

VLAWMO Watershed Management Plan
Formal Review Comments and **DRAFT** Responses



Comment #	Source	Section	Subsection	Page	Paragraph	Comment	Change Needed	Flag	Revision/Comment
1	MDH	Overall	n/a	n/a	n/a	We commend VLAWMO for the emphasis on the importance of VLAWMO lakes as sources of drinking water throughout the plan. Of note is the presence of this information in the Executive Summary, as well as the inclusion of location within the chain of lakes used for drinking water as a resource prioritization criterion.	N		Thank you
2	MDH	Overall	n/a	n/a	n/a	We commend VLAWMO for the inclusion of implementation actions that will protect both groundwater and surface water sources of drinking water. It is clear that drinking water protection was considered throughout plan development.	N		Thank you
3	MDH	Overall	n/a	n/a	n/a	We are appreciative of the opportunity to be involved in the TEC+ and to provide preliminary informal comments on draft sections of the plan. The MDH Source Water Protection Unit will continue to be available as a resource to VLAWMO.	N		Thank you
4	MDH	Overall	n/a	n/a	n/a	Recommend a final review of the plan to check for errors. There are some minor ones throughout the plan including references to "Appendix X", minor typos (including in in-text citations), and references to the implementation table as both Table 4-5 and 4-6.	Y		Appendix X is a placeholder until this final review. Will amend any in-text citation typos and change implementation reference to table 4-5.
5	MDH	Overall	n/a	n/a	n/a	During implementation of the plan, we strongly recommend considering the intersection of multiple issues, whether this be considering the multiple benefits of projects, or considering potential negative impacts to a resource while working to improve another. Some examples of this are: 1) limiting or conducting a higher level of engineering review of infiltration BMPs places adjacent to a source waterbody within a protection area, considering the impacts to the drinking water source body; 2) consider the costs and benefits to groundwater and/or drinking water when implementing grant programs (e.g., soil health projects will likely have an added benefit of groundwater quality improvement or protection, whereas some stormwater infiltration BMPs can negatively impact these resources); 3) Much of the area along Lambert Creek in its subwatershed is within a highly vulnerable DWSMA, so infiltration BMPs may not be advised or should have a higher level of engineering review. See informal comments on section 4 for more details. MDH Source Water Protection staff are available for technical assistance regarding all subjects related to this.	N		Thank you, we will consider it.
6	MDH	Overall	n/a	n/a	n/a	During informal comments, VLAWMO staff notes that some technical work is planned that will investigate groundwater impacts and potential projects during the life of this plan. Keep in mind MDH's Groundwater Protection Initiative Accelerated Implementation Grant for such work, as it is likely eligible: https://www.health.state.mn.us/communities/environment/water/groundwater/accimpgrant.html . Contact the MDH planner if considering applying for assistance.	N		Thank you, VLAWMO will consider this grant.
7	MDH	2	2.1	7	1/list	Consider that member communities' 2040 Comprehensive Plans will soon be outdated as they will begin and complete their 2050 Comprehensive Plans during the first half of the life of this Watershed Management Plan. Consider linking to general city planning webpages instead of direct PDF links, or noting in the text that this update is occurring and should be complete in late 2028 or early 2029.	Y		Text added that cities may be updating their Comprehensive Plans, and websites should be referred to for the latest version.
8	MDH	2	2.3.1	10	3	Consider noting that Sucker Lake, where there is a fishing pier, has fish consumption guidelines more restrictive than the statewide guidelines for bullhead due to mercury contamination. The guidelines for Sucker Lake can be found here: https://www.dnr.state.mn.us/lakefind/fca/report.html?downum=62002800 . The statewide guidelines can be found here: https://www.health.state.mn.us/communities/environment/fish/guidelines.html#NaN . Note that it appears that only fish from Sucker, Pleasant, East Vadnais, and Goose lakes have been tested for contaminants within the watershed.	Y		Added this comment to Table 2-2 for Sucker Lake.
9	MDH	2	2.4.1	14	2	Since DWSMAs change over time and the figure in the plan is a snapshot in time, consider directing readers to MDH's Source Water Protection Map Viewer for the most up to date information, as on page 16. Be sure to link to the static page, not the map itself, as that link may change over time as updates are made to the map viewer. https://www.health.state.mn.us/communities/environment/water/swp/mapviewer.html (see additional comment later in this spreadsheet as well regarding the map viewer).	Y		Kept Figure 2-5, but added link as recommended.

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10	MDH	2	2.4.1	15	1	It appears that the link to the Watershed Health Assessment Framework tool has been updated. Consider linking to the static DNR webpage instead in case that happens again: https://www.dnr.state.mn.us/whaf/index.html .	Y		Updated link.
