques we have seen from a variety of other sources (both regulated and proposed or implemented). Please feel free to contact me if you would like to discuss or evaluate this type of additional information.”</p>	
<p>Chapter 4, Goals, Policies, and Actions</p> <p>Lakeshore Landscaping</p>	<p>“In the discussion of the Water Quality Action items, the Draft Plan encourages shoreland restorations and other water quality improvement projects on private property (Chapter 4.0, Water Quality Actions, Page 45). The Draft Plan also addresses Goals, Policies, and Actions for Lakeshore Restorations (Chapter 4.0, Lakeshore Restorations Goals, Policies, and Actions, Pages Pages 49 to 50). For both of these action items in the Draft Plan (i.e., Water Quality Actions on Page 45 and Lakeshore Restoration Actions on Pages 49 to 50), the SRWMO could also consider implementing an appropriate recognition and/or award-type program to recognize individuals and/or organizations that undertake or implement shoreland restoration and water quality improvement projects. This type of program could be an effective tool to recognize and reward stewardship practices. The DNR has some experience with a similar program through a consortium of environmental-related non-profit and governmental agencies in the Brainerd lakes area in Minnesota. If the Anoka Conservation District or the SRWMO is interested in additional information about this type of program, please contact DNR Environmental Assessment Ecologist Michael North at 320-255-427, ext. 235.”</p>	<p>We agree that marketing these types of projects is important to success. We currently have an action item and an implementation item to for annual lakeshore landscaping education. Based on your comment, we have bolstered our plan with the following changes:</p> <p>(a) reword from “education campaign” to “marketing campaign” to better reflect the spirit of the work. We don’t want people to simply be educated, we want to motivate them to action.</p> <p>(b) We’ve added becoming a partner in the Blue Thumb consortium to our 2011 implementation plan. This partnership helps create a unified public education message. We can then purchase promotional materials co-developed by field professionals, and more effectively collaborate with agencies and organizations with shared education goals. They also offer “how to” manuals for residents. More directly to your point, they are a forum for Blue Thumb parties that could recognize completed projects.</p> <p>(c) We’ve added \$700 each year to our implementation plan for lakeshore landscaping marketing.</p>

Topic	Comment	SRWMO Response
<p>Chapter 4, Goals, Policies, and Actions</p> <p>Invasive Species</p>	<p>The Goals, Policies, and Actions in Chapter 4.0 of the Draft Plan also address Aquatic Plants, Including Invasives (Page 48). The Draft Plan proposes an action item to educate lakeshore homeowners about the benefits of native aquatic plants and the threat of invasive species. This is an area and subject of concern to the DNR. The SRWMO could add to this action item an additional effort to educate lakeshore homeowners and residents about how to check boats and trailers for “hitch-hiking” aquatic vegetation. To assist with this, the DNR has completed a number of brochures and informational cards and materials regarding aquatic plants and invasive species. Please contact me if you would like me to provide some or all of this educational material to you separately. The DNR recommends that the effectiveness of this particular action item could also be increased by adding language related to plans to monitor existing public accesses for appropriate informational signs or descriptive material about exotic species. In addition, this should be done along with an effort to then report less than adequate signage to the DNR’s Division of Parks and Trails.</p>	<p>The following action item has been added in Chapters 4:</p> <p>“Maintain existing SRWMO signage at all public boat landings in the watershed. These signs provide a message consistent with DNR signage, but show local endorsement. They also show a running tally of infested lakes.”</p> <p>The following has been added to our implementation plan:</p> <p>“...Also education about aquatic hitchhikers, for which MN DNR is an educational materials source. Target neighborhoods are those surrounding Coon, Fawn, Linwood, and Martin Lakes. Existing SRWMO signage at boat landings will be maintained.”</p>
<p>Chapter 4, Goals, Policies, and Actions</p> <p>WCA</p>	<p>Goals, Policies, and Actions related to Wetlands and to the Minnesota Wetland Conservation Act (WCA) are discussed in this Chapter of the Draft Plan (Pages 51 to 52). For your information, the DNR has not been receiving WCA notices from the four governmental units that are part of the SRWMO. Generally, the WCA requires that the DNR receive WCA documents for review and comment, and the DNR is a member of the Technical Evaluation Panel when a project is in a shoreland area. WCA documents and notices should be sent to DNR Environmental Assessment Ecologist Michael North, 940 Industrial Drive South, Suite 103, Sauk Rapids, Minnesota, 56379.</p>	<p>Thank you for bringing this to our attention. The appropriate person at each municipality has been notified of your comment. Please keep in mind that there have been very few recent projects in these communities.</p>
