2050 WATER POLICY PLAN

Public comment summary

January 2025

IMAGINE 2050

the region's plan for an equitable and resilient future

Regional vision

A prosperous, equitable, and resilient region with abundant opportunities for all to live, work, play, and thrive.

Regional core values

Equity | Leadership | Accountability | Stewardship

Regional goals

Our region is equitable and inclusive
Racial inequities and injustices experienced by historically marginalized communities have been eliminated; and all people feel welcome, included, and empowered.

Our communities are healthy and safe
All our region's residents live healthy and rewarding lives with a sense of dignity and wellbeing.

Our region is dynamic and resilient
Our region meets the opportunities and challenges faced by our communities and economy including issues of choice, access, and affordability.

We lead on addressing climate change
We have mitigated greenhouse gas emissions and have adapted to ensure our communities and systems are resilient to climate impacts.

We protect and restore natural systems
We protect, integrate, and restore natural systems to protect habitat and ensure a high quality of life for the people of our region.

Public Comment period

The Metropolitan Council accepted public comments from August 15 through October 7 through various channels, including email, phone, mail, recorded message, an online comment portal, and a public hearing on September 25. During that time, more than 1,200 total comments were received from approximately 500 organizations and individuals. Specifically, the draft Water Policy Plan received approximately 111 comments from 14 cities, four counties, four watershed organizations, three non-governmental organizations, one Metropolitan Council advisory committee, one federal agency, one state agency, one water supplier, and 11 residents of the region.

For individuals who commented on the draft Water Policy Plan and provided voluntary demographic data, the following data are available:

Gender

- 67% identified themselves as men
- 13% as women
- 6% as transgender
- 14% preferred not to answer.

Age

- 18-24: 8%
- 25-34: 38%
- 35-44: 8%
- 45-54: 15%
- 55-64: 15%
- 65-74: 8%
- 75-84: 8%

Summary of feedback

Selected quotes

"This Board strongly supports the fact that the Metropolitan Council is still planning to acquire a site for a water resource recovery facility (WRRF) to provide service to western Scott County and potentially provide relief for the Blue Lake facility. County staff remains committed to working with Metropolitan Council staff on the securement of that site. The Board would encourage the completion of that acquisition sooner than later."

"The Water Policy Plan provides a framework for integrated water planning and management (wastewater, water supply, stormwater, and natural waters) for the region to secure a clean and plentiful water future."

"I think our draft water policy has been very well put together by the all the members on the task force. I am very interested in reviewing what other stakeholders share and how we can incorporate those ideas into the policy. The collaborative approach has been a real game changer in developing this policy. I highly encourage this approach on future policy endeavors."

"Water Sector Workforce Development Policy a. We're very happy to see workforce as an inclusion in the plan. We appreciate the collaborative emphasis and focus on K-12 audiences. One opportunity is mapping industry specific skills and needs."

"The plan includes a water reuse policy, along with several other mentions of reuse. The County supports safe water reuse - reuse that does not further spread any existing contamination."

"Excellent effort to include multiple perspectives and stakeholders into the development of the plan. Dividing the plan by subregion is essential in ensuring there are not "one-size-fits all" policies. The place-based narrative was consistently unique for all subregion plans, highlighting your commitment to an equitable process."

Major themes

- Appreciation for process to create the Water Policy Plan and for the general organization and comprehensive nature of the plan (some comments identified areas for improvement)
- Support for the objectives for the draft Water Policy Plan as identifying the critical areas to guide regional water goals; several agencies provided specific feedback
- Support for simplification (reduction) of the number of state and regional agencies that regulate water quality activities
- Desire for greater discussion of collaboration between government partners
- Greater coordination between conservation districts, watershed organizations, and other local agencies to address best practices, particularly related to agricultural areas
- Concerns about situation in the White Bear Lake area and ways coordination and planning can prevent it in the future
- Concerns about emerging contaminants
- Additional discussions about the roles that private and public entities play in various aspects of water quality, pollution prevention, and water management
- General support for Integrated Water Policy, desire for clarity on how that relates to authorities vested in state agencies
- General support for acknowledgement of climate change adaption and resilience relate to water resources management, including flooding and surface water
- Interest in greater safe water reuse and support for the concept
- General concern when the plan includes language related to water utilities
- Support for plan focus on protecting water quality and reducing stormwater impacts near infrastructure development, particularly riverfront areas
- Support for subregional work; requests for additional resources related to the designated areas and analysis

Note: In the Land Use policy sections of Imagine 2050, many cities provided feedback on their community designations, related density expectations, and how that related to their connections to the wastewater system. Staff will be reviewing those comments collaboratively and will have responses in the coming weeks.

General concerns

- Spreading pollution
- Aquifer depletion
- Lead pipes
- Climate change
- Wastewater reuse
- Contaminants of emerging concern and forever chemicals
- Farming practices

- Integrating one water, climate, and equity implications instead of cost alone
- Water sustainability
- Need for a stronger ecosystem focus
- Minnesota water governance framework and agency collaboration
- Priority Waters List
- Water equity
- Taking on new regulatory authorities
- Making water supply a “system”
- Multiple benefits of resource recovery
- Water affordability
- Aquifer recharge
- Land use density requirements
- Liquid waste drop-off sites
- Sewer Availability Charge program costs and charges

Proposed revisions

Proposed revisions to the 2050 Water Policy Plan fall into three main categories:

1. Minor edits: clarifications, adding fuller definitions, highlighting features of the region, highlighting connections where they exist, and sections that needed additional copy-editing.
2. Revisions from other sections of the plan: several elements of the Water Policy Plan connect to other policy areas and will need clarification and updating. Examples include forecasts, climate and natural systems requirements, affordable housing elements, land use density policy
3. Specific policy updates based on feedback from the public comment process. Those updates are noted in the spreadsheet for the plan.

Selected samples

The following are examples of the ways the Water Policy Plan may be revised in response to a submitted comment. A full list of comments with responses is included in this report.

Comment	Response	Proposed revision
City residents and community members have for decades invested in infrastructure. Our community is currently investing in a new public drinking water well and WWTP expansion. Significant investments in wells, water treatment facilities, the water distribution system, water storage facilities, the wastewater collection system, the wastewater treatment plant, the stormwater collection system, stormwater facilities, and local cost-shares in regional transportation facilities have contributed to the vitality of the metro region. These investments serve not only existing demand but must be designed, financed, and built in a forward-looking manner to accommodate future growth.	Thank you for the comment. Additional language will be considered to strengthen our recognition of the significance of investments by rural communities in the region. State Statute directs the Met Council to determine the compatibility of local comprehensive plans with the plans of other local governments. When incompatibility is found, Met Council plays a convening role to facilitate discussions and cooperation among jurisdictions. The Met Council is aware that growth in Rural Center and Suburban Edge communities often relies on the annexation process and cooperative relationships between communities to ensure	Edits made to documents

These investments are not able to be scaled incrementally and paid in cash to serve a few connections at a time. Rather they must be scaled in large increments, financed by debt issues, and essentially 'bank' on forecast growth to cash flow. It is crucial the Metro Council works with the City to best capitalize on these infrastructure investments and provide for managed growth in rural growth centers. Therefore, we strongly request policy and objective language be added to acknowledge rural growth centers have and will continue to make infrastructure investments that necessarily require orderly, managed growth unconstrained by large lot rural residential clusters and commercial/industrial development patterns in urban expansion areas (i.e. areas for which municipal services have been designed to accommodate).	orderly and economical growth. The Land Use policy chapter (pg. 23) also address these issues to the extent possible. The Met Council also has and will continue to provide technical assistance for rural communities to support the utilization of existing infrastructure.	
The Water Policy Plan identifies working with agricultural landowners to help promote best management practices (i.e., pages 1-32, 1-37). Dakota County recommends the Metropolitan Council work with the soil and water conservation districts, watershed organizations or other local agencies that have established relationships and are a trusted source of information with the agriculture community.	Thank you for your comment. We will revise the text to specifically include the soil and water conservation districts. The Met Council also recognizes the value of the soil and water conservation districts and will be continuing to build our relationships and coordination with them. We agree that they are often the best local partner to reach many landowners especially in agricultural areas.	Water-centered growth policy: d. Work with communities, watersheds, <u>soil and water conservation districts,</u> agricultural landowners and businesses, and agency partners to identify, promote, and assess best management practices, including nature-based stormwater management. Conservation and Sustainability policy: <u>e. Work with soil and water conservation districts, watersheds, or other local organizations that have established relationships and are a trusted source of information within the agricultural community.</u>
Policy 5 and 6, Pages 1-36 - 1-39: Dakota County recommends defining and differentiating between water conservation vs water reuse. The difference between the two may be confusing to the general public.	Thank you for your comment. We will revise the text to specifically define these methods.	Water reuse: Reclaims water from a variety of sources then treats and reuses it for beneficial purposes such as agriculture and irrigation, potable water supplies, groundwater replenishment, industrial processes, and environmental restoration. (US EPA) Water conservation: Any beneficial reduction in water losses, waste, or use. (US EPA)
Within the Local Surface Water Management Plan Elements, consider explicitly including source	Thank you for your comment. Met Council will revise Appendix A of the Water Policy Plan to strongly	Revise Appendix A of the Water Policy Plan from require inclusion of source water protection areas to

water protection areas (surface water and groundwater, municipal and non-municipal). This would fit under element 3 as part of the physical environment and land use and would ideally include a map of these areas their corresponding vulnerabilities.	encourage inclusion of source water protection areas.	strongly encourage inclusion of source water protection areas.

Data from online comment portal

Question: How do you interact with water?

- Drinking water - 95%
- Recreation (swimming, fishing, boating, etc.) – 95%
- Cultural or social activities – 55%
- Other (please specify) – 9%
    - Irrigation
    - Appreciation for the beauty of nature

Question: How satisfied are you with the current work in the region being done on the following topics?

	Highly satisfied	Satisfied	Neutral	Dissatisfied	Highly dissatisfied
Water quality of lakes and rivers	18%	14%	18%	33%	5%
Addressing climate change impacts	24%	24%	24%	33%	0%
Safe/clean drinking water	33%	33%	14%	14%	5%
Water equity (including affordability and access to clean water)	20%	30%	25%	15%	10%

Question: What concerns do you have about water in your community?

I'm concerned about prioritizing car infrastructure over clean water on lakes and rivers. I'm concerned about continued privatization of shorelines and the accompanying degradation of riparian areas. I'm concerned about a lack of beavers in the water systems of the region. I'm concerned about aging dams and the harms they have done to water systems.

The lakes and their cleanliness. Drinking water in some areas are not good. Minneapolis water in my opinion is the best I've had throughout the state. Everywhere else, the water is subpar and now questionable with the Pfas concerns.
Contamination of drinking water and costs for it.
Continued development draining groundwater, and Met Council's insistence on more and more density. The Met Council is beholden to no one.
The continued use of groundwater in the White Bear Lake area is unsustainable. For over a decade nothing substantive has been done to resolve the problems associated with groundwater use. The DNR and the Metro Council need to push for solutions and work to force the municipalities to solve the problems. Local officials are not acting responsibly.
Pollution, especially forever chemicals. Lack of public access to water, especially swimming beaches. Public beaches are nearly always closed outside of core summer, they should always be open for swim at own risk.
I am concerned we are not doing enough to protect natural waterways.

Question: How important do you find each of these water objectives in meeting the regional goal?

	Important	Somewhat important	Neutral	Somewhat unimportant	Not at all important
Climate	67%	33%	0%	0%	0%
Investments	67%	17%	0%	17%	0%
Health	83%	17%	0%	0%	5%
Equity	33%	0%	50%	0%	17%

Question: How would you prioritize Met Council's work in these policy topics?

Tied for 1: Water Sustainability
Tied for 1: Clean and Abundant Water
3: Climate Chage
4: Integrated Water and Land Planning

Question: What actions caused you to rank policies as a higher priority?

Water sustainability and availability is vital to the safety and economic prosperity of our communities.
I think climate change is the number one issue of our time.