11	MDH	2, 3	2.4.1 and 3.4.2	15 and 35	2 and 2	While some of the decrease in groundwater withdrawals in the watershed may be due to water conservation efforts, this is likely mostly due to the increased reliance on surface water by SPRWS. Recommend including this factor to avoid misleading readers. This comment was given informally for the text in section 3.4.2, which was temporarily changed to include a note about the decrease in groundwater use by SPRWS, but now has changed again. The text in section 3.4.2 no longer implies a reason for the decreasing withdrawals, so that one is okay, but could consider a revision to that section as well.	Y		Amended text on page 15 to say the decrease in groundwater use may be due to increased reliance on surface water by SPRWS, and water conservation efforts also assist in decreasing groundwater use.
12	MDH	2	2.4.2	16	1	The link to the Source Water (not surface water, as written in the plan) Protection Map Viewer is no longer an active link. As the map viewer link itself may change over time as updates are made, please link to the static webpage, where users can then click on the link on that page for the map viewer: https://www.health.state.mn.us/communities/environment/water/swp/mapviewer.html .	Y		Updated link as recommended.
13	MDH	3	3.2	24	1	Consider providing an example of a partner project table or sharing a link to the most recent one, if available, to provide readers some context regarding what this entails.	Y		Added "such as Table 4-5."
14	MDH	3	3.3.3	30	3	This section ties AIS management to surface water and drinking water quality. Keep in mind that there are restrictions to invasive plant removal depending on the waterbody's status. Chemical treatment is not recommended on any waterbody that serves as a drinking water source. DNR permits for chemical application that involve a waterbody that serves as a drinking water source will also be reviewed by MDH. We evaluate these on a case by case basis, but chemical treatment is never recommended on these waterbodies, even if allowed by the DNR.	Y		Added "MDH does not allow chemical treatment of AIS on waterbodies that serve as a drinking water source in order to protect drinking water quality."
15	MDH	3	3.4.1	33	Table 3-2	It appears that the last column for Pleasant Lake was cut off.	Y		Spacing fixed.
16	MDH	3	3.4.3	37	3	Consider a brief mention in this section that chloride is a contaminant of concern for groundwater as well as surface water. Also consider if an evaluation of chloride sources in the watershed may be worth pursuing as an action item. It is good to see other sources of chloride listed in this section, especially water softeners, and the reference to Overbo, 2021.	Y		Added "Chloride is a contaminant of concern <i>for both surface water and groundwater</i> in the watershed"
17	MDH	4	4.4.5	69	4	Really like to see the notes of water reuse projects occurring where "feasible and safe" in projects 303H/403H and 305D/405D. Consider this note in project 305L on page 69 as well.	Y		Added this disclaimer to water reuse projects.
18	MDH	Appendix	Appendix C	43	n/a	It is noted that the Water Management Policy is currently under revision. Consider allowing plan review agencies the opportunity to review the policy in case there are comments that can be provided to assist in this update.	N		The Water Management Policy will be updated at a later time, in a process separate from the plan update process.
19	BWSR	Overall		N/A		This was a pleasure to read! Very well-written, well-organized, and visually appealing. Very nice work!	N		Thank you for your assistance in plan development.
20	BWSR	Overall		N/A		VLAWMO did an excellent job with public and stakeholder engagement process and issue prioritization, which was well-documented in the plan and appendix.	N		Thank you
21	BWSR	Overall		N/A		Thank you for considering many of the priorities submitted in our early input letter including chloride pollution, climate change and resiliency, and environmental justice.	N		Thank you
22	BWSR	Overall		N/A		The implementation table for this plan runs from 2027-2036; will VLAWMO be using the current plan for implementation during 2026? When does VLAWMO hope to seek BWSR Board approval? Note that the BWSR Board approval date is what determines the duration and expiration of a plan. MN Statute §103B.231 Subd. 4 (a) states, "The watershed management plan must specify the period covered by the plan and must extend at least five years but no more than ten years from the date the board approves the plan", where "board" refers to the BWSR Board, per MN Statute §103B.205 Subd. 2.	TBD	3	To be confirmed with BWSR. If needed, plan will be changed to 2026-2036 with implementation table updated accordingly.
23	BWSR	ES		ES1		Consider using "residents" rather than "citizens" for inclusivity. Also appears in Section 1, p. 1	Y		Replaced "citizens" with a combo of "the public", "community members", or "residents" depending on the context of where it appears.