<p>Chapter 4, Goals, Policies, and Actions</p> <p>Rare Natural Features</p>	<p>The DNR notes and acknowledges that the Draft Plan in the Resource Inventory and Assessment, includes information about the Natural Land Cover in the Sunrise River Watershed including natural communities and rare species. The DNR has concerns that while these resources are identified, there is a lack of follow-through in the Goals, Policies, and Actions. Topics included in the Goals, Policies, and Actions chapter encompass</p>	<p>Through discussions with Hannah Texler at your agency and were able to find several ways to improve how our plan addresses rare species and ecologically rich areas. Additions to our plan include:</p> <ul style="list-style-type: none"> <li>• Added unique ecological features to our list of possible public education topics.</li> <li>• Added rare ecological sites to our list of possible public officials tour sites.</li> <li>• Added this policy: “The WMO encourages management of MN DNR classified Natural</li> </ul>

Topic	Comment	SRWMO Response
	<p>maintaining or improving water quality and protecting upland native plant communities. Protecting upland native plant communities is an important component of maintaining water quality. The DNR recommends that it is appropriate for the Watershed Management Plan to explicitly address rare species in this chapter by stating that improving water quality and protecting native plant communities will benefit rare species. For further information on how to address the protection of rare features in the Watershed Management Plans goals and actions, please contact Hannah Texler, Regional Plant Ecologist for DNR's Central Region (651-259-5811 or <a href="mailto:hannah.texler@dnr.state.mn.us">hannah.texler@dnr.state.mn.us</a>).</p>	<p>Communities and other high quality natural areas in order to maintain their ecological integrity.”</p>
<b>Comments from MN Board of Water and Soil Resources</b> (letter from Melissa Lewis 10-12-09)		
General	<p>Overall, it is unclear how the implementation plan will accomplish many of the goals, policies and actions in the Plan. The Plan does not clearly define the responsibility of the WMO and the responsibility of the member communities to carry out the implementation plan. The Plan fails to comply with many requirements of Minnesota Rules Chapter 8410. Without extensive revision of the Plan, staff will not recommend the Plan be approved. We are available to assist the WMO with revisions to the Plan.</p>	<p>Revisions based on comments from all reviewers have resulted in notable plan improvements. With regards to the contention that “the plan fails to comply with many requirements of Minnesota Rules 8410,” we disagree. While many of our revisions do improve the rigor with which we have addressed the requirements of Rules 8410, the content requirements of 8410 were nearly entirely met in the plan. We used 8410 as a checklist for required content before distributing it for the 60-day comment period. In hindsight, the only required element of 8410 that the draft plan clearly lacked was a legal description of the WMO in the joint powers agreement. While your suggestions of places to more closely relate our goals to measurable actions is helpful, we note that this aspect of our plan was specifically praised verbally and in writing by all other state review agencies.</p>
Table of Contents	<p>Recommend including a list of tables and a list of figures.</p>	<p>Lists of tables and figures have been added.</p>
Terminology	<p>“‘Member cities’ and ‘municipalities’ are often used. If these terms do not include all of the member communities in the WMO, ‘member communities’ should be used.”</p>	<p>The suggested change has been made throughout the document.</p>
Chapter 2 - Data Source for Tables	<p>Data source is missing on a number of the tables, and Tables 14 and 15 are small and difficult to read.</p>	<p>Data sources have been added to several tables. Tables 14 and 15 have been enlarged.</p>
Chapter 3 – Water Quality Trends	<p>Suggest noting in this chapter that water quality trends are discussed in chapter 2 or including a brief summary of the overall water quality trend in the WMO.</p>	<p>A short statement about water quality trends was added for each lake, as well as a reference to Chapter 2 for more information.</p>
Terminology	<p>Clarification as to if ‘sewer’ is referring to storm sewer, sanitary sewer, or both is needed</p>	<p>Clarifying terms have been added throughout the plan.</p>

Topic	Comment	SRWMO Response
	in this chapter and throughout the plan.	
