

Name of Submitter	Organization	Date	#	Section	Page	Comment	Response
Kate MacDonald	Minnesota Pollution Control Agency	3/13/2026	N/A			The Minnesota Pollution Control Agency (MPCA) appreciates the opportunity to review your draft Brown's Creek Watershed District Local Water Plan (Plan) dated 2027 - 2036, as well as providing input throughout your Plan development process. Overall, the Plan is well written, concise, and thorough. We have no comments as part of the official 60-day Review and Comment Period.	Thank you for reviewing the draft plan!
Barbara Riehle	Stillwater Township	4/8/2026	N/A			Both our Planner and Engineer have reviewed and responded that they do not have comment.	Thank you for reviewing the draft plan!
Josh Norman	Board of Soil and Water Resources	4/9/2026	1	Overall	N/A	This was a pleasure to read! The plan is extremely well-written, well-organized, and visually appealing. Very nice work!	Thank you for the feedback!
			2	Overall	N/A	The addition of the equity and climate change lenses for all issue categories is a great path forward.	Thank you for the feedback!
			3	4.1.4	24	The goal that aims to target rate control states that the accompanying implementation items are in Table 81. That table concerns thermal improvements, TSS load reduction, and ecological health projects. I am not seeing a direct correlation with rate control. I would recommend making the relevant implementation actions more clearly tied to rate control. For example, in Table 81, the Boutwell Road pond is identified as a future TSS load reduction project, and one of the implementation activities mentions adding grade control. If this is the project that was considered to be targeting rate control, it should be made clearer. (8410.008)	We updated the Brown's Creek Management Plan table (Table 81 in the 60-day draft) to clarify that proposed improvements address both thermal loads and rate control by reducing peak flow rates, while also stabilizing soils, minimizing erosion and sediment transport, and lowering thermal loads to the creek.  Additional detail provided describing improvements.
			4	4.1.4	25	The goal "regularly inspect and maintain stormwater management facilities" could be more measurable. How often? Just BCWD owned or funded? Will it be all management facilities every year/two years? (8410.008)	We updated language to specify in Monitoring and Maintenance of SWMFs Goal A that this is focused on BCWD-owned BMPs. And in Goal B this is other BMPs constructed to meet the BCWD's rules and performance standards related to their construction and ongoing maintenance.
			5	4.2.4	30	Goal A on this page talks about long term.... What is long term	We rephrased the goal to: "Provide stabilization of the five highest priority erosion problem areas through stormwater management and stabilization projects, including the establishment of native vegetation, such that erosion is minimized, and channel/bank stability is maintained under design storm conditions (e.g., 2-, 10-, and 100-year events). Stabilization shall be in perpetuity, recognizing natural disturbances may necessitate occasional maintenance."
			6	4.2.4	30	Implementation item 3 under goal A describes determining sediment and chloride loading rates from gravel roads and parking lots. Chloride feels shoehorned into this implementation item. I think the chloride runoff problem is better suited under the previous issue category of Stormwater Runoff, not here in Erosion Prevention and Sediment Control.	We moved to Stormwater Runoff Management Table 5 in a new Goal G.
			7	4.4.4	42	"Consider adopting and implementing regulatory provisions to reduce chloride contamination" does not feel like an implementation item to include in this plan. How do you measure the action of considering? What can tangibly result from consideration? This language feels weak and out of place among the other very specific and measurable implementation items listed in this plan.	BCWD continues to assess the sources of and solutions to the chloride impairment in Long Lake and chloride contamination in the watershed generally. BCWD also continues to assess possible regulatory mechanisms that could reduce chloride loading to waters. Rather than weak and out-of-place, the proposed approach identifies specific and appropriate steps BCWD will take early in the process, rather than promising a specific action prior to undertaking the legally required process for adopting a new regulatory provision (see Minn. Stat. sec. 103B.341).
			8	4.5.4	46	Another "consider" implementation item for rule amendments.	Draft response under review and will be available by end of day Tuesday.
			9	4.6.4	50-52	Two more "considers" for implementation actions.	Draft response under review and will be available by end of day Tuesday.
			10	4.6.4	51	Implementation item 4 under policy #3's goal regards the possible amendment of no net loss of flood storage in District rule from permitted activities. The very next goal is "ensure no net loss of flood storage capability within the watershed." I think that implementation item might fit better under this goal.	The implementation activity "Review and, as necessary, amend BCWD's rules to require no net loss of flood storage from permitting activities. Costs reflected in Regulations." is now associated with the goal "Ensure no net loss of flood storage capability within the watershed."
			11	4.6.4	52	One goal is "balance prevention and mitigation efforts." I am having a hard time imagining how this is specific or measurable. One of the implementation items is one of those "consider" activities, the other is about "exploring the expansion of the cost-share program", which is similar in vagueness. Again- how can you demonstrate and measure on paper that options were explored? Is this plan the place for this brand of noncommittal goals and activities? Unless the language can be changes for these "considers" and "explores" I would recommend omitting them. (8410.008)	In reviewing the goal, the language more closely corresponds to a policy-level direction used to inform goals and implementation items. The policy has been updated to read: "BCWD recognizes the need to balance flood prevention and mitigation by integrating upstream runoff reduction, floodplain management, and infrastructure improvements. The district will collaborate with property owners, local communities, and state and federal agencies to reduce flood risk under current and future conditions." The goal has been removed, and its applicable implementation items have been reassigned to Goal B "Support property owners' efforts to manage their flood risk".
