

#	Section	Entity	Comment Synopsis	DRAFT Response To Comment	plan revision?
Overall					
1		MPCA	Many of the strategies from the Lower Minnesota River Watershed Restoration and Protection Strategy (WRAPS) Report have been integrated into the Plan, but we would like to call attention to pages 124-126 of the final WRAPS report as a potential resource to inform ongoing implementation planning: https://www.pca.state.mn.us/sites/default/files/wq-ws4-58a.pdf .	A link to the WRAPS will be added to Goal WQ4 and referenced for how implementation planning and strategies will be informed.	Y
2		MPCA	We would like to see additional discussion about chloride management and prevention in the Plan. While none of the water resources within PLSLWD have been assessed as impaired for chloride, preventative action in chloride management will be key to protecting them going forward. The MPCA has developed multiple resources on chloride management, which are available on our website: https://www.pca.state.mn.us/water/statewide-chloride-resources .	Chloride management and prevention will be incorporated into the District's Education & Outreach Program.	Y
3		MPCA	In general, MPCA would like to see more consistent terminology across the Plan to differentiate between implementation steps and strategies that are being implemented. Progress in this area would improve the connection between the actual Best Management Practices (BMPs)/projects being implemented and the larger priority concerns and goals identified early in the Plan.	The plan will be reviewed and revised, as necessary, to differentiate between strategies and implementation steps.	Y
4		MNDNR	Overall, be sure to be consistent with the language of "goals, issues and concerns". Don't confuse goals and issues. C.1 states there are a total of 23 goals. Is this the same as "issues"?	The plan will be reviewed and revised, as necessary, to ensure there isn't inconsistency in terminology.	Y
5		MNDNR	Generally, I think that the District would be best to take more of a lead role in stream and wetland restoration, but recognize the difficulties associated with that. I believe these to be among the most feasible options for flood reduction in the watershed.	The District role in these activities are included in the Stream Restoration Program (IV.C.1.10) and Wetland Restoration Program (IV.C.1.12). Implementation projects for these programs prioritize water quality improvement and flood reduction for Tier 1 lakes.	N
6		Scott WMO	The County strongly encourages the District to reference and utilize the existing AIS plan for Scott WMO. AIS is best coordinated at the County level. Rather than create a separate, new plan the District should improve efficiency and eliminate redundancy by looking for opportunities and gaps within the existing AIS plan. The County AIS coordinator is a valuable resource to assist with this process.	Goal AIS1 will be revised to state "Develop and implement an Aquatic Invasive Species (AIS) Response and Prevention Plan in coordination with Scott County to help prevent new AIS from entering Tier 1 lakes."	Y
7		Scott WMO	We recommend the District develop a Plan that builds capacity long term, includes appropriate metrics to measure results, builds partnerships, and sets up a process to learn and adapt quickly.	"Organizational Capacity" and "Leveraging Partnerships" will be added as new sections under the Section IV Administration.	Y
8		Scott WMO	We recommend the District consider a staffing strategy/policy similar to the Scott WMO (Policy 6.6 in the SWMO's draft plan) to preferentially use SWCD staff in addition to District staff before using other outside staffing when appropriate. SWCD staff have developed numerous relationships with landowners and have the local resource knowledge. The county covers much of the SWCD overhead (facilities, IT, etc.) which then provides the District with access to economical support.	Under the "Organizational Capacity" and "Leveraging Partnerships" discussed above, the plan will be revised to note that the District will continue to partner with the SWCD on cost-share activities, monitoring assistance and Farmer-Led Council initiatives and will consider SWCD staff as a resource when the District has workload beyond staff capacity.	Y
9		Scott WMO	We happy to see the District included a strategy to continue as a sponsor and supporter of the Scott Clean Water Education Program (SCWEP). We believe this partnership provides good collaborative ideas and economies.	The District agrees that SCWEP affords opportunities for partnership and collaboration.	N

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10		MDA	<p>Page 17 of the plan states that “feedback from farmers in the Agricultural Issues Survey identified impacts to groundwater resources, degraded soil health, loss of productivity due to flooding and soil loss as the highest priority issues for the agricultural community”. Particularly with impacts to groundwater resources and degraded soil health, MDA has ongoing and new efforts to engage with the agricultural community to address these issues. These are described in more detail below.</p> <p>The MDA has developed and is implementing the Minnesota Nitrogen Fertilizer Management Plan (NFMP). (See: https://www.mda.state.mn.us/pesticide-fertilizer/minnesota-nitrogen-fertilizer-management-plan) The NFMP is the state’s blueprint from addressing nitrate in groundwater from N fertilizer. The primary goal of the Nitrogen Fertilizer Management Plan is to involve the agricultural community in problem solving at the local level to address localized concerns about unsafe levels of nitrate in groundwater. The state’s new Groundwater Protection Rule (GPR) became effective June 24, 2019. The GPR will reduce the risk of nitrate from fertilizer impacting groundwater in areas of the state where soils are prone to leaching and where drinking water supplies are threatened. (See: https://www.mda.state.mn.us/nfr). Though limited, there are areas within the PLSLWD where the GPR will apply. These areas are shown on the MDA vulnerable area map at: https://www.mda.state.mn.us/chemicals/fertilizers/nutrient-mgmt/nitrogenplan/mitigation/wrpr/wrprpart1/vulnerableareamap</p> <p>Areas in the PLSLWD include a small portion of the Shakopee Drinking Water Supply Management Area (DWSMA) (shown in green on the MDA vulnerable area map) and areas sensitive to groundwater contamination (shown in purple on the MDA vulnerable area map). These areas are subject to fall nitrogen fertilizer restrictions. In addition, in the Shakopee DWSMA, the MDA anticipates working with local farmers to implement practices that are protective of groundwater. The NFMP and GPR identify the need to work with local farmers to implement nitrogen fertilizer best management practices and other practices (such as vegetative cover and soil health practices, precision agriculture and others) that will address nitrate in groundwater. Watershed plans often also include the Minnesota Agricultural Water Quality Certification Program (MAWQCP) as an on-farm implementation effort to address water quality (It appears to be noted on Page 529 or pg.23 of 27 of 2019 CPFAP Policy Manual). The Minnesota Agricultural Water Quality Certification Program is a voluntary opportunity for farmers and agricultural landowners to take the lead in implementing conservation practices that protect our water. Those who implement and maintain approved farm management practices will be certified and in turn obtain</p>	Reference to these Plans, Rules and Programs will be included, as appropriate, under the Farmer Led Council Initiatives (IV.C.2.4).	Y
11		City of Prior Lake	<p>The current PLSLWD Water Resources Management Plan (Plan) contains 5 specific goals to guide its water resources planning and management functions. Accordingly, these goals should encompass the priority issues of the PLSLWD.</p>	So noted.	N