Typo-graphical	Typo in last paragraph on page 41: ‘count’ should be ‘county’.	Corrected.
Goals, policies, and actions	<p><sup>1</sup>Goals and policies that are written to be results-oriented and measurable are critical to determining future success of plan implementation as well as for citizens to have a better understanding of the actions of the WMO. The chapter identifies a number of goals, policies, and actions that overlap, are somewhat vague, do not have corresponding implementation items or a budget supporting their implementation, and may be more appropriately included in standards.</p> <p><sup>2</sup>Additionally, the plan does not clearly distinguish between the policies and actions the WMO is taking responsibility for such as monitoring, modeling, education/outreach, etc., from the policies and actions the member communities are to be responsible for such as adopting ordinances, maintenance, enforcing standards, etc. <sup>3</sup>We recommend providing definitions for vision, goal, policy, standard and action and revising the wording in these items to be consistent with the definitions.</p> <p><sup>4</sup>We also recommend separating the items that specifically require the member communities to take action from the policies and actions of the WMO. <sup>5</sup>We also suggest numbering or lettering these items for easier reference.</p>	<ol style="list-style-type: none"> <li>1. We’ve reviewed the goals, policies and actions and revised based on your later comments (see below) and this general comment. Multiple changes have been made.</li> <li>2. In Chapter 4 we have reorganized the list of actions for each priority topic into two lists – one for WMO actions and one for member community actions.</li> <li>3. Definitions for vision, goal, policy, standard and action have been added at the beginning of Chapter 4.</li> <li>4. See #2 above.</li> <li>5. Reference numbers have been added to goals, policies, and actions.</li> </ol>
Water quality goals, policies, and actions	The Plan should indicate how the WMO is going to address the soon to be completed St. Croix River TMDL study and how this study might impact the WMO’s goals and policies; specifically, how the loads identified in the TMDL might influence the WMO’s 20% reduction goals for the Group I lakes.	We added an action to implement projects and practices in the Lake St. Croix TMDL. We clarified that 20% is a short term goal for this plan that serves as a significant step toward the TMDL goals, which are exceedingly large and demand a longer timeline. See MPCA comment response above for more info.
Water quality goals, policies, and actions	The assessment of problems identifies issues the WMO has with the impaired waters listing of several water resources within the WMO; however, no actions are specifically identified for addressing these issues.	Action has been taken and will likely be resolved before this plan is finalized. Please see our response to the MPCA on this issue for more information.
Water quality goals, policies, and actions	How and when will the SWAT model referred to in the policies be calibrated and utilized for the WMO? Will the model referred to, which is being developed for the entire Sunrise, be at the appropriate resolution for the WMO?	We’ve re-thought the most effective way to meet our model needs. We need to estimate phosphorus export from our jurisdictional area so we can quantify our 20% phosphorus reduction goal. The SWAT model already includes monitoring data collected by the SRWMO to ensure the model will be accurate for our area and the 60-day draft of the plan budgeted funds to ensure it was well-calibrated and customized for the WMO. That model does have fine-scale resolution – it consists of 140 sub-basins that are a few square

Topic	Comment	SRWMO Response
		<p>miles each.</p> <p>Still, after discussions with Jim Almendinger at the St. Croix Watershed Research Station who is creating the SWAT model, we believe applying a simpler FLUX model to our already-collected monitoring data will be the most accurate way to estimate our phosphorus discharge. FLUX uses flow and water sample data to calculate load. It avoids “noise” that might be created by many other factors in the SWAT model. This FLUX approach has replaced SWAT in our plan’s actions and implementation plan.</p> <p>The SWAT model is still mentioned in our plan as a secondary tool for answering “what if” questions about changes in the watershed. Given that we have no foreseeable need to use it, it is not in our action items or implementation plan. Rather, it is in a new section of Chapter 2 (Resource Inventory) entitled “Special Studies.”</p>
<p>Water quality goals, policies, and actions</p>	<p>Estimating phosphorus reductions would require a smaller-scale model than the SWAT.</p>	<p>We agree. Our policy was to “estimate pollutant loading reductions from each water quality improvement project...” using the most appropriate of the many pollutant load estimators that exist. We added text that “Calculators from the BWSR Elink online database, or similar, should be used.”</p>