			12	4.9	69	The baseline monitoring program is discussed, and there are a few implementation actions that discuss specific sampling locations, the frequency of sampling, the proposed parameters to be measured, and the requirement of periodic analysis of data. To be consistent with rule, there should be more information included about the rest of the sampling locations (especially as a part of the baseline monitoring program). Where are the existing stations? What are they measuring and how often? I think a link to the monitoring and data collection page on your website would suffice, since the annual monitoring reports are housed there which include locations. (8410.0105 subp. 5)	Appendix F - Land and Water Resource Inventory, section 1.3.7 describes the district's monitoring program including monitoring inventory for lakes, stream, and groundwater with monitoring parameters, locations, and yearly records. A reference to refer to this appendix and a link to the Monitoring and Data Collection page of the BCWD website has been added to section 4.9.2.
			13	4.9.4	71	The first implementation item on this page "conduct regular surveys..." how often is regular?	We qualified with "every three years"
			14	4.10.4	75	Implementation items 2 and 3 under goal A on this page seem misplaced. I do not understand how local water management plan review ties into the permit application stage. Unless the review is of local partner's permitting process? That still does not seem to fit with the goal of "coordinate with district partners early in the permit application stage" because reviewing the plans would be prior to any application, right? I think if item 2 were to be kept here, there should be a stronger link to the goal. Additionally, implementation item 3 is vague. What regional solutions are sought? How are they linked to the permit application stage? Also- how is the cost for this implementation item tied to flood prevention? (8410.0105)	Draft response under review and will be available by end of day Tuesday.
			15	4.10.4	76	Implementation item 1 under Goal E of the Permit Program sub-issue also feels misplaced. This goal is about improving the enforcement process, and there is not a clear link between that and district boundary review. I understand the need for boundary review under the permit program, but perhaps it would fit better under a different goal.	We agree with the comment and have reassigned the implementation item to B3 under Sub-Issue Permit Program.
			16	4.12.4	87	Implementation item 1 on this page should be a little clearer to tie to statute. The rule calls for "An annual communication must be distributed to residents of the organization." While this activity is budgeted for each year of the plan, it might be helpful to include a timeframe in the implementation item text. (8410.0105 subp. 4)	We changed to "Annually promote..."
			17	4.13.4	95	Goal B on this page "preserve and restore..." restore to what condition?	Draft response under review and will be available by end of day Tuesday.
			18	4.14.4	98	Implementation item 6 on this page deals with allocating funds in anticipation of the next 10-year plan. The associated goal with this item is "seek and acquire alternate sources of funding... for BCWD studies, projects, and capital improvements." This does not feel like a good fit for this specific goal.	The budget allocation to set aside money for the next watershed management plan has been removed from the "Funding" issue and given a separate line in the Implementation Plan Table after Project Development
			19	5.6.2	111	While the plan talks about the CAC and TAC, there is no procedure listed to establish committees for the purpose of making recommendations on a ten-year plan amendment. (8410.0105 subp. 1)	Thank you for the comment - this is intentional. Recommendation on a ten-year plan amendment would be carried out as a full board as described in section 5.8.1.
			20	5.7	114	Table 79 includes a list of community liaison members and their names. I would recommend removing this table and instead add a link to your website with the current board members/community liaisons. Otherwise this table will be out of date and incorrect almost immediately once members move on.	We have removed the table and noted that this information is available on the website with the link.
			21	5.7.2	114-115	This section of the plan is about local water management plan requirements and BCWD review. While a process is clearly laid out evaluating the implementation of local water plans and how local governments can adopt this plan by reference, there is no clear process mentioned for what BCWD would do if an LGU failed to implement its local water plan. (8410.0105 subp. 1)	Section 5.7 states that BCWD is not relying on cities and townships in the watershed to implement plan programs, and that a collaborative approach will be taken to implement projects. Subsection 5.7.2 describes specific steps BCWD will implement to ensure mechanisms are adopted and implemented to meet regulatory goals. Beyond these provisions, BCWD will not monitor or audit LGUs implementation of the local water plans for their own purposes. In the event BCWD comes to be aware nonetheless of inaction on a local plan that implicates a significant water-resources protection or flood-risk management issue, BCWD will advise the Board of Water and Soil Resources, given watershed districts' lack of statutory authority to take other enforcement measures in such circumstances.
			22	Overall	Overall	After finishing this plan, I must say that is is extremely thorough and well put together. I loved how policies, goals, and implementation actions were grouped in the table formats. One would have to look very hard to find anything deeper than some surfcial complaints (comments above).	Thank you for the feedback!