Clean and abundant water is something we can successfully implement changes on. To me, it is the lowest hanging fruit in the list of policies which can be more easily regulated, planned for, and policies implemented. I also think that the general public has a better grasp on what this policy might entail so there could be stronger support from the community members.
Water sustainability includes the core function of MCES, to provide efficient, effective and high-quality wastewater services to the Region.

Question: What actions caused you to rank policies as a lower priority?

Responding to and adapting to "climate change" is secondary to your primary reasonability of ensuring we do not run out of or mismanage our current supply of clean drinking water, i.e., water sustainability. We can be as green as we want and work on reducing our carbon emission; however, if our water supply become undrinkable or pumped out of state, what's the point of a few green initiative "feel-good" accolades, if our families have to ration water. Please focus on sustainability and availability.
I think the state already does a great job providing clean water.
I think climate change on our regional level will be realized with successfully implementing my top 3 policies
Planning, while necessary for good works, is not an action that improves the value of water systems.

Question: Based on your high priority topics, is there anything you hope is included as an action or in further detail?

Require local government water planning approval criteria to include equitable, sustainable, cost efficient, long term water and wastewater infrastructure for residents including metering and building permitting consistent with developer plan agreement plans. Assist residents whose water and wastewater infrastructure does not meet the above criteria to transition onto either public or individual private water / wastewater resource systems to ensure long term water utility stability and increase public trust in equitable water planning. Provide funding to residents to correct prior local water planning errors and plan for a sustainable future.
I think organic farming needs to become the only type of farming allowed. This would significancy reduce pesticide and herbicide run off into our waterways.
Reuse of wastewater needs more attention. It is not sustainable to pump aquifer water, use it once, and flush it down the Mississippi losing it for Minnesotans. What have we learned from the East Bethel plant's pumping effluent back into the ground; can more be built efficiently over time? Can we pump captured storm water into some aquifers - without significant pollution issues - to make up for the lost groundwater. Is it practical to incent water intensive businesses to use wastewater effluent? I would like to see an MCES partnership looking at the potential and known impacts / risks (including thermal pollution) of the development of aquifer geothermal heat systems. I would like to see a partnership developed across Minnesota academia, government and

businesses to further water sustainability research here. Minnesota should start and host a "national water lab" (like has been hugely successful in energy research).

Question: Is there anything or any topics about the Met Council's policies that you were surprised to not see listed?

No

I was surprised that very little narrative is included about maintaining (and even improving) the efficiency of the wastewater operations - and the economic and environmental benefits to the Region therefrom.
Related to that it seems like: i) a policy to explicitly mention that wastewater rates on cities shall be based on approximate costs of service and ii) that wastewater fees collected shall not be used for non-wastewater functions...

Topic	Organization	Comment	Action	Response
Groundwater		Concerns about: - spreading of pollutants into and possible depletion of our aquifers	Comment noted	Comment noted. Thank you for raising this concern, which is shared by other stakeholders across the region. The Metro Area Water Supply Plan recognizes the challenge of groundwater pollution and depletion. This reflected in higher level goals and in more detailed subregional action plans that the Met Council is committed to supporting.
Drinking water, Pollutants		Concerns about: - lead pipe contamination of drinking water for some	Comment noted	Comment noted. Thank you for raising this concern, which are shared by other stakeholders across the region. The Metro Area Water Supply Plan recognizes the challenge of lead in water supply infrastructure. This is reflected in higher level goals and in more detailed subregional action plans that the Met Council is committed to continue supporting in our work with other state agencies as appropriate.
Climate		Concerns about: - impacts of climate change on surface waters (and our peoples)	Comment noted	Comment noted. Thank you for raising this concern, which is shared by other stakeholders across the region. The Water Policy Plan which includes the Metro Area Water Supply Plan and the Wastewater System plan as well as our policies and actions around protecting surface and groundwater quality and quantity, recognizes the challenge of climate change. This is reflected in the shared regional climate and natural systems goals, in the Water Policy Plan's climate objective and Climate Change Mitigation, Adaptation, and Resilience Policy, and in more detailed subregional water supply

*If Organization is blank, comment was submitted by an individual.

				action plans that the Met Council is committed to supporting.
Groundwater, Conservation		Groundwater needs to be more responsibly conserved.	Comment noted	Comment noted. Thank you for highlighting the need for groundwater conservation. Met Council will continue to focus on water conservation and efficiency, and both the regional and subregional action plans in the Metro Area Water Supply list the Met Council's commitments in this area.
Integrated Water	SPRWS	Comments related to the Water Policy Plan document. Page 3 – Regional goals and water management strategies, 3rd item "Our Region is dynamic and resilient". Potentially add a 4th bullet point indicating some form of the following: "Facilitate collaboration between communities and water agencies to understand the sustainable limits of groundwater and surface water sources to meet future water demands within subregions of the metro area."	Met Council will revise	Thank you for your comment. The text will be revised to reflect this.
Groundwater appropriation	SPRWS	Comments related to the Water Policy Plan document. Page 1-10, 4th paragraph: Consider the following change. "Similarly, excessive appropriation and use of groundwater sources for *x commercialx* [land development] purposes or agricultural irrigation can impact…." Commercial land use is	Met Council will revise	Thank you for highlighting that groundwater use in rural areas includes more than just commercial and agricultural uses, and that this groundwater use can impact both groundwater and connected surface

		not the only source of groundwater impacts within urban areas.		waters. The text will be revised to reflect this.
	SPRWS	Comments related to the Water Policy Plan document. Page 1-26, 5th paragraph: The term "we" is used interchangeably throughout to document, at times referring to the Met Council, water agencies, water stakeholders, or the general public. Not a critical issue, but something to consider during final proofing of the document.	Met Council will revise	Thank you for your comment. The text will be revised for consistency.
Land Use	SPRWS	Comments related to the Water Policy Plan document. Page 1-30, #2 Water-Centered Growth and Development Policy states. "The effects of land use and population changes on water and water service providers are identified, potential negative outcomes addressed, and past harms repaired." If the statement "past harms repaired" is included in the Water Policy Plan, there may be an obligation for the document to define the extent that past harms are required to be repaired by a community or water service provider(s), which agency determines the extent of "past harms", who may assume the cost to repair past harms caused by regional water practices, and the consequences to an individual community or water service provider if they fail to fully repair past harms. Perhaps the existing policy text could be modified to indicate past harms will be evaluated and mitigated.	Met Council will revise	Thank you for your comment. The text will be revised to reflect this.

Land Use, Water Supply	SPRWS	Comments related to the Water Policy Plan document. Page 1-31, Policy #2, Desired Outcomes, 2nd bullet point. "Growth is prioritized where multiple source water supplies are feasible and where existing infrastructure can accommodate growth." The goal of limiting growth to locations having multiple source water supplies should be further defined. Is this interpreted as a goal that growth should primarily occur in areas having both groundwater and surface water sources, sources from multiple jurisdictions, multiple treatment plants, or different aquifers to meet water supply demands? Suggest striking "multiple source water supplies are feasible" or indicate a general desire to consider multiple source water supplies during the planning process.	Met Council will revise	Thank you for your comment. We will revise the referenced text to remove reference to multiple source water supplies. We will also revise the policy actions to include partnering with others to develop water supply constraint and availabiltiy criteria, to inform future growth planning. We will also consider how to include information about where water additional or multiple supplies are most feasible in future updates of the Water Supply Planning Atlas.
Sustainability, Conservation	SPRWS	Comments related to the Water Policy Plan document. Page 1-37, #5, Conservation and Sustainability Policy, Desired Outcomes, 6th (last) bullet. Consider substituting "available" or "existing" for the term "original" within the sentence, "Agency priorities, management, and regulatory strategies are aligned and support local plans for land use and related water demand that is consistent with currently available design capacity for water infrastructure."	Met Council will revise	Comment noted. The text will be revised.

Integrated Water, Water Supply	SPRWS	Comments related to the Water Policy Plan document. Page 1-42, #8 Water Monitoring, Data, and Assessment Policy. There is a significant need for more collaboration and coordination between state agencies, water providers and cities in the metro area to monitor and discuss long-term projections for the available quantity of source water, including groundwater and surface water sources, and the long-term projections for overall water demand within subregions of the metro area. While these discussions are now occurring in the east metro, the Met Council could serve an important role to facilitate these discussions throughout the region before source water availability become an acute problem and growth and economic development is disrupted. Leadership from a regional or state agency level is needed to guide collaborative discussion and data sharing for these large-scale issues. Perhaps the Actions/Plan section of policy #8 could be expanded to more directly describe the important work that Met Council has initiated in this area and information contained within Appendix G.	Met Council will revise	Comment noted. Text will be revised to further describe the work in this area.
Reuse, Water Supply, Wastewater		Reuse of wastewater needs more attention. It is not sustainable to pump aquifer water, use it once, and flush it down the Mississippi losing it for Minnesotans. What have we learned from the East Bethel plants pumping effluent back into the ground; can more be built efficiently over time? Can we pump captured storm water into some aquifers - without significant pollution issues - to make up for the lost groundwater. Is it practical to incent water intensive businesses to use wastewater effluent?	Comment noted	Thank you for this comment. The Met Council is investigating ways to utilize our existing infrastructure and facilities to recover and reuse wastewater for internal and external uses. We are excited to pursue innovative methods in a cost-efficient way so that we can maximize our water use sustainably. As noted, we have some lessons learned from our previous efforts and are working with state agencies and local partners to identify new opportunities. The Water Policy Plan commits the Met Council to continue this work through our Water Reuse Policy.

Reuse, Wastewater		I was surprised that very little narrative is included about maintaining (and even improving) the efficiency of the wastewater operations - and the economic and environmental benefits to the Region therefrom. Related to that it seems like: i) a policy to explicitly mention that wastewater rates on cities shall be based on approximate costs of service and ii) that wastewater fees collected shall not be used for non-wastewater functions...	Met Council will revise	Thank you for your comment. Environmental Services strives to continually improve efficiency at all of our facilities, seeking solutions that will improve environmental and public health outcomes while reducing energy use and operational costs. With regard to rate setting, the Policy Plan directs readers to the Waste Discharge Rules where that topic is addressed in more detail
Pollution Prevention		I would like to see an MCES partnership looking at the potential and known impacts / risks (including thermal pollution) of the development of aquifer geothermal heat systems.	Comment noted	Thank you for your comment. The Minnesota Department of Health is responsible for the regulation of these systems and the Council will follow their guidance on management of these systems as we support local communities in their efforts to sustainably develop and manage water resources.
Climate, Conservation	Dakota County	No, I think the plan has it covered	Comment noted	Thank you for your comment
Drinking water		The former Jonathan, just outside Chaska, MN, was the best solution - Minnesota is not a squashed metro area - villages should be constructed near work, schools, recreation, and retail spaces - mega shopping centers and stores damage our area - old structures, poorly built, after WWI and WWII should be removed - energy efficient structures built - safe clean potable water and underground utilities are more important than roads - Fiber Optics should mandatory for all areas - transportation between business districts in the metro area should be built as downtowns shrink	Comment noted	

Conservation	The continued use of groundwater in the White Bear Lake area is unsustainable. For over a decade nothing substantive has been done to resolve the problems associated with groundwater use. The DNR and the Metro Council need to push for solutions and work to force the municipalities to solve the problems. Local officials are not acting responsibly.	Comment noted	Comment noted. Thank you for highlighting an area of the metro region where water supply planning resources need to be focused. This area is being studied in response to legislative action from the 2023 legislative session. The Met Council in partnership with a defined working group is developing a comprehensive plan to ensure communities in the White Bear Lake Area have access to safe and sufficient drinking water to allow for municipal growth while simultaneously ensuring the sustainability of surface water and groundwater resources to supply the needs of future generations.
Pollution Prevention, Monitoring	Pollution, especially forever chemicals. Lack of public access to water, especially swimming beaches. Public beaches are nearly always closed outside of core summer, they should always be open for swim at own risk.	Comment noted	Thank you for your comment. The Met Council is continuing to work with its Federal, State, and local partners to address pollutants including forever chemicals. The Minnesota Department of Health has established recommended water quality criteria for swimming and wading and beach closures often take place to reduce the risk of people getting sick when bacterial levels exceed those limits.

