

Lower Rum River draft 2022-2031 Watershed Management Plan - Response to formal Plan review comments (September 9, 2021)

Number	Commenter	Plan Location	Topic/Section	Comment	Edit Planned	Proposed response to comment
1	ACD	Cover page	Cover page	The plan title lists dates of 2021-2031, however table 5-2 (implementation plan) has dates of 2022-2031. Revise title to 2022-2031.	Y	Plan title will be revised to reflect the implementation schedule dates.
2	ACD	Appendices A, B, & C	Appendices A, B, & C	Consider removing Appendix A, B, and C (LRRWMO joint powers agreement, permit application, WCA application) from the plan. With them in the plan, any revision to them will also require a plan amendment with additional expense. Refer the reader to the LRRWMO website for the current version.	N	Typically, changes to Plan appendices can be made following the minor Plan amendment process. Updates to the permit applications will be made available separately at the LRRWMO website and updated in the Plan document as well.
3	ACD	vi	Acronyms	The list of acronyms includes many not mentioned in this plan. Remove unused acronyms.	Y	The list of acronyms will be checked against the final Plan text.
4	ACD	ES-3, 2-25, 4-2	Exec Summary, 2.7.1, goal WQ-A, 5.3.4.1 and elsewhere	Rogers Lake is listed as a LRRWMO priority non-impaired lake and one where the LRRWMO will monitor water quality. This lake was impaired until the LRRWMO and ACD advocated for it to be removed from the impaired waters list because it didn't meet the definition of a lake. Also in the last 10 years the LRRWMO decided to stop monitoring water quality in the lake because it doesn't have public access. Also noteworthy is that the lake is half in the URRWMO. I just want to clarify this is the intent of the board?	Y	Upon subsequent review, the Board of Managers have determined that Rogers Lake will not be included among the LRRWMO priority waterbodies for the reasons identified. The LRRWMO will consider collaborating with the URRWMO and/or Rum River 1W1P partnership, if requested, in efforts related to Rogers Lake.
5	ACD	1-4	1.3	Item 20 in the list of LRRWMO authorities is a reference to another watershed organization. Delete.	Y	This typo will be corrected.
6	ACD	2-1	2.8	This section states Anoka SWCD established a conservation area at the confluence of the Rum River and Cedar Creek. Correction: it was established by Anoka County. In this section it may be helpful to readers to consistently call the Anoka Conservation District ACD and not Anoka SWCD.	Y	The text will be clarified to indicate that the conservation area was established by Anoka County. All Anoka SWCD references within the Plan will be changed to ACD.
7	ACD	4-3 and beyond	Table 4-1 LRRWMO goal statements and associated metrics	Many goal statements include a goal followed with "...through..." after which means to achieve the goal are listed. The means are listed again under the outputs column. They can be deleted from the goal statement.	Y	For several goals, the inclusion of the means by which the goal will be accomplished is purposefully included to clarify the metrics by which the goal will be assessed. These details are added based on BWSR's increased emphasis on goal measurability. All goals will be reviewed to eliminate extraneous language while maintaining specificity where it is desired by the Board of Managers.
8	ACD	4-3	Table 4-1 LRRWMO goal statements and associated metrics	In goal WQ-B, reducing Rum River TP by 100 lbs/yr it may be worth noting that this is a goal for the LRRWMO only. The LRRWMO may collaborate through the 1W1P to achieve additional upstream reductions that benefit the LRRWMO area. I would suggest doing so is a priority (if water quality upstream is trashed, your gains will mean little). Specific suggestion is to shorten the goal statement to "Maintain TP in the Rum River in the LRRWMO below 100 ug/L by reducing phosphorus loading" (the remaining text was already in both the goal and metrics, so delete it). Revise the metrics to: Water quality monitoring results; TP reduction of 100 lbs/yr in the LRRWMO; at least two capital improvements/restoration projects; and collaborate with the 1W1P	Y	Goal WQ-B will be revised to note that the target load reduction is intended to be achieved within the LRRWMO. Policy 29 states the LRRWMO's intent to collaborate with the Rum River 1W1P partners to implement upstream projects. The goal will be revised to note that this goal will support the Rum River 1W1P goal of 5% TP reduction. See also the response to Comment 7,

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9	ACD	4-3	Table 4-1 LRRWMO goal statements and associated metrics	<p>Goal WQ-E, achieving Mississippi River water quality standards is not feasible by actions only in the LRRWMO. Consider rewording to acknowledge upstream work needed.</p> <p>Specific rewording suggestion is goal of "contribute to larger efforts to achieve Mississippi River water quality standards...through implementation of programs and projects in the LRRWMO."</p> <p>Consider adding measurable outputs of projects achieving X lbs TP reduction.</p>	Y	The text of the goal will be revised to note that the efforts of the LRRWMO will work towards achieving Mississippi River water quality standards.
10	ACD	4-3	Table 4-1 LRRWMO goal statements and associated metrics	<p>Goal WQ-F - I'm skeptical of achieving the goals of Trott Brook dissolved oxygen can be achieved through community education and "review of riparian restoration opportunities." It seems either the goal needs to be scaled back to be consistent with the actions, or the actions need to be scaled up and made more specific. If changes are made to this goal, corresponding changes may be needed in Table 5-1 (implementation schedule) line PP-4.</p>	Y	The Rum Rive WRAPS document identifies strategies for Trott Brook include restoration of adjacent wetlands and urban BMPs. The actions in the implementation table are intended to start the process for riparian wetland projects by identifying where projects are feasible and reaching out to private landowners. We acknowledge that achieving the in-stream DO targets may not be realized during this plan. The Board of Managers will consider scaling back the goal to reflect reasonable progress.
11	ACD	4-3	Table 4-1 LRRWMO goal statements and associated metrics	<p>Goal WQ-G - Typo in the output column "educations distributions"</p>	Y	This typo will be corrected.
12	ACD	4-4	Table 4-1 LRRWMO goal statements and associated metrics	<p>Goal NA-A "Minimize AIS..." Consider an output of supporting programming of the Anoka County AIS Coordinator. This can include education, AIS spread prevention tools, boat inspectors, and others. This will be much more descriptive than the current "cooperative opportunities and education distribution."</p>	Y	This goal will be revised to include the recommended outputs.
13	ACD	4-4	Table 4-1 LRRWMO goal statements and associated metrics	<p>Goal ES-A - "Reduce sediment loading from streambank along the Rum River..." You might consider adding an output of "collaborate with the 1W1P implementation entity to achieve the measurable outputs in the 1W1P including a 5% reduction in sediment."</p>	N	<p>Policy 29 states the LRRWMO's intent to collaborate with 1W1P partners to implement upstream projects. Goal ES-A be revised to note that this goal will support the Rum River 1W1P goal of 5% sediment reduction.</p> <p>See also response to comment 8.</p>
14	ACD	4-4	Table 4-1 LRRWMO goal statements and associated metrics	<p>Goal NA-B - "Minimize negative impacts to wetlands through continued administration of the Wetland Conservation Act." Consider deleting the "through continued..." because that is the means, not the goal. Consider adding a community education output toward this goal.</p>	Y	The Board of Managers wish to maintain the reference to the WCA, which is the primary means of wetland management for the LRRWMO. The goal will be expanded to include educational activities.