Lee M. Mann, City Engineer	City of Oak Park Heights	4/13/2026	23	Budget		<p>We note that BCWD allocates less of its budget percentage to projects and much more toward monitoring than the adjacent Valley Branch Watershed District (VBWD). The proposed monitoring actions exceed requirements. Consider adjusting the BCWD's budget to increase the resulting percentage to projects.</p>	<p>These monitoring activities were reviewed with the board, TAC, and CAC, all of whom supported continuing these efforts. There was also consensus that the monitoring program should be evaluated on a regular basis to ensure the data collected continues to provide meaningful value.</p> <p>Comparisons between watershed districts are inherently challenging, as monitoring programs vary based on the number and type of resources, as well as the extent of BMP performance tracking. In addition, differences in how activities are categorized and reported across plans make direct comparisons difficult.</p> <p>For example, BCWD's monitoring budget includes future hydrologic and hydraulic (H/H) updates, which may not consistently be classified as "monitoring" activities in other plans. Despite these differences, BCWD's monitoring program is generally aligned with the activities identified in the VBWD plan, and the overall level of investment is comparable.</p> <p>Section 1.5 of the plan includes the policy statement agreed to by the board that 35% of the district's annual budget should go to construction projects that benefit the Brown's Creek watershed's surface water and groundwater resources.</p>
			24	4.5	47 A4 and A5	<p>For the proposed actions listed below we question whether BCWD is extending itself past its core mission:</p> <p><b>a. Wetland Bank Creation:</b> Washington County may be better positioned to determine the feasibility of creating a wetland bank. Also, the County may be better positioned to equitably distribute cost and benefits if a wetland bank does prove to be feasible.</p> <p><b>b. Wetland Monitoring:</b> The Plan proposed to monitor five wetlands for 5-years for land use and climate change implications. How this research project will directly benefit the watershed or is not redundant to research by others is not explained. A 5-year period is an environmental snapshot while climate change is a multi-decade or longer process. How the implied outcome will be achieved within five years is not understood.</p>	<p>a. During TAC conversations with Washington County, their representative advocated for the inclusion of wetland bank feasibility evaluation in the plan. No comments from BWSR were received indicating they had an issue with these. BCWD recognizes Washington County and local communities as excellent partners in this process and is committed to working with them to evaluate the feasibility and develop partnerships for wetland banking opportunities where appropriate.</p> <p>b. We added the following definition for sentinel wetlands: "Sentinel wetlands refer to wetlands assessed with specific characteristics that make them useful indicators of changes to their environment over time." Members of the TAC with board support expressed interest in understanding how climate change is impacting these resources to better inform resource management decisions. We acknowledge that in the lifespan of this plan, we will only get a snapshot of change to these resources and intend that this monitoring be continued in subsequent plans.</p>
			25	4.7		<p>DWSMA Resolution: What issue is the BCWD looking to resolve with the Mn Dept. of Health (MDH) regarding drinking water supply management areas (DWSMA) between Stillwater and Oak Park Heights and the BCWD's areas of concern? MDH has approved both communities' DWSMA boundaries.</p>	<p>The Stillwater and Oak Park Heights wellhead protection plans have conflicting information that causes confusion when permit applicants try to meet BCWD's stormwater management requirements. The communities have assigned different vulnerabilities to the same aquifer, and the Wellhead Protection Areas (WHPAs) overlap. This issue was identified in 2018 and brought to MDH and the City of Oak Park Heights' attention when BCWD was reviewing a permit application from the Madison Hospitality Group (Permit 18-08) and again for Curio (which is in the City of Stillwater). Administrator Erik agreed that this needed to be addressed together in future updates/amendments.</p>
			26	4.7	59	<p>No-Net Loss of Groundwater Recharge: The BCWD's interest in such a future rule may place it in conflict with the land use planning role of individual communities and Met Council.</p>	<p>BCWD is already achieving this goal through the volume control requirements in its rules. This implementation activity reflects a commitment that future rule revisions maintain "no-net loss" of recharge and we are working with local communities and the Metropolitan Council to address this through the comprehensive plan updates and the local surface water management plans.</p>
			27	4.7		<p>Additional Groundwater Level Data Collection: We believe Washington County, acting under their Groundwater Plan should be the lead agency and BCWD be in a supporting role rather than collecting data. The County's Plan includes action item 2.F.4 "Explore and, if feasible, implement additional groundwater level data collection, to complement state efforts to monitor groundwater levels. This could include cost-sharing with other local agencies." The County may be better positioned compared to BCWD to equitably distribute costs for such efforts.</p>	<p>BCWD participated in the county's groundwater plan and was commended for the groundwater level data collection. Washington County is not collecting this information and is relying on BCWD to collect this information which is being shared with the Metropolitan Council, Minnesota Department of Natural Resources, and others conducting regional groundwater modeling efforts. BCWD partners with the Minnesota Department of Natural Resources on the Observation Well network and would welcome partnering with others who may have capacity to collect this information.</p>
			28	4.8		<p>While sustaining healthy upland ecosystems is desirable and often better than implementing stormwater best management practices to treat impacted runoff, we question whether upland land practices are within the regulatory scope of BCWD.</p> <p><b>a. Native plant community preservation and restoration projects:</b> Short of changing land use will the impact to stormwater for these undefined projects be measurable and have a cost benefit? Some non-native plants have excellent nutrient uptake and are very good at soil stabilization (e.g. reed canary grass) while unfortunately outcompeting native grasses.</p> <p><b>b. Pollinator (bee) conservation strategies:</b> While Minnesota Statute 103B does leave room for interpretation on the purpose of watershed districts, it is unclear that bees were considered for this purpose.</p> <p><b>c. Oak forest monitoring in Stillwater:</b> Why are BCWD funds going to a City of Stillwater resource? Should the management of this resource be left to the City of Stillwater?</p> <p><b>d. Pilot Rotational Livestock Grazing of Turf Areas:</b> What is the cost benefit of pursuing this issue in the name of soil health improvement?</p> <p><b>e. Vegetation surveys:</b> We believe that BCWD should support communities conducting their own inventories for planning purposes. Otherwise, we question the equitable benefit for taxpayers within BCWD.