



#	Section	Comment	From	Response
1	4.2/Table 4.1	Strategy 5 and Strategy 10 are the same. As are Strategy 7 and 8. It might be clearer to just use one number and cite it under each goal to which it applies.	Metropolitan Council	Strategy numbers have been removed.
2	Overall	The plan does a good job describing the physical and human environment within the watershed, as well as summarizing the issues related to RBWMO's mandate.	Hennepin County	Thank you for your comment.
3	4.2.1/5.5	Develop a program for completing Subwatershed Assessments through the watershed area that would identify solutions and opportunities systematically through the watershed and add these opportunities to your CIP and future development plans.	Hennepin County	Member cities will be completing H&H studies independently. Results will be reviewed for RBWMO planning.
4	5.3	Develop an individual or neighborhood type program to approach residents within the watershed to implement best management practices on their properties.	Hennepin County	If there becomes an interest within the watershed the RBWMO member cities will consider dedicating funding and education opportunities for urban BMPs rather than through the RBWMO.
5	3,4	Encourage you to think about the intersections between Issues 3 & 4 - another audience you may want to consider as a target in your outreach and education planning is the community of public officials and developers who are most likely to influence redevelopment in the watershed over the next decades.	Hennepin County	The RBWMO Annual Board Meeting includes an educational element to the elected officials.
6	General	We feel that the identification and focus on areas such as redevelopment opportunities and public outreach are attainable and complement each of the cities' implementation goals.	MN Board of Water & Soil Resources	Thank you for your comment.
7	General	Typographical and grammatical errors should be addressed prior to 90-day submittal.	MN Board of Water & Soil Resources	Errors will be addressed.
8	4	The plan has identified seven goals, however it is unclear how they will be measured (MN Rule 8410.0080 Establishment of Goals. Subpart 1. Requirements). Having specific measurable goals will allow the RBWMO to better complete the self-assessment and track progress on the plan.	MN Board of Water & Soil Resources	The Goals would be measured through the implementation of the respective strategies. The strategies would be reviewed annually.
9	4.2.1.2 Strategy 2	We acknowledge the RBWMO's recognition of the importance of the development of a chloride management plan.	MN Board of Water & Soil Resources	Thank you for your comment.
10	5	The plan should identify areas that the RBWMO may seek grant funding to support its efforts. These could include areas that overlap with multiple watershed management areas within the Cities of Richfield and Bloomington.	MN Board of Water & Soil Resources	We will consider identifying areas and projects as part of the plan where grant funding may be available.
11	5	The RBWMO has identified redevelopment as an opportunity to achieve greater stormwater management solutions. The RBWMO should commit financial resources to this as an incentive for private developers to exceed RBWMO standards (MN Rule 8410.0105 Subp. 7. Incentive Programs)	MN Board of Water & Soil Resources	Member cities do provide some financial benefit and/or resource. Richfield allows reduced fees when LID techniques and BMPs are included. Bloomington has partnered on grant opportunities when available.
12	5.5	The RBWMO recognizes that the Capital Improvement Projects (CIP) identified in the plan is not inclusive of all projects. For projects not included within the CIP, the RBWMO will be required to undergo plan amendments in accordance with MN Rule 8410.0140 Plan Amendments.	MN Board of Water & Soil Resources	Noted. We will review our current City CIPs to match and reduce the chance for a needed amendment.