12		City of Prior Lake	<p>PLSLWD Plan Goal 1: To minimize the negative effects of water level fluctuations in the District. Comments: The PLSLWD should continue to actively work on addressing flooding issues through the sound management of the Prior Lake Outlet Structure and Channel as the PLSLWD was originally created primarily to address water level fluctuation issues. The updated Plan should reference the Prior Lake Stormwater Management & Flood Mitigation Study (2016), as the primary source of information relating to flooding within PLSLWD.</p>	<p>The Prior Lake Stormwater Management & Flood Mitigation Study (2016) is referenced under the Executive Summary - Past Accomplishments (Page 3), Section III.C Guiding Principal #3 - To Reduce Flooding Impacts (Page 27), Section IV.B Strategies for Goal RF1 (Page 41), Section IV.C.1.9 Storage and Infiltration Projects, and Section IV.C.3.9 Upper Watershed Storage Strategy. While the Prior Lake Stormwater Management & Flood Mitigation Study (2016) established the basis for current flood reduction initiatives it is envisioned that the Upper Watershed Storage Strategy will expand on previous efforts and more precisely target cost-effective methods for flood reduction (and water quality improvement).</p>	N
13		City of Prior Lake	<p>PLSLWD Plan Goal 2: To maintain or improve the quality of all water resources within the District. Comments: This broad goal aligns well with broad City goals. To meet this goal, the PLSLWD Plan currently specifies that parameters established by TMDL studies, PLSLWD water-resource specific studies, and statewide standards will be used as goals, in that order. The City supports the use of studies and statewide standards to provide justification and backing for water quality improvement programs.</p>	So noted.	N
14		City of Prior Lake	<p>PLSLWD Plan Goal 3: To maintain and expand the recreational, aesthetic, and wildlife habitat benefits associated with surface water and natural spaces in the District. Comments: The City supports this general goal and has a track record of working with the PLSLWD to implement and improve green corridors, parks, and other long-term water and open space plans, as outlined in the current Plan. Updates to the Plan should preserve this goal to ensure that our organizations can continue to work together in this capacity for our residents. Strategies to meet this goal should be updated through the Plan update process which allows for City input.</p>	<p>Recreation, aesthetic and wildlife habitat improvements remain a consideration in all aspects of District function, albeit secondary to primary goals of improving water quality, managing AIS and reducing flooding. The District will continue to consider these secondary benefits and incorporate design elements into projects as feasible.</p>	N

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15		City of Prior Lake	PLSLWD Plan Goal 4: To improve the understanding of local water resources and practices among all stakeholders in the District. Comments: The City is mandated by the State of Minnesota to provide stormwater education for residents as part of the MS4 Permit program. PLSLWD education efforts should be coordinated with City efforts where topic areas and target audiences overlap.	The District agrees that MS4 coordination with the City of Prior Lake is important and cost effective method to provide education and outreach to it's residents. Strategy (now Implementation Action) 23 will be amended to read, "Coordinate with other LGU partners at least once per year to provide targeted outreach to landowners to encourage them to use good water resource practices and/or participate in cost-share opportunities which not only fulfils MS4 education and outreach obligations but also supports all District projects & programs.."	Y
16		City of Prior Lake	PLSLWD Plan Goal 5: To be as efficient and effective as possible in all District activities. Comments: General Plan strategies listed under this goal include collecting water monitoring data, coordinating activities with local, regional, state, and federal agencies, seeking and utilizing grant funding, and utilizing an adaptive management approach to regularly re-evaluate programs and projects relative to expected outcomes. PLSLWD and City staff regularly coordinate regarding the various projects and programs of both organizations. We have worked to jointly develop and implement several water quality projects since the last Plan update. There are program areas where our organizations overlap and where updated strategies are needed to reduce the potential for duplicative engineering reviews, permits, inspections, and standards.	The District agrees there are additional opportunities to reduce overlap between the City and the District. Strategy (now Implementation Action) 24 will be revised to read, "Coordinate effectively with LGU partners by meeting a minimum of biennially with each partner in the District to discuss upcoming projects, opportunities to collaborate, partnerships to increase efficiency and reduce overlap...." The District is interested in working with the City after completion of District Rule revisions to identify and implement some of these strategies through update and execution of the Memorandum of Agreement for Local Water Planning.	Y
17		City of Prior Lake	In accordance with PLSLWD Plan Goal #2, the PLSLWD should use study information and/or state standards to set goals that drive implementation of PLSLWD programs. For example, the Prior Lake Stormwater Management & Flood Mitigation Study (2016) contains detailed information that is being used to inform flood policy decisions within the Spring Lake and Prior Lake drainage area. The existing Spring Lake and Upper Prior Lake TMDL study and implementation plan should be used similarly to inform water quality decisions in the drainage areas of our impaired lakes, rather than relying on blanket regulatory approaches that cannot be targeted to address specific impairments.	So noted.	N
18		City of Prior Lake	The PLSLWD should lead an effort to review the existing TMDL study and implementation plan for Spring Lake and Upper Prior Lake, determine how much progress has been made towards meeting the goals of the TMDL, and work with local stakeholders (including the City of Prior Lake) to develop strategies addressing TMDL goals.	The District will take leadership in assessment of TMDL progress-to-goals process and will add this effort to Section IV.C.3.7 (Planning & Programming) Implementation Steps.	Y
19		BWSR	The draft Plan contains numerous spelling, grammatical, text formatting, paragraph/section formatting, and writing style inconsistencies throughout the Plan, which need to be corrected. A summary of the issues and inconsistencies identified will not be detailed in this letter but will be generally summarized in a separate correspondence to District staff.	Inconsistencies pointed out by BWSR will be addressed.	Y
20		BWSR	Plan tables, figures, and graphics need to be labeled throughout the Plan and Plan appendices. Tables, figures, graphics, and appendices presented in the Plan should be directly referenced where appropriate in the Plan text. There were several tables and figures presented in the Plan appendices that when printed, cut off relevant information. This issue needs to be corrected prior to the draft Plan submittal for the final 90-day review. It would also be helpful if pages in the Plan's appendices be numbered in sequence and in accordance with the main body of the Plan.	All main body in-text references to figures as well as numbering issues will be addressed. All Appendices will become linked references.	Y
21		BWSR	The Shakopee Mdewakanton Sioux Community (SMSC) should be identified on Plan (including appendices) figures and maps where necessary and appropriate. The Plan should also clarify the distinction between the SMSC as a sovereign nation and valued government partner, and the District's extent and limitations of watershed district statutory authorities regarding SMSC and non-tribal 'local government units' and 'LGUs' present in the District.	SMSC has been referenced, as appropriate, in specific projects and implementation programs throughout the plan. The distinction between the SMSC as a sovereign nation and valued government partner, and the District's extent and limitations of watershed district statutory authorities will be referenced in Section VII of the Plan.	Y
21	Table of figures	BWSR	List is not inclusive of all maps, figures, graphics and pictures presented in the draft Plan and Plan appendices. Suggest either identifying those included in the main body of the draft Plan or all included in the draft Plan and Plan appendices.	Table of contents will be revised to include all figures.	Y
23	Acronyms	BWSR	Provide a more comprehensive list of acronyms used throughout the draft Plan. Acronym use should be consistent throughout the draft Plan and consistent with organizational and industry accepted use.	All acronyms used in the plan are consistent with industry accepted use and will be included in this table.	Y