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15	ACD	4-4	Table 4-1 LRRWMO goal statements and associated metrics	Goal GW-A "cooperate with partners to limit groundwater pollution" could be reworded to be a resource goal. For example, the goal might be "minimize groundwater pollution, particularly in DWSMAs." More specific actions are needed so we know what we'll be doing for the \$1,000/yr in Table 5-1 line PP-6.	Y	This goal will be rephrased to lead with the pollutant minimization to better parallel the language of other goals. Specific activities will be noted in the implementation table.
16	ACD	4-5	Table 4-1 LRRWMO goal statements and associated metrics	Goal FC-D "work with partners to consider and incorporate recreational benefits..." and an output of "meetings with partners" is vague.	Y	The outputs of this goal will be revised to include more specific potential actions and/or process.
17	ACD	4-5	Table 4-1 LRRWMO goal statements and associated metrics	Goals ED-A and B could be enhanced by referencing the outputs in the Rum 1W1P Outreach Plan. It is likely that funding for outreach in the LRRWMO and elsewhere will be coming via the 1W1P partnership. I'm happy to provide the most recent draft Outreach Plan.	Y	We will review the 1W1P outreach plan and incorporate and/or reference the appropriate elements.
18	ACD	5-2	5.2 Prioritization and Targeting	Has the LRRWMO considered adding "groundwater" to its list of priority waters? The plan has actions targeting groundwater.	N	Groundwater has been omitted from the list of specific priority waters based on the role and authority of the LRRWMO relative to partners such as Anoka County, MDNR, and MDH. Groundwater is identified as a Level 1 priority issue area.
19	ACD	5-4	5.3.3 Education Program	It would be helpful to summarize the key outreach messages, audiences, and outreach frequencies for each that are scattered elsewhere in the plan.	N	A detailed education program will be developed in coordination with ACD during Plan implementation.
20	ACD	5-8	Table 5-1 Implementation Schedule	In the Projects/Programs line PP-2 I suggest that riverbank stabilizations be expanded from just the Rum River to also include the Mississippi River. Erosion inventories are complete on both rivers, and these can identify priority sites.	Y	Proposed projects within the implementation table will be expanded to include Mississippi River shoreline stabilization efforts.
21	ACD	5-8	Table 5-1 Implementation Schedule	In the Projects/Programs line PP-3, I recommend increasing funding levels from \$5,000 LRRWMO and \$45,000 grants to \$10,000/\$100,000. This scale would be more consistent with the LRRWMO's goals of identifying and installing multiple projects.	Y	The budget estimated for specific projects and programs considers existing and anticipated local funding sources, WBIF sources, and other grants/partner funding. We will review the implementation schedule budget for all individual items for accuracy. The Board of Managers will review whether budgets should be increased over the course of Plan implementation to achieve the intended scope.
22	ACD	5-9	Table 5-2 Implementation Schedule	Table 5-2 lines ED-3, and PP-2 through PP-5 have a problem for those who will be doing LRRWMO budgeting and the member cities who will be paying: it doesn't ANNUALLY separate money that the LRRWMO needs to budget from grant money the LRRWMO hopes to get. Please consider separating LRRWMO and grant funds for each year.	Y	We will attempt to reformat the implementation table to separate the local and grant funding expectations on an annual basis.
23	ACD	5-9	Table 5-2 Implementation Schedule	The annual grand total expense are adjusted 3% for inflation, but the individual line items are not. Please consider applying the 3% adjustment to each line so we can see anticipated costs for each task.	Y	The line items do not include an inflation adjusted cost so that the LRRWMO and cities can identify relative changes in cost over time. The Board of Managers will consider updating the line item costs to reflect inflation, based on what is more useful internally.