</p>	<p>Protecting upland areas supports many—if not all—of the 14 statutory purposes of watershed districts. BCWD recognizes the importance of including ecological health as a stand-alone issue, as improvements in ecological function provide multiple co-benefits, including stormwater rate and volume control, water quality enhancement, and flood risk reduction. This integrated approach is consistent with the principles of natural asset management. These implementation actions were identified through engagement with the TAC, CAC, and board, and will be further evaluated by BCWD to ensure they are cost-effective prior to implementation.</p> <p>Specifically:</p> <p>a. Native plant community preservation and restoration projects: New (unpublished) research by the Saint Anthony Falls Laboratory (SAFL) demonstrates that "pervious area amendments" (green spaces amended through direct soil management practices or vegetation) may be the most cost-effective adaptation strategy for watersheds where soils can be remediated, reducing the total volume of runoff generated and reducing flood risk for a range of storms.</p> <p>b. Pollinator (bee) conservation strategies: BCWD recognizes that pollinator-friendly landscapes (native vegetation, reduced disturbance, fewer chemicals) also improve water, soils, and ecosystem performance. By promoting pollinator (bee) conservation strategies, BCWD is engaging with stakeholders and changing behaviors in a way that speaks to something other than stormwater management while still achieving stormwater management.</p> <p>c. Oak forest monitoring in Stillwater: This activity is important in managing the bounce on Long Lake where a number of homes do not have the desired freeboard allowance. Maintaining and enhancing the ecosystem services this area provides is one of the strategies being taken to provide flood management.</p> <p>d. Pilot Rotational Livestock Grazing of Turf Areas: This activity was identified during the engagement process and will be further vetted by BCWD to ensure this is a cost-effective management strategy.</p> <p>e. Vegetation surveys: BCWD is interested in talking to Oak Park Heights about their interest in vegetation surveys to see if there is alignment between BCWD and the city's goals. These surveys will help make management decisions and recommendations in light of the land use and climate changes we are seeing moving forward.</p>
			29	4.9		<p>As mentioned previously the proposed \$2.3 Million budget under this line item (not including related efforts discussed above) is significantly greater than the larger VBWD.</p> <p>a. The Plan includes development of a storm utility database. Development would be required as a permit condition to provide GIS data to BCWD. The City previously commented to BCWD on 1/12/2026 regarding the Flood Vulnerability Assessment report that the City had data security concerns. We request that utility data sharing not be made a development condition but provided by communities at their discretion.</p>	<p>See response to comment 28 above. BCWD's rules have historically required the submittal of as-built information to verify that stormwater management features are constructed per the construction plans, thereby meeting the stormwater management requirements. We have changed the implementation activity to read "Work with Washington County, surrounding watershed districts and member communities to develop a comprehensive database for storm sewer and structures located in the watershed by compiling what has been surveyed to date, coordinating with member communities, and evaluating the need to supplement with future structure inventory surveys."</p>
			30	4.13		<p>Consider supporting communities in their land purchases to protect the watershed. Local leadership is often viewed more favorably. Consider expanding the scope of eligibility to include stormwater retrofits and equitably distribute funds across the BCWD.</p>	<p>BCWD's policy on land conservation states that we will work with communities, agencies, homeowners' associations, developers, residents, and non-profits, as appropriate, to protect land throughout the watershed to preserve and restore the resource quality, stormwater benefits, groundwater recharge, wildlife habitat connection, and access to natural spaces provided by key upland and lowland areas. BCWD welcomes communities to highlight their priorities so they can be included in the district's Capital Improvement Program. If there are items that don't fit under land conservation there are likely other areas where these projects could be accommodated.</p>
31	4.15		<p>We agree with BCWD that these pollutants are beyond the scope of the watershed district and State and Federal agencies are best positioned to address these pollutants. Given BCWD's lack of a clear role and the small budget for PFAS monitoring, consider rolling this issue up into Issue 9.</p>	<p>Thank you for the feedback - conversations during the watershed management plan development process preferred a dedicated issue to give the issue the space to elaborate on the statement profiling the issue and its relevance to the district.</p>			
32	Appendix C		<p>Summary of Civic Engagement Input: This appendix includes a memo summarizing flood vulnerability assessment discussion items during meetings with cities and townships. This memo's statements and recommendations don't include references to the City's comments provided to BCWD on 1/12/2026. Please revise your summary to reflect the City's comments.</p>	<p>Since the release of the draft plan for 60-day comment, a revised summary has been finalized that documents these comments. This revised summary will be included in the updated Appendix C.</p>			
Megan Moore	Department of Natural Resources	4/13/2026	33			<p>We recommend the WMP 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.</p>	<p>Thank you for providing these resources. They are noted separately from the plan and will be used as specific resources provided to permit applicants as part of Permit Program Goal C1.</p>
			34			<p>We recommend that the new WMP 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.</p>	<p>We added a reference to Rare Natural Communities in section 4.5.1.</p>
			35			<p>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.</p>	<p>We added "Native plants provide important benefits: their deep roots help control runoff, reduce erosion, and reduce flooding; they provide shelter and food for wildlife, including pollinators; they require little-to-no fertilizer, which keeps nutrients out of the water system; and they are generally well-adapted to local climate conditions." to section 4.8.1.</p>
			36			<p>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 <a href="https://bluethumb.org/">https://bluethumb.org/</a>, 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.</p>	<p>Thank you for providing these resources. They are noted separately from the plan and will be used as specific resources provided across multiple sub-issues and goals related to naturalized landscapes, shoreline preservation, and erosion prevention in Education, Outreach, and Stewardship.</p>
			37			<p>We appreciate the plan's inclusion of routine shoreline surveys using the "Score Your Shore" assessment process in its list of implementation activities. Such work will provide valuable information about lake health and help identify opportunities for shoreline restoration.</p>	<p>Thank you for the feedback!</p>
			38		7	<p>Figure 2, BCWD Annual Budget Percentage Allocation per Plan Issue Category includes a difficult-to-read legend. We recommend including larger text and larger symbols.</p>	<p>We have updated to make the legend larger and easier to read.</p>

			39	4	20	References a Table 7980. This appears to be an incorrect reference.	We will make sure all table labels and references are updated and accurate.
			40	5.3	103	References a Table 7980. This appears to be an incorrect reference.	We will make sure all table labels and references are updated and accurate.