24	BWSR	ES		ES7		Wonderful subwatershed map - very useful for orienting the reader to the WMO's resources and geography.	N		Thank you
25	BWSR	1		1		In figure 1-1, there are green outlines around some areas in the Lambert Creek subwatershed that do not appear in the legend; unclear what they represent.	Y		Map revised, these are restored wetland complexes

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26	BWSR	1, 4	1.2 and 4.5	3 and 58		In the description of plan priorities, it's noted that VLAWMO intends to focus on the "... Pleasant Lake chain, Wilkinson Lake, Tamarack Lake, and ongoing efforts to improve Lambert Creek". BWSR encourages resource prioritization and appreciates that VLAWMO has selected a handful of resources on which to focus conservation efforts. However, this statement conflicts with Table 4.3, "VLAWMO resource prioritization criteria" on p. 58, which includes all VLAWMO waters listed in Table 2-2, other than Gem Lake. If nearly every water body is a priority, how will the WMO decide where to target its efforts, given that you likely can't work everywhere at once? Which resources does the WMO hope to make measurable progress on over the next 10 years? Where would you like to start? It's not clear from the plan.	Y	1	Priority Resource Criteria renamed to Section 4.5 Enhanced Priority Criteria to keep the door open for working on all important lakes and streams in the watershed on an opportunity basis with partners. The 319 Designation criteria will be removed. Wilkinson, Tamarack, and Birch will be an elevated resource priority designation in the next 10 years of this plan because of the 319 small, priority watershed program participation.
27	BWSR	2	2.1	7		Consider referencing the Water Management Policy (and similar policy documents, both here and elsewhere in the plan) rather than including in the appendix. Items in the appendix are considered part of the plan, so any changes to them could require a plan amendment.	Y		Noted with thanks. The policy documents will be added to the References Cited document with a link to the VLAWMO homepage website to access the policy documents.
28	BWSR	2	2.1	8		Thank you for clarifying the land use map and chart and ensuring that they are consistent with one another.	N		Thank you for your review.
29	BWSR	2	2.3.1	9-10, Table 2-2		The text states that Table 2-2 includes "...a summary of each lake's... trend in total phosphorus (TP) and chlorophyll-a (Chl-a)...", but there is no trend information present in the table. While the most recent 5 year-average for these parameters is an important data point, one cannot infer a trend in water quality from this information alone. There is no other place in the plan where water quality trends are discussed with any significance. VLAWMO and partners do an excellent job with water monitoring and should be able to easily include a discussion or even a simple table to illustrate positive, negative, or no change in water quality parameters. Trends are vital for a thorough understanding of the state of the water resources in VLAWMO, developing measurable outcomes, and providing public transparency. Further, trend analysis is a required component of the issue prioritization process, and trends must be included in the land and water resources summary.	Y	5	Trend data summarizing TSI trends from monitoring report added to Table 2-2. "Neutral" status used to summarize lakes that are holding steady, or do not have a clear trend. Paragraph added to explain TSI trends (and why used) and why 5 years is used for trends versus 10 (based on creating an inclusive dataset as some lakes do not have 10 years of data). Trend graphs is available in monitoring report.
30	BWSR	2	2.3.2	11		Thank you for clarifying the drainage geography, history, and ownership in this section.	N		Comment noted, with thanks.
31	BWSR	2	2.3.3	11		While WCA is intended to be protective of wetland acres, part of planning is to consider which, if any, of those wetlands could be priorities for restoration, functional enhancement, or protection. With 15% of the land area of VLAWMO classified as wetland (>1000 wetlands, 47 of which are public waters), are there some with greater biological significance or some that would benefit from projects that go above WCA's requirements? While there are at least two wetland-related projects in the implementation table (Rotary Park Restoration - 401G and Whitaker Wetland Retrofit Project - 405A), there are no wetland areas that have been specifically prioritized in the plan. Where would VLAWMO like to prioritize activities to see improvement in wetland resources over the next 10 years?	Y	4	Language added to section 4 prioritization section "Rotary Park is a priority area for partner communication to pursue wetland restoration. Rotary Park efforts are currently underway with a 5-year conservation partnership grant to complete a large wetland restoration in the area. The Wilkinson Deep-Water Wetland is a completed project toward improvement of Wilkinson Lake and is a priority for wetland maintenance. VLAWMO will also explore prioritization in Vadnais-Sucker Lake Regional Park based on partner involvement. Efforts would be led by partner entities." Priority areas added to a wetland map. Map placed in LWRN to address 8410 requirements
32	BWSR	3	3.7	19		Thank you for including a section about climate that includes trends and discusses the implications of changing precipitation/temperature regimes for watershed planning and resource protection. As Atlas 15 is rolled out, how will VLAWMO ensure that municipalities are utilizing this data for planning and design to ensure resiliency and resource protection?	Y		Added to goal statement: VLAWMO will review Local Water Plans to determine that municipalities will use Atlas 15 as available for future studies.