Monitoring	-	I am concerned we are not doing enough to protect natural waterways.	Comment noted	Comment noted. Thank you for raising this concern, which are shared by other stakeholders across the region. The Water Policy Plan which includes the Metro Area Water Supply Plan and the Wastewater System plan as well as our policies and actions around protecting surface and groundwater quality and quantity, recognizes the challenges for water planning and protection. This is reflected in the shared regional natural systems goal, in the Water Policy Plan's climate and health objectives and several of our policies that the Met Council is committed to supporting.
Climate, Conservation	-	I think organic farming needs to become the only type of farming allowed. This would significancy reduce pesticide and herbicide run off into our waterways.	Comment noted	Thank you for your comment.
Pollution Prevention	-	Lead and contaminants from agriculture, medicines, permanent chemicals and micro-plastics.	Comment noted	Thank you for your comment. These concerns are shared by other stakeholders across the region. The Water Policy Plan which includes the Metro Area Water Supply Plan and the Wastewater System plan as well as our policies and actions around protecting surface and groundwater quality, recognizes the challenge of environmental pollution. This is reflected in the shared regional healthy and safe goal, in the Water Policy Plan's health objective and Pollution Prevention and Contaminant Management Policy, and in more detailed subregional water supply action plans that the Met Council is committed to supporting.

Land Use	Belle Plaine	City residents and community members have for decades invested in infrastructure. Our community is currently investing in a new public drinking water well and WWTP expansion. Significant investments in wells, water treatment facilities, the water distribution system, water storage facilities, the wastewater collection system, the wastewater treatment plant, the stormwater collection system, stormwater facilities, and local cost-shares in regional transportation facilities have contributed to the vitality of the metro region. These investments serve not only existing demand but must be designed, financed, and built in a forward-looking manner to accommodate future growth. These investments are not able to be scaled incrementally and paid in cash to serve a few connections at a time. Rather they must be scaled in large increments, financed by debt issues, and essentially 'bank' on forecast growth to cash flow. It is crucial the Metro Council works with the City to best capitalize on these infrastructure investments and provide for managed growth in rural growth centers. Therefore, we strongly request policy and objective language be added to acknowledge rural growth centers have and will continue to make infrastructure investments that necessarily require orderly, managed growth unconstrained by large lot rural residential clusters and commercial/industrial development patterns in urban expansion areas (i.e. areas for which municipal services have been designed to accommodate).	Met Council will revise	Thank you for the comment. Additional language will be considered to strengthen our recognition of the significance of investments by rural communities in the region. State Statute directs the Met Council to determine the compatibility of local comprehensive plans with the plans of other local governments. When incompatibility is found, Met Council plays a convening role to facilitate discussions and cooperation among jurisdictions." The Met Council is aware that growth in Rural Center and Suburban Edge communities often relies on the annexation process and cooperative relationships between communities to ensure orderly and economical growth. The Land Use policy chapter (pg. 23) also address these issues to the extent possible. The Met Council also has and will continue to provide technical assistance for rural communities to support the utilization of existing infrastructure.

Land Use, System Plan	Inver Grove Heights	New Connections to Regional Sewer System (Objective 1, Policy 2, Action 2) In addition to its increased density expectation, the System Statement discusses various policy approaches to implement density requirements, including requiring new connections to the regional system to meet minimum density requirements. If the focus of any minimum density requirement is based on the average net density in development areas, then the potential policy of requiring all "new connections" to meet that minimum density is likely in conflict with average net density. For example: Assuming a minimum average net density of 4.0 units per acre is adopted, a new individual, single-family residential development with a proposed density of 3.0 units per net acre would not be authorized to connect as that development, and resulting "new connections," would not comply with the minimum required, even if that Low Density Residential land use is part of area average calculation for minimum density. The assumption of this example is that Low Density Residential area, and related density range, is part of an adopted Comprehensive Plan and within the MUSA. City Response: The Metropolitan Council is asked to clarify the intent of the "new connections" policy and its relationship to individual developments and the minimum average net density. The City would object to this policy if the intent is as described in the example above, whereby every new, individual development would need to meet the adopted minimum average net residential density.	Comment noted	Thank you for the comment. Many approaches were analyzed during the policy development process, one of which was requiring new connections to the regional system to meet minimum density requirements. However, after discussions with local governments and policymakers, this approach was not recommended and is not included in Imagine 2050 policies. The Met Council will continue to apply density requirements using a community-wide average net residential density calculation. Minimum density requirements apply to all areas that the City is planning to accommodate their forecasted growth. For example, an apartment complex with a higher density can balance out a single-family residential development with lower density so long as the average across the city within the planning decade is at least the minimum requirement for the community. This allows local governments to plan for a diversity of housing types across their community.

Water Supply	Inver Grove Heights	Metro Area Water Supply Plan The Metro Area Water Supply Plan policy statement identifies a framework for sustainable long-term water supply planning based on local control and responsibility for water supply systems (Pg. 3-70). The City of Inver Grove Heights supports local control over water supply planning. As an operator of an independent public water system, the City complies with all appropriations permitting and regulatory requirements for groundwater systems, including implementation of local controls for water supply management and protection, as regulated through the Minnesota Department of Natural Resources. City Response: The City supports a reduction in the number of State and regional agencies that regulate municipal activities related to both water quality (storm water) and water supply (groundwater).	Comment noted	Thank you for your comment. Met Council will continue to recognize the responsibility and authority of local water suppliers to provide water. A regional perspective is also important, because the effects of local water supply decisions do not stop at community boundaries. Metropolitan Council's role regarding water supply is to support regional planning including technical work to provide a base of technical information for sound decision-making, and to provide local planning and plan implementation assistance. The Met Council is not a water supply utility nor a regulator. The Met Council's water supply planning work is guided by the Metro Area Water Supply Plan, which provides a framework for water supply planning at the regional and local level in a way that supports local control and responsibility for water supply systems; is developed in cooperation and consultation with local, regional, and state partners; and highlights the benefits of integrated planning for stormwater, wastewater, and water supply.

System Plan	Inver Grove Heights	Wastewater System Plan The Wastewater System Plan policy statement discusses existing capacity, system growth and ongoing/future investment, yet makes no mention of the Metropolitan Urban Service Area (MUSA). While MUSA is referenced and discussed in the Land Use System Statement, this boundary is not discussed or depicted within the Wastewater System Plan. There are also no maps or diagrams of the current and/or future/proposed MUSA boundary. The MUSA boundary has been a guiding tenant for wastewater planning with previous system statements and resulting comprehensive plan updates. City Response: The Metropolitan Council is asked to clarify the change in and recommended new approach to wastewater and land use planning if the Metropolitan Council and cities are to no longer plan based on the MUSA boundary.	Met Council will revise	Thank you for your comment. Language to better describe the Metropolitan Urban Service Area (MUSA) has been added to the Wastewater System Plan. No change in the approach for wastewater planning is recommended in policy. The Wastewater System Plan contains the Long-Term Service Area which is an illustration of areas that can be served based on the capacity of existing water resource recovery facility sites. The MUSA represents the areas that already have regional wastewater service or are planned to receive service within the planning horizon. The current MUSA represents the areas agreed upon and authorized through the 2040 comprehensive planning cycle. through the 2050 comprehensive planning cycle, the Council will continue to work with communities to refine those areas to accommodate regional and local growth projections.

Priority Waters, Pollution Prevention	Dakota County	The Water Policy Plan places emphasis on utilizing the Priority Waters List for decision making throughout the plan. The Priority Waters List does not have substantial influence over local protection or enhancement efforts. Local efforts are guided more by Total Maximum Daily Load (TMDL) requirements, restoration plans, or other local plans and studies. Dakota County recommends the Metropolitan Council utilize TMDL, restoration plans, and local water plans and studies for prioritizing efforts.	Comment noted	Thank you for this comment. The Priority Waters List is intended to help the Met Council direct its funding and monitoring efforts at the regional scale. We acknowledge that other factors and information play a role in defining local prioritization which are strongly tied to water quality characteristics. The Priority Waters List is intended to complement the current way many other organizations allocate resources. The Met Council believes paring the Priority Waters List with waterbody impairment status will encourage more holistic water resources management in the region. Additionally, the Priority Waters List focuses on waterbodies deemed regionally significant. Regional significance was determined using regional scale datasets. Just because a waterbody is not on the Priority Waters List does not mean it does not have value. That waterbody may still be a priority for an individual city or local organization.
Conservation, Pollution Prevention	Dakota County	The Water Policy Plan identifies working with agricultural landowners to help promote best management practices (i.e., pages 1-32, 1-37). Dakota County recommends the Metropolitan Council work with the soil and water conservation districts, watershed organizations or other local agencies that have established relationships and are a trusted source of information with the agriculture community.	Met Council will revise	Thank you for your comment. We will revise the text to specifically include the soil and water conservation districts. The Met Council also recognizes the value of the soil and water conservation districts and will be continuing to build our relationships and coordination with them. We agree that they are often the best local partner to reach many landowners especially in agricultural areas.

Water Supply	Dakota County	When considering tools and resources to better understand pressures on and interconnections between water resources, it is important for local governments to have water supply sustainability targets for regional planning to prevent issues that occurred in White Bear Lake from occurring elsewhere. The state agencies or Metropolitan Council should update groundwater models to help identify regional sustainability targets for development planning. (Policy 2, page 1-32 - 1-33; and Policy 5 page 1-37)	Comment noted	Thank you for your comment. Met Council will revise the regional action work plan item to develop, track and report on measures to include developing benchmarks or targets as well. Met Council will continue to support regional modeling, and the regional action plan discussion of groundwater modeling will be revised to include both regional and subregional groundwater modeling to support sustainable decision-making.
Pollution Prevention, Wastewater	Dakota County	Wastewater System Plan, PFAS, PFOS, PFOA Section, page 2-67: The Metropolitan Council appears to be reactionary vs proactive in addressing PFAS in wastewater discharge and biosolids and only proposes to address concerns if regulation is proposed and adopted. PFAS contamination is a growing concern in the metropolitan region. The Metropolitan Council has a responsibility to support reduction of PFAS sources to the environment, even if there is not a current state or federal requirement. Dakota County recommends the Metropolitan Council identify within the Wastewater System Plan what is currently being completed to reduce PFAS in waste streams and identify PFAS reduction goals based on reasonably anticipated future regulations. For example, the Metropolitan Council can support its partnering state agencies in identifying ways to reduce these inputs upstream where possible and applicable.	Met Council will revise	Thank you for your comment. Environmental Services is actively supporting source reduction efforts, is involved in PFAS research, and works in collaboration with state agencies on PFAS efforts. Environmental Services recently launched a webpage describing our latest efforts in source reduction. More information can be found at this link: https://metrocouncil.org/Wastewater-Water/Services/Industrial-Waste/PFAS.aspx
Private Wells	Dakota County	Partners' roles and relationships, Page 1-24: The paragraph at the top of the page states that "... private well owners plan, partner, and implement water projects at the local scale." Individual private well owners do not typically implement water projects and this section appears to be treating all private well owners as a local water organization. Dakota County recommends removing private well owners from this list since not included in Table 1.3 or clarify this as large water	Met Council will revise	Thank you for your comment clarifying the role of private well owners. The text will be revised to "... operators of high-capacity, nonminicipal wells plan, partner, and implement water projects at the local scale."