			41	4.3.2	33	It states "the St. Croix River is a Wild and Scenic Waterway." For accuracy and communicating the designation's relevance, we recommend changing this text to "the St. Croix River is a National Wild and Scenic River."	We have changed the wording to be "National Wild and Scenic River."
Lila Franklin	Metropolitan Council	4/16/2026	42	1		Executive Summary: Although it is included later in the plan, consider including the BCWD's vision and mission statements in the Executive Summary section.	We added the vision and mission statements added to the Executive Summary
			43		7	The budget allocation for issue area "Pollutants of Emerging Concern" does not appear to be represented in Figure 2 "BCWD Annual Budget Percentage Allocation per Plan Issue Category."	Figure 2 has been updated to include Pollutants of Emerging Concern, thank you for catching this.
			44		9	The term "equity" appears at the bottom of this page and throughout the plan, but is not defined in the glossary. Consider adding a definition for this word that clarifies how the term is used within the context of this plan, as its meaning can vary and a shared definition helps ensure consistent interpretation.	The equity definition as it is applied in this plan has been added to the glossary
			45		17	There is a reference to Table 8283 which does not appear to exist. Check table references throughout the document for accuracy.	We will make sure all table labels and references are updated and accurate.
			46		20	The second paragraph references implementation "strategies" as well as implementation "activities." Later in the plan, some elements are referred to as implementation "items." If these terms mean the same thing, consider using consistent language throughout the document to reduce confusion about whether "strategies" are different from "activities" and "items."	The document has been reviewed, and a consistent terminology has been applied to refer to "implementation activities"
			47		26	For Table 6, consider reiterating what the italicized text means in a footnote.	Emphasis has been added at the start of the document section about the role of italicized text by underlining the connection of italicized items to lower priority actions.
			48		34	Goal A, Implementation Item 2 says "Cost identified under monitoring and data collection," however it appears the cost is included under "Stream Management" (as seen within implementation table, page 121)	Removed the reference to the cost being identified under monitoring and data collection, cost is recognized under Stream Management
			49		65	It appears the implementation item "Conduct point-intercept surveys at each lake/pond > 20 acres in size every five to ten years with flexibility..." is not associated with any budget stream or connected to any other table.	We added to Table 46. Ecological Health Implementation Activities covered by Baseline Monitoring Program.
			50		85 & 88	The implementation item "Develop demonstration projects..." referenced on pgs. 85 & 88 is not reflected in the implementation table activities.	We added to Table 68. Education, Outreach, and Stewardship Implementation Activities covered by East Metro Water Resource Education Program
			51		115	Both the Met Council's Imagine 2050 regional development guide and 2050 Water Policy Plan were adopted on February 12, 2025.	The dates for the Imagine 2050 and 2050 Water Plan have been updated.
			52		135-136	Implementation Table: The label for Table 82 needs to be brought down to the page with the table.	We have adjusted the formatting.
Karla Bigham and Alissa Lopez	Washington County - Public Health and Environment	4/16/2026	53	Overall	Overall	Public Health and Environment (PHE) reviewed how the BCWD 2027-2036 Watershed Management Plan addresses groundwater. Washington County commends the BCWD for recognizing the county as a partner in water resources management. The Watershed Management Plan identifies many strategies that align with the Groundwater Plan including protection of groundwater quality and quantity, pollutants of emerging concern, and groundwater monitoring and data collection. PHE appreciates the focus on climate change throughout the plan, as well as the effort BCWD has put into developing an equity policy. PHE looks forward to working with the BCWD and finding opportunities for collaboration and partnership during the implementation of the county's Groundwater Plan and the BCWD 2027-2036 Watershed Management Plan.	Thank you for the feedback!
			54	4.7	58	Table 38 Goal C 1 & 3 and groundwater flooding policy – The county appreciates BCWD's commitment to collect and share groundwater elevation and flooding data with Washington County. The county supports opportunities to share groundwater monitoring data and collaborate on groundwater related research opportunities as BCWD and Washington County implement their respective plans.	Thank you for the feedback!
			55	4.9	71	Table 50 Goal B item 2 – should this say Washington County consortium?	We have updated to be "the Washington County Water Consortium"
			56	4.1	75	Table 54 Goal B item 1 – The county thanks BCWD for considering consistency of rules and use with surrounding watershed management organizations. We look forward to working together to coordinate discussions about rule revisions as part of the water consortium.	Thank you for the feedback!
			57	4		Consider numbering sub-issue and policy within the policies, goals, and implementation activities tables to assist with plan navigation and ease of reference.	Draft response under review and will be available by end of day Tuesday.
	Washington County - Public Works	4/16/2026	58	Overall	Overall	Include the year the photo was taken in the image captions whenever that information is available.	We will include years in the image captions when available
			59	Overall	Overall	Review the formatting of the table titles to ensure they are consistent throughout the document.	We will review to address inconsistent table title formatting.
			60	1.5	7	For Figure 2, increase the spacing between the percentage values.	We have updated to make the legend larger and easier to read.
			61	2.2	10	Check the spacing of the text for year 2008.	We will fix the graphic and update in the plan document.
			62	2.2	10	For Figure 3, the label "2017–2036 4th Generation Management Plan" should be corrected to "2027–2026 4th Generation Management Plan."	We will fix the graphic and update in the plan document.
			63	2.6	12	Consider formatting the table in chronological or reverse-chronological order to help readers clearly identify which Board Members served together, and which Management Plan updates they contributed to.	We will update the table to make clearer which managers served together and the plans they may have contributed to.
			64	2.7	14	Include the oxford comma in the sentence beginning "In pursuit of this goal, BCWD will ensure diversity, equity, inclusion and accessibility influence development."	We will review the document and fix inconsistencies where the oxford comma is missing, including here.