<p>Water quality goals, policies, and actions</p>	<p>What is the water quality monitoring plan for Group I waters, how will the WMO determine if water quality changes are occurring, and what action will the WMO take if changes are occurring? Chapter 2 identifies that the municipalities are responsible for Group II waters; however, what standards are the municipalities managing these resources to and what actions will occur if these resources show declining water quality?</p>	<p>The water quality monitoring plan for Group I waters is already detailed in the implementation plan. It includes parameters, sites, a schedule, estimated costs, and separates tasks done by volunteers from those done by a hired professional. We added that a trend analysis consistent with those in Chapter 2 should be completed after each year of new monitoring.</p> <p>Our second water quality policy addresses your comment about Group II waters. It states “member municipalities shall maintain the general water quality of Group II water and wetlands to ensure their viability for wildlife habitat, aesthetic values, and natural water treatment.” Appropriate actions for any problems will be determined by the member community.</p>
<p>Water quality goals, policies, and actions</p>	<p>The policy to seek rough fish control is quite broad and does not have a corresponding action. How will the WMO determine when to become involved as well as the extent of this involvement?</p>	<p>The action item “Implement projects and practices recommended in the Typo and Martin Lakes TMDL” was amended to also read “Efforts to manage rough fish are expected to be one part of this work.”</p>
<p>Water quality goals, policies, and actions</p>	<p>How and when will the WMO play a role in advising on the design of stormwater systems, what standard will this advice be based on and how will the WMO determine if the advice has been followed?</p>	<p>Our purpose is to bring the issue of water quality into consideration in any new stormwater project that drains to a Group I lake. We rely on our board members to bring any applicable projects to our attention. Our input is not technical. We rely on engineering staff from the member community to incorporate our input into designs. Wording changes</p>

Topic	Comment	SRWMO Response
		were made to this action item to better convey this approach.
Water quality goals, policies, and actions	Achieving the goals of this topic relies on implementation of the WMO's Stormwater Standards, yet those standards are not referred to in the section.	They are referred to in the policy (converted to an action in the next draft) that requires "each member community will adopt, implement, and enforce ordinances that meet or exceed the standards in this plan These include:...Stormwater ordinance"
Septic system compliance goals, policies, and actions	An action is needed for inventorying systems or other means in order to achieve the goal of locating non-functioning septic systems.	The WMO feels that the on-going, constantly-updated type of record-keeping required by MN Rules 7080-7082 (as updated in 2008), is superior to a one-time inventory. This is discussed in the policies, but this action item has also been added:  "Member communities will accomplish a septic system inventory, maintenance tracking, and a system for maintenance reminders and corrective action by adopting and enforcing a septic system ordinance consistent MN Rules 7080-7082 (updated in 2008) and Statues 115.55-56."
Education goals, policies, and actions	The fourth goal lists a tool, not a goal and should either be reworded or incorporated into other goal(s) for education.	The statement you reference is: "Community informational meetings or workshops." It has been combined with the preceding goal such that it now reads "Reach a broad audience by using multiple formats, including city newsletters, websites, newspapers, local cable, informational meetings, and workshops."
Education goals, policies, and actions	Suggest removing the header for policies in this section, or adding policies or a statement as to why no policies have been established for education.	The header has been removed.
Aquatic plants goals, policies, and actions	The policies and actions for this priority topic need to clearly specify when and how the WMO will be involved in managing invasive species. As written, the proposed actions do not appear to be enough to meet the vision and goals of the WMO.	The visions and goals we wrote for invasive aquatic species were ambitious, and reflected the results we hoped from the ongoing efforts of many organizations. Please note that a table in our implementation plan lists work being done by others that helps reach SRWMO goals including lake improvement district Eurasian water milfoil control and the DNR's Stop Aquatic Hitchhikers campaign. We've revised policies to state that we support both of these and recognize them as important to accomplishing the WMO's goals. We have added more specifics about the WMO's actions for education, including a new action to maintain the existing WMO signage at public boat landings.
Funding goals, policies, and actions	This topic needs a policy and action(s) addressing the WMO and municipalities' commitment to provide a level of base funding for implementing the plan. See Chapter 5 comments.	This policy has been added: "The SRWMO member communities are committed to providing a base level of funding to implement this plan."