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24	ACD	5-9	Table 5-2 Implementation Schedule	Consider adding a monitoring schedule somewhere in the plan, particularly for lake water quality. The fluctuating expense suggests lakes are monitored in a rotation, but that rotation is unclear.	Y	A monitoring schedule will be added showing specific years (versus intervals such as "every three years")
25	ACD	5-9	Table 5-2 Implementation Schedule	Line EN-1, costs for engineering services is \$5,000/yr. I notice the 2020 budget was \$7,000 for this item. Is \$5,000 enough?	Y	The annual engineering expenses will be reexamined.
26	ACD	5-9	Table 5-2 Implementation Schedule	Line MN-1, lake water quality monitoring, increase the cost from \$1,500/lake to \$2,000/lake to reflect actual costs.	Y	The costs will be increased as recommended.
27	ACD	5-9	Table 5-2 Implementation Schedule	Line MN-3 Rum River water quality monitoring - The LRRWMO draft plan includes only monitoring at County Road 7, and relies on Met Council to monitor at the dam. I recommend checking with Met Council that they will continue to monitor the Anoka Dam area.	N	We will confirm with the Metropolitan Council that they plan to continue monitoring the Anoka Dam location.
28	ACD	5-9	Table 5-2 Implementation Schedule	Line MN-5 wetland monitoring - Adjust the expense from \$1,000 to \$2,000 to reflect present day actual costs.	Y	The costs will be increased as recommended.
29	ACD	5-9	Table 5-2 Implementation Schedule	Line PP-2 streambank restorations - The costs are spread relatively evenly amongst years. Instead, consider bursts of activity/expense in three consecutive years. Grants that make up the bulk of the funds will come in bursts, and similarly require matching funds from the LRRWMO in bursts. Timing for this line item should consider your priority sites. For example, if Anoka's Woodbury House site is a priority ASAP, then the plan may need to show a burst of expenditures in 2022. Also, I know that at least Anoka has some other priority sites on city property at the Anoka Nature Preserve, behind the high school, etc. Specifically mentioning these in the plan greatly increases their positioning for competitive grants. For all other sites, note that ACD has identified priority sites within riverbank condition inventories.	Y	We will coordinate with ACD to determine the likely years of implementation. At present, the relatively uniform distribution of costs reflects uncertainty in when these projects will be implemented.
30	ACD	5-9	Table 5-2 Implementation Schedule	In the education section, does the LRRWMO wish to continue its public officials pontoon tours (every 2 yrs) or dinner meetings (every 5 yrs). It seems that those items have been a hit in the current plan. They effectively engage city council members.	Y	This activity will be specifically noted in the education narrative and implementation schedule.
31	ACD	5-9	Table 5-2 Implementation Schedule	Line EN-4 management plan update - Nearly all of the expense is in the years 2029-2031. In the past the LRRWMO has intentionally budgeted for this "big ticket" item over many years. Is it the board's intention to put the cost in just three years?	Y	The implementation table is intended to reflect when activities will be completed (and by association when expenses will be incurred). A footnote will be added to note that the LRRWMO budgets a small amount each year to pay for the Plan update.

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32	ACD	5-11	5.4.6	Paragraph two describes WBIF grants. However, it only describes WBIF metro funding. The LRRWMO will also be eligible for the basin-wide Rum WBIF once the 1W1P is complete. The LRRWMO can be part of deciding how each pot of funding is used. Recommend adding this to the plan, as it is a major financial consideration.	Y	This section will be revised to note the 1W1P funding available to the LRRWMO.
33	ACD	All	General	A helpful addition to the plan would be a summary of implementation actions in the plan that the communities are required to complete. The same list would be used in annual city reporting to the LRRWMO.	N	A checklist for cities will be developed outside of the Plan document itself after approval and adoption (as it may evolve over time).
34	ACD	All	General	Consider cross referencing this plan to city MS4 goals/activities.	N	This Plan seeks to reduce or eliminate redundancy with MS4 SWPPPs. Also, the MS4 permit will likely be updated before the Plan is updated. For this reason, specific references to SWPPP sections are not included.
35	ACD	All	General	Consider a method to have cities communicate their individual accomplishments to LRRWMO goals, so that the LRRWMO can count those as accomplishments. For example, the LRRWMO plan includes installing stormwater retrofits to achieve certain numeric goals. I understand that the cities do that kind of project too, such as during street reconstruction, that should rightly count as progress to LRRWMO goals. The current LRRWMO checklist works well, but doesn't include construction projects. An updated checklist or city annual reporting form is needed to go with the new LRRWMO plan.	N	A checklist for cities will be developed outside of the Plan document itself after approval and adoption (as it may evolve over time). It is intended that this checklist will assist in measuring progress towards LRRWMO goals.
36	City of Ramsey	1-4	No. 20	Change BCWMC to LRRWMO	Y	This typo will be corrected.
37	City of Ramsey	2-23	Table 2-6	Classification of Rogers Lake, Grass (Sunfish Lake), and Jeglens Marsh as Natural Environment. City Code identifies all three (3) as Recreational Development Y	Y	We will confirm the MDNR classification of these lakes.
38	City of Ramsey	2-26	2.7.2	Is City of Ramsey's MnRAM Info (3.0) obsolete? Plan references need to be version 3.2 or current.	N	The MnRAM reference is intended for current/future application. Assessments performed in the past with then-current versions are not necessarily obsolete.
39	City of Ramsey	2-41	2.7.7	Wording of last paragraph (should regulative be changed to regulate?)	Y	This typo will be corrected.
40	City of Ramsey	3-3	3.2	Wording of first sentence of first paragraph ("...discuss their priority to be addressing in the...")	Y	This typo will be corrected.
41	City of Ramsey	3-9	3.3.4	2nd paragraph, 4th sentence, should say contribute not contributed	Y	This typo will be corrected.
42	City of Ramsey	3-9	3.3.5	Wording in 2nd sentence ("...for residential, commercial, and land uses..."). Appears use like industrial is missing	Y	This typo will be corrected to say "... and other land uses"
43	City of Ramsey	3-9	3.3.5	3rd sentence, should it refer to "...areas of biological significance...". Currently says significant	Y	This typo will be corrected.
44	City of Ramsey	3-12	3.4.2	2 nd paragraph, 3 rd sentence, should say "...in collaborative actions" instead of collaborate	Y	This typo will be corrected.
45	City of Ramsey	4-3	Table 4-1	WQ-D: under Measure/Output, should say "educational distributions..." instead of educations	Y	This typo will be corrected.