		users such as industrial, or non-community (non-municipal) wells.		
Conservation, Water Reuse	Dakota County	Policy 5 and 6, Pages 1-36 - 1-39: Dakota County recommends defining and differentiating between water conservation vs water reuse. The difference between the two may be confusing to the general public.	Met Council will revise	Thank you for your comment. We will revise the text to specifically define these methods.
Integrated Water	Forest Lake	The City is strongly in support the goal that "water planning, management and operations are collaborative..."of Policy 1: Integrated Water Policy. That said, the City is not in support of the entirety of the Integrated Water Policy action to: • Plan: 1. Provide local surface water, water supply, and wastewater plan timing, requirements, and guidance to align state, regional, and local efforts in water planning, management, and development decisions. Nor is the City in support of the following actions identified in Policy 7: Pollution Prevention and Contaminant Management Policy • Partner: 1. Develop potential water quality standards with stakeholder groups, state agencies, local utility organizations, researchers, and regional water professionals. • Partner: 9. Partner with local public works and city planners to ensure stormwater infrastructure helps protect and enhance receiving waterbody quality. The City recognizes the Council's desire to be a part of an integrated water policy and we commend this goal. The City further appreciates the role the Council may be able to play in encouraging an integrated regional water policy that addresses drinking and surface water, in addition to wastewater. However, it appears the current statutory authority is only granted to other state agencies to establish, manage and enforce water regulations. The Council is limited to being a recommending body. The field of water regulators is	Met Council will revise	Thank you for your comment. We agree. The Met Council does not have the authority to create new statutes, rules, or water quality standards, but we do have a role in the development of these new statutes and standards to represent the needs of metro area residents and stakeholder groups. We will modify the language to better reflect our intention to support the organizations that have the authority to make these decisions.

		already robust, and the City of Forest Lake expresses its concern that the creation of an additional regulatory layer via the Council would create a significant undue burden on local governments.		
	Vermillion River Watershed JPO	Policy 10, page 1-47: The intent of Partner Action "h" is unclear. Please provide clarification on this action, to include what is meant by "strength".	Met Council will revise	Text will be edited for clarification
Wastewater	Vermillion River Watershed JPO	Wastewater System Plan, Table 2.2, page 2-54: The Hampton wastewater treatment plan discharges to the South Branch Vermillion River, not the Vermillion River as identified in the Plan.	Met Council will revise	Thank you for your comment. Correction made.
Ecosystem, Infrastructure		I'm concerned about prioritizing car infrastructure over clean water on lakes and rivers. I'm concerned about continued privatization of shorelines and the accompanying degradation of riparian areas. I'm concerned about a lack of beavers in the	Comment noted	Thank you for your comment. We recognize the value of ecosystem services and one of our overarching management strategies is to protect and restore natural systems.

		water systems of the region. I'm concerned about aging dams and the harms they have done to water systems.		
	City of Edina	Pg 86/95 Text "This subregion is also home to a number of natural features that serve important social, cultural, and economic functions, including the Minnesota and Crow Rivers, Lake Minnetonka, Minnehaha Creek, and other streams and wetlands." Check the Crow river, I thought that was more northwesterly.	Comment noted	Thank you for your detailed review of the text. While the North Fork of the Crow River is north of the West Metro subregion, the South Fork of the Crow River flows through the western part of the area including the City of Watertown.
Water Supply	City of Edina	Page 89/95, water conservation section "There will be regional watering restrictions." I expressed a more nuisance view, that water restrictions and other elements of the drought plan should be based on the resource. Right now we trigger water restrictions based on Mississippi flow that has nothing to do with the groundwater trends. We should be more specific to the resource we draw from. The regional nature of this comment would be more about a shared message between suppliers, broken down by water supply, for the metro area.	Met Council will revise	Thank you for your comment. Met Council will revise the introductory text of the West Metro subregional action plan to "Triggers, outreach, and actions for drought response will be developed and implemented across the region, taking into consideration different water sources and users". Additionally, an additional bullet will be added, "Communications about restrictions will be improved so that suppliers and users understand water restrictions."
Water Supply	City of Edina	Page 89,90/96 Meeting demand section "Cities will not have to be the heavy hand, because residents will make better choices." This language may be better as part of an outreach/education section, if there is one in the west metro.	Met Council will revise	Thank you for your comment. Met Council will revise the west metro subregional chapter to move this action into an outreach/education section.
Equity	City of Minneapolis	General Comment: Is the term "equity" or "equitably" being used consistently throughout this policy plan. There are instances where it meets the traditional definition of equity and other instances where equal or equally seems to be meant.	Met Council will revise	Thank you for your comment. We will revise the text for consistency.

Water Supply, Integrated Water	Washington County	Washington County prioritizes water as one of its most valuable resources and appreciates the opportunity to comment on the Water Policy Plan. The county relies solely on groundwater for drinking water and is home to many high-quality lakes and streams that depend on clean and plentiful groundwater. It also shares the border of the federally designated 'Wild and Scenic River' the St. Croix River, as well as the Mississippi River. The county has a Groundwater Plan, currently in the process of being updated, that helps the county coordinate and partner to protect this resource.	Comment noted	Thank you for your comment
Roles	Washington County	Suggest adding "county commissioners appoint watershed managers" to list of county's example water responsibilities listed in Table 1.3 (pg. 1-24).	Comment noted	Thank you for your comment. The table is not intended to be an exhaustive list and only represents some of the responsibilities as noted by 'Example Water Responsibilities'.
Water Reuse, Pollution Prevention	Washington County	The plan includes a water reuse policy, along with several other mentions of reuse. The County supports safe water reuse - reuse that does not further spread any existing contamination.	Comment noted	Thank you for your comment and support of safe ways for reusing water.
Climate	Washington County	The county commends the Council for acknowledging climate change adaption and resilience with respect to water resources management, particularly the role flooding will have on communities and residents. The county appreciates past (and continued) work by the Council to provide technical information and resources on impacts from flooding.	Comment noted	Thank you for your comment
AIS	Washington County	The Council mentions Aquatic Invasive Species as a potential "concern" that contributes to surface water contamination issues. The county would ask the Council to consider how AIS work in the future may impact water quality and what the Council's role might be, if any.	Comment noted	Thank you for your comment. The Minnesota Department of Natural Resources will remain the lead agency on aquatic invasive species. The Met Council will continue to support the DNR's work in this area through reporting of identified aquatic invasive species while conducting water quality monitoring.

Groundwater, Integrated Water	Washington County	There are many actions identified in the Water Policy Plan which are similar to actions identified in Washington County's draft Groundwater Plan. The county would like to ensure that efforts are not being duplicated, and that clear roles/potential partnerships are identified within our jurisdiction. Washington County can provide comments on opportunities to partner based on the draft Groundwater Plan if desired.	Met Council will revise	Thank you for your comment and support to align the Metro Area Water Supply plan with the Washington County draft Groundwater Plan. We will revise the East and Northeast subregional action plans to acknowlegde Washington County's role in groundwater management as well as to identify a role for Washington County on tasks related to the county's Groundwater Plan.
Water Supply	Washington County	The Council should consider consistency and more clarity around "possible involved parties" column in subregional action plans. Definitions will be necessary for implementation. For example, there is no definition of local in this context. It is unclear who is responsible for these actions when no one is listed.	Met Council will revise	Thank you for your comment. Met Council will review and revise as needed the definitions of local and local control in section 5 of the Water Policy Plan, and ensure those terms are used consistently across the Water Policy Plan and Metro Area Water Supply Plan (including subregional action plans). Met Council will also revise subregional chapters to include an early task to define roles for all prioritized actions as part of subregional engagement and plan implementation.
Water Supply, Pollution Prevention	Washington County	The county appreciates the Council's inclusion and recognition of per and poly fluoro alkyl substances (PFAS) in their Policy Plan and related documents. The county would encourage the Council to acknowledge the challenges and time lines water suppliers will face in implementing changes to federal rules around drinking water, as it relates to drinking water supply, with the new federal Maximum Contaminant Level for PFAS in drinking water at 4 parts per trillion for PFOA and PFOS.	Met Council will revise	Thank you for your comment. The Met Council will revise the discussion of the Pollution Prevention and Contaminant Management Policy to include acknowledgement of the challenges and timelines that water utilities face in implementing changes to federal rules.

Pollution Prevention	Washington County	The county encourages the Council to include maps or additional information that show the extent of PFAS contamination in the metro.	Comment noted	Thank you for you comment. We appreciate the recommendation to promote understanding about the extent of PFAS and other contamination in the metro region. Because water contamination information is updated much more frequently than the decadal update of the regional Water Policy Plan, Met Council will work to provide and promote links to this information in our local planning assistance programming such as the Local Planning Handbook.
Water Supply, Subregional Engagement	Washington County	Add the corresponding subregion name into the heading of the subregional action plans.	Met Council will revise	Thank you for your comment. Met Council will revise the format of the subregional action plans to include the subregion name in the heading of each plan.
Pollution Prevention	Washington County	The county is supportive of identifying permanent funding options being provided for privately owned wells and septic system repair and replacement, including treatment of PFAS and other contaminants.	Met Council will revise	Thank you for your comment. Met Council will revise the regional action plan to recognize MDH efforts to support the repair and replacement of privately-owned wells and to support collaboration with Clean Water Council and others to efficiently and consistently promote resources for this work region-wide. Met Council will revise the east and northeast subregional action plans to identify a role for Washington County on tasks related to funding of privately owned wells and septic system repair and replacement. Met Council water supply planning staff will work with land use policy staff to coordinate responses, because there may be a connection to housing and development programs for funding.

Wastewater	Washington County	Comprehensive Sewer Plan Update Review Requirements: Washington County encourages the Metropolitan Council and the Minnesota Pollution Control Agency to coordinate closely with LG Us with respect to planning and development of decentralized wastewater treatment systems.	Comment noted	Thank you for your comment. We are exploring many alternatives for the future of the regional wastewater treatment systems and commit to engaging state and local governments in this exploration.
SSTS	Washington County	Comprehensive Sewer Plan Update Review Requirements: Metropolitan Council should serve in a coordinating role between all SSTS permitting agencies (LGUs) and state agencies.	Comment noted	Thank you for your comment. The Council does require all communites to include information in their comprehensive plans about who manages their SSTS. We also work with the state agencies on SSTS rule updates.
SSTS	Washington County	Comprehensive Sewer Plan Update Review Requirements: Requirements for Areas Served by Private Communal Treatment System (pg. 6-174) – Management requirements for all subsurface sewage treatment systems with pretreatment should include periodic sampling and laboratory analysis by credentialed professionals to ensure they are meeting design standards and are compliant with their operating permits.	Comment noted	Thank you for your comments. The Council works closely with the PCA on the requirements related to SSTS. One of those requirements is to ensure that all SSTS are inspected and or pumped every 3 years.
Integrated Water		I think our draft water policy has been very well put together by the all the members on the task force. I am very interested in reviewing what other stakeholders share and how we can incorporate those ideas into the policy. The collaborative approach has been a real game changer in develpoing this policy. I highly encourage this approach on future policy endeavors.	Comment noted	Thank you for your comment
Water Supply	City of Richfield	Page 1-16 shows a well with contamination above health-based values (HBVs) in the Eastern part of Richfield. It's unclear what well this is referring to. The map is low resolution, but it does not appear to match our municipal well locations (which to the best of my knowledge do not have contamination above HBVs). Would like information on what this is.	Met Council will revise	Thank you for your comment. Information about wells with contamination above health-based guidance, shown in Figure 1-4, was from the MPCA Groundwater Contamination Atlas. Figure 1-4 has been revised to include data sources.

Water Supply, Pollution Prevention	City of Richfield	Page 2-68 inaccurately states that there are no human health PFAS water quality criteria at the federal level. EPA announced final National Primary Drinking Water Regulation (NPDWR) for six PFAS compounds on April 10, 2024. If the plan is referring to surface/wastewater specifically, that should be clarified.	Met Council will revise	Thank you for this comment. We will revise the plan.
Water Supply, Subregional Engagement	City of Richfield	On page 3-104, in the list of planning and implementation activities for the central planning area should include development and completion of the West metro multi-community wellhead protection plan from 2025-2030. This process is already underway. This could also go on page 3-162 for the West Metro subregional plan.	Met Council will revise	Thank you for your comment. Met Council will revise the central and west subregional chapters to include development and completion of the west metro multi-community wellhead protection plan from 2025-2030, which is already underway.
Water Supply	City of Richfield	Also on page 3-104, the objective of "Work with the legislature to take pressure of metro to grow by encouraging growth in regional centers: Mankato, Moorhead, Duluth, Rochester, Worthington, etc." seems out of place in this area of the plan for a multitude of reasons. The Met Council plans for the Twin Cities metro area, not the rest of the state. This also neglects the groundwater supply issues present in greater Minnesota, and the fact that water usage per capita is lower in urban core than in less dense areas.	Comment noted	Comment noted. The wording in the subregional chapters of the Metro Area Water Supply Plan was drafted by local stakeholders; the wording reflects local perspectives, not the Met Council. We will review the wording in this section to make sure it is clear that statements in this section are statements received from stakeholders as part of the subreginal group discussions that provided the content for this section.
Water Supply	City of Richfield	Page 3-146 includes a bullet point noting "Cities shy away from Met Council trying to regionalize water supply, but there may be value to that". This is a drastic change in the way water utilities currently work that is mentioned nowhere else in the plan. If this is something the Met Council is seriously considering at any point in the future, they will need to engage with cities and explain what exactly they aim to do.	Comment noted	Thank you for your comment. The wording in subregional chapters reflects what stakeholders shared as chapters were drafted; the wording reflects local perspectives, not the Met Council.