			65	4.5	48	Include more descriptive language in the photo captions to indicate the specific locations of the wetlands within BCWD.	We will make sure all image captions are descriptive and include locations when applicable.
			66	4.1	75	In Table 54, "work with developers and municipalities to coordinate permit applications early in the design stage" should state "work with developers and municipalities to coordinate permit applications early in the design stage."	We have fixed the misspelling of "developers"
			67	5.3	103	There are references to a Table 7980. Verify whether this table number is correct as written.	We will make sure all table labels and references are updated and accurate.
			68	5.7	116	In the sentence ending with "deemed sufficient to meet the stormwater management requirements of BCWDs rules," please note that BCWDs is missing an apostrophe.	We have fixed to include the missing apostrophe
Greg Williams	Valley Branch Watershed District	4/17/2026	69	Overall	Overall	Our review finds the BCWD's Plan is closely aligned with VBWD's priority issues and goals, particularly regarding water quality and regulatory mechanisms. We also note the Plan identifies coordination with VBWD in updating its jurisdictional boundary by 2030 and look forward to cooperating with you in this effort.	Thank you for the feedback!
			70	Overall	Overall	We also suggest there may be opportunities for coordination during Plan implementation regarding future Rules updates and issues related to permitting programs, including but not limited to erosion and sediment control inspections and enforcement.	Thank you for the feedback!
Sara Belden	Rice Creek Watershed District	4/17/2026	71	Overall	Overall	RCWD acknowledges that we have shared high priority issues and goals. Surface water, groundwater management, data collection and flooding are major concerns for our district and drive many of our WMP Goals. Overall, we applaud your transparent and organized approach to this plan update. The District looks forward to future collaborations where hydrologic and legal boundaries align and continued collaboration on neighboring parcels and regional projects.	Thank you for the feedback!
Abby Shea	Minnesota Department of Health	4/20/2026	72	Overall	Overall	Consider referencing the Lower St. Croix River Watershed Groundwater Restoration and Protection Strategies (GRAPS) Report somewhere in the Plan; this area is one of the few in the Twin Cities metro that have a completed GRAPS report. This report is available here: <a href="https://www.health.state.mn.us/communities/environment/water/docs/cwf/grapsrscrw.pdf">https://www.health.state.mn.us/communities/environment/water/docs/cwf/grapsrscrw.pdf</a>	We have added to section 5.7.3.
			73	Overall	n/a	Thank you for the opportunity to participate in several TAC meetings. We have enjoyed working with BCWD staff, consultants, and partners and look forward to continuing this partnership! We are always happy to provide any assistance or collaborate on projects.	Thank you for the feedback!
			74	Glossary	viii	Suggest changing the definition of aquifer to "A body of permeable rock or sand and gravel that can contain or transmit sufficient quantities of groundwater to wells" per the USGS Water Basics Glossary (we made some edits to make it more plain language).	We have updated the definition to this suggestion.
			75	Glossary	viii	Suggest changing the definition of aquitard to "A low permeability unit that slowly transmits groundwater", as adapted from the MN DNR Groundwater Atlas User Guide.	We have updated the definition to this suggestion.

76	Glossary	viii	The fen definition uses "ground water" with a space. Suggest changing to groundwater with no space to be consistent with common practice and the rest of the plan.	We have changed "ground water" to "groundwater" here and ensured consistency throughout the plan.
77	Acronyms	xi	Suggest using the aquifer codes as defined by the MN Geological Survey and not combining codes into a long code that is not used. For example CFRNCECR = CTCE, CJDNCSTL = CJSL. MGS aquifer codes can be found at <a href="https://mgsweb2.mnms.umn.edu/cwi_doc/aquifer.asp">https://mgsweb2.mnms.umn.edu/cwi_doc/aquifer.asp</a>	We have updated the aquifer codes to match the Minnesota Geological Survey well codes.
78	Acronyms	xiv	We believe that SWUDS has changed to MPARS. This might be left over from the last plan. Suggest confirming with MN DNR staff.	We have made that change. Yes, the Minnesota Department of Natural Resources uses MPARS while the USGS has SWUDS.
79	1.4	6	Consider for the primary goal regarding groundwater management, inclusion of protecting groundwater quality for human health, rather than only groundwater-dependent natural resources in the watershed. The specific goals later in section 4.7 do get at this, but consider for inclusion in this primary goal.	We have added "...and contribute to protecting drinking water supply for human health benefits."
80	2.3	11	Groundwater is spelled both with and without a space in this section. Suggest using "groundwater" without a space as in MN Statutes 103B.	We have updated all instances of "ground water" to "groundwater."
81	2.7.1	13	Regarding "According to Kenny Blumenfeld, Senior Climatologist with the Minnesota Department of Natural Resources", suggest citing data or a specific study/paper/etc.	Reference to the January 8, 2020, Washington County Water Consortium meeting, where Kenny Blumenfeld presented on Hydroclimatic Conditions and Changes in the Twin Cities will be added to the references in the watershed management plan.
82	3.4	17	We appreciate climate change integration in all issues!	Thank you for the feedback!
83	3.4	17	We appreciate the high priority on groundwater resource management, as groundwater supplies the drinking water for all residents of the watershed.	Thank you for the feedback!
84	4.1.1	21	The third sentence notes that unless land use changes are properly managed, surface water quality and groundwater quantity will decrease. Consider stating that water quality will decrease to be inclusive of groundwater, as land use changes can also impact groundwater quality. This is one example where the connection between groundwater and surface water/stormwater/land use/etc. could be a bit more explicit. For any assistance with this or to discuss suggestions for any areas of the Plan, please don't hesitate to contact MDH SWP staff.	We added a statement to reflect that decrease in quality of waters infiltrated from runoff from land uses.