Section I – Executive Summary

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24	B.1	MNDNR	How did groundwater overuse become a primary water quality issue? I don't think I would have identified groundwater overuse with the PLSLWD and/or tied it to water quality. Perhaps this is an issue you'd want to go through with Joe Richter before finalizing this document. Perhaps this would be better was groundwater sustainable use? But honestly, Joe would be best to weigh in on this and maybe I'm off base. Supplement from Joe Richter (MnDNR): In general, I agree with Jennie's comment about surface water quality not being impacted by groundwater over use. Theoretically, the use of a large volume of ground water could deplete a streams baseflow, and impact surface water quality. But the volume of ground water that would need to be taken from a watershed in order for this to occur is extremely large, and it would become apparent only during long dry periods.	The quality of groundwater was mentioned as a concern by the FLC. Groundwater "overuse" (currently listed on Page 5 (now Page 8), in the table on Page 18 (now Page 20), and WQ Goal 14 (Page 38, now Page 43)) is a mis-categorization of this concern and this term will be removed from the WRMP and changed to "Groundwater Quality".	Y
25	B.1 (now C.1 and D.1)	MNDNR	One issue associated with Flood Reduction is "future increased runoff". I'd like to see this expanded to include predicted changes in rainfall intensity. I recognize that citizens view more development as something that causes increased runoff. The reality is much more complicated. We've found that development can sometimes reduce runoff, especially when a development incorporates a good deal of open space and adequate stormwater treatment or the development is from tile drainage agriculture to large multi-acre lots.	The Priority Concern of Flood Reduction (Section I.B.1, now I.C.1) and Goal RF1 (Section I.C.1, now I.D.1) are high level statements irrespective of the cause of flooding. The Section II.H table under Reduce Flooding will be amended to add "increased rainfall depths and intensities" under the issue of "Future Increased Runoff" to address this comment. In addition, Strategy (now Implementation Action) 74 will be amended to include mention of "increased precipitation and intensity resiliency scenario analysis" to inform setting of new goals. Finally, an additional Implementation Step will be added to Section IV.B.3.9 Upper Watershed Storage Strategy (now Upper Watershed Blueprint) for analysis of flood resiliency for future precipitation and development conditions.	Y
26	B.1	MNDNR	I'm unclear on "need to assess flood reduction goals" but we won't have time to discuss that issue together. Maybe this is meant to be "assess flood reduction methods"? The goal is protection of property, isn't it?	The Prior Lake Stormwater Management & Flood Mitigation Study (2016) identified the first-tier priority flood reduction goal to reduce the flood level on Prior Lake. The referenced need to assess flood reduction goals is to identify the next goal to target after the first-tier goal is met.	N
27	E	MNDNR	I know it's a touchy subject, but I think that farmer-led council initiatives can/should go under Reduce Flooding as well as water quality. Wetland restoration could/should go there as well. Not all wetland restorations need to be banking. For example, MCWD has working on projects that could restore wetlands and/or wetland buffers which can have a big impact on flood reduction. Off channel storage/ponds when incorporated with channel restoration can be very beneficial for both these goals too. Please get in touch early with DNR if the District has the opportunity to push forward any wetland or channel restoration projects. You can always reach out to the Area Hydrologist for anything and they'll pull in the right folks here.	The District concurs that FLC initiatives, wetland restoration, wetland buffers (or other land use conversions) as well as off-channel storage and channel (County Ditch 13) restoration can have stacked benefits including downstream water quality improvement, flood reduction and increased habitat. Almost all of District programs and projects have multiple benefits. Section I.E will be revised to better clarify that the projects under each of the three categories meet multiple goals, but will achieve the most towards the category they were placed under.	Y
28	E	MNDNR	Another major action that could go under water quality and flood reduction would be shoreline buffers. This is something the Carver WMO is currently considering and you might want to have a chat with them. It would be great to see shoreline buffers when someone rebuilds a retaining wall or something else that would trigger a grading permit.	Given the highly altered shoreline and heavily urbanized nature of the riparian properties surrounding Spring, Upper Prior and Lower Prior Lakes, the District has determined that District staff time and budget is best spent elsewhere, where greater benefits are realized. The District has chosen not to attempt to force restoration of shorelines or require buffers on residential lots through regulation. It should also be noted that the District CAC may undertake assessment municipal shoreland ordinances to identify additional opportunities to encourage shoreline buffers.	N
29		BWSR	Introduction -- Watershed districts may be established when conducive to public health and public welfare and for specific State statute purposes. A watershed management organization's boundary may be loosely based on hydrologic watersheds but the jurisdictional boundaries for many are not solely hydrologic based. Revise language in paragraph 2.	Paragraph 2 of the Executive Summary will be revised as suggested.	Y
30	F	BWSR	Section I.F. Local Government Responsibilities – Provide the responsibilities of local governments related to implementation of the Plan and any changes in responsibilities from the previous Plan per MN Rule 8410.0050 (F).	This section will be revised to Reference Section VII. Local Government Unit Requirements and note that the plan does not add new responsibilities as compared to the existing District plan.	Y
Section II – Issues Identification & Assessment					

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31	G	MPCA	Based on the information sources available to us (Final Inventory of Protected Waters and Wetlands for Scott WMO: https://files.dnr.state.mn.us/waters/watergmt_section/pwi/SCOT_PWILIST.PDF), the Minnesota Department of Natural Resources (DNR) appears to consider Buck Lake (70-0065-00) to be a public waters wetland. Given its apparent status as a wetland, MPCA would most likely not assess Buck Lake as a lake. MPCA encourages PLSLWD to contact the DNR office for confirmation of Buck Lake's status as a protected water. Given Buck Lake's connection to Spring Lake, MPCA supports PLSLWD's identified strategy to complete a diagnostic study to determine a phosphorus budget for Buck Lake (Strategy 40); the diagnostic study can inform and support management actions for downstream water quality, which supports goal WQ2 (Meet the state water quality standards for aquatic recreation on Spring Lake).	Correct, Buck Lake is MnDNR Protected Wetland 65w. Implementation Step 2 (potential delisting) of Section IV.C.5.1. Buck Lake Diagnostic Study will be deleted.	Y
32	C	MnDNR	Please consider breaking Figure 3 out into 2 or 3 figures so they can be more zoomed in.	A hyperlink to this map will be added to the plan directing the user to a high-resolution version of the map.	Y
33	B	City of Prior Lake	The City supports the concept of "zonation" through the Issues Identification Mapping Exercise (IIME) process. The results of this process should be used to prioritize PLSLWD activities as stated in Section II.C. The results should also be incorporated into or referenced in other documents such as the PLSLWD Rules.	The IIME process was one of many tools utilized by the District during the issues identification process. This section will be revised to better tie the IIME process to the Tiered Lake approach, specifically noting that of the preliminary areas identified, three were prioritized to be included in the Tiered Lake approach.	Y