Water Supply	City of Richfield	Pages 3-146-3-149 are poorly written. Reads more like notes or brainstorming ideas than a finished plan.	Met Council will revise	The wording in subregional chapters reflects what stakeholders shared as chapters were drafted; the wording reflects local perspectives, not the Met Council. To improve clarity, Met Council will revise the southwest subregional action plan section 'Prioritized focus areas and draft action plan' to move the barriers into the 'issues and opportunities' section above and move the roles into table 3.8.
Pollution Prevention	City of Richfield	We commend the emphasis on chloride, PFAS, and other contaminants of emerging concern from a holistic water management perspective. This is an issue that will only grow as we learn more and requires a coordinated regional approach.	Comment noted	Thank you for your comment
Wastewater	Scott County	It is noted that the Metropolitan Council now refers to wastewater treatment plants (WWTP) as Water Resource Recovery Facilities (WWRF).	Comment noted	Comment noted
Wastewater	Scott County	This Board strongly supports the fact that the Metropolitan Council is still planning to acquire a site for a water resource recovery facility (WRRF) to provide service to western Scott County and potentially provide relief for the Blue Lake facility. County staff remains committed to working with Metropolitan Council staff on the securement of that site. The Board would encourage the completion of that acquisition sooner than later.	Comment noted	Thank you for your support. We are continuing efforts to identify and acquire a site for a future water resource recovery facility and will continue to keep the county informed and engaged in this process.
Wastewater	Scott County	It is noted that the 2050 Regional Wastewater System Long-Term Service Areas (LTSA) map continues to identify a future WRRF search area between Jordan and Shakopee along the Minnesota River, continues to designate much of western and central Scott County as a long-term service area, and continues to designate "Scott Co. Rural Center Expansion" areas around Jordan and Belle Plaine.	Comment noted	Acknowledged. The comment is consistent with the regional wastewater system plan.

Local Surface Water Management Plan	Minnehaha Creek Watershed District	I recommend that the Met Council consider the following additions or revisions to the suggested local surface water management plan elements under Appendix A, pages 6-168 and 169: Proposed addition: Evaluate opportunities to improve integration of land use and water planning across city departments.	Comment noted	Thank you for your comment. We will include this as a best practice in our Local Planning Handbook.
Local Surface Water Management Plan	Minnehaha Creek Watershed District	I recommend that the Met Council consider the following additions or revisions to the suggested local surface water management plan elements under Appendix A, pages 6-168 and 169: Proposed addition: Consider development of a flood mitigation strategy, including identification of flood-prone areas and potential storage opportunities to reduce flood risk.	Comment noted	Thank you for the comment. The WPP does encourage climate resiliency and mitigation strategies to be developed by each community to meet their individual needs.
Local Surface Water Management Plan	Minnehaha Creek Watershed District	I recommend that the Met Council consider the following additions or revisions to the suggested local surface water management plan elements under Appendix A, pages 6-168 and 169: Consider revising item g. to "…NOAA Atlas 14, or the most current version available…" since Atlas 15 is currently in development.	Met Council will revise	Thank you for the comment. The text will be revised to suggest Atlas 14 or the most current version available.
Wastewater	City of Hastings	Historic planning for wastewater treatment has been to relocate the existing Hastings WWTP to a new location within Hastings. Due to "new environmental regulations and regional treatment goals" this has now changed. We believe the 2050 Plan should document this new approach by setting goals, committing to a schedule, and scope to plan this new future. Hastings is left in a state of unknown in their project planning, development commitments, and comprehensive planning efforts until MCES can provide an updated vision. Opportunities for synergy will come and go with major projects scheduled with MnDOT (2027 construction) and Dakota County (2029 construction) if MCES planning efforts delay. This causes cost increases for rate payers and missed opportunity. We respectfully request the Regional Planning	Comment noted	Metropolitan Council is continuing to evaluate regional wastewater service scenarios for Hastings. A decision has not been made on a revised approach to service for Hastings. Environmental Services staff are committed to working with the City to advance our decision making as quickly as possible and to find opportunities for collaboration.

		Study for the Hastings area be prioritized and a commitment to a timely solution be memorialized in the Imagine 2050 Water Policy Plan.		
Pollution Prevention, Water Supply	City of Hastings	PFAS is an emerging contaminant that is crippling the City of Hastings with financial burden and time commitment. Removal of PFAS from our drinking water is the number one priority of the Hastings City Council. Safe clean drinking water below federal MCL's should be a commitment by all State Agencies to our public. Unaffordable water rates to residents, staggering costs for existing business survival, and a deterrent for new growth and development are not the goals of Imagine 2050 and strong communities. We believe the Imagine 2050 Plan should include commitments to addressing this legacy contamination in our region. This should include but not be limited to wastewater discharge, biosolids, and associated groundwater/surface water remediation within MCES control and impact. Imagine 2050 should align and commit resources to a shared goal of upstream treatment or other appropriate mitigation strategies for these impacted areas. This will need to include testing, study, and analysis in coordination with other State Agencies to identify feasible solutions. Those solutions will need to get incorporated into plans and result in action, rather than avoiding the problem and waiting for regulation to be set in the future to mandate a response. The Met Council should be part of the development of a solution to this region-wide contamination issue in our environment. We request the Wastewater System Plan acknowledge the PFAS initiative outlined above.	Met Council will revise	Thank you for your comment. We will revise the Metro Area Water Supply Plan's regional water supply action plan so that the mitigation measure evaluation actions include evaluation of the feasibility and effectiveness of a range of upstream mitigation options for PFAS and/or other emerging contaminants in water supply sources. Environmental Services is currently working with state agencies and researchers on this issue from the wastewater perspective. More information about our latest efforts to monitor and reduce PFAS in the wastewater system has been added to the Wastewater System Plan. Environmental Services is beginning to focus on source identification and reduction of PFAS in the Blue Lake Water Resource Recovery Facility service area and will expand to other service areas. Environmental Services will continue to work with our partners to find the most feasible approach to reduction of PFAS in the environment.

				The Pollution Prevention and Contaminant Management Policy provides more specific actions regarding PFAS.
Pollution Prevention	National Park Service	Emphasizing Alternative Transportation and Water Resource Protections In addition to public transportation enhancements, we encourage the 2050.Plan to expand its focus on alternative transportation networks, including pedestrian and bicycle pathways. This would align with NRRA's mission to increase sustainable, low-impact public access to the river, minimizing environmental impacts while promoting recreational use of the corridor. The Water Policy Plan's focus on protecting water quality and reducing stormwater impacts further supports this objective, particularly in sensitive riverfront areas where development pressure could threaten water resources.	Comment noted	Thank you for your comment. The Mississippi River is included in the Met Council's Priority Waters List for multiple reasons, and we will continue to coordinate with local partners to protect and improve its water quality. Additionally, we are stressing the importance of equitable access to the waters in the region.

	National Park Service	Highlighting the Mississippi National Water Trail The Mississippi National Water Trail is a unique National resource that should be featured within the Parks and Trails and Water Policy Plans. This nationally recognized water trail offers recreational, educational, and economic opportunities that can strengthen residents' connections to the river. Highlighting the Water Trail within the framework of expanding access to water-based recreation will promote deeper engagement with the river and encourage stewardship of this invaluable natural resource.	Comment noted	Thank you for your comment. We will look for ways to highlight this valuable resource in our plan.
Water Supply	Metro Cities	As the Metropolitan Council continues to assess the region's water supply and its sustainability, it must work cooperatively with local policymakers and local professional staff to ensure an on-going base of information that considers local information, data, cost-benefit analyses, and projections before any policy recommendations are issued.	Comment noted	Thank you for your comment. The Met Council strongly agrees that effective water supply planning requires collaboration with local policymakers and professional staff. To that end, the Met Council is committed to supporting continued subregional engagement as reflected in Metro Area Water Supply Plan's regional action plan and subregional chapters.
Water Supply	Metro Cities	Metro Cities supports the role of the Metropolitan Area Water Supply Advisory Committee (MAWSAC) and the sub-regional engagement the Council has done in the development of these draft documents. Metro Cities also recognizes a key role for the MAWSAC in providing water supply planning assistance to local governments in the region, without usurping local decision making.	Comment noted	Comment noted. Thank you for supporting a collaborative water supply planning approach, which is the foundation for the Metro Area Water Supply Plan and its implementation.

Water Supply	Metro Cities	Metro Cities strongly opposes the Metropolitan Council as another regulator in the water supply arena. Metro Cities further opposes the elevation of water supply to regional system status, or the assumption of Metropolitan Council control and management of municipal water supply infrastructure. This document largely recognizes what the Council's role is and what it is not in this arena, however, regional regulation over local water supply is posited in the policy document as an idea warranting future consideration. Metro Cities stands firmly in opposition to this idea.	Comment noted	Thank you for your comment. Met Council continues to recognize the responsibility and authority of local water suppliers to provide water. A regional perspective is also important, because the effects of local water supply decisions do not stop at community boundaries. Metropolitan Council's role regarding water supply is to support regional planning including technical work to provide a base of technical information for sound decision-making, and to provide local planning and plan implementation assistance. The Met Council is not a water supply utility nor a regulator. The Met Council's water supply planning work is guided by the Metro Area Water Supply Plan, which provides a framework for water supply planning at the regional and local level in a way that supports local control and responsibility for water supply systems and is developed in cooperation and consultation with local, regional, and state partners
Wastewater	Metro Cities	Metro Cities recognizes the goals and objectives for mitigating inflow and infiltration in local systems and appreciates the support and partnership with the Metropolitan Council on funding to assist cities with local efforts in this area.	Comment noted	Thank you for your comment. The Metropolitan Council appreciates the support of Metro Cities to maintain sanitary sewer capacity and reduce costs for communities.