85	4.1.4, Table 5	24	Goal A: Appreciate the goal to protect and maintain the quantity and quality of groundwater recharge! This gets at what we are referring to in comment #12.	Thank you for the feedback!
86	4.1.4, Table 5	24	Goal C, item 1: Suggest ensuring protection of human health is explicit when mentioning reuse. Examples: "Promote stormwater reuse where protective of human health..." or "...encouraging reuse where safe and feasible", etc.	We have added this statement to the implementation activity.
87	4.1.4, Table 5	25	Goal A: This early involvement in development review could also be protective of drinking water resources.	We have added this statement to the implementation activity.
88	4.1.4, Table 5	25	Goal B: Appreciate the holistic view of preservation and protection of water resources, rather than only surface water resources.	Thank you for the feedback!
89	Table 6	27	Regarding the second item here, this might be something that MDH could help with especially in surface water contribution areas (SWCAs) within Drinking Water Supply Management Areas (DWSMAs). Keep MDH in mind as a possible partner for this work.	We have added "State and Federal Agencies" in Table 79. Implementation Plan - Higher Priority as a partner.
90	4.2	29-32	There are a few items here that could also benefit groundwater and drinking water, particularly in highly vulnerable areas and/or SWCAs: 1) Goal A, item 3 on page 30; 2) soil health in general. Keep multiple benefits in mind when implementing projects like these and other similar projects/programs.	Draft response under review and will be available by end of day Tuesday.
91	4.6.1	49	Appreciate the acknowledgement of health risks when wells are inundated.	Thank you for the feedback!
92	4.6.1	49	Suggest changing "private well overtopping" to "drinking water well flooding". When a well is surrounded by flood waters, the flood waters can move quickly down the outside of the casing to the aquifer. This can impact all drinking water wells, including both public water supply wells and private wells.	We have updated the sentence to read "Flooding can subject properties to damage (including damage that may not be covered by insurance) and pose health risks when flood waters intersect with drinking water wells."
93	4.6.4, Table 31	50-52	Consider including information on how to protect wells from flooding in property owner packets and associated action items in this table. MDH SWP staff can connect BCWD with staff in our Well Management Section for resources to include. See the link for a peek at what we have available online already, but note that I believe they are working on developing more resources as well. <a href="https://www.health.state.mn.us/communities/environment/water/wells/natural/floodprecautions.html">https://www.health.state.mn.us/communities/environment/water/wells/natural/floodprecautions.html</a>	Thank you for providing these resources. They are noted separately from the plan and will be used as specific resources provided as part of the Permit Program and Education and Outreach.
94	4.7.1	55	Appreciate the acknowledgement of potential impacts to drinking water supplies here!	Thank you for the feedback!
95	4.7	55	DWSMAs are mentioned in the implementation item 2 under goal B on page 57 and other references to this implementation item, but are not mentioned or discussed anywhere else in the plan. A description and explanation of what DWSMAs are and what areas in the watershed are vulnerable would be beneficial to add into the plan. If not wanting to add too much to the main body of the plan, a brief mention of this and a link to the MDH SWP Map Viewer ( <a href="https://www.health.state.mn.us/communities/environment/water/swp/mapviewer.html">https://www.health.state.mn.us/communities/environment/water/swp/mapviewer.html</a> ) could be included here and then perhaps more information could be included in Appendix F.  The southern portion of the watershed is of high or moderate vulnerability. Ideally this section would include a figure that includes the DWSMAs that overlap with the BCWD boundary, along with a link to the SWP Map Viewer since these areas will be updated over the life of the plan. This way when DWSMAs are referenced in the implementation item, there is a more clear understanding of what these areas are and why they are important in water management. It would also be helpful to highlight potential for multiple benefits projects where a project could improve groundwater and drinking water in addition to surface water, stormwater, etc. Note that "wellhead protection areas" are mentioned in Appendix F, but the DWSMA is the area for management and we recommend sticking with that term for consistency and clarity. MDH staff are happy to assist with any wording of a section on DWSMAs, map-making, etc.	We added a brief DWSMA discussion to Appendix F, section 1.3.7.3. A new figure is included in the plan showing the BCWD boundary, current DWSMAs, parcel lines, and regional wells, zoomed into Stillwater, Oak Park Heights, and Lake Elmo. The map includes a note to check MDH's SWP Map Viewer for the most current information on the DWSMA boundary and condition as this may change over the course of the plan.
96	4.7.2	55	Consider noting here that 100% of the drinking water in the BCWD is provided by groundwater as part of the relevance to the district. However, it is acknowledged that this is mentioned in the sub-issue areas.	We have added this statement to section 4.7.2.
97	4.7.3.1	56	Appreciate that part of management of groundwater quality is management of stormwater will not lead to contamination of groundwater! This is the idea we were getting at with the prior comment on the stormwater section.	Thank you for the feedback!
98	4.7.4, Table 38	57	We commend the BCWD for the inclusion of Goal B here and all 3 of the associated implementation items - we love to see this and appreciate this work!	Thank you for the feedback!
99	4.7.4, Table 38	57	We also love the Goal A, item 4 on this page!	Thank you for the feedback!
100	4.8.4, Table 43	64	Goal A is another example of something that could positively impact drinking water. Consider multiple benefits in the implementation of items related to this goal.	Drinking water protection has been added as an ecosystem service described in the sub-Issue area description in section 4.8.3.2.
101	4.12.4, Table 63	86-89	Love the mentions of groundwater in various items throughout this table! Especially Goal A, item 3 on page 87 and Goal A on page 89.	Thank you for the feedback!