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46	City of Ramsey	4-4	Table 4-1	NA-B "...through continued administration..." instead of continue	Y	This typo will be corrected.
47	City of Ramsey	4-6	4.2.1	3 rd sentence, "...to efficiently achieve shared..." instead of achieving	Y	This typo will be corrected.
48	City of Ramsey	4-8	Table 4-2	Under Policy, modify wording "...regarding water and environmental and promote..." because not sure what was intended	Y	This typo will be corrected.
49	City of Ramsey	4-9	Table 4-3	#9, Under Target Audience(s), change to Cities instead of cites	Y	This typo will be corrected.
50	City of Ramsey	4-11	Table 4-4	#s 18 and 19, under Target Audience(s) change to Cities instead of cites	Y	This typo will be corrected.
51	City of Ramsey	5-8	Table 5-1	The AD-1 Budget seems low given the partial year contract just signed with the ACD for administrative services. Ask to review the 10 year budget	Y	The budget for administrative services will be confirmed with ACD and draft contract.
52	City of Ramsey	5-8	Table 5-1	The EN-1 Budget seems low. The proposed amount may only cover 1 or 2 projects over the ten year life of the permit. Ask to review the proposed 10 year budget	Y	This line item is intended to cover general engineering. Engineering in support of specific projects included among the Projects/Programs sections are included among those line items. The budgets of all implementation items will be reviewed.
53	City of Ramsey	5-8	Table 5-1	Most Budget Categories seem light for providing the proposed services over 10 years. Many of the total 10 year costs are more like 2 – 4 year total costs. Ask to review and revise this table	Y	Many of the line item costs are based on existing budgeted amounts for similar items, with additional costs for new projects/programs added. We will review the overall budget and determine whether the total costs reflected are appropriate.
54	Met Council	5-8	Table 5-1	Would like to see more specific projects and plans. This can be helpful to save amendment effort in the future and position LRRWMO for next round of WBIF. In addition want to see more potential stormwater, water quality, and streambank projects which amount for \$710,000 for the ten-year period so that the WBIF can be used. Proposed projects should include targeted waterbodies and locations	Y	We will work with ACD and the member cities to include more specific projects, if they are known at this time. In addition, future Plan amendments will be made as necessary to add specific projects.
55	Met Council	5-8	Table 5-1 and Table 5-2	Suggest the LRRWMO allocates more than \$10,000 for the 10-year period to item AD-4	Y	This budget item will be increased to reflect a greater focus on grant funding for implementation.
56	Met Council	2-7	Figure 2-2	Label watersheds and flow directions	Y	The figure will be revised to show flow directions and watershed labels.
57	Met Council	2-28	2.7.3?	Consider summarizing all ongoing monitoring programs, including frequency and responsible party, in a table	Y	A table of monitoring activities will be added.
58	Met Council	2-29	Figure 2-10	Include groundwater quality monitoring and observation wells on Figure 2-10. Document later indicates that groundwater monitoring locations are shown in Figure 2-10, but they are not	Y	The figure will be revised to show the groundwater monitoring locations.
59	APCHES	All	General	The consistent integration of groundwater resources throughout all areas of the Plan is noticed and commended. Groundwater is a critical, and often overlooked, component of comprehensive watershed management.	N	Thank you.

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60	APCHES	All	General	In general, when discussing education and outreach opportunities, keep in mind, and consider adding into the Plan, the availability of Know the Flow (www.knowtheflow.us). Anoka County Public Health and Environmental Services maintains this site and is happy to partner with the LRRWMO in the dissemination of water resources-related information.. Anything that the LRRWMO, or its member cities, would like shared on the website can be emailed to Abby.Shea@co.anoka.mn.us. APCHES recommends including the resource of the Know the Flow website in the Plan, or just keep in mind while implementing the Plan.	Y	Reference to Anoka County education and outreach will be added to the discussion of education within the implementation section. The Board of Managers will leverage Anoka County in the implementation of this Plan.
61	APCHES	ES-1	Section 1	Change “Joint Powers Association” to “Joint Powers Agreement” on page ES-1.	Y	This typo will be corrected.
62	APCHES	ES-2	Section 2	Land and Water Resources Inventory” on page ES-2 does not make sense. There appears to be a couple of typos preventing the reader from understand the meaning of the statement. Edit this sentence to have it convey intended meaning	Y	Awkward phrasing in this section will be corrected.
63	APCHES	1-2	1.2.1	“The limits of Anoka County form the jurisdictional boundary of the LRRWMO to the north and to the west.” However, the northern boundary of the LRRWMO is the cities of Northern and Oak Grove, which are part of the Upper Rum River Watershed Management Organization. Edit the statement on page 1-2 to accurately describe the northern boundary of the LRRWMO.	Y	The narrative description of the northern boundary of the LRRWMO will be corrected.
64	APCHES	2-2	2.1.1	The sentence starting on page 2-2 and ending on page 2-3 inaccurately refers to Table 2-1 when referencing snowmelt runoff data. Table 2-2 is the table relevant to snowmelt. Edit the reference on the very top of page 2-3 to refer to Table 2-2 instead of 2-1.	Y	The table references will be corrected.
65	APCHES	2-7	Figure 2-2	It may aid readers of the Plan in visualizing the locations of the level 8 watersheds if they were labeled in Figure 2-2. Include the names of the level 8 watersheds in Figure 2-2, or number the watersheds in the figure and provide a key.	Y	The watershed names will be added.
66	APCHES	2-29	Figure 2-10	Add the groundwater quality monitoring locations and the observation well within the LRRWMO to Figure 2-10. Ensure these are clearly denoted and listed in the figure key. Alternatively, create a new figure for just groundwater the quality monitoring locations and the observation well within the LRRWMO.	Y	The figure will be revised to show the groundwater monitoring locations.