34	B	BWSR	Section II.B Review of Local and Regional Planning Documents – The second paragraph identifies that information collected during review of existing plan and policies is summarized in Appendix L: Summary of Management Plan Meetings & Public Feedback. The stakeholder input process summarized in Appendix L identifies input gathered from the community, including public at large and jurisdictions that are located within and adjacent to the watershed. Appendix L table: 'DRAFT Public Engagement Summary Table: PLSLWD 2020 Water Resources Management Plan' does not identify that information was collected from a specific document as referenced in the Plan text. Clarify and revise.	This paragraph will be revised to accurately reference the intended appendices.	Y
35	C	BWSR	This section largely summarizes the process through which the District determined Plan priority issues and resources, with a focus on the Issues Identification Mapping Exercise (IIME) completed. Per 8410.0045 Subp. 7, the stakeholder input received must be summarized and the assessment process for evaluating issues received, and goals received from the Plan review authorities, must be included in the Plan. The summary needs to provide greater connectivity to the larger stakeholder input process completed (Appendix L), not just the IIME exercise, and how the District determined priority issues, resources and Plan goals from that collective stakeholder input process.	The first paragraph on Page 15 will be revised to refer to Appendix L - Public Engagement Summary Table (the "larger stakeholder input process" that was actually collected through the IIME process). It should also be noted in this section that the direct watersheds of Spring and Upper Prior were not included in the IIME as there was general consensus that the District has been focusing on impaired waters and will continue to do so.	Y
36	C	BWSR	Fourth paragraph (page 13) – Clarify if the District's Citizen Advisory Committee (CAC) also took the IIME survey.	The CAC did not take the IIME survey, but reviewed the result of the surveys taken by other stakeholders and then weighed in with detailed comments regarding the Potential Issue Area identified on Figure 3. The fourth paragraph of Section C and Section D.3 will be revised to clarify.	Y
37	C	BWSR	Fourth paragraph (page 13) – The five priority area maps referenced would be helpful to include for reference in Appendix L, in addition to clarification as to how issues areas were 'further vetted' by stakeholders.	Clarifying language will be added to this section.	Y
38	C	BWSR	Provide a copy of the IIME survey in Appendix L.	The IIME survey is already appended to Appendix L.	N
39	C	BWSR	Identify axis labels for Figure 2. Results of Broad-Scale IIME Survey.	Axis labels will be added to Figure 2 (now Figure 4).	Y
40	C	BWSR	Figure 3. Potential Issue Areas for Consideration is difficult to interpret given the current map resolution, scale and label sizing. It would be helpful to have connectivity to the potential issue areas presented in Table 2 and geographical reference of those areas in Figure 3.	A hyperlink to this map will be added to the plan linking the user to the map at high resolution.	Y
41	D	BWSR	Section II.D Previous Plan Recommendations – The narrative provided on the District's progress and success of implementing the previous Plan must be expanded Per 8410.0045 Subp. 7. The District should have a greater sense of the Plan implementation progress made in the four years after BWSR's completion of the District's 2016 performance review.	This section will be revised, building off the District's last PRAP, to summarize implementation plan progress in the last 4 years.	Y
42	G	BWSR	Section II.G Priority Areas for Implementation – Priority wetland, stream and groundwater resources are referenced in Plan Section III.A but only Tier 1, 2, and 3 lakes are identified in Plan Section II.G. Clarify and revise for consistency where necessary.	Section II.G does identify wetlands and streams and ditches and how they will be prioritized for implementation. Section II.G will be revised to more clearly call out these resources. Paragraph 2 will be moved to follow the listing of Tiered Lakes and start the paragraph with the heading of "Wetlands, Streams & Ditches" to call greater attention to these resources.	Y

Section III – Guiding Principles, Policies, & Measurable Goals

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43	A	MPCA	For goal WQ5 (Improve water quality in Arctic Lake by supporting SMSC's improvement efforts), what are the water quality conditions desired for Arctic Lake by the end of the Plan cycle? The current goal is vague and could be improved with a goal that allows for more quantitative accounting of improvements compared to the desired lake condition. The TMDL developed for Upper Prior Lake assigned significant reductions in total phosphorus loading from upstream lakes, which includes Arctic Lake. An assessment of current progress toward TMDL implementation could be helpful in determining how much additional work needs to be completed (on both Arctic Lake and throughout Upper Prior Lake's subwatershed).	Goal WQ5 will be revised to be more specific and measurable, to read: "Improve water quality in Arctic Lake by supporting SMSC's improvement efforts to reduce watershed phosphorus loading by 37 lbs/yr and by partnering with SMSC, the City of Prior Lake and the Three Rivers Park District on future projects as opportunities arise.." There is not WLA assigned to the Arctic Lake watershed in the Spring-Upper Prior TMDL.	Y
44	A	Scott WMO	In reference to Goal WQ2: Meet the state water quality standards for aquatic recreation for Spring Lake. It's our understanding that since the completion of the Spring Lake – Upper Prior Lake Nutrient Total Maximum Daily Load (TMDL) study, that the District completed sediment coring and historic phytoplankton enumeration that suggests that Spring Lake historically had never achieved the state standard and that a more modest site specific standard would be appropriate. It would be beneficial for the Plan to note this finding. It should also discuss whether the District plans to pursue a site-specific standard. It would be a shame to invest significant public and private dollars pursuing an unattainable standard.	Goal WQ2 will be revised to, "Meet the state-approved, site-specific water quality standards for aquatic recreation on Spring Lake."	Y
45	A	Scott WMO	In reference to Goal WQ8: Assign a District water quality standard for Buck Lake and set management goals for the next 10-year plan. What do you mean by set a "District water quality standard?" Does that mean the District thinks it's unlikely the state standard for that water body to be achieved and is planning to pursue a site-specific standard? Please clarify.	Buck Lake is MNDNR Protected Wetland 65w, therefore not subject to state water quality standards for lakes. That said, the District intends to complete a Diagnostic Study (Section IV.C.5.1) given it's connection to Spring Lake to determine a phosphorus budget for Buck Lake (Strategy, now Implementation Action, 40) to inform and support management actions for downstream water quality.	N
46	A	MDA	NFMP or GPR activities could align with: GUIDING PRINCIPLE #1: To maintain or improve quality of water resources (WQ) on page 21; GOAL WQ14: Actively participate in groundwater planning efforts and incorporation of groundwater considerations into projects & programs on page 26; and associated strategies on page 38.	Strategy (now Implementation Action) 59 will be revised to, "Develop a plan on how to better incorporate consideration of groundwater protection when reviewing new permits and completing capital projects to incorporate the alignment with NFMP and GPR activities."	Y
47	F	MDA	Page 16 and 74 (and elsewhere) notes working with Farmer Led Councils and associated goals and strategies. These Farmer Led Councils may be an avenue to further the MAWQCP and discuss soil health and other practices protective of surface and groundwater.	See response to Comment #10. Also note that there are many similarities between MAWQCP and the District's Lake Friendly Farm Program.	N
48	A.1.b	City of Prior Lake	Section III.A.1.b. Goal WQ5 should include other partners including the City of Prior Lake, Scott WMO, and Three Rivers Park District.	These partners will be added to the end of the goal "...by supporting SMSC's improvement efforts to reduce watershed phosphorus loading by 37 lbs/yr and by partnering with SMSC, the City of Prior Lake and the Three Rivers Park District on future projects as opportunities arise."	Y