Sewers goals, policies, and actions	This topic directly overlaps with municipal sewer/community septic policy in topic 2. We recommend combining this topic with topic 2 and including actions as to how the WMO will	We have combined topic 2 (septic system compliance) with topic 6 (sanitary sewer). Keep in mind that this has the effect of elevating sanitary sewer to a higher priority.

Topic	Comment	SRWMO Response
	ensure municipal sewers will be installed or updated to benefit water quality, and what standards will be used to measure if installed or updated sewers do benefit water quality.	The WMO’s actions are limited to those listed, namely providing written or education support to a municipality upon request. Our lake monitoring program can determine water quality changes.
Lakeshore Restoration goals, policies, and actions	The first goal is to identify properties on lakes for restoration, but the topic does not include an action for achieving this goal.	In fact, our draft plan had the following action item directly related to the goal: “Create a mailing list of properties that do not have a minimal lakeshore buffers. Contact these homeowners with educational materials and assistance available. Lakes included...”  However, we have decided to delete this goal and action because the cost of creating that inventory exceeds the cost of simply sending education materials to every lakeshore residence.
Lakeshore Restoration goals, policies, and actions	The policy to maintain buffer zones needs more specific standards as to how this will be met. Design of buffers for water quality can vary significantly from buffers for wildlife. Also need a definition for ‘natural vegetation’.	We had these two similar policies: 1. Buffer zones of natural vegetation should be maintained around waterbodies for wildlife and water quality. 2. The SRWMO encourages shoreland restorations on public and private lakeshore properties.  These have been replaced by: “Buffer zones of unmowed, preferably native, vegetation are encouraged around waterbodies for wildlife and water quality.”
Lakeshore Restoration goals, policies, and actions	How is the WMO going to educate property owners? How frequently?	Text has been added to the action item to specifying the types of work that will occur each year, as well as special work that will be done in 2013.
Funding priorities	The plan contains seven priority topics and four non-priority topics, each with a significant number of goals, policies, and/or actions, but no discussion of how the WMO’s limited resources might be applied differently to priority vs. non-priority topics.	We added the following funding policy: “The following considerations (from most to least important) shall guide the WMO in selecting how to apply limited resources: 1. Priority topics, in the order specified in this chapter 2. Tasks done with partners for greater accomplishment or cost sharing 3. Impaired waters, or those where water quality is declining or immediately threatened. 4. Protection of good or stable water quality 5. Non-priority topics”
Neighboring jurisdictions	Considering many of the subwatersheds within this WMO cross outside of the WMO’s boundary, we recommend a policy or policies and steps for coordination with areas outside the WMO’s jurisdiction.	Our plan does include this policy: “The SRWMO will actively communicate with upstream and downstream agencies regarding water quality or quantity issues.” As reminders for communication with affected parties in and outside our jurisdiction, our implementation plan tables list partners for every task. Additionally, by joining the St. Croix Basin Team we ensure formal, recurring opportunities for multi-jurisdictional coordination.
Implementation plan funding	While we understand the WMO has significant water resources and a limited tax base, we interpret the language in the second sentence of	We assume you are referring to sentences which state that “the SRWMO area is approximately 50% water and wetlands with substantial public lands, and

Topic	Comment	SRWMO Response
	<p>the first paragraph of the action plan on page 55 as significantly weakening the WMO's commitment to plan implementation. Please consider moving this sentence to Chapter 7, Plan Amendments.</p>	<p>development is scattered rural residential. Tax base is therefore relatively small, while the need for water resource management is significant.”</p> <p>You are interpreting these statements incorrectly. These are factual statements that frame our implementation plan by recognizing both need and limitations. Our implementation plan, including estimates of WMO expenditures, should serve as a gauge of our commitment.</p> <p>After discussions with your staff, we find these sentences do not seem to fit with the procedures for plan amendment in Chapter 7.</p>
<p>Implementation Plan</p>	<p>The implementation plan does not include many of the activities identified in Chapter 4.</p>	<p>We reviewed and found an implementation item corresponding to each action item, and vice versa. Our revisions in those sections make connections more clear.</p>
<p>Estimated Budget</p>	<p>The estimated budget for many of the tasks and projects does not appear to be sufficient to carry out many of the components in the implementation plan. For example, the plan depends heavily on the participation of the members, collaboration with others, volunteers, and potential grants for implementation, all of which take a significant amount of time and coordination. However, the plan contains little discussion of administration of many of these activities. The administration component of the implementation plan is very limited.</p>	<p>The estimates in our budget are based upon fee schedules from the Anoka Conservation District (ACD), our recording secretary, laboratory, etc. We recognize that ACD subsidizes its fees to WMOs, so these costs are lower than we would expect from others.</p> <p>We've reviewed all budget estimates and made the following changes:</p> <ul style="list-style-type: none"> <li>• Nine annual financial audits <del>\$11,000</del> \$2,950</li> <li>• Two public officials tours <del>\$1,200</del> \$3,000</li> <li>• Lakeshore landscaping ed increased from three years to nine years <del>\$5,400</del> \$9,400</li> </ul> <p>While administration of every task is figured into the cost of that task, the WMO does recognize there are additional administration costs that are not linked to a particular project. These include preparing budgets, seeking bids on work plans every other year, administering our cost share grants, correspondence, fielding questions or requests from agencies or residents, and other tasks. The WMO has therefore added \$1,500 (1st 4 yrs) to \$1,700 (2<sup>nd</sup> 5 yrs) per year for an on-call, limited administrator. This cannot be incorporated into 2010 budgets and will begin in 2011.</p>