	MN Department of Health	The Water Policy Plan includes definitions for various terms. Many of these terms have been defined by other agencies and we suggest the Met Council utilize those definitions where possible. The terms include the following: • Source water protection - Source water protection also includes water quantity not just water quality. • Contaminants of Emerging Concern (CECs) o MDH does not limit CECs to man-made chemicals and defines CECs as follows: "A CEC is a contaminant that has been newly discovered in the environment; or is generating increased interest due to new scientific information about its effects on public health or the environment. CECs can be naturally occurring or human-made. These contaminants are often unregulated or are regulated at a level that may no longer be considered adequately protective of human health." https://www.web.health.state.mn.us/communities/environment/water/initiatives.html	Met Council will revise	Thank you for your comment. We will revise definitions in section 5 of the Water Policy Plan. The Metro Area Water Supply Plan only refers to CECs as a topic for research with minimal discussion, and no text changes are needed. Discussion of source water protection in the Metro Area Water Supply Plan will be revised.
Water Supply, Pollution Prevention	MN Department of Health	When discussing major contaminants or groups of contaminants, MDH feels that there is some missing information when discussing contamination with regards to drinking water in the Twin Cities metropolitan region (metro). • The following changes are suggested for groundwater: o Remove selenium as MDH is not aware of this being an issue in the metro area. However, if Met Council has data to suggest otherwise, please share this with MDH: Add arsenic. This geogenic contaminant is fairly widespread throughout the metro and has significant negative health impacts.	Met Council will revise	Thank you for your comment. We will revise the discussion of contamination regarding drinking water to include arsenic. Selenium was included in response to legislative language related to a Clean Water Fund appropriation to the Met Council for work including "support the growing needs of community water suppliers facing challenges, including PFAS, radium, manganese, and selenium contamination" (M.L. 2023 Chapter 40, House File 1999, Art. 2, Section 8)
Water Supply, Pollution Prevention	MN Department of Health	When discussing major contaminants or groups of contaminants, MDH feels that there is some missing information when discussing contamination with regards to drinking water in the Twin Cities metropolitan region (metro). • The following additions are suggested for example surface water contaminants: o Sediment (TSS) and mercury. These	Met Council will revise	Thank you for this comment. We will revise the plan to include these other groups of contaminants.

		contaminants are very common and have many TMDLs associated with them in the metro area.		
Roles	MN Department of Health	The table laying out agencies' water governance roles and responsibilities misses a few of MDH's key roles. Consider including: • Consider including mention of the Safe Drinking Water Act such as "Inspect and monitor public drinking water supplies for compliance with the federal and state standards and regulations, including the federal Safe Drinking Water Act". • Consider including the Water Policy Center's role to provide support for private well users. • Consider changing the source water protection description to "Administer source water protection program" or "Provide guidance and assistance for source water protection."	Met Council will revise	Thank you for this comment. We will revise the plan to include these other MDH roles and responsibilities.
Water Supply	MN Department of Health	The Water Policy Plan includes significant discussion of stormwater management. However, public health concerns do not appear to be explicitly stated within the plan. A particular example is when considering infiltration, the vulnerability of drinking water supply management areas (DWSMAs) and implications to drinking water supply should be considered. The plan currently states that infiltration should be implemented "where feasible". It is suggested to replace this with "where feasible and appropriate for public health". Consider additional wording changes to ensure public health is considered when evaluating stormwater management.	Met Council will revise	Thank you for your comment. Met Council will revise discussion of stormwater reuse in the Metro Area Water Supply Plan to acknowledge public health.
Water Reuse	MN Department of Health	Similarly, but not limited just to stormwater, when discussing water reuse, there are no mentions of protecting public health. Consider including public health considerations when determining the feasibility of water reuse.	Comment noted	Thank you for your comment. We include public and ecosystem health as factors in reuse of stormwater and wastewater in our policy statement.

Wastewater	MN Department of Health	MDH recognizes the importance of limiting inflow and infiltration (I/I) to keep costs of treatment and infrastructure down. MDH is concerned that areas which experience I/I could also experience wastewater leakage into the aquifer when groundwater levels fluctuate. Consider mentioning this within the I/I policy. When prioritizing I/I mitigation projects in the Comprehensive Sewer Plan, consider DWSMAs as criteria. This would help prioritize protecting drinking water sources.	Comment noted	Thank you for your comment. That is a good criterion to consider and prioritize for I/I mitigation. That suggestion will be made with communities as they prepare and submit their I/I work plan and Comprehensive Sewer Plan
Water Supply	MN Department of Health	When discussing the different types of communities following Table 3.1 and when describing the communities in the subregional chapters, DWSMAs are mentioned. However, it appears that only municipal groundwater DWSMAs are included in the tallies and discussion in these sections of the plan. Double check these numbers for accuracy and ensure that all DWSMAs are included – surface water DWSMAs (Priority Areas A and B), non-municipal public water supply DWSMAs, and municipal public water supply DWSMAs. Throughout the plan, ensure that non-municipal DWSMAs within a community's jurisdiction are considered and correctly referred to.	Met Council will revise	Thank you for your comment. Met Council will revise the Metro Area Water Supply Plan summary of different community water supply types to ensure that all DWSMAs are accurately described.
Water Supply	MN Department of Health	Consider placing clearer, more explicit emphasis on the fact that a large portion of the population of the metro sources their water from a surface waterbody. Additionally, large portions of the metro are included in one or more surface water DWSMA and it would be helpful to ensure it is clear which communities are affected, particularly for the Priority Area As. This could be done by outlining or adding a table of communities that the Priority Area As encompass.	Met Council will revise	Thank you for your comment. Met Council will revise the Metro Area Water Supply Plan description of sustainable water supply to include that planned land use and related water demand protects source waters and is consistent with long-term design capacity for water supply infrastructure, when that design capacity is based on sustainable sources. The Metro Area Water Supply Plan will also be revised to highlight the importance of the Upper Mississippi River as an important water supply for Minneapolis, Saint Paul, and the communities they serve. A table of communities that Priority A DWSMAs encompass will be included in the

				'Locations of different water sources' section.
Local Surface Water Management Plan, Water Supply	MN Department of Health	Within the Local Surface Water Management Plan Elements, consider explicitly including source water protection areas (surface water and groundwater, municipal and non-municipal). This would fit under element 3 as part of the physical environment and land use and would ideally include a map of these areas their corresponding vulnerabilities.	Met Council will revise	Thank you for your comment. Met Council will revise Appendix A of the Water Policy Plan to strongly encourage inclusion of source water protection areas.
Water Supply	MN Department of Health	Another point to consider including in the plan is a statement that the Priority Areas A and B will soon be replaced by new delineations, consisting of an emergency response area (ERA), spill management area (SMA), and the greater surface water DWSMA (DWSMA-SW). The establishment of these new delineations is currently in progress for St. Cloud and will begin very soon for Minneapolis and St. Paul. Including this point in this plan will ensure the plan stays relevant and applicable for the next 10 years.	Met Council will revise	Thank you for your comment. Met Council will revise the last two paragraphs of the 'Water contamination, pollution prevention and source water protection' section and Figure 1.3 of the Water Policy Plan with language that will ensure the plan's reference to source water protection areas stays relevant for the next 10 years.
Water Supply	MN Department of Health	Within the water supply-related elements of comprehensive plans, consider explicitly including source water protection areas (surface water and groundwater, municipal and non-municipal) as a requirement for all communities. This is important for all communities, even if they do not have a municipal public water supply system, because another (municipal or non-municipal) system's DWSMA could overlap their jurisdiction. This could be part of the "official controls addressing water supply" and would ideally include a map of	Met Council will revise	Thank you for your comment. Met Council will revise Appendix A of the Water Policy Plan to more explicitly include source water protection areas as official controls addressing water supply.

		these areas and their corresponding vulnerabilities. This would help integrate source water protection within the comprehensive planning process.		
Pollution Prevention	MN350	Efforts to protect water are not adequately addressed in the report, despite ongoing concerns over the upkeep and removal of aging pipelines across the state as well. Organizers and volunteers have observed violations during pipeline removal that threaten wildlife, contaminate water, and disrupt vital ecosystems. These include wild rice beds and water sources crucial to disadvantaged communities. Minnesota continues to allow pipeline development without sufficient measures to prevent environmental harm, further endangering food and water systems. Through intersection, in our MMIR campaign we are committed and would like to see more people in positions of power take on more active roles in addressing these impacts. Efforts such as human trafficking prevention training for park police and camp rangers in the Twin Cities area; along with working to lower the number of missing people in the state, is integral to recognizing the connection between environmental harm and community vulnerability.	Comment noted	Thank you for your comment. The Met Council works closely with our partners to develop and implement a regional watershed-based approach that addresses both improving impaired waters and protecting unimpaired waters. As specific issues arise, we address those through our technical assistance with our partners.
Integrated Water	City of Woodbury	If the Council becomes more involved in water issues, other state and local agencies with regulatory authority must relinquish some or all of that authority, or else the situation will become even more fractured and complicated.	Comment noted	Thank you for your comment. The Council is not proposing to take on any new regulatory authorities related to water. The regulatory authorities for agencies involved in water issues are statutorily defined.

Conservation	City of Woodbury	The City of Woodbury is a leader in water conservation efforts and has seen significant water savings from its proactive local programs. Any conservation targets should take into account savings seen by industry leaders over the past five years, not just savings from today and beyond.	Comment noted	Thank you for your comment. No specific conservation targets are included in the Metro Area Water Supply Plan. The following measures of success related to water conservation are included, but they do not have specific dates or values associated with them: "as a region, the average indoor, outdoor, and residential water use per person declines" and "As a region, the total summer versus winter water use ratio declines". The Metro Area Water Supply Plan notes that, as this plan is implemented, Met Council and partners will develop and track more specific targets.
Wastewater	City of Greenwood	Third: the need to make efficient use of its wastewater infrastructure investment is a frequently cited by Metropolitan Council staff in support of Density requirements including at Metro Cities Committee meetings. In 2025 the Metropolitan Council's average per Residential Equivalent Unit (REU) wastewater charge will likely be a bit less than $300. A cursory review of Metropolitan Council budget data indicates that the majority of this cost is incurred in the wastewater treatment plants so the ballpark transport portion of the cost is likely in the $125 range. Greenwood's understanding is that the maintenance and replacement costs of wastewater transport pipe and systems in Urban and Urban Edge areas can be double to triple the costs in the Suburban Edge because of the constraints from working in dense, highly developed areas that make access to large wastewater pipes very time consuming and expensive. Thus, it is quite likely that that Metropolitan Council's transport costs for Suburban Edge Communities' wastewater are actually lower than the estimated average $125 per residence per year cost. More importantly any differences in per residence transport costs for Suburban Edge communities such as Greenwood are not significant enough in size to be used to support density expectations as so doing can	Comment noted	Past evaluations have indicated that service costs for Urban Center areas are less than those for Suburban and Emerging Suburban areas. The current cost-of-service model includes a uniform rate structure in order to not disincentivize growth in areas outside of the Urban Center. Our rate structures are periodically reviewed, and these comments will be shared with our Finance Department to consider for future rate structure consideration.

		reasonably be compared to the tail wagging the dog. Going forward the City of Greenwood suggests that it would be helpful for the Metropolitan Council use its accounting and engineering data to provide estimates of transport costs by Community Designation.		
	Freshwater	Regional Development Guide Connection to Water: This section was well done and comprehensive. We liked how it incorporated mention of failure to act on this plan. Mentioning that implementation strategies for the goals are listed later in the chapter as they relate to water, possibly even referencing sections, would be a helpful addition for navigation. Another area to incorporate within these goals is ensuring it's clear that triple bottom line analysis is a highlight of decision-making for the region to ensure that cost does not become the only determinant.	Comment noted	Thank you for this comment. We are exploring ways to navigate this document as we move it towards adoption. Additionally, the Regional Development Guide goals show the Met Council's commitment to evaluating our work beyond financial costs.
Natural Systems	Freshwater	Within the "We protect and restore natural systems" section, consider adding mention of evaluating the importance of keeping water within the region rather than sending it downstream, where applicable.	Comment noted	Thank you for your comment. No changes are proposed.

	Freshwater	Water Policies Overall, we were very happy with the water policies proposed by Met Council. Excellent work with the organization of these sections and relating them back to the greater objectives. Our comments on the individual policies are below.	Comment noted	Thank you for your comment
Integrated Water, Reuse	Freshwater	Integrated Water Policy a. Consider including: Partner with economic development partners for private business partnerships (wastewater reuse, new businesses, public works development, etc.).	Met Council will revise	Thank you for your comment. We will add, "Partner with economic development entities for private business partnerships with multiple benefit outcomes." to the actions of this policy
Integrate Water, Land Use	Freshwater	Water-Centered Growth and Development Policy a. Consider including under Desired Outcomes: Promote long-term thinking and circular economy concepts around water use and byproducts. b. Include: Partner with city and state economic development teams. c. Include: Support economic development teams with feasibility proposals for new facilities that use water.	Comment noted	Thank you for this comment. This is addressed in the Integrated Water Policy
Equity, Engagement	Freshwater	Water Equity Policy a. Include: Provide increased community engagement strategies such as food, daycare or stipends for participation in engagement sessions.	Comment noted	Thank you for your comment. No changes are proposed to the document. However we will look into expanding our options for participation for future engagements.
Climate	Freshwater	Climate Change Mitigation, Adaptation, and Resilience Policy a. Consider including emergency preparedness within this section, both as a desired outcome and an action.	Met Council will revise	Thank you for your comment. We will revise the text to address this.
Conservation, Sustainability	Freshwater	Conservation and Sustainability Policy a. Include: Provide grants to local units of government for conservation programs, similar to years past.	Met Council will revise	Thank you for your comment. We will add a new bullet that states we will continue to offer grants to support conservation and efficient water use practices and appliances as funding is available.