49	A.1.b	City of Prior Lake	Section III.A.1.b. Goal WQ6 states that PLSLWD will partner with SMSC to improve Pike Lake by achieving a 10% improvement in TP concentrations. Please note that the City of Prior Lake controls approximately 50% of the shoreline around Pike Lake (about 5,700 feet) between Pike Lake Park and the right-of-way of Pike Lake Trail NE. Any partnerships to improve Pike Lake should also involve the City. In addition, a TMDL that includes Pike Lake is currently under development at the State level. Instead of an arbitrary 10% reduction in TP (in accordance with its standing as a Tier 2 lake within the WRMP), the long-term water quality goal for Pike Lake under this WRMP should be to implement practices to achieve the future TMDL implementation plan goals which will ultimately lead to Pike Lake achieving state water quality standards. The 10% TP reduction could be listed as an interim goal, with any reductions eventually credited towards meeting TMDL pollutant reduction requirements.	To include the City of Prior Lake as a partner, the goal will be revised to state "In partnership with SMSC and the City of Prior Lake, improve.....". To address the TMDL implementation, the goal will be revised to state "...achieving a 10% improvement in TP concentrations to work toward the TMDL pollutant reduction requirements.."	Y
50	A.3	City of Prior Lake	Section III.A.3. Goal WQ13 should be updated to reference completed FEMA work and the existence of the PLOC Master Plan with its bank repair project goals. The PLOC Master Plan is summarized in Section IV.C.2.8.	Goal WQ13 will be revised to remove "remaining" and reference the PLOC Master Plan.	Y
51	A	BWSR	Section III.A Guiding Principle #1 – More clearly identify the identified Plan priority resources in III.A.1 Lakes, III.A.2. Wetlands, III.A.3 Streams and III.A.4 Groundwater sections.	This section was revised to include more clear references to the priority resources.	Y

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52	A, B, C	BWSR	<p>The Plan must include specific measurable goals per MN Rule 8410.0080 Subp. 1, that address priority Plan issues. Measurable goals identify the quantifiable change in resource condition the District would expect after implementation of the Plan. The measurable goal should relate to the desired future condition of the resource issues being addressed and express the extent of progress toward achieving that desired future condition that the District will make during the Plan period. Many of the Plan goals established to address priority issues for lakes, wetlands, water quantity (flooding impacts) are measurable. However, water quality (WQ) goal 5, WQ goal 12, WQ goal 13, WQ goal 14, aquatic invasive species (AIS) goals 1 through 4, and reduce flooding impacts (RF) goals 2 through 5 lack specificity and measurability to determine the resource issue and resource change sought to be achieved by the end of the Plan.</p> <p>As an example, goal WQ5 is to improve water quality in Arctic Lake by supporting SMSC's improvement efforts. The goal lacks the specificity to establish how much (or what measures) improvement in Arctic Lake water quality the District desires to achieve. As part of the outcomes and measures dashboard presented in Appendix M for the goal, the District identifies that lake water quality concentrations for total phosphorous (TP), chlorophyll-a (chl-a), and Secchi disc transparency will be assessed every two years, with at least two of those parameters indicating improvement in water quality by 2025. This is the resource condition desired and measurability component that could be included in goal WQ5 to achieve the requirements of MN Rule 8410.0080.</p>	<p>Goal WQ5 (for Arctic Lake) will be revised as noted above. The nature of some of those goals make quantitative measurability difficult. For instance, RF5, assess progress on flood reduction goals and establish an updated flood reduction goal for the next WRMP. In some instances a goal is not measurable because it relies upon information gained from future work. The District believes that remainder of the goals identified in this comments are measurable to extent possible and would argue that state rules do not indicate what type of specific measurement is required. Upon further discussion with BWSR, the revision of WQ5 was deemed sufficient.</p>	Y
53	A.4	BWSR	<p>Section III.A.4 Groundwater – With the number of community water suppliers and residents on private water wells, many of the proposed implementation strategies and activities identified in the Plan achieve multiple benefits, including those for groundwater. The Plan would benefit from a stronger correlation of implementation activities proposed and subsequent impacts to groundwater resources.</p> <p>Minnesota's Groundwater Protection Rule also identifies an area of the City of Shakopee's drinking water supply management area (DWSMA) as vulnerable area with increasing concentrations of nitrates. A portion of this area is within the District and but may fall outside of the Tier 1 priority lakes (and lake watersheds). The District has the opportunity to promote best management practices and to work with partners, local farmers and agronomists in adopting the most current science based and economically viable practices that can reduce nitrate in groundwater in this specific vulnerable area, and other areas of the District.</p>	<p>The District will modify Goal WQ14 to read "Actively participate in groundwater planning efforts to support municipal protection of highly vulnerable areas of DWSMA's or groundwater dependent natural resources.". The District will also revise Strategy (now Implementation Action) 61 to make this connection.</p>	Y
Section IV – Strategies, Programs & Implementation Actions					
54	C.1.10 (now B.1.10)	MPCA	<p>MPCA would like to see additional supporting information on how the Streambank Restoration Program will relate back to PLSLWD's water quality goals. How did PLSLWD arrive at 10 sites to be completed during this Plan cycle? Have estimates of the total amount of work needed and potential phosphorus/Total Suspended Solids (TSS) load reductions been completed? Has PLSLWD investigated potential co-benefits for flood and peak flow mitigation from stream and floodplain access restoration projects?</p>	<p>This goal will be revised to note this is an interim goal to be revised via plan amendment after inventory and assessment work has been completed.</p>	Y
55	C.1.10 (now B.1.10)	MNDNR	<p>Pg 59. We find that "bank stabilization" projects are not effective for reducing erosion over the long-term. Stabilization using rock, when floodplain access is not incorporated, most often moves the erosion problem elsewhere in the stream, thus resulting in continued erosion. The district or the districts partners would benefit from expanding easements where streams and/or the PLOC could access the floodplain. This can be very effective to reduce velocity during high flow events and reduce erosion.</p>	<p>The District concurs with MNDNR opinion on the importance of incorporation of floodplain access. Section IV.C.1.10 (now IV.B.1.10) Implementation Step 1 (Conduct Field Assessment) and Implementation Step 3 (Prioritize Potential Projects) will be revised to recognize import and benefit of floodplain connection (and restoration).</p>	Y
56	C.2 (now B.2)	Scott WMO	<p>Page 80, 2. Operations and Maintenance Program, 8. PLOC Management. The District purchased flowage easement rights and obtained permits to divert water to what is called the outlet channel in the early 1980s. Prior to the District obtaining these right's, the county (and others) had road crossings (CR 42, CR16, and Hwy 101 for example) over portions of this drainage way. In other words, other entities had some prior rights. The county requests that this be acknowledged. In particular, the county requests more of a partnership approach. The District frequently inspects the outlet channel, and calls Scott WMO Hwy when flow from the outlet channel carries even minor amounts of debris into county crossings. We are more than happy to respond when the diversion carries large amounts of debris into the culverts that is difficult to manage or has the potential to create problems. However, we request District staff carry a rake and move minor items themselves when the District's diversion carries items into the county's infrastructure – after all District staff is already on-site and has observed the items.</p>	<p>This section will be amended to refer to PLOC MOA Inspection Program. District staff currently conducts minor maintenance with hand equipment on routine inspections.</p>	Y