<p>Budget</p>	<p>Projects the WMO has identified as grant-dependent, such as TMDL studies, need to be listed separately from the implementation plan and not contained in the budget.</p>	<p>We have added asterisks to the implementation plan tables indicating projects that are grant-dependent or need additional funding from the community where they will occur. There are only three such projects.</p> <p>We prefer to keep these items included in the budget. Most grants require matching funds. If we fail to budget anything for the project, we substantially reduce the chance of receiving any grants. Likewise, projects with municipalities will fail if the WMO does not budget its share.</p>

Topic	Comment	SRWMO Response
Public Participation	Resident frustration and lack of knowledge were identified as issues, but neither the implementation plan nor the joint powers agreement identifies means for ongoing public participation, such as advisory committees. See joint powers agreement comments.	<p>The first paragraph of Chapter 4 describes how we have combined the topics of resident frustration and education in our goals, policies and actions section. Please refer to the education section to see our four goals and four actions directly related to addressing resident lack of knowledge and frustrations. The same section includes three additional actions (moved to policies in next plan draft) for public participation, including forming advisory committees.</p> <p>Likewise, section 4.4 of the Joint Powers Agreement (JPA) does give the SRWMO a means to “appoint citizen and technical advisory committees...”, however we anticipate that this section will be updated to better describe the process when we revise our JPA.</p> <p>Please note that most of the resident frustrations expressed to us in the planning process were complaints about DNR conservation officers from people who had been issued citations. This is not within the WMO’s power to address.</p>
Grants	Table 21 includes grants that are no longer available and/or are not available directly to the WMO. Rather than including a table that will quickly become dated, we suggest a discussion of how the WMO will coordinate and collaborate with the other agencies and organizations to best align the WMO to be eligible for grants and funding opportunities. Again, given the limited administration component in the implementation plan, the Plan needs to include who is responsible for identifying grant opportunities and completing grant applications.	Table 21 has been removed. We added a general discussion of likely grant sources to the already-existing “grant search and applications” item in our implementation plan. It does specify that the SRWMO will be responsible for this work and budgets \$1,000 every year to hire assistance.
Plan Amendments	<p><sup>1</sup>This section needs a table or discussion of anticipated amendments such as the Martin and Typo Lakes Water Quality Projects, other potential projects, regulatory changes, or addition of impaired waters and TMDL information.</p> <p><sup>2</sup>Additionally, revise the second paragraph of the Local Water Plans section to state that the municipalities <u>must</u> communicate to the WMO that they feel no updates are necessary, provide guidance as to the timeline for this communication, and consider incorporating this paragraph into the Review Process for local water plans.</p> <p><sup>3</sup>Under the Adoption by Reference part, we recommend adding language to clarify that “member municipalities may adopt the WMO plan <u>or parts of it</u> by reference ...”.</p>	<p>1. We’ve discussed this item with your staff, and based on follow-up advice have added this statement: “Amendments may include re-direction of this plan based upon the completion of new TMDL studies, changes to the state list of impaired waters, or for other reasons.”</p> <p>2. Text has been revised to: “If, after comparing their local water plan to this plan, the community feels no updates are necessary they <del>should</del> <u>must</u> communicate this to the WMO <u>within 18 months from the time of SRWMO adoption of this plan</u>, and provide a copy for the WMO to review and approve. <u>The review process detailed on the following page shall be followed, except that submittal of the plan to the Metropolitan Council is not required provided it has not been changed since last Metropolitan Council approval.</u>”</p> <p>3. The suggested change has been made.</p>

Topic	Comment	SRWMO Response
Joint Powers Agreement	Exhibit 1, referred to in the JPA and assumed to be the legal description, is missing from Appendix A. The JPA is also lacking procedures providing for the establishment of citizen and technical advisory committees or other means of public participation. These items must be incorporated into the JPA and the JPA must be fully executed before t	The SRWMO is planning to update our Joint Powers Agreement. It is listed in the implementation budget for 2010. Per your comment, we'll begin this process a few months earlier. We will not be able to complete it for the 45-day draft of the plan, but it should be available in the early part of 2010.