Reuse	Freshwater	Water Reuse Policy a. There's a heavy focus on the economic and technical feasibility of reuse projects. Consider including best practices for resource and ecosystem restoration. b. Add: Consider social, environmental, and economic impacts when evaluating reuse potential. c. The policy description is missing the inclusion of rainwater reuse. It's important to make the distinction between rainwater, stormwater, and wastewater reuse when it comes to implementation and guidance.	Met Council will revise	Thank you for your comment. We have edited a Partner action to be more inclusive of all water reuse projects, not specifically storm. For your b comment, we agree that social, environmental, and economic impacts should be considered when evaluating reuse. That holistic review is also supported in our Integrated Water Policy. We specifically call out the economic impact in our Partner action to "Partner with economic development entities for a multiple benefit outcome/triple bottom line." Regarding the c comment, rainwater is a subset of stormwater (as defined by MPCA). The standards for each are identified and would be considered on a case-by-case basis
Pollution Prevention	Freshwater	Pollution Prevention and Contaminant Management Policy a. We appreciate the mention of research partners and permit holders, as well as including low salt practices and design. b. Appropriate consideration is given to PFAS, chloride and nitrate.	Comment noted	Thank you for your comment.
Monitoring, Integrated Water	Freshwater	Water Monitoring, Data, and Assessment Policy a. Where possible, consider data collaborations with other regulatory agencies like MPCA or DNR to encourage consistency with state-wide data.	Comment noted	Thank you for your comment. We will continue to coordinate with our partners on increasing consistency of state-wide data.

Wastewater	Freshwater	Regional Wastewater Service Area Policy a. For both Urban Service Area item k and Rural Service Area item o: "Extend wastewater service to suburban communities if the service area contains at least 1,000 developable acres and guides residential land use densities consistent with Met Council policy." This rule seems exclusionary to other scenarios for wastewater treatment such as a large volume private users or systems that want to combine/regionalize.	Comment noted	Thank you for your comment. Communities may request service extension in the comprehensive planning process, which could include service for large volume private users or other possibilities. The Met Council maintains this policy to prevent investing in infrastructure for a small number of users, where the cost of investment may not be recovered through user fees and the Sewer Availability Charge. The 1,000 acres minimum is in place to encourage growth that would support the capacity enhancements.
Wastewater	Freshwater	Regional Wastewater Operations and Finance Policy a. We appreciate the focus on sustainable operations.	Comment noted	Thank you for your comment.
Inflow and Infiltration	Freshwater	Inflow and Infiltration Policy a. Well-developed I&I policies for ensuring unnecessary additional treatment.	Comment noted	Thank you for your comment.
Workforce	Freshwater	Water Sector Workforce Development Policy a. We're very happy to see workforce as an inclusion in the plan. We appreciate the collaborative emphasis and focus on K-12 audiences. One opportunity is mapping industry specific skills and needs.	Comment noted	Thank you for your comment.
Wastewater	Freshwater	Wastewater System Plan No comments on this section. Comprehensive overview of existing facilities and opportunities for the future.	Comment noted	Noted.

Water Supply	Freshwater	Metro Area Water Supply Plan Great integration of figures and overall plan organization. The seven elements used consistently throughout the plan were helpful to explain the general water supply setting, challenges, and opportunities for the region's water supply. High level roles for planning and implementation as well as regional indicators and performance measure were clear and concise. An important addition that could be made to the regional indicators and/or performance measures is an emphasis on education to the public about sustainable water use, especially as the compounding effects of climate change contribute to fluctuating water availability.	Met Council will revise	Thank you for your comment. Met Council will revise the Metro Area Water Supply Plan performance measures "In collaboration with organizations such as the Clean Water Council, Minnesota Groundwater Association, American Water Works Minnesota Section and others, consistent and region-wide development and use of outreach and engagement materials to increase awareness of sustainable water use, especially as the compounding effects of climate change contribute to fluctuating water availability." A reference to Minnesota Ground Water Association white paper 'Minnesota's Groundwater Education Gap: Preparing Students to Effectively Manage our Groundwater Resources in the Future' was also included.
Water Supply	Freshwater	Metro Area Water Supply Plan Excellent effort to include multiple perspectives and stakeholders into the development of the plan. Dividing the plan by subregion is essential in ensuring there are not "one-size-fits all" policies. The place-based narrative was consistently unique for all subregion plans, highlighting your commitment to an equitable process. In particular, Shakopee Mdewakanton Sioux Community's comments had a distinct influence on the challenges, opportunities, and actions outlined in the Southwest Metro subregion.	Comment noted	Comment noted.

Sustainability, Conservation	Freshwater	• Ecosystem focus: There are a few mentions of protecting ecosystems, but this is rarely a focus in the actions and the performance measures. We suggest much greater emphasis on this as water supply cannot be sustainable only for the direct ways it benefits humans. A greater emphasis on ecosystem health is crucial for acknowledging the interconnectedness of all systems. For example, how are wetlands directly recharging water to the aquifers? How do cold water streams and springs support unique habitats that are valued by those that fish, gather, or hunt for health and subsistence? How is data informing the sustainability and crucial role of these ecosystems?	Met Council will revise	Thank you for your comment. Met Council will look at ways to include more language around the connections to ecosystem health benefits as we review and update language in the final version of the Water Policy Plan.
Subregional Engagement	Freshwater	• Consistency: While the seven elements per region are helpful, their descriptions are not always clear or specific enough. For example, climate and weather often have vague details, and this is another opportunity to incorporate disaster preparedness and emergency response explicitly.	Met Council will revise	Thank you for your comment. Met Council will revise climate and weather discussion in the challenges and opportunities sections of the Metro Area Water Supply Plan to address disaster preparedness and emergency response, highlighting MDH and community roles.
Integrated Water	Freshwater	• Links: More links to specific laws or examples of the challenges and opportunities faced by different communities would be helpful in the subregion sections for context and referencing.	Comment noted	Thank you for this comment. We have highlighted some challenges in the Water Policy Research Papers and the Water Atlas, which are resources that helped to inform this plan and that are available on the Council's website.
Monitoring, Reuse	Freshwater	• Technology: There is little reference to integration of innovative technologies or other advancements. Given this is a long-term plan, there will be many changes to how data is collected, how people are employed, and how we rely on technology. These are important considerations as we manage our water systems and respond to risk. Similarly, there is a need to explore strategies to transition our uses of freshwater to reliable alternatives including new infrastructure like greywater and rainwater collection, filtration and routing systems, and reuse.	Met Council will revise	Thank you for your comment. Met Council will revise the Metro Area Water Supply Plan's regional action plan to incorporate more description of potential system assessment projects such as exploring technology to optimize water management and prevent cyber attacks.

Groundwater, Climate	Freshwater	Water Plan Objectives These objectives feel appropriate and adequately represent the critical areas to guide regional water goals. We have one suggestion that could strengthen the Climate objective: include mention of encouraging groundwater restoration strategies in ensuring resilient and sustainable water supply in the face of climate change impacts (page 1-28).	Comment noted	Thank you for your comment. The objectives are intended to be high-level. This is covered in the Water Supply Plan.
Wastewater	City of Jordan	The City has also reviewed the Met Council Wastewater System Plan, and offers the following comments: 10. The plan notes the Met Council is planning to acquire a site for a water resource recovery facility to provide service to western Scott County and potentially provide capacity relief for the Blue Lake facility. The City of Jordan completed a facility plan of its wastewater treatment facility in 2022 to plan for necessary facility improvements through 2040 and beyond. Prior to Met Council acquisition of a site in western Scott County, discussions should occur with the City of Jordan regarding the respective service areas of the Jordan WWTF and conceptual future Met Council facility such that investments by neither agency are wasted and all opportunities for mutually beneficial partnerships are first explored.	Comment noted	Thank you for your review and comment. Met Council will collaborate and engage with Jordan and surrounding communities as early as possible and throughout the planning process for the planned water resource recovery facility to serve portions of Scott County. The Met Council acknowledges the significant investments and planning that rural growth centers undertake to provide services to their residents and strives to utilize those existing investments for future growth.

Wastewater, Density	City of Cottage Grove	Objective 1, Policy 2, Action 2 - New Connections to Regional Sewer System With unique developable areas requiring creative development design in Cottage Grove, single family development will be challenging to meet the average 4.0 unit per acre density. This objective then limits diversity of housing and requiring new connections to meet the minimum density likely limits the ability for unique development opportunities. The City objects to the policy if the intent is to allow connection for only those development projects meeting the proposed minimum average net residential density.	Comment noted	Thank you for the comment. Many approaches were analyzed during the policy development process, one of which was requiring new connections to the regional system to meet minimum density requirements. However, after discussions with local governments and policymakers, this approach was not recommended and is not included in Imagine 2050 policies. The Met Council will continue to apply density requirements using a community-wide average net residential density calculation. Minimum density requirements apply to all areas that the City is planning to accommodate their forecasted growth. For example, an apartment complex with a higher density can balance out a single-family residential development with lower density so long as the average across the city within the planning decade is at least the minimum density requirement for the community. This allows local governments to plan for a diversity of housing types across their community. Communities can work with their Sector Representatives to discuss any unique development opportunities that may arise and the Met Council would encourage these new ideas and support growth in the region.

Water Supply, Integrated Water	City of Cottage Grove	Metro Area Water Supply Plan The City, as an operator of an independent public water system, the City complies with all appropriations permitting and regulatory requirements for groundwater systems and supports local control over water supply and the reduction of the number of State and regional agencies that regulate municipal actives related to both water quality and water supply.	Comment noted	Comment noted. Met Council will continue to recognize the responsibility and authority of local water suppliers to provide water. A regional perspective is also important, because the effects of local water supply decisions do not stop at community boundaries. Metropolitan Council's role regarding water supply is to support regional planning including technical work to provide a base of technical information for sound decision-making, and to provide local planning and plan implementation assistance. The Met Council is not a water supply utility nor a regulator. The Met Council's water supply planning work is guided by the Metro Area Water Supply Plan, which provides a framework for water supply planning at the regional and local level in a way that supports local control and responsibility for water supply systems and is developed in cooperation and consultation with local, regional, and state partners.

Wastewater	City of Cottage Grove	Waste Water System Plan The plan does not mention or reference the Metropolitan Urban Service Area {MSUA) while it is referenced in the Land Use Plan. Given the MUSA boundary has been a guiding document for wastewater planning with previous system statements resulting in comprehensive plan updates. Clarification should be provided to clarify if cities are no longer planning based on the MUSA boundary.	Met Council will revise	Thank you for your comment. Language to better describe the Metropolitan Urban Service Area (MUSA) has been added to the Wastewater System Plan. No change in the approach for wastewater planning is recommended in policy. The Wastewater System Plan contains the Long-Term Service Area which is an illustration of areas that can be served based on the capacity of existing water resource recovery facility sites. The MUSA represents the areas that already have regional wastewater service or are planned to receive service within the planning horizon. The current MUSA represents the areas agreed upon and authorized through the 2040 comprehensive planning cycle. through the 2050 comprehensive planning cycle, the Council will continue to work with communities to refine those areas to accommodate regional and local growth projections.
Wastewater	City of Prior Lake	The City of Prior Lake does not support the policy related to the Metropolitan Council evaluating requests to connect areas within the municipality to the regional wastewater system based on the regional need for additional land to accommodate growth and local development trends. The Metropolitan Council is proposing to review requests to ensure a 20-year rolling land supply considering both regional and local market demand. A significant portion of developable property in the City of Prior Lake is owned by one family who appears to have little interest in selling their property for development. The City does not want future development decisions to be made by Met Council staff based on having available land elsewhere in the community, or region, that may not actually be available for development due to that property owner's decisions or other market conditions.	Comment noted	Thank you for your comment. The Met Council sets policies for system expansion to ensure infrastructure is utilized economically to both prevent premature investment as well as to prevent under-utilization. The intent of the policy is to consider requests for MUSA expansion beyond what is already planned for in local conprehensive plans to include both regional and local demand and contraints. The Met Council has a comprehensive plan amendment process to consider new development that relates to the local context. The Met Council's Sector Representative program is staffed to

				provide technical assistance and information regarding this issue.
Integrated Water	City of Hugo	The Water Policy Plan provides a framework for integrated water planning and management (wastewater, water supply, stormwater, and natural waters) for the region to secure a clean and plentiful water future. The items in this section seem to align with the core values of Imagine 2050.	Comment noted	Comment noted. Thank you for your support for integrated water planning.
	City of Hugo	Some of the items in the policy plans are unclear on what the outcome for communities will be and what will be required. The City of Hugo discourages requirements to adopt specific policies and ordinance to meet Imagine 2050 policy plans goals and actions. We encourage the Metropolitan Council to allow communities to determine what is best for their community to meet the intent of the goals and action items.	Comment noted	Thank you for your comment. The water-related requirements for LGU will basically include required elements for LSWMPs as defined in Mn Rules 8410, local water supply plans as defined from the DNR, and wastewater requirements which have not changed significantly from 2040. We rely on the cities to determine what is needed in ordiances to meet those requirements.