33	BWSR	2	2.7.1	20		It's wonderful to see the reference to the Met Council flood mapping tool. However, are there any particular areas of concern within VLAWMO that the WMO or its partners would want to prioritize for volume reduction projects? Also, please add information about or reference to the 100-year flood levels.	Y		Text added "VLAWMO is currently pursuing high impervious areas within the Lambert Creek planning region for volume reduction projects." Added link to FEMA 100-year floodplain
34	BWSR	2	2.7.1	20		The heading of this section is, "Flooding, Peak Discharge, and Climate Resiliency", but there is no text addressing peak discharge. Please include.	Y		Text added addressing peak discharge.

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35	BWSR	4	4.4	30-47		<p>In general, most of the goals are not clear in how they will contribute to <i>measurable progress</i> in protecting and restoring VLAWMO's resources with respect to the priority issues identified in the plan. While BWSR appreciates the inclusion of quantifiable <i>outputs</i> (e.g. number of BMPs), they often are not able to provide a meaningful descrption of the progress (e.g. water quality <i>outcomes</i>) that VLAWMO hopes to see in 10 years. Specific examples for some, but not all, goals are provided in comments, below.</p>	Y	2	<p>All goals reviewed to ensure measurability and capability to readily assess progress during implementation. Where needed (i.e. Erosion of Shorelines and Streambanks; Groundwater and Drinking Water Quality), additional measurability was added.</p> <p>For Surface Water Quality Goals, the following language was added: <i>Outcomes from Project / Grant Dependent Measures aim to accomplish the following water quality outcomes:</i></p> <ul style="list-style-type: none"> • <i>Tamarack Lake (Project 403J): Maintain total phosphorus concentration below 80 ug/L, using a five-year average of summer total phosphorus concentrations.*</i> • <i>Wilkinson Lake (Project 403A, 403B, 403C): Reduce watershed phosphorus loading by 21 lbs/year** based on watershed projects implemented or to the maximum extent practicable given the uncertainty of future available funding, the final design of the project area, and modifications that may be incurred during construction. This reduction will be pursued through targeted management strategies that enhance upstream storage, conveyance, and water quality.</i> • <i>Birch Lake (Project 200C, 200H) : Achieve an in-lake summer-average total phosphorus concentration of equal to or less than 40 µg/L</i>
36	BWSR	3	3.4.2	32-34		<p>Surface water quality goal of "protect and improve" everywhere is vague and the number of BMPs, while quantifiable, does not contribute meaningfully to what success looks like for water quality. Consider including parameters such as delisting a particular lake, or no new impairments for nutrients and/or chloride, reducing average TP in XYZ lake by 20%, or adding specificity to how the WMO will help MS4s meet their WLAs. In other words, what do you want the state of the resource to be after 10 years of work? What do you want your monitoring data to show and, importantly, what do you want to be able to tell the public about your accomplishments? It's noted that the water quality goals and strategies in the 2017-2026 plan were considerably more measurable than the goals and actions of this plan, e.g. Goal 1-2: Demonstrate stable or improving water quality trends in all of VLAWMO lakes and streams by 2026 (p. 27).</p>	Y	2	See response to Comment #35.
37	BWSR	3		34		<p>If the quantifiable measure for the surface water quality goals, as well as for many others, is "<i>up to</i> X number of things", what does success look like? Is doing 1 out of 4 things sufficient, or 1 of 12 things? Suggest that you reconsider this framing to provide a more specific benchmark by which to measure success or failure over the next 10 years.</p>	Y		Revised to remove "up to" language.
38	BWSR	3	3.4.2	36		<p>Ensure that groundwater goals address issues identified within Met Council's water supply plan and relevant source water protection plans, as stated in MN 8410.</p>	N		Goals confirmed relative to Met Council and source water protection plans.
39	BWSR	3	3.4.4	40		<p>In Table 3-3, is the target audience for MS4 Outreach only the MS4 partners themselves, or are you also targeting their residents?</p>	Y		Target audience expanded to MS4 partners and residents.
40	BWSR	3	3.4.5	42		<p>The drainage system goal addresses inspections and identifies needs, but does not discuss implementation of maintenance or repairs. Consider revising to "maintain functionality of public drainage systems in accordance with the Public Drainage Policy" , which also includes the inspection process as a <u>strategy</u> to accomplish this goal.</p>	Y		Text revised to "manage public drainage systems in accordance with the Public Drainage Managment Policy. Systems will be inspected per the Public Drainage System Inspection Protocol."