102	4.13	94	Keep in mind for multiple benefits that land conservation can benefit groundwater and drinking water quality too. In fact, there are financial resources for land conservation in vulnerable DWSMAs. Contact MDH or BWSR staff for any assistance on those programs. Land conservation can also be beneficial for private wells in sensitive areas, but I am not aware of funding resources available specifically for those scenarios.	Thank you for providing these resources. They are noted separately from the plan and will be used as specific resources provided as part of the Permit Program and Education and Outreach.
103	4.14	97	As a reminder, MDH has an accelerated implementation grant that the watershed would be eligible for regarding groundwater protection, and the BWSR competitive grant program has a drinking water grant opportunity. MDH staff are happy to assist with applications to these grant programs. <a href="https://www.health.state.mn.us/communities/environment/water/groundwater/accimpgrant.html">https://www.health.state.mn.us/communities/environment/water/groundwater/accimpgrant.html</a>	Thank you for providing these resources. They are noted separately from the plan and will be used as specific resources provided as part of the Permit Program and Education and Outreach.
104	4.15	99	Appreciate the inclusion of the section, as this is an important emerging issue for this area of the metro.	Thank you for the feedback!
105	Chapter 5	103, 113	Check various links to tables throughout this section. There are a few examples on pages 103 and 113 where they are off - it appears that "Table 7980" should be "Table 80", for example. These links throughout the plan are very helpful and make the plan easy to navigate!	We will make sure all table labels and references are updated and accurate.
106	5.4.1.1	105	Consider including public health improvements in the assessment of Programmatic Cost-Share Projects.	We have added in the second paragraph when they align with the watershed district's purposes and powers
107	Table 82	137	Appreciate the inclusion of the following implementation item: "Provide technical support to residents with a well entirely within the critical flood event footprint".	Thank you for the feedback!

			108	Table 84	140	Appreciate the inclusion of the second implementation item on this page regarding working with partners to collect and share groundwater data.	Thank you for the feedback!
			109	Appendix F 1.3.7	28	This section on groundwater monitoring is the first mention of groundwater in this appendix. Suggest moving this section after the groundwater resources section to improve context and understanding.	We have updated so that Groundwater Resources and Surface and Groundwater Appropriations sections precede monitoring so that readers have context of these elements of the hydrologic system before it is discussed how they are monitored
			110	Appendix F 1.3.8	31	SWUDS has been changed to MPARS (Minnesota Permitting and Reporting System)	This change in title has been addressed.
			111	Appendix F 1.3.9	32	Quaternary should be capitalized throughout when referring to the geologic period.	We have capitalized all instances of Quaternary.
			112	Appendix F 1.3.9.1	32	Suggest replacing the second and third sentences in the first paragraph with something like "The Quaternary aquifer is typically the shallowest aquifer throughout the watershed. An important exception is the area around the lower reaches of Brown's Creek where bedrock is exposed."	This suggested language has been incorporated into the document.
			113	Appendix F 1.3.9.1	32	The Eau Claire Formation is typically considered an aquitard, as opposed to an aquifer.	Clarified in instances where the Eau Claire formation is identified that it is an aquitard
			114	Appendix F 1.3.9.3	33	Suggest removal of "Groundwater quality in both the private and public wells is good to excellent." or provide a source for this statement.	Draft response under review and will be available by end of day Tuesday.
			115	Appendix F 1.3.9.3	33	Suggest removal of "At present, groundwater quantity is sufficient to provide adequate volume to private and public sources." or provide a source for this statement.	Draft response under review and will be available by end of day Tuesday.
			116	Appendix F 1.3.9.3	34	The mention of wellhead protection areas is not cited and the only MDH source cited (source 10) is the Minnesota Well Index, which is a good source of information on wells, but is not a source for information on wellhead protection areas or DWSMAs. Suggest adding information on DWSMAs as mentioned in comment 23 and including the SWP Web Map Viewer ( <a href="https://www.health.state.mn.us/communities/environment/water/swp/mapviewer.html">https://www.health.state.mn.us/communities/environment/water/swp/mapviewer.html</a> ) as a source if information is added in the appendix. If information is not added in the appendix, it could still be a helpful source for the reference to wellhead protection area maps on this page 34.	SWP Web Map Viewer has been added as a reference to information pertaining to the Stillwater and Oak Park Heights DWSMAs.
			117	Appendix F 1.6.2	63	Suggest rewording discussion about CEC and MDH to " Under the CEC program, MDH is able to take a proactive approach to the protection of drinking water by considering contaminants that have been found in groundwater, surface water, or soil, or have the potential to enter our waters." Statement taken from the MDH CEC webpage ( <a href="https://www.health.state.mn.us/communities/environment/risk/guidance/dwec/index.html">https://www.health.state.mn.us/communities/environment/risk/guidance/dwec/index.html</a> ). MDH can help with any additional rewords as necessary too.	This suggested language has been incorporated into the document.
Jay Riggs	Washington Conservation District (WCA LGU)	4/27/26 (Late comment)	118	Wetland/WCA		<p>Please consider revising language relating to wetland mitigation requirements because the WCA will allow banking remote from the impacts.</p> <p>When mitigation for unavoidable wetland impacts is required, replacement shall be provided in the following order of preference:</p> <ol style="list-style-type: none"> <li>1) within the same subwatershed (HUC 12) or onsite if site conditions are conducive,</li> <li>2) within the same minor watershed (HUC 10),</li> <li>3) within the same major watershed/subbasin (HUC 8),</li> <li>4) within the same major basin (HUC 6), and</li> <li>5) elsewhere consistent with the priorities of Minnesota Rules 8420.</li> </ol>	Draft response under review and will be available by end of day Tuesday.