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67	APCHES	2-25, 2-33, 2-34, 2-35	Text in multiple paragraphs for Section 2	On page 2-33, the third paragraph references Table 2-8 when it should reference Table 2-7. The Plan also incorrectly refers to Table 2-8 on page 2-25. In addition, on page 2-34, the Plan refers to Table 2-9 when it should refer to Table 2-8. This mix-up also occurs twice on page 2-35. Also, on page 2-35, the Plan refers to Table 2-10 and Table 2-11 when it should refer to Table 2-9 and Table 2-10. It appears many table references are just one off throughout this section of the Plan. Recommend checking rest of section 2 for other discrepancies and correct them	Y	The table references throughout the document will be checked.
68	APCHES	3-2	3.1.1	Include Anoka when listing the "Counties and SWCDs" involved in the 1W1P process.	Y	Anoka County will be added to the counties and SWCDs.
69	MPCA	All	General	MPCA acknowledges previous agency comments being addressed in the latest version of this plan and appreciates those inclusions.	N	Thank you.
70	MPCA	All/5-8	General/Table 5-1	As available, MPCA recommends including more specifics on implementation projects and estimated reductions pursued over the life of the plan to reach reduction and priority goals.	Y	See other comments regarding implementation schedule and projects.
71	MPCA	5-6	5.3.4.1	MPCA recommends working with the Metropolitan Council Environmental Services Citizen Assisted Lake Monitoring Program (CAMP) to add at least one annual chloride analysis to the lakes monitored in LRRWMO.	Y	The Board of Managers will request that ACD add chloride to the parameters monitored in LRRWMO waterbodies.
72	MPCA	5-6	5.3.4.1	Furthermore, section 5.3.4.1 states "The LRRWMO will coordinate with ACD to determine if chloride analysis should be added". What will be the criteria to determine if chloride analysis will be added? Increasing chloride concentrations are problematic even if well below the standard to protect aquatic life. Even limited monitoring could tip off increases in degradation and urgency of chloride BMP implementation.	Y	The Board of Managers will request that ACD add chloride to the parameters monitored in LRRWMO waterbodies.
73	MPCA	5-6/2-28	5.3.4.1 and 2.7.3	A monitoring approach is outlined in narrative in the plan, addition of a simple table or visual could be beneficial to understanding. Is there a link to either CAMP, ACD or LRRWMO monitoring approaches in a visual format or table?	Y	A table of monitoring activities will be added.

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74	BWSR	2-35	2.7.4.1	The Land and Water Resource Inventory discussion on water quality trends of priority waters indicates that there is no trend for the 95% confidence level. Then it goes to mention that there is a decreasing (improving) trend for “P” in Round Lake with a 90% confidence level which is good. However, it begs the question of what are the indicated trends for the water quality parameters of the various priority water bodies if the WMO uses a 90% confidence level for them also? The purpose of looking at the water quality trend analysis is to provide a trigger for the WMO to take action to address a potential water quality resource issue before the resource becomes impaired. The WMO should discuss this issue with their TAC members who have expertise in water quality monitoring (i.e. MPCA and Metropolitan Council) to see if it makes sense to use a coarser confidence level as the canary in the coal mine, especially given the limited monitoring being done by the MWO.	Y	The Board of Managers will consider whether negative trends observed at a 90% confidence level should trigger more frequent monitoring.
75	BWSR	2-7	Figure 2-2	For Figure 2-2 Topography and Drainage Patterns; label the watersheds consistent with Table 2-3 and include flow directions in the figure.	Y	Watershed labels and drainage arrows will be added.
76	BWSR	Unclear	Unclear	The Land and Water Resource Inventory identifies priority areas for wetland protection and restoration. BWSR wetlands staff have also identified and mapped the restorable wetlands as part of our wetlands banking program for the “Local Government Road Wetland Replacement Program”. The LRRWMO is included in “Bank Area – 7: Middle Mississippi. Please contact Ben Meyer the BWSR Wetland Specialist for Anoka County for additional information on the BWSR Banking program, potential funding availability.	Y	Restorable wetland information available from BWSR will be reviewed for consistency with priority wetland areas already included based on ACD analysis.
77	BWSR	2-30	Figure 2-10	Section 2.6 Groundwater: Figure 2-10 Monitoring Locations, is missing the groundwater monitoring locations.	Y	The figure will be revised to show the groundwater monitoring locations.
78	BWSR	2-38	2.7.5	Provide information on how the reader can obtain stormsewer system information. Also, drainage systems and control structures and their operation and maintenance.	Y	The text will be revised to note that stormwater system information is available from the respective cities, and is summarized in their local water management plans.

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79	BWSR	3-1	3	In the second sentence it is mentioned that many of the priority issues to be addressed during the life of this Plan are similar to those described in the previous plan. 8410 requires that the plan include a summary of the evaluation of the success (and failures) of implementing the previous plan and considered in the identifying priority issues. It does not appear that the required summary is included in the Plan (this is typically done with a mention in the body of the Plan and a reference to an attachment or appendix).	Y	A list of accomplishments is included in Section 1 - Introduction. This will be augmented with additional information from previous annual reports.
80	BWSR	3-1	3.1	Stakeholder Engagement and Issue Identification. Good summary of the stakeholder engagement process to identify issues. Appendix D with the Gaps Analysis and additional issue and priority identification background is also helpful.	N	Thank you.
81	BWSR	3-4	3.2	It would be helpful if there was a little more information/definition as to what the various priority levels mean in regard to actions the WMO will take and the timing of those actions. You might want to include a Level 1 and Level 2 priority for the organization priority, to be consistent with the resource priorities. We would also suggest that the WMO give some thought as to if each of the specific issues for a given issue area are really all the same priority level. It would make some sense that the WMO will likely treat some of them as a lower priority. If so, call it out in the table.	Y	This section will be revised to note that the resource priority levels are used as a guide for work planning and allocation of funding. In evaluating the work planned and budget for each year, the Board of Managers will consider the breakdown of dollars allocation to level 1 issues (e.g., water quality improvement projects) versus level 2 issues. These priority levels have also been used in determining "high" versus "medium" priority activities in the implementation schedule.
82	BWSR	3-5	Table 3-1	The table is nicely laid out and easy to read. The Issue ID's are good idea, but they don't appear to have been used to correlate specific issues to goals and implementation activities as stated and needed. Try incorporating these into the goals and implementation tables or text.	Y	The issue IDs will be correlated with the goals and implementation activities in the revised version of the Plan.
83	BWSR	3-5	Table 3-1	For NA-1: which "other waters" lack buffers and to what extent?	Y	This will be revised to note that the other waters include wetlands and developed lakes. Specific information about the degree of the problem is located in the narrative.
84	BWSR	3-5	Table 3-1	We agree with the specific issue of limited funding and staff capacity to implement projects and programs for the LRRWMO. In addition to looking for more external funds to solve these issues the MWO also needs to look internally. Make sure there are goals and implementation activities that also address the internal funding and capacity issues. The WMO may want to include a workload analysis and/or strategic planning as an organizational goal and implementation item. BWSR occasionally has some PRAP grant funds available for this type of work (talk to your BC about it).	Y	The Board of Managers will consider whether an increase in base funding levels are needed to implement this Plan, and/or schedule an analysis to this effect during Plan implementation.