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41	BWSR	3	3.4.5-3.4.7	41-45		The plan is missing specific, measurable water quantity goals, e.g. no net increase in volume or peak flows. VLAWMO has standards, and while those standards are potentially changing, they could still be used to frame a measurable goal. Further, if municipalities have water quantity goals and VLAWMO is coordinating to meet these goals, the plan should make this connection in a tangible way.	Y	2	VLAWMO does not enforce water quantity standards; member municipalities do this. Goal added to summarize East Vadnais Lake project benefits for peak-flow reduction. <ul style="list-style-type: none"> • <i>Peak Flow (Project 407A): Reduce peak stormwater flows from the East Vadnais Lake Subwatershed project area by 10% during a 10-year, 24-hour design storm event, or to the maximum extent practicable given the uncertainty of future available funding, the final design of the project area, and modifications that may be incurred during construction. This reduction will be pursued through targeted management strategies that enhance upstream storage, conveyance, and water quality.</i>
42	BWSR	4	4.3.3	51		VLAWMO has a robust and well-run monitoring program, for which the stated purpose includes "... to evaluate project and program effectiveness and progress towards water quality goals". However, the water quality goals, as written, do not contain water quality parameters that can be used to assess success or failure of the goal. Because VLAWMO has such an excellent monitoring program, BWSR recommends that goals be reevaluated to include metrics for which the monitoring program can be utilized to directly measure success or failure of the goal. Creating plan goals that can be measured with monitoring data also increases public transparency with respect to how VLAWMO is spending money to improve natural resources.	Y	2	See response to Comment #35.
43	BWSR	4	4.3.3	51		Text says "...four automated samplers are in place along Lambert Creek to provide continuous flow data", but Figure 4.1 and what should be Table (not Figure) 4.2 indicate that there are only three samplers.	Y		Text revised to 3 samplers for consistency.
44	BWSR	4	4.3.5	54		Figure 4.2 is great; a concise high-level overview of previous plan goals/accomplishments.	N		Comment noted, with thanks.
45	BWSR	4	4.3.7	55		VLAWMO has a variety of highly successful incentive programs. Please ensure that a description of or reference to complete program information (general purpose, amount of funds, eligibility criteria, etc) is provided to meet plan content requirements.	Y		Text added: "Eligibility criteria for specific grant programs are updated on an annual basis. See the VLAWMO website for more information."
46	BWSR	4	4.4	58		The 319 Grant priority subwatersheds are mentioned several times throughout the plan and in the implementation table, but without identifying any projects that would be implemented as part of the program. The Nine Key Elements plan includes specific subwatershed projects and anticipated implementation year, but there is very little connection between these projects and the watershed plan. Could you be more specific with respect to which 319 program projects are likely to be implemented? Also, can you clarify how the anticipated projects in these subwatersheds will contribute to the goals for this plan?	N		Connection to priority resources, projects included as part of partner / grant dependent measure (303 B and C; 403 A, B, C).
47	BWSR	4	4.4	58		Please explain or add a brief summary and reference regarding the Grant Program priority zones; where are they and how have then been established?	Y		Text added to plan "The locations of the priority zones for VLAWMO's grant programs can be found on the VLAWMO website: https://www.vlawmo.org/grants/landscape/ ." The targeted habitat priority zones are locations that have been identified by the MN DNR as native plant communities or high potential rusty patched bumblebee habitat areas that should be preserved or restored. The volume reduction priority zones are areas where there is denser development and higher likelihood for flooding to occur.

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48	BWSR	4	4.4	58		Priority criteria #4 includes lakes that are "impaired, nearly impaired, barely impaired, or a lake of high biological significance". Are those all of equal importance for targeting projects? Where is progress more likely to happen and be visible/measurable? Suggest prioritizing within this category to help target implementation and make measurable progress.	Y	1	Specifics added to Resource Prioritization to identify enhanced priority waterbodies: Wilkinson, Tamarack, and Birch. See also response to Comment #31 regarding prioritization of wetlands and parks as identified in survey results.
49	BWSR	4	4.4	58		With respect to prioritization, there are data in the survey to indicate some resources that may be priorities for residents. Granted, the survey results indicated that respondents want to prioritize "all" resources and "lakes", but the reality is that VLAWMO won't be able to make measureable improvements everywhere or protect everything, and much of the general public may not understand the limitations. Drilling down, however, respondents identified Vadnais and Sucker parks and lakes as being very important, followed by Pleasant lake, and then Deep Lake, Birch Lake, etc. Consider using the survey results as well as additional parameters such as TEC/Board priorities, direct or indirect public access, habitat/park adjacency etc. to futher prioritize implementation activities.	Y	4	Specifics added to Resource Prioritization to identify enhanced priority waterbodies: Wilkinson, Tamarack, and Birch. See also response to Comment #31 regarding prioritization of wetlands and parks as identified in survey results.