#	Section	Entity	Comment Synopsis	DRAFT Response To Comment	plan revision?
57	C.3 (now B.3)	Scott WMO	Page 85, 2. Comprehensive Wetland Plan Update. The County's development process allows for Planned Unit Developments (PUDs) that have more of a negotiated process/outcome. To this end the County is using stormwater storage and wetland restoration sites identified by the District to map potential Public Values in the District area. The county requests that the District: 1) acknowledge county use of the District inventory for stormwater and wetland sites; 2) articulates support of the PUD process and Public Values with respect to regional stormwater sites and wetland restoration sites; 3) develops a strategy for the District to accept and maintain easements acquired through the PUD process; and 4) develops a strategy for completing associated stormwater improvements and wetland restorations on the areas so acquired if they are not completed as part of the development process.	The District acknowledges this partnership and appreciates that the County incorporated District-identified areas in the County's mapping of potential Public Value areas. The Plan will be revised to better acknowledge this support and incorporate the requested development of strategies into Section IV.C.3.2 (now IV.B.3.2) (Comprehensive Wetland Plan Update) and also reference this activity in Sections IV.C.3.8 and IV.C.3.9. (now IV.B.3.8 and IV.B.3.9) The District will follow up with the County to confirm District involvement in PUDs within the District.	Y
58	C.3.5 (now B.3.5)	MDA	The Groundwater Protection Plan section on page 89 could include NFMP, GPR, and/or MAWQCP activities.	This section will be updated to refer to these activities as suggested.	Y
59	A (now, no title)	BWSR	Section IV.A Introduction –This section identifies 74 'strategies' as methods or approaches needed to achieve Plan goals in addition to 'key implementation activities' identified as projects necessary to meet the Plan goals. Per MN Rule 8410.0105 Subp. 1, the Plan must contain prioritized implementation actions through the year the Plan extends to address the goals defined in the Plan. The Plan needs to clearly identify the implementation activities proposed (Plan proposed strategies or projects), as required by MN Rule. There should be a clear connection between the implementation activities proposed to achieve the Plan goals and the desired Plan goal progress to address priority issues. More clearly identifying implementation activities in the Plan will also help the District be more competitive for grant funds. As presented in subsequent District program sections in Section IV.C, the strategies identified seem most appropriate to define as the actual Plan implementation activity proposed. See additional comments on Section IV.C (Projects & Implementation Actions) below.	The District will revise Section V to make the connection between implementation activities and goals more clear.	Y
60	B (now A)	BWSR	Section IV.B Strategies – Please note that color coding and/or language used for some identified strategies changes in subsequent sections of the Plan. BWSR did not conduct a comprehensive comparison of the strategies presented in the remainder of the Plan text, but did note these occurrences for strategies 4, 12, 22, 25 and 42. Review and revise for consistency.	Cross-check the wording of all strategies will be completed.	Y
61	C (now B)	BWSR	The second to last paragraph of the introduction (page 45) states that each project was identified with the waterbody it benefits and the strategy that it implements. As identified in comment 19 [#59] above, the implementation activity should connect back to the Plan goal the activity is proposed to help achieve and the priority issue addressed. Clarify and revise for consistency.	Management goals are identified for each project in the associated table. After further discussion with the District's BWSR Board Conservationist it has been determined the District's draft plan meets the intent of this subsection of MN Rule 8410.	N
62	C (now B)	BWSR	Consistent with comment 21(a) above, there should be a distinct connection to the fundamental Plan goals addressed ('Management Goals Addressed') and priority resource/resource issue addressed. ('Waterbodies Addressed'). In some program sections, the plan goals addressed do not always directly reflect back to implementation activity description or priority resource/resource issue being addressed.	The issues are clearly identified in the strategies section tied to each goal. Please refer to each goal to find the connection to issues. After further discussion with the District's BWSR Board Conservationist it has been determined the District's draft plan meets the intent of this subsection of MN Rule 8410.	N
63	C (now B)	BWSR	As identified in comment 19 above, the Plan implementation activities must be clearly defined in the subsequent program sections. As identified Plan implementation activities seems to better correlate to 'Strategies Implemented' in each of the subsequent section. However, there needs to be clearer distinction between the differences and purpose of those activities identified in 'Strategies Implemented', 'Supporting Strategies' and 'Implementation Steps'.	Clarifying language will be provided to more clearly define the implementation activities in this plan and the distinction between the differences and purposes of the activities in Section IV of this plan.	Y
64	C (now B)	BWSR	With implementation activities categorized as 'Strategies Implemented' and 'Supporting Strategies', it leaves the reader with the impression that 'Strategies Implemented' are those core implementation activities proposed to achieve the identified Plan goals. It is assumed that each of the 74 previously identified strategies would be identified in this category, under one of the identified subsequent District programs; with color coding also indicating the District Program type (i.e. capital improvement, monitoring, planning, etc.) the estimated budget for that activity is incorporated into. Not all of the identified 74 strategies is incorporated at the 'Strategies Implemented' level and/or are included in identified programs consistent with the color coding (i.e. Planning). For example, strategies 3 (Operation & Maintenance), 35 (Monitoring), 37 (Planning), and 51 (Operation & Maintenance) are identified in the Capital Improvement Programs presented as a 'Strategies Implemented' and color coded to the District program identified in parenthesis (). However, each of those strategies is not reflected at the 'Strategies Implemented' level in each of their respective program areas. This issue is present (at varying degrees) in each of the main District programs presented. Review and revise for consistency and clarify where that activity budget is incorporated in the Plan Capital Improvement and Implementation table. The following strategies could not be found at the 'Strategies Implemented' level in any of the District programs presented: 14 (Operation & Maintenance), 74 (Planning), and 53 (Monitoring). Review, clarify and revise as needed.	Clarifying language will be provided to more clearly define how implementation activities in this plan are associated with different programs.	Y

#	Section	Entity	Comment Synopsis	DRAFT Response To Comment	plan revision?
65	C (now B)	BWSR	The 'Implementation Steps' as presented generally reflects a finer level of detail, sub-process, and timeline for completing an implementation activity. The actual proposed implementation activity (required Per MN Rule 8410.0105 Subp. 1) has generally not been explicitly identified in this area of District Programs presented. If the District defines the identified 'Strategies' as the Plan implementation activities as recommended in comment 19 above, the proposed implementation activities should also be clearly referenced in the 'Implementation Steps' and provide the overall timeframe for completion to satisfy the requirements of MN Rule 8410.0105 Subp. 1(A). If not, the District will need to revise the Capital Improvement and Implementation Activity table with a description of each component of the of the implementation activities, the schedule, estimated cost and funding sources for each activity to satisfy the requirement of MN Rule 8410.0150 Subp. 1(A).	After further discussion with the District's BWSR Board Conservationist it has been determined the District's draft plan meets the intent of this subsection of MN Rule 8410.	N
66	C (now B)	BWSR	The District should review current year (2019/2020) water resources implementation activity efforts to ensure that those currently ongoing activities that will not be fully completed by the end of 2020 (current Plan expiration) or prior to BWSR approval of the District's 2020-2029 Plan, are incorporated into the District's 2020-2029 Plan. For example, Section IV.C.1.8 (Spring Lake West Subwatershed Project) strategy 8 identifies implementation of the Spring Lake West Feasibility. However, if the feasibility study has not been or will not be completed prior to this time, an implementation activity for completion of the feasibility study should be incorporated.	Will review all activities that were referred to as being completed by the end of 2020 and will create an implementation activity for anything that will not be completed by the expiration of the most current plan. (will also need these activities to be added to the budget)	Y
67	C.1.6 (now B.1.6)	BWSR	Section IV.C.1.6 Lower Prior Lake Subwatershed Project – Please verify if the 2020 Lower Prior Lake Feasibility Study has already been completed.	This activity has been completed.	Y
68	C.1.10 (now B.1.10)	BWSR	Section IV.C.1.10 Streambank Restoration Program – Please verify if project cost-effectiveness will be based on sediment reductions, which is typical for projects of this type.	Revise to note sediment reduction and flood reduction through floodplain access/restoration.	Y
69	C.1.11 (now B.1.11)	BWSR	Section IV.C.1.11 Sutton Lake Outlet Structure – If the District determines there is value added by including a copy of the referenced permit (2018-3741) in the Plan, provide the specific location reference to where this document may be found in the Plan.	The District does not see value in including the permit. The important reference, once developed and approved by MnDNR, is the Operation Plan. This will be added in a future plan amendment.	N