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85	BWSR	3-10	3.3.5	This section notes the importance of adequate buffers for water quality and other benefits. It then goes on to explain that the WMO only requires temporary buffers during construction and then only at 15-ft. This seems to identify a need for permanent buffers around wetlands (and shoreland (streambanks) areas for resource protection. During development would likely be the best time to acquire this important protection for wetlands (and other areas) so the developer pays for the cost of protecting the resources the development will be impacting. This approach seems much more cost effective especially for current taxpayers.	N	The issue of permanent wetland buffers has been reviewed by the Board of Managers at multiple points during the Plan development process. The Board of Managers decided not to require permanent wetland buffers, leaving this determination up to the individual cities.
86	BWSR	3-12	3.4.2	Exactly what is limiting the WMO's ability to fund the work necessary to pursue its goals and increase organizational capacity to address the high priority issues that were identified in the planning process during the 10-yr life of this Plan? How does the WMO's funding capacity compare with other metro WMO's and WD's? When making this funding capacity comparison the WMO will want to look at cost to the property taxpayer per \$100,000 or \$200,00 of tax value or capacity of the WMO. This will help define what "the reasonable tax burden" is. The analysis is more than just comparing operating budgets. This section also implied that significant savings could be accomplished by limiting redundancy with partners, which would then presumably free up funds to do additional projects needed to address the WMO's priority issues. This redundancy item/issue needs to be pursued further and incorporated into the WMO's goals and implementation actions so the additional needed projects can be funded to address priority issues during the life of the Plan.	Y	The Plan will be revised to describe how funding amount from each City is determined consistent with its Joint Powers Agreement (i.e., 50% based on land area and 50% based on tax value). The Manager prefer not to include the estimated cost to individual properties within the Plan document. The text is intended to acknowledge that leveraging partner strengths and limiting overlapping roles and responsibilities (e.g., WMO policies duplicating individual MS4 permit requirements) will promote cost effectiveness. The text will be revised to minimize the implication that there are significant savings "left on the table" under the current operational relationships. The distribution of regulatory roles between WMO and Cities is one area where these benefits have been realized. The text will be revised to note specific examples where this has been accomplished, and areas where additional efficiency may be gained.

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87	BWSR	4-2	Table 4-1	Goal ID SW-A: Setting a pollutant reduction goal based on permit requirements isn't really a valid pollutant reduction goal since your reducing the increase in pollutant loading that is being caused by permitted project. It is also not a valid goal for measuring the success of your permit program as the goal has little to do with the actual implementation of the permit program that is being evaluated. For example part of the current goal is to prevent 800lbs/yr of TP via the permit program, what if the WMO only has one project requiring a permit and it only has permit requirements that result in 5 lbs/yr of TP being removed from the development? When the WMO goes back to evaluate the success of the permitting program, the program would have to be considered a failure when compared against the established 800 lbs/yr TP reduction goal. Even though the permit program was likely implemented perfectly. Having goals related to the implementation of the permit program is great, especially since it is such an important part of what the WMO does to protect its resources. However, those goals should be in the regulation issue area and related to the performance and implementation of the permit program. Then when the WMO does the periodic evaluations of the program they will have some metrics and data against which to evaluate the effectiveness of the regulatory programs. This comment applies to all goal statements and measures where the goal involves a pollutant reduction related to implementation of the permit program. Also refer to my comments below on the Regulatory Program Efficacy.	Y	This comment was noted during the informal review. Upon further consideration, we agree that this goal should be moved to the regulatory section of the goals.
88	BWSR	4-2	Table 4-1	Goal ID SW-B: This goal would be better if it was targeted to a particular priority resource impacted by developed areas. The goal could then be used to meet the pollutant reduction goal for the resource. We would also encourage the WMO to be more aggressive with this goal and coordinate it with the street rehabilitation programs of the member cities.	Y	This goal will be revised to target the Rum River (i.e., within the Rum River waters, and prioritizing untreated discharges to the Rum River).
89	BWSR	4-2	Table 4-1	Goal ID SW-C: I think this measure is intended to read "...90% of permitted projects achieving volume reduction goals through abstraction/infiltration? Please double check it.	Y	The goal will be revised to clarify.
90	BWSR	4-2	Table 4-1	Goal ID SW-E: The measure/output doesn't clearly cover the required inspection and maintenance part of the goal statement. The WMO will also then need to review those reports to determine if the cities are fulfilling their requirements so there needs to be a budgeted activity in the implementation schedule.	Y	The measures/outputs will be revised to specify review of annual reports from cities and MS4 reporting (which include operation and maintenance requirements). The implementation activities descriptions will be revised to note where this activity is included.