50	BWSR	4	4.4	76-77		BWSR understands and appreciates the need to provide flexibility to respond to unforeseen opportunities for CIPs through the "Future Subwatershed Capital Improvement Project" activities in the implementation table. However, note that this particular plan reference may not be sufficient for eligibility for some BWSR grants, e.g. WBIF or Projects & Practices. Should a project that falls into the "Future CIP" category arise for which VLAWMO would like to pursue BWSR funding, a plan amendment may be the best option to meet eligibility requirements.	N		Comment noted with thanks.
51	BWSR	N/A				Please specify the degree to which the plan may be adopted by reference by a local government unit.	Y	6	Text added to clarify the degree to which the cities can adopt the plan by reference. Member cities may adopt the data and maps in the Land and Water Resources section by reference, but not the implementation section.
52	BWSR	N/A				Please include a include a schedule for implementation of local water plans that requires all local water plans to be adopted not more than two years before the local comprehensive plan is due.	Y		Statement added to 5.2.1, "all local water plans must be adopted not more than two years before the local comprehensive plan is due."
53	BWSR	Appendix C				Suggest moving policy documents out of the Appendix and including them by reference. Items in the Appendix are considered part of the Plan, so any significant modification to those documents would likely need to be part of a Plan amendment.	Y		Noted with thanks. The policy documents will be added to the References Cited document with a link to the VLAWMO homepage website to access the policy documents.
54	BWSR	ES		ES3		Second sentence of top right paragraph uses "intented" twice in five words; consider an alternative for improved readability.	Y		Deleted second intend.
55	BWSR	ES		ES6		3. If a resource is <u>in</u> VLAWMO's...	Y		Revised as suggested.
56	BWSR	ES		ES8		Looks like there's a space before "As a joint powers..." starting the second paragraph on the right.	Y		Fixed spacing.
57	BWSR	1	1.1	2		Inconsistent first-line indentations; right-column paragraphs are indented, left are not.	Y		Revised as suggested.
58	BWSR	2		6		Missing half of last sentence in middle paragraph. "This summary is intended"	Y		Revised as suggested.
59	BWSR	2	2.1	7		Consider adding a link to the WBL comp plan for consistency with others	Y		Revised as suggested.
60	BWSR	2	2.3.3	11		"RCD <u>14</u> is also..."	Y		Fixed typo.
61	BWSR	3	3.4.5	39		In green box, "Continuously monitor and maintain website;	Y		Revised as suggested.
62	BWSR	Multiple	Multiple			Be sure to update "Appendix X" as appropriate, e.g. on p. 41	Y		Revised as suggested.
63	BWSR	4	5.1	48		Figure 4.1 should be Table 4.1	Y		Revised as suggested.
64	BWSR	4	4.3.4	52		Figure 4.2 should be Table 4.2	Y		Revised as suggested.
65	BWSR	4	5.4	58		Figure 4.3 should be Table 4.3	Y		Revised as suggested.
66	BWSR	4	4.4.7	70		Delete the commentary in the red box	Y		Revised as suggested.
67	BWSR	4	4.5	75		Figure 4.4 should be Table 4.4	Y		Revised as suggested.
68	BWSR	5	5.2	78		Very nit-picky, but noticed the "Enter into contracts & agreements" row in Table 5-1 has "&" on one side but "and" on the other.	Y		Changed both to "and."
69	DNR	2				Rotala ramosior (Toothcup) should be added to the list of rare species in the WMP area. Toothcup was confirmed in the area in 2024 by a DNR ecologist.	Y		Toothcup added as threatened.

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70	DNR	2				The WMP should include a discussion of how Threatened and Endangered species are regulated. All projects must comply with Minnesota's endangered species law in accordance with Minn. Stat. 84.0895. Permit applicants should be directed to Minnesota Conservation Explorer to complete an environmental review. Project proposers should be aware that they may need to seek an NHIS review from the DNR regardless of the size of their project area. Early coordination is strongly encouraged.	Y		Text added on how species are regulated as provided.
71	DNR	2				The new WMP should include a discussion of Rare Natural Communities (RNCs). RNCs are determined by the DNR and are a special consideration under the Wetland Conservation Act. A guidance document on RNCs is available at WCA Rare Natural Community Guidance	Y		Included in plan "VLAWMO follows WCA rules pertaining to RNCs."