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13	7	The RBWMO should include the procedures of how it will conduct its evaluation of progress on goals and the implementation actions in accordance with MN Rule 8410.0150 Subp. 3. E.	MN Board of Water & Soil Resources	We will add 'annual review of Strategies' to the evaluation process.
14	General	Assess to determine if there are proper staffing levels available to achieve the goals of the plan and, if not, include a description and budget of what will need to be done to remediate.	Bloomington Sustainability Commission (BSC)	Staffing format will remain as is.
15	2	Add a statement in the executive summary further describing the history of the make-up of the CAC and whether members of the community have been asked to participate.	BSC	A description of the CAC is included in the executive summary. Further information on the Commissions that make up the CAC can be found on their respective city websites.
16	Further describe what will be needed to ensure that the following requirements will be followed:		BSC	
16a	3,4	The MIDS abstraction rate of 1.1 inches to capture runoff from impervious surfaces will be used	BSC	The RBWMO and member cities use NPDES requirements not MIDS.
16b	3,4	The rate control standard for new development storm water runoff rates not to exceed existing conditions	BSC	Consistent with MS4 permit requirements, staff review all development plans for requirements specific to that project.
16c	3,4	A requirement for unrestricted redevelopment to capture and retain runoff from new and/or fully reconstructed impervious surfaces	BSC	Consistent with NPDES requirements, staff review all development plans for requirements specific to that project.
16d	3,4	A requirement that water quality for new developments achieve no net increase of storm water discharges for TSS and TP	BSC	Consistent with MS4 permit requirements, staff review all development plans for requirements specific to that project.
16e	3,4	A requirement for maintenance access and maintenance agreements (for perpetuity) for storm water management structures and facilities	BSC	Per member cities requirements, staff review all development plans for requirements specific to that project.
17	3,4	The Sustainability Commission fully supports the goals of better coordination between the cities for wellhead protection planning to provide consistent infiltration standards and working closely with the Department of Health for better identification of vulnerable areas	BSC	Thank you for your comment.
18	2,3	The Sustainability Commission fully supports the development of redevelopment standards and thresholds – especially if those do not currently exist.	BSC	Thank you for your comment.
19	The Sustainability Commission recommends to follow state statute as follows:		BSC	
19a	3	Add a "Groundwater" issues section to address groundwater-surface water interaction defined in county groundwater plans and establish goals to address groundwater issues identified within the Met Council's Master Water Supply Plan	BSC	Ground water supply plans and requirements are addressed by cities.
19b	4.2	Include a Volume Control statement	BSC	We will add a strategy matching the volume control requirements currently in place.
20	4.2.1.3.1	Change regulated threshold from one-acre to 10,000 square feet	BSC	This threshold will remain as is.
21	4.2.1.3.1	Clearly define "new" impervious to include "fully-reconstructed" impervious at every mention of "new" impervious	BSC	The current definition is consistent with state requirements.
22	4.2.1.3.1	Including soil standards requiring decompaction and soil organic amendment for graded/impacted soils that are proposed to be revegetated as part of a construction project that trips the requirement threshold.	BSC	The RBWMO encourages this practice but it is not enforceable.
23	5.3	Providing consistent (year after year) funding for Enhanced Public Education & Outreach to reach residents, students, churches, businesses, etc.	BSC	The decision during planning discussions was to focus on students in education efforts.



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24	5.4	Providing consistent (year after year) funding for water quality monitoring, aquatic invasive species vegetation mapping, aquatic invasive species control (e.g. invasive aquatic plants, rough fish, etc.)	BSC	The plan calls for engaging with partner agencies on invasive species efforts but it is not feasible for the RBWMO to lead these efforts.
25	General	Include a map that indicates overall/general surface/storm water flow through the RBWMO, and discharge points including storm water infrastructure, ponds, wetlands, and ditches.	BSC	Maps with water flow information will be included as appendices.
26	General	Include a section on wetlands and identify them on a map.	BSC	A wetland map will be included as an appendix.
27	5.4	Include monitoring of Wright's Lake if it has heavy algae blooms and dense macrophyte beds.	BSC	Wright's Lake is already monitored.
28	General	Include in the plan a process for determining or estimating the depth of all lakes where the depth is currently unknown.	BSC	This information is available. We will include depths in the plan where applicable and replace those identified as "unknown."
29	3.5	In Section 3.5 include a description of wetlands within the RBWMO and expand the descriptions of individual water bodies including more information about each water body. Specifically, estimates of watershed/surface acres draining to each water body could be listed, land uses/habitats surrounding the water bodies, challenges, successes, etc.	BSC	This information is available. We will include as applicable.
30	4.2	Strategy 4: include a definition of "periodic" and include what data will be collected	BSC	This item was deleted as part of a previous revision.
31	4.2	Strategy 11: include in the outreach plan activities that include all residents in the RBWMO and additional avenues (e.g. utility bills, city newsletters, websites, social media, a newsletter sent annually to residents of the WMO, etc.)	BSC	Member cities will include RBWMO branding on outreach that is already being sent out. Additional outreach items will be considered.
32	4.2	Include collaboration with the City of Richfield and the City of Bloomington, Hennepin County, MN Dept. of Ag, MN DNR, the MN River National Wildlife Refuge and others to combat invasive species through prevention, education, and management.	BSC	Goal 6 includes engagement with partner agencies on these issues.
33	4.2	Broaden the scope of species to focus on (such as gypsy moths, hybrid/narrow-leaf cattail, loosestrife, etc.) Or limit the scope to include only aquatic invasive species.	BSC	Identificaiton of specific species will be removed.
34		Include more information about how management will be implemented	BSC	More information needed to interperate this comment.
35		Include more information on chloride, including currently levels and BMPs being used, and future plans to reduce chloride levels.	BSC	As stated in the plan, the RBWMO will work with the MPCA on Chloride TMDLs.
36		Include information or a reference to what specifically the RBWMO has accomplished in the last 10 years.	BSC	The CWMP is a forward-looking document. Information on past accomplishments are documented in annual board meetings and reporting.