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91	BWSR	4-2	Table 4-1	Goal ID WQ-A: This goal only applies to non-impaired lakes. What about the impaired lakes and other water bodies? The WMO needs to establish specific water quality goals (condition goals) for each of the public waters previously identified. The goals should identify where they are now and where they will be at the end of the 10-yr Plan life as well as the long-term water quality goal. Based on the existing conditions of the water body and the pollutant of concern the WMO can then set a pollutant reduction goal that is needed to achieve the desired lake water quality goal. For impaired waters these goals and pollutant removals should already be established, or at least sufficient information to set the removal goals for the contributing LRRWMO area. For non-impaired waters that the goal is protection I believe the MPCA or DNR has developed some methods for establishing protection goals. Suggest the WMO consult with their TAC members who have experts on this subject. May need a separate table or expanding a previous table with information on public waters to include this information if it is not possible to make Table 4-1 work.	Y	There are no impaired lakes within the LRRWMO. Thus, the goal for all priority lakes is to maintain existing water quality. Deviation from this goal will be assessed through monitoring data and trend analysis. Pollutant reduction goals are included for priority rivers (Rum River and Mississippi River). However, the location of the LRRWMO relative to each watershed prevents an accurate assessment of in-resource water quality resulting from local pollutant loading reductions.
92	BWSR	4-3	Table 4-1	Goal ID WQ-D: The proposed output of the distribution of one piece of education literature per year is unlikely to have any impact on progress towards the resource goal by reducing bacteria loading from contributions by the LRRWMO area. A more comprehensive effort is needed, we suggest getting advice on the issue from your TAC for this level 1 priority issue.	Y	We will work with ACD to develop targeted education and communication goals related to this issue as part of developing an education and outreach plan
93	BWSR	4-3	Table 4-1	Goal ID WQ-E: The pollutant reduction goals and measures for the Mississippi should be similar to what is provide for the Rum in WQ-B and WQ-C, identify the pollutant reductions that the LRRWMO is going to achieve from its watershed during the 10-yr Plan life. Then the WMO can reference that goal when applying for grants for implementation projects.	Y	An estimated quantity of pollutant reduction for Mississippi River direct tributary areas will be added consistent with goals WQ-B and WQ-C.
94	BWSR	4-3	Table 4-1	Goal ID WQ-F: Good goal statement. However, for the measure/output it is not clear how this has a chance of meeting the stated goal. We would assume that the WMO is going to have to make a significant proactive effort to assess the problem and identify cost effective projects, with willing landowners, that will increase the DO of the Trott Brook. and then implement those projects.	Y	See also comment 10. We acknowledge that achieving the in-stream DO targets may not be realized during this plan. The Board of Managers will consider scaling back the goal to reflect reasonable progress based on the planned implementation activities.
95	BWSR	4-4	Table 4-1	Goal ID ES-A: This goal is pretty small considering the need and already identified and prioritized bank erosion areas. We suggest that the LRRWMO review this goal with the Anoka Conservation District (ACD) to come up with a more realistic achievable goal for the Rum River. Having the goal, in the WMO Plan will also help the ACD be more competitive in grant applications that they partner with the LRRWMO.	Y	We will review this goal with ACD and revise accordingly,

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96	BWSR	4-4	Table 4-1	Goal ID NA-B: Ok. However, It might help to clarify that the WMO is continuing to implement WCA.	Y	The goal will be revised to note continued WCA implementation.
97	BWSR	4-4	Table 4-1	Goal GW-A: Good goal statement. The measure/output should include a measure for providing Technical Assistance (TA). More importantly make sure that the TA is included in the implementation schedule with a budget.	Y	The output will be revised to include a measure for technical assistance.
98	BWSR	4-4	Table 4-1	Goal ID RP-A: This is a good goal statement, too few regulators do this self-evaluation. However, the permit program assessment metrics (and related goals) need to be developed and included as part of this Plan, not as a future project. Example assessment metrics could be: the annual percent of permits that are granted without being after-the-fact permits; percent of permits that are closed out by the permit expiration date without needing an exception; something based on reporting requirements reporting requirements for volume control, or other parameters). Basically, whatever metrics the WMO (more importantly City staff charged with enforcing the permits) considers for the permit program to be successfully implemented. It would be good to also include in that evaluation any ties to the condition monitoring of the resources. Another item related to this is the monitoring of the O&M operations and continued effectiveness of the installed water quality treatment practices. We suggest looking at the CLFLWD CWMP that is currently in 90-day final review draft on their website, for some examples of metrics and measurable goals for permitting programs, monitoring programs and education programs.	Y	The goal metrics will be revised to include specific measures for assessment. The narrative section addressing the permit program will also be revised to include the specific metrics for evaluation of the program.
99	BWSR	4-4	Table 4-1	Funding and Capacity Issue Area: We noted that none of these goal statements or measures address an assessment of the WMO's funding capacity, or a review of what it is and its limitations and what it needs to be done to address the identified priority issues. Organizational administrative capacity to implement the plan and operate the WMO needs to be addressed. The WMO needs something like the URRWMO watershed coordinator position. The establishment of such should be a goal.	Y	A goal and/or implementation activity will be added to assess the funding capacity of the WMO to determine if increases in based funding revenue are needed. The implementation schedule does include funding for an administrator position.
100	BWSR	4-5	Table 4-1	Education and Engagement: The completion of the Education and Engagement Plan described in section 5.3.3 should be included as a goal/measure/outcome.	Y	This will be added to the outputs.
101	BWSR	Entire section	Section 5	In general, the Implementation Program is a significant improvement over the one in the previous plan in both organization and commitment to address identified priority issues during the 10-yr life of the plan.	N	Thank you.