72	DNR	3				We appreciate the plan's goal of encouraging streambank and lakeshore landowners to plant native vegetation riparian buffers through partnership projects and VLAWMO's landscape grant programs. We recommend that the plan point out the many benefits of using native plants, including: deep roots to help control runoff, reduce erosion, and reduce flooding; providing shelter and food for wildlife, including pollinators; requiring little to no fertilizer, which is a benefit to establishing native plants around water systems; and plants that are adapted to local climate conditions.	Y		Benefits added to plan text.
73	DNR	4				There are numerous online resources that could be included in the plan covering native plants and their use to protect shorelines and streambanks from erosion. These include: BWSR's list of state seed mixes, BWSR's page on native plant identification and establishment, information from Blue Thumb, a BWSR partner at https://bluethumb.org/ , the DNR's native plant supplier webpage, BWSR's Streambanks and Shorelines webpage, BWSR's Lakeshores fact sheet, DNR's Planting Trees and Shrubs on Your Shoreline fact sheet, and DNR's Natural Shorelines webpage.	Y		Thank you, VLAWMO often uses these helpful resources when communicating with the public. Language added "VLAWMO also promotes the State's resources and grant programs as part of its internal grant processes."
74	DNR	4				We encourage VLAWMO to coordinate early with the DNR on the projects identified in Chapter 4, Implementation Plan. Through discussion with the Area Hydrologist, public waters work and water appropriation permitting requirements can be identified ahead of time. By submitting project review requests online to the Minnesota Conservation Explorer (MCE), VLAWMO can identify measures required to protect rare resources, including threatened and endangered species.	N		Comment noted for use in implementation, with thanks.
75	City of WBL	N/A		General		We have enjoyed being a part of the VLAWMO TEC+ meetings during the development of this Plan. The opportunity to provide comments and hear feedback from other agencies during these meetings has helped to streamline the formal review process and make the Plan more relevant and useful for stakeholders.	N		Thank you for your engagement!
76	City of WBL	Multiple		General		Consider adding sources to the maps throughout the Plan as needed.	Y		Sources added as relevant.
77	City of WBL	1		4	Figure 1-3	consider adding another arrow near the outlet of Birch Lake	Y		Arrow added to map.
78	City of WBL	2		6	section 2	complete the last sentence or delete.	Y		Typo fixed.
79	City of WBL	2	2.1	7		revise the WBL 2040 Comprehensive Plan text to be bold and underlined like the others in the list.	Y		Link added.
80	City of WBL	2	2.5	17		revise the last sentence of the first paragraph to include wetlands and lakes as final discharge points, and replace 'filtration' with 'treatment'.	Y		Revised as suggested.
81	City of WBL	2	2.5	17		in the second paragraph, last sentence, VLAWMO also actively supports MS4s by partnering on stormwater BMP projects that help meet TMDL load reduction requirements.	Y		Added that VLAWMO supports MS4s through stormwater projects.
82	City of WBL	2	2.5	17		in the fourth paragraph, consider adding a hyperlink to the 'What's in My Neighborhood' text to direct readers to the MPCA WIMN map.	Y		Link added.
83	City of WBL	2	2.7.1	20		the word 'size; is misspelled in the second sentence.	Y		Typo fixed.
84	City of WBL	3	table 3-2	33		remove the word 'for' in last column for Pleasant Lake	Y		Formatting cut line off, fixed in formal review
85	City of WBL	3		35-36		switch the order of the sections to be consistent with the two items listed at the top of page 35.	Y		Swapped bullet points.
86	City of WBL	3		38		flip the boxes around to be consistent with the order of the items listed at the top of page 37.	Y		Revised as suggested.
87	City of WBL	3		39		for consistency, change the section title from 'Outreach and Marketing' to 'Outreach and Communication'.	Y		Revised as suggested.
88	City of WBL	3		41		fill in the Appendix letter in the last sentence of paragraph 3.	Y		Revised as suggested; was a placeholder.
89	City of WBL	3		42		remove the text 'Public Works or' in the last sentence.	Y		Revised as suggested.
90	City of WBL	3	table 3-4	43		add the WBL Sports Center Swale to this table, assuming the maintenance agreement will be finalized soon.	N		The city was a VLAWMO Landscape Level 2 grantee, and therefore does not qualify as a VLAWMO facility.

Comment #	Source	Section	Subsection	Page	Paragraph	Comment	Change Needed	Flag	Revision/Comment
91	City of WBL	3		44		fill in the Appendix letter in the third sentence under the Stormwater Management Standards section.	Y		Revised as suggested.
92	City of WBL	4		50		update the Program Summary title.	Y		Rephrased to match resource category
93	City of WBL	5		79		revise the photo title to say 'White Bear Lake' or 'Downtown White Bear Lake', and update the website to our new link at www.whitebearlakemn.gov	Y		Revised as suggested.