70	C.1.12 (now B.1.12)	BWSR	Section IV.C.1.12 Wetland Restoration & Enhancement – Please identify the frequency at which the District intends to designate funds the reserve fund for wetland restoration once established. The table provided in 'Implementation Steps' identifies one contribution in 2021. Strategy 47 is identified as a 'Strategy Implemented' In Section IV.C.1.12 and IV.C.1.13 Wetland Banking Program. Please clarify if creation of non-wetland bank restorations are proposed under both programs.	Clarifying language will be added to both programs to note that reserve funds are intended to receive \$50K+ per year, starting in 2021 for the duration of the plan. Implementation tables will be adjusted accordingly. Clarifying language will be added to note funds reserved for restoration and banking are for those purposes only.	Y
71	C.2.3 (now B.2.3)	BWSR	Section IV.C.2.3 Cost Share Program – The District may want to consider evaluation of project cost-effectiveness based on anticipated sediment reductions, particularly for streambank and agricultural best management practices.	Cost-share cost effectiveness is addressed in the District's Cost Share Docket. For instance, projects that cost greater than \$100 for each pound of P per year require further review. There is a procedure for when the Board has to decide in the Docket.	N
72	C.3 (now B.3)	BWSR	Section IV.C.3 Planning Program – Up to this point, the draft Plan provides reference to several studies to be completed during the life of this Plan. Ensure that those studies are also directly referenced as proposed Plan implementation activities, where appropriate in the subsequent Planning Program sections.	The District will review the plan and ensure all implementation strategies are referenced in the implementation steps.	Y
73	C.3.3 (now B.3.3)	BWSR	Section IV.C.3.3. District Plan Updates – BWSR approval of a Plan amendment does not extend the life of the District's Plan. This is a separate process. Clarify the narrative in the Background & Purpose. Updates to a State approved Plan as describe, constitutes a Plan amendment that must be completed in accordance with MN Rule 8410.0140 and MN Statute 103B.231 Subp. 11. Clarify language presented in 'Minor Plan Updates'.	Section IV.C.3.3 (now IV.B.3.3) will be revised as noted in this comment.	Y
74	C.3.5 (now B.3.5)	BWSR	Section IV.C.3.5 Groundwater Protection Plan – As identified in comment above, the District has the opportunity to promote best management practices and to work with partners, citizens, local farmers and agronomists in adopting the most current science based and economically viable practices that can reduce nitrate and pollutants in groundwater resources in vulnerable and other areas of the District. We recommend that the District emphasis that connectivity and incorporate some of those strategies and implementation activities in this section. This could also include soil health initiatives, agricultural best practices, protection of key groundwater recharge areas, stormwater runoff reuse, etc.	Strategy (now Implementation Activity) 61 will be modified to include protection of groundwater quality.	Y
75	C.3.9 (now B.3.9)	BWSR	Section IV.C.3.9 Upper Watershed Storage Strategy – The third paragraph in the Background & Purpose states: 'To address volume-drive flooding at the watershed scale, a more comprehensive strategy may be required that promotes increased consumptive use of water.' We recommend rewording this statement as additional context beyond the description in the next sentence is needed.	Will reword this statement to include more context.	Y
76	C.5 (now B.5)	BWSR	Section IV.C.5 Monitoring Program (introduction) – Per MN Rule 8410.0105 Subp. 5 revise the District's long-term monitoring plan or identify in the Plan that the District must also annually submit the collected data that has been quality-controlled and quality-assured to the appropriate state agency.	The introduction to this section and the long-term monitoring plan will be revised to note QA/QC and reporting requirements.	Y

#	Section	Entity	Comment Synopsis	DRAFT Response To Comment	plan revision?
77	C.5.1 (B.5.1)	BWSR	Section IV.C.5.1. Buck Lake Diagnostic Study – The District should clarify the intent of reclassification of Buck Lake as a Public Water Wetland. Is the intent to avoid listing as an impaired water or is the intent to more appropriately manage the water resource?	Buck Lake is MNDNR Protected Wetland 65w, therefore Implementation Step 2 of Section IV.C.5.1. Buck Lake Diagnostic Study will be deleted.	Y
78	C.6.1 (now B.6.1)	BWSR	Section IV.C.6.1. Permit Program – The Background & Purpose are not specific to the purposes of why the District implements rules and the resource benefits and protections the District hopes to achieve through implementation of District rules. Suggest clarifying. Revise language in the fourth paragraph of the Background & Purpose. The decision to transfer authority of the Wetland Conservation Act is at the discretion of those local government units with which the authority currently resides. The District may choose to implement standards more restrictive than those required by the Wetland Conservation Act as determined necessary to achieve wetland Plan goals defined under MN Rule 8410.0080.	This section will be revised as recommended.	Y
79	C.6.2 (now B.6.2)	BWSR	Section IV.C.6.2 Conservation Easement Program – Provide reference (i.e. hyperlink) to the District’s Easement Amendment Request Policy referenced in the Background & Purpose. A District permit may be required under a District rule. We recommend the Plan narrative make the distinction between the District’s ability to require a permit under the District’s statutory authority to implement rules. Clarify language in the second paragraph of the Background & Purpose. It is unclear who (the District or partners) has the maintenance responsibility of best management practices referenced.	This section will be revised to: 1) include a hyperlink to the District’s Easement Amendment Request Policy, 2) distinguishes between requiring a permit and authority to implement rules, and 3) include more clarity on who will be doing the maintenance.	Y
80	C.6.3 (now B.6.3)	BWSR	Section IV.C.6.3 District Rules Updates – Revise the narrative in the Background & Purpose. The rule revisions proposed in 2019 have not been approved at present time. Revise the Implementation Steps table presented. Previously in the draft Plan the District has indicated that District rules are intended to be reviewed, and possible revised, every five years. This timeline should also be reflected in this program section and table.	This section will be revised as suggested.	Y
81	C.6.4 (now B.6.4)	BWSR	Section IV.C.6.4 District Boundary Revision – Revise the Plan narrative to be consistent with the scope and extent of District boundary review the District intends to explore with that proposed in the narrative presented in Section IV.C.7 Administration Program (Fiscal Management last paragraph, page 125). Section IV.C.6.4 references areas flowing to Tier 1 lakes and Section IV.C.7 references the District’s hydrologic boundary, which is assumed to also encompass the Prior Lake Outlet Channel.	While these sections are not inconsistent, minor revisions will be made for the sake of clarity.	Y
82	C.7 (now B.7)	BWSR	Section IV.C.7 Administration Program – This section should provide a generally summary of what administrative costs (e.g. staffing, facility, equipment, vehicle, etc.) are included in the program budget in the Plan implementation table.	The narrative of this section will be amended to include a general summary of what is included in administrative costs.	Y
83	D (now C)	BWSR	Section IV.D Implementation Table – Per MN Rule 8410.0105 Subp. 1 and Subp. 2 the Plan must contain a table that briefly describes each component of the implementation actions, the schedule, estimated cost, and funding sources for each component including annual budget totals and a table for a capital improvement program that identifies structural and nonstructural alternatives that would lessen capital expenditures and sets forth, by year, details of each contemplated capital improvement that includes the need, schedule, estimated cost, and funding source. We recommend revising the title of this table to also include the District’s capital improvement program. As identified in above, Section IV District program ‘Implementation Step’ tables may reflect the level of detail required per the reference MN Rule and/or the detail must be provided in the Implementation Table presented in Section IV.D. Where individual capital improvements and projects and costs are known, we recommend identifying that information in the Section IV.D table.	After further discussion with the District’s BWSR Board Conservationist it has been determined the District’s draft plan meets the intent of this subsection of MN Rule 8410.	N
Section V – Outcomes and Measures					
84	C	Scott WMO	Page 130, V. Outcomes and Measures. We recommend that the District develop a method for calculating watershed yield (fraction of precipitation documented as runoff) at the Hwy 13 wetland outlet as a way of documenting whether or not the District’s management approaches and the land use changes occurring in that subwatershed are moderating runoff. We know the District did have continuous stage and flow recorded at this site to control the FeCl treatment system, and we’re assuming this is still in place. We would be happy to share what we’ve learned from that measure.	The District will follow up with the Scott WMO to better understand the insights and lessons learned from its watershed yield assessment methodology and consider whether to incorporate said exercise in future planning efforts or modeling updates, via plan amendment.	N
Section VI – Land and Water Resources Inventory					
85	B.4	MPCA	Page 146 of the Plan references an implementation plan being created for the Fish Lake and Pike Lakes TMDLs. Is this implementation plan referring to a plan that PLSLWD intends to create? Note that the WRAPS report (linked in Comment 1) is intended to take the place of a standalone TMDL implementation plan from MPCA’s perspective.	All references to the Fish and Pike TMDL Implementation Plans will be corrected to the WRAPS report.	Y
86	B.5	Scott WMO	The NFMP could be include on the list of groundwater resources on page 146	NFMP will be included as a resource.	Y
87	B.3.c	City of Prior Lake	Section VI.B.3.c. Please add information about the Wetland Conservation Act (WCA) to this section.	WCA, and the District’s role in WCA proceedings will be added to this section.	Y