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102	BWSR	Entire section	Section 5	The Implementation Program is lacking in the inclusion of specific projects that will be completed during the 10-yr life of the Plan to address specific priority issues and goals. The WMO needs to consult with its member communities and partners such as the Anoka Conservation District to identify and include any projects they have identified that would help address WMO priorities and goals. (i.e. it is our understanding that the City of Anoka has some projects related to the Rum River Woodbury House site that is a big priority, but not included in the WMO Implementation program, we expect that the member communities also have upcoming street reconstruction projects planned during the next 10-yrs and these would be opportunities for providing additional water quality treatment projects (in excess of what is required by regulations) these projects should be identified, described and included. These projects are important to identify in the Implementation Program and Schedule for the LRRWMO, Cities and ACD to be more competitive in their grant applications. The projects need to be specifically scheduled in the WMO's implementation program, addressing identified high priority issues and goals for the most competitive grant applications.	Y	<p>The Board of Managers sought input from member cities and other partners in developing the implementation schedule. The Board of Managers will again request that member cities provide project opportunities.</p> <p>We will also meet individually with ACD to determine if additional ACD projects can be added, in detail, to the LRRWMO implementation schedule.</p> <p>The Board of Managers understands that without specificity within the implementation schedule, Plan amendments may be required to incorporate future projects.</p>
103	BWSR	Entire section	Section 5	The Implementation program appears to only include matching funds for WBIF projects (current 10% match requirement). The WMO is going to need to pursue other grants to fund projects to address all the identified priority issues. These grants are likely to require a higher match, for example the CWF competitive grants have a 25% match requirement. Availability of CWF funds will be expiring about the same time as this plan, so the WMO should try to take advantage of this funding while it is available, by being more aggressive in its implementation activities	Y	The text notes that the LRRWMO will pursue additional grant and cost share funding opportunities in addition to WBIF. However, it is difficult to quantify competitive grant funding in implementation dollars. Where appropriate, activity descriptions will be revised to note the pursuit of additional grant and cost-share funding.
104	BWSR	Entire section	Section 5	Projects need to be described in greater detail than what is provided in the implementation schedule. Description should include the targeted water bodies and locations. If project is identified in a feasibility type study, then referencing that with a link would be helpful. Refer also to later comments on Table of adopted SWA's.	Y	See response to comment 102.
105	BWSR	Entire section	Section 5	The Implementation Schedule (general administration) includes funding for the first time of a contracted watershed administrator. This position will be helpful in implementing the Plan. The activity description provided is helpful, but it would be good if there was additional detailed description of the administrator's responsibilities (job description and expectations) under section 5.3.1 Administration, especially since this is the first time the WMO will hiring such a position. It will also be important for this position to actively represent the WMO in the WBIF funding process, grant applications and coordinate with the Rum River 1W1P group to help address upstream pollutant sources. The proposed description and budget do not appear to be sufficient for these activities.	Y	<p>We will coordinate with ACD to include the determined job elements.</p> <p>We will revise the grant application and/or other administrative items to note the advocacy of the administrator in WBIF matters.</p>

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106	BWSR	5-3	Section 5.2	Mentions that subwatershed analyses (SWA's) will be performed. The implementation Plan needs to identify the specific SWA's (and targeted resource) to be prepared and include the specific SWA;s in the Implementation Schedule. The Plan needs to identify the criteria for what comprises an acceptable subwatershed assessment (ACD can probably help with this).	Y	We will work with ACD to more specifically describe the areas to be covered under the planned SWAs, the associated resources they protect, and the intended outputs of the SWAs.
107	BWSR	5-3	Section 5.2	The Plan needs to identify the existing SWA's (and priority resource being addressed) that the WMO is adopting and will be implementing as part of the plan (include in the implementation schedule along with identification of the priority resource goal it helps address). The Plan also needs to establish a process for WMO Managers to adopt future completed SWA's into the Plan via the amendment process. We suggest that the Plan include a separate table (maybe in the appendix for easier updating) with a brief description of the SWA its effective date and a link to where it is located on the WMO website or partners website. Similar for other guidance type documents like feasibility studies that the WMO will be implementing as part of the Plan. Once the SWA (or other completed feasibility study) is adopted into the plan it is easier to link to the implementation table. Then it can be referenced, along with the pollutant reduction and resource goals the projects will help achieve, for grant applications making for a more competitive grant application.	Y	Will need to confirm with ACD if there are applicable SWAs within the LRRWMO area. It is not clear if there are SWAs that are already available for the LRRWMO to target projects. If existing SWAs are available, they will be noted and referenced in the Plan.
108	BWSR	5-5	Section 5.3.4	The monitoring program at a minimum needs to include a schedule of monitoring activities for the Plan life. To get the full picture (and identify any gaps) of the monitoring effort should include WMO funded monitoring as well as local partner monitoring that the WMO depends on to get a complete picture of resource health.	Y	A table of monitoring activities will be added.
109	BWSR	5-8	Table 5-1	The LRRWMO should consult with the member communities and partners to see if they have identified any proposed water quality projects that would help address LRRWMO priorities and goals. If so the LRRWMO should get the specifics and consider including them in the implementation program section of the Plan. (Note the most recent round of WBIF grant funding required that the projects be identified as a priority in the implementation program section of the WMO/WD Plan).	Y	The LRRWMO invited member cities to propose individual projects for inclusion within the LRRWMO implementation schedule. City projects will be added to the implementation schedule at the request of the Cities during Plan revision.

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110	BWSR	5-8	Table 5-1	We want to reiterate the importance of the WMO consulting with their partner, the ACD on the proposed implementation program and schedule to see if there are any issues that they know of, or projects that they have identified that will help address some priority water resource issues and goals. The ACD is involved in a lot of the conservation work and support that gets done in Anoka County, especially on private lands, so it is important that their input is sought for this plan. Given that there was only one TAC meeting it is not clear that happened. If the ACD approves it, the WMO could identify them as the ones responsible for implementing the project, although they would likely need some match funds since they do not have leavy authority to raise their own funds. However, many of their projects often end up getting matching funds from private landowners.	Y	We will meet with ACD during Plan revision and revise the implementation schedule, as needed, to promote consistency between the LRRWMO implementation program and ACD projects and programs. Where appropriate, specific ACD projects will be included in the implementation schedule.
111	BWSR	5-12	Section 5.5.2	Provide in an appendix, a draft of the biennial assessment form described in this section including all the measurable goals and metrics and implementation actions needed to assess the WMO's progress towards implementing the Plan.	Y	A draft tracking form will be included with the Plan as an appendix. Note that this review form may be revised based on experience gained over the first two years of implementation
112	BWSR	5-15	Table 5-3	Need to complete table with date of city adoption information.	Y	This information will be obtained from the member cities.