<b>Comments from Anoka County Environmental Services</b> (letter from Bart Biernat 10-22-09)		
Water Supply	<p>Legislative reports prepared by the Minnesota Department of Natural Resources (Sustainability of Minnesota's Ground Water - Statement of Issues and Needs, June 2005) and the Metropolitan Council (Water Supply Planning in the Twin Cities Metropolitan Area, January 2007) have suggested that groundwater resources in middle and northern Anoka County may not be sufficient to support extensive, long-term growth.</p> <p>The Metropolitan Council has completed its preparation of the Metropolitan Area Master Water Supply Plan and technical information that indicates some unique challenges for northern Anoka County and the SRWMO. The Metropolitan Council's computer model of the groundwater throughout the region (Metro Model 2) indicates that within the SRWMO a hydraulic connection between surface water features and groundwater exists. It is projected that increasing groundwater pumping is likely to directly impact surface water features (see Metropolitan Council's Master Water Supply Plan; Appendix 1; page A1-11) in much of Anoka County and the SRWMO. The model projects that groundwater pumping in 2030 and 2050 will result in drawdown of surface water features up to 3.281 feet (1 meter) in much of the SRWMO (see Metropolitan Council's Master Water Supply Plan; Appendix 1; pages A1-18 and A1-19).</p> <p>The Anoka County Comprehensive Plan (1998-2020) indicates that there is a need for additional groundwater information to determine the extent of potential risks (including exceeding the safe yield of groundwater resources).</p> <p><b>We Recommend:</b> that the Plan encourage the Minnesota Department of Natural Resources to establish a sufficient groundwater and surface water level monitoring network to determine</p>	<p>We agree that groundwater quantity is an important regional issue. We have modified an existing policy to incorporate your suggestion. It now reads:</p> <p><u>"The SRWMO supports long-term efforts to protect groundwater quality and quantity. This includes support for more robust regional groundwater monitoring to inform decision-making."</u></p>

Topic	Comment	SRWMO Response
	<p>watershed baseline information. Through the collection and periodic analysis of water level information, the SRWMO can determine if future water use is impacting the sustainability of the watershed resources.</p>	
<p>Chapter 2-Resource Inventory and Assessment</p>	<p>The Plan states that Anoka County is updating the Groundwater Protection Assessment Report (dated 1995). The Anoka County Community Health and Environmental Services Department (CHES) is cooperating with municipalities, watershed management organizations and other parties interested in groundwater and surface water management to prepare a Water Resources Management Report that is to be included in the county's Community Health Services (CHS) Plan. The report was recently completed and forwarded to the Anoka County Board of Commissioners with the CHS Plan. The protection of Anoka County groundwater and surface water is a priority issue for the 2010-2014 CHS Plan.</p> <p>The County's water protection and management priority (surface and groundwater) is to acknowledge its importance water plays in the health of our community and our residents. The CHES Department intends to update the Water Resources Management Report during the scheduled update of the Community Health Services Plan (every 5 years).</p> <p><b>We Recommend:</b> that the Plan indicate that the County has updated and expanded the 1995 Groundwater Protection Assessment Report to include the protection and management of surface water resources.</p>	<p>Our plan now includes a new table of special studies in the SRWMO area. The County Groundwater Management Report is included in that table. We used some text from your comment letter in the description of the study.</p>