94	City of WBL	5		80		clarify which NPDES program is being referred to in the first sentence or remove 'NPDES and'.	Y		Revised as suggested.
95	City of WBL	5		82		change Table 5-2 to Figure 5-2	Y		Revised as suggested.
96	City of WBL	5		83		Update the website in the photo to our new link at www.whitebearlakemn.gov , if this photo is from our website	Y		Revised as suggested.
97	MPCA	3	3		Table 3-2	Pleasant Lake – adjust the depth of the row so that it says “No TMDL for Nutrients”	Y		Revised as suggested.
98	MPCA	4	5			Implementation tables – add a description of the toggle switch column.	Y		Revised as suggested.
99	MPCA	5	5.2.2			It is nice to see the WLA and MS4 responsibilities. a. This will help track projects and reductions in the watersheds. b. Consider adding the pounds reduced with already implemented projects or an estimated percent reduction already achieved.	Y		See response to Comment #35.
100	RCWD	3				Shared high priority issues and goals -There are many high priority issues that RCWD is concerned about as well. Surface water, groundwater management, data collection and flooding are major concerns for our district and drive many of our WMP Goals. -As the adjacent Watershed District to the north, we encourage collaboration if there are opportunities to partner on these goals, especially at our shared boundary or where the hydrologic and legal boundaries vary.	N		Comment noted with thanks.
101	RCWD	Multiple				Photo crediting lacked uniformity throughout the Plan. Consider citing all the photos at the beginning of the document (example: Credit for all photos: vlawmo.org) or labeling each photo individually.	Y		Photo credit changed for consistency- added credit at the beginning unless it is a non-vlawmo photo
102	RCWD	Multiple				Symbology used in various maps: -Some maps were challenging to distinguish between elements in the legend and in use on the map. Ex: page 15 used shades of reds and blues to denote different features on the map. The similar gradient of colors made it challenging to interpret the map's features. Consider alternative solutions like using a variety of shapes for the symbology or more contrasting colors.	Y		Symbology changed to be consistent.
103	Met Council	2		7		Communities will be undergoing a new Comprehensive Planning cycle as early as September this year. Please be prepared to update the links on this page with new links once the new comprehensive plans have been adopted.	Y		Plan will not be edited without an amendment process. Text added that readers can reference city and township websites for the most up-to-date plans.
104	Met Council	2		20		Thank you for including the Met Council's Localized Flood Map Screening Tool as a resource.	N		Comment noted with thanks.
105	Met Council	3		36		Please cross check that the groundwater goals address issues identified within the Met Council's Water Supply Plan. To develop the Water Supply Plan the Met Council split the metro region into seven subregions and held extensive stakeholder engagements with each subregion to develop individualized implementation plans. VLAWMO is within the Northeast Subregion and serves the Central Subregion's drinking water supply.	N		The WMP addresses challenges, oportunities, and changing conditions identified by Met Council WSP
106	Met Council	3		39		We suggest adding a measure relating to environmental justice in the Outreach and Community Engagement goal to reflect language in section 3.3.2, “Strategic community engagement in environmental justice areas will be incorporated into implementation of communication and outreach programs and projects where applicable to ensure community needs are reflected in programming”.	N		Thank you for your suggestion. This will be pursued during implementation as opportunities are presented.
107	Met Council	4		64		There are reuse projects identified in the watershed's CIP, but there is no mention prior to the CIP of the benefits and challenges of stormwater reuse. We recommend including language about stormwater reuse, and why the projects identified have been identified as potential reuse options. Additionally, the Met Council may have available funding in 2026 for stormwater reuse grants. Please keep us in the loop on these projects for potential support and partnership.	Y		VLAWMO looks forward to learning more about the potential 2026 stormwater reuse funding from Metropolitan Council. Discussion of reuse added to Groundwater goal text: "VLAWMO will seek MDH guidance as needed during implementation of water reuse / infiltration projects to ensure protection of groundwater."

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108	Met Council	5		79		We ask that VLAWMO includes a schedule for implementation of local water plans that requires all local water plans to be adopted not more than two years before the local comprehensive plan is due. As a reminder, local water management plans are reviewed by the Met Council as part of the local comprehensive planning process prior to their approval by the appropriate watershed organization(s) and adoption by the community. Local water management plans must be submitted to the Met Council for review and the appropriate watershed organization(s) for approval. Please update the language in this section to include the Met Council's role, to help limit confusion for its communities. We ask that once a watershed approves a local surface water plan they send the notice of approval to the Met Council as well to help inform our comprehensive planning process.	Y		Schedule table added.