	City of Minneapolis	Thank you for the opportunity to comment on the Metropolitan Council's draft Imagine 2050 Water Policy Plan. We appreciate the work of the Metropolitan Council staff that developed the draft plan. We commend you on drafting a comprehensive document that begins to take steps to address racial and economic inequities, clearly identifies the water resource policy area strengths and challenges, and sets the stage for integrated water resource management. Attached to this letter are a series of comments developed by staff for you to consider as you refine the Water Policy Plan. Please reach out if you have any questions. We look forward to working in partnership with the Metropolitan Council on our next Water Resources Management Plan and Comprehensive planning process.	Comment noted	Thanks for this comment.
Stormwater, Integrated Water	City of Minneapolis	General Comment: The water resource regulatory environment in the state of Minnesota is very robust with multiple state agencies and local watershed management organizations all providing a regulatory framework for stormwater management. Adding any additional regulation in this sphere is unnecessary and has the possibility of needlessly complicating an already complicated regulatory environment.	Comment noted	Thank you for your comment. The regulatory authorities for agencies involved in water issues are statutorily defined. This plan does not propose any new statutoriliy defined water regulations.
Equity, Metrics	City of Minneapolis	Page 9: Equity: The Metropolitan Council doesn't have an effective way to factor equity into decision-making especially as it relates to grant programs. Applying equity metrics at just the city scale misses many overburdened communities, especially in a city the size of Minneapolis with very diverse neighborhoods with significantly different tax capacities. An average in this case would miss many areas that would benefit from assistance through equitably applied grant programs.	Comment noted	Thank you for this comment. We agree that equity analyses need to be applied at many different scales. We commit to exploring and discussing how to do this work over the life of the plan.
Metrics	City of Minneapolis	Page 9: Accountability: Accountability is an important value in the plan. Metrics put in place to measure accountability should be reasonable, measurable, and consider regional variability.	Comment noted	Thank you for your comment. We are currently developing the metrics for how we will measure our effectiveness.

Equity	City of Minneapolis	Page 10: Our region is equitable and inclusive. Investigate and support programs to address affordability and accessibility of water services, especially in underserved areas.: The Metropolitan Council should also be implementing programs that support affordability and not just supporting them at the city level.	Comment noted	Thank you for this comment. We agree that equity actions need to be applied at many different scales. We commit to exploring and discussing how to do this work over the life of the plan.
Integrated Water, Wastewater, Inflow and Infiltration	City of Minneapolis	Page 10: Our communities are healthy and safe: Develop strategies to manage water -related hazards such as flooding and contamination to enhance community safety and resilience. This is an area where a one-water approach should be further investigated. Policies on the wastewater side are solely focused on removing I/I (clean water) from the sanitary sewer system with little consideration for where it will be directed. This is problematic for older communities that are fully developed.	Comment noted	Thank you for your comment. This can be a challenge for developed communities. I/I mitigation efforts have been very impactful at minimizing peak flows. As more mitigation takes place, it is possible that flooding would increase, if there are not adequate stormwater best management practices in place. This is something the Met Council can evaluate with communities, as the question and issues arise. The municipal grant program does allow for 10% grant reimbursement for drainage improvements that are needed due to I/I. As our region becomes more developed, this may be an area to increase grant reimbursements.
Infrastructure	City of Minneapolis	Page 10: Our region is dynamic and resilient: Programs around this strategy should include accommodations for infrastructure age and other regional variability.	Comment noted	Thank you for your comment.
Stormwater	City of Minneapolis	Page 11: Sustaining plentiful and clean water: Why is green infrastructure singled out as the recipient of stormwater. There are many other stormwater management facilities that exist in the metropolitan area. Also, it is far more common for stormwater to not be treated prior to release into natural receiving waters than to receive treatment via green stormwater infrastructure or other best management practice. Implying that all stormwater is treated, and infiltrates is a mistaken impression.	Met Council will revise	Thank you for your comment. We will revise the plan.

Stormwater	City of Minneapolis	Page 15: Figure 1.2: Water movement through the natural and built environment: This figure doesn't account for stormwater runoff accumulating in natural lakes, creeks, wetlands, and the river. In the built environment infiltration is a less significant part of the water cycle and direct runoff to water bodies accounts for a higher percentage. Even in the natural environment, stormwater runoff to natural waterbodies should not be discounted.	Met Council will revise	Thank you for your comment. We will work to integrate these ideas into the figure.
Water Supply, Groundwater	City of Minneapolis	Page 16: Key Water Sustainability Challenges: Since most of the metropolitan area is sourcing their drinking water from groundwater sources how does groundwater recharge fit into this list of themes/priorities?	Met Council will revise	Thank you for your comment. The 2050 Water Policy Plan recognizes the importance of groundwater and its connection to climate, the landscape, surface waters, and water infrastructure. This concept is embedded in the integrated water planning and management approach that the plan is based on. The plan will be revised to more clearly define from the beginning that when the plan mentions "water", groundwater is part of that and the integrated water planning covers all types of water sources, uses, and objectives.

Integrated Water, Climate	City of Minneapolis	Page 42: Climate risks and their potential to impact the benefits of clean and plentiful water and water services are assessed across water sectors, in the built and natural environment.: These assessments should be across the water sectors in an integrated manner to evaluate the relative impacts of various policies and how they affected the different water systems.	Comment noted	Comment noted. Thank you for raising this concern, which is shared by other stakeholders across the region. The Water Policy Plan which includes the Metro Area Water Supply Plan and the Wastewater System plan as well as our policies and actions around protecting surface and groundwater quality and quantity, recognizes the challenge of climate change. This is reflected in the shared regional climate and natural systems goals, in the Water Policy Plan's climate objective and Climate Change Mitigation, Adaptation, and Resilience Policy, and in more detailed subregional water supply action plans that the Met Council is committed to supporting. Met Council will revise the climate and weather content in the Metro Area Water Supply Plan's challenges and opportunities sections to address disaster preparedness and emergency response.
Wastewater, SAC	City of Minneapolis	Page 54: Continue efforts to simplify and improve the Sewer Availability Charge (SAC) program and its communication to customers.: The SAC program is expensive for the City of Minneapolis to run. Even with the 1% discount for paying the SAC fee on time to the Met Council, the city is losing money on this program. The city can't be the fee collector for the Met Council without an increased amount going to the city or the Met Council paying a flat fee to administer this program. This is a pass-through fund and the city should not be losing money.	Comment noted	Thank you for this feedback. The SAC program is continually seeking feedback to improve the program and meet the needs of our region. This comment will be shared with the Environmental Services Finance department for the next program update.

Wastewater	City of Minneapolis	Page 55: Septage, biosolids, leachate, and other hauled liquid waste will be accepted at designated sites, provided that the waste can be efficiently and effectively processed and not adversely impact the conveyance and treatment system.: It has become harder for haulers to drop off FOG. There used to be two metro locations and that was changed to one. This caused haulers to have to spend more time and money on hauling FOG longer distances with longer wait times at the disposal site. This cost gets passed down to the business and creates a cost barrier for the regular cleaning of grease interceptors with more impacts to the broader sanitary sewer system.	Comment noted	Thank you for the feedback. Environmental Services strives to meet the needs of our customers. Our Industrial Waste department recently led a Task Force focused on FOG outreach and evaluating how we can better serve our customers that create and dispose of FOG. More information about the outcomes, next steps, and resources from the Task Force can be found on our website: https://metrocouncil.org/Wastewater-Water/Services/Industrial-Waste/Fats-Oils-Grease.aspx We are aware of issues sewer cleaning waste haulers face regarding site availability and are currently working to identify additional disposal options for them.
Wastewater, SAC	City of Minneapolis	Page 55: Sewer availability charges will be uniform within the urban area based on capacity demand classes of customers and the SAC procedure Manual.: Higher density means fewer miles of sewer per capita to maintain within urban and ultra-urban cores as compared to the suburbs and exurbs. This should be factored into SAC charges. We would like to see this program reevaluated so that customers are not getting overcharges and urban customers are not bearing a high burden to support growth in the suburbs and exurbs.	Comment noted	Thank you for your comment. The SAC program is continually seeking feedback to improve the program and meet the needs of our region. This comment will be shared with the Environmental Services Finance department for the next program update.

Wastewater	City of Minneapolis	Page 55: Evaluate level of service for all customer types to address needed enhancements or availability of wastewater services like liquid and vactor (sanitary sewer debris collected by vacuum truck) waste disposal sites.: How is the Met Council defining the current level of service? What is the current level of service and how will it be evaluated in the future?	Comment noted	Our current goal for vactor waste haulers is to reduce travel time to 30 minutes or less, one-way, for customers. Recent survey results have shown that approximately 75% of our customers using vactor waste disposal sites travel 30 minutes or less for disposal. We are aware of service issues for liquid waste disposal haulers and have and continue to seek customer input on the issues and ideas for solutions, including offering additional locations.
Wastewater, Inflow and Infiltration	City of Minneapolis	Page 56: Capacity enhancements are not made to accommodate excess inflow and infiltration.: More work should be done around how this relates to the one-water, climate, and equity policies and the relative cost.	Comment noted	Thank you for that comment. A one-water approach is a goal of the Water Policy Plan, so that perspective, with the climate and equity considerations, will be considered as the Inflow and Infiltration grant programs are improved (municipal and private) and funding is requested.
Wastewater, Equity, Inflow and Infiltration	City of Minneapolis	Page 56: Partner with the state to make funds available for inflow and infiltration mitigation and promote statutes, rules, and regulatory to encourage inflow and infiltration mitigation.: Equity should be a factor in any funding formula around I&I mitigation. Historically redlined neighborhoods have experienced less long- term investment and have more frequent and more severe infrastructure challenges as a result. As private sewer laterals are significant contributors to I/I, consider additional funding for supporting private sewer lateral improvements.	Comment noted	Thank you for your comment. Environmental Services is proud to offer the Private Property I/I Grant Program. We know the need for this program and financial support for private property owners far exceeds currently available funding. We are continuing to improve the program and find more financial support for this important issue.
Wastewater, SAC	City of Minneapolis	Page 56: Limit expansion of wastewater service within communities where excessive inflow and infiltration jeopardizes the Met Council's ability to convey wastewater without an overflow…: There should be some analysis of where in the region the investments are made to separate sewers and reduce I&I, where the benefits are gained, and how this relates	Comment noted	Thank you for this comment. This feedback will be shared with the Environmental Services Finance department and will be considered as we continue to develop strategies for I/I mitigation and funding through the I/I grant programs.

		to policies around SAC, service expansion, etc. What are the relative costs of service redevelopment vs. development beyond the current service areas.		
Workforce	City of Minneapolis	Page 57: Develop and activate workforce succession plans and tools that account for current and future staffing levels, knowledge transfer and cross training, and talent readiness.: This is critical. There is a sector- wide need to