#	Section	Entity	Comment Synopsis	DRAFT Response To Comment	plan revision?
88		BWSR	We recommend that the District consider consolidation of Appendix B: Reference Maps and Appendix G: Hydrologic Data and Figures. Figures and data from both are referenced throughout this Plan section.	Hyperlinks to these appendices will be provided, but they will not be consolidated.	N
89		BWSR	Per MN Rule 8410.0060 Subp. 1, required land and water resources information may be incorporated by reference if the data is generally described in the Plan and the complete data and analysis is in a freely accessible location that is specified. There are a number of resources and information referenced throughout this Plan section. We recommend that the District consider inclusion of a table that more readily summarizes the data and information referenced and the specified location where the information is freely accessible (i.e. web link). If not, web links to referenced information should be provided in the Plan narrative.	Web links will be provided, as available.	Y
90		BWSR	Information, data, and the analysis summarized in this Plan section should represent the most currently available data and must be specific to the watershed area.	So noted.	Y
91		BWSR	The District should acknowledge SMSC in the narrative for 'Physical Setting' and identify the community in applicable referenced maps and figures.	Will revise as suggested.	Y
92	B	BWSR	The summary provided for groundwater resources (page 135 and page 146) are not sufficient to achieve the requirements of MN Rule 8410.0060 Subp. 1. Please note that Scott WMO does not have a current State approved Groundwater Plan. References to groundwater in the Scott Watershed Management Organization (WMO) are not appropriate as there is no overlap between the Scott WMO and District jurisdictional areas.	This section will be revised to include more information on groundwater resources.	Y
Section VII – Local Government Unit Requirements					
93		BWSR	Section VII needs to include the schedule for implementation of local plans per MN Rule 8410.0105 Subp.9 and also MN Rule 8410.0160 Subp. 6 for adoption and implementation of the local plan. The Plan narrative needs to also recognize the review provided by the Metropolitan Council per MN Statute 103B.235 Subd. 3a.	This section will be revised as noted.	Y
Section VIII - Plan Review and Amendment					
94		BWSR	Clarify the statement made in Section VIII.B Plan Review paragraph 3 (page 152): 'No formal CAC was created due to low participation.' This statement seems contradictory to information previously presented in the Plan regarding the stakeholder input process the District completed for development of the draft Plan.	This sentence is holdover from the existing plan and will be revised including a list of CAC members that participated in this plan amendment.	Y
95		BWSR	Please note that a Plan amendment will be needed to revise the highlighted text identified in Section VIII.B Plan Review (page 153) once the Plan has been State approved and locally adopted.	The last two sentences of the last paragraph will be stricken.	Y
96		BWSR	Plan amendment procedures outlined in Section VIII.C Amendment Procedures (pages 153-154) need to be revised for consistency with the requirements and schedule for watershed Plan amendments per MN Rule 8410.0140 and MN Statute 103B.231 Subp. 11.	Will revise plan amendment procedures to be consistent with the requirements and schedule in the referenced rules & statutes.	Y
Appendices					
97	Appendix D	Scott WMO	The County and SWMO strongly recommends the District remove the proposed Rule updates as part of the Draft Plan and replace with the currently approved Rules. The agencies did not review the proposed Rules as part of the Plan review as they are currently under a separate review process and timeline, and felt an additional review was confusing.	A hyperlink to current enforceable rules will be provided.	Y
98	Appendix D	City of Prior Lake	The WRMP must include the current PLSLWD Rules instead of the draft Rules that were included as Appendix D. Section IV.C.6.3 includes this statement: "The District's Rules were last substantively revised in 2020." This statement is incorrect as the most recent draft Rules have not been adopted, and it conflicts with a statement in Section IV.C.6. (page 118) which correctly lists the last revision date as October 13, 2015. Although the PLSLWD Rules update process is underway and may be completed in 2020, the WRMP text should reflect the current status of this process. The WRMP should be updated through the minor amendment process after the current PLSLWD Rules update process concludes.	See response to Comment #97.	Y
99	Appendix B	City of Prior Lake	Appendix B. Please update the "Floodplain Map" found in Appendix B to remove reference to revised floodplain for Prior Lake. Although a FEMA floodplain update was recently approved for Prior Lake, it is unnecessary to show this as a revised area. Because regulatory floodplains are revised from time to time, the FEMA website and FEMA Flood Insurance Rate Maps (FIRMs) should be referenced in the note below the map as these are the official sources of maps for the public. Section VI.B.2.c contains the correct FEMA website link.	This map will be revised as requested.	Y
100	Appendix D	BWSR	It is highly recommended that the District's detailed rules or draft of proposed rule revisions not be included in the District's Plan. The process and timeframe required for a rule revision is separate from the process and timeframe required to update and amend the District's Water Resources Management Plan. Inclusion of draft rule revisions into the District's Plan, would not constitute approval of the District's rules or proposed rule revisions once the District's Plan is approved and locally adopted. As indicated in comment 3 above, any revisions to a copy of detailed District's rules ultimately included in the State approved and locally adopted Plan would require a Plan amendment to bring the Plan current with any approved revised District rules.	See response to Comment #97.	Y

#	Section	Entity	Comment Synopsis	DRAFT Response To Comment	plan revision?
101	--	BWSR	The District should review the value added to the Plan by incorporation of each appendices; some of which are already outdated. Updates to documents currently included in the Plan appendices, would require a Plan amendment per MN Rules 8410.0140 to bring the Plan current when a referenced document is updated. This information may be more easily incorporated into the Plan by reference with a hyperlink to the reference document on the District's website and would not require a Plan amendment if/once a document is updated.	District staff will set up a webpage for posting current versions of all appended documents and appendices will be removed.	Y
102	Appendix G	BWSR	Appendix G: Hydrologic Data and Figures was missing from the draft Plan submitted for 60-day review. BWSR was unable to determine if Plan content requirements 8410.0060 have been satisfied. A full copy of the draft Plan will need to be submitted for the 90-day review.	A hyperlink for this appendix will be provided.	Y
103	Appendix B	BWSR	See comments above. Maps and Figures need to be labeled and directly referenced in Plan narrative when noted. It is recommended that figures be presented in the appendices in the order in which they are referenced in the Plan narrative.	So noted; will revise as necessary.	Y
104	Appendix F	BWSR	Section IV.C.4.1 identifies that the District's Education and Outreach Plan is updated annual. If a copy of this document remains in the Plan, include the most current version.	A hyperlink for this appendix will be provided.	Y
105	Appendix H	BWSR	See comment 21(p) above. If a copy of this document will remain in the Plan, the yellow highlighted text will need to be revised for the draft Plan 90-day submittal.	A hyperlink for this appendix will be provided and it will be revised as recommended.	Y
106	Appendix J	BWSR	If a copy of this document remains in the Plan, include the most current version.	A hyperlink for this appendix will be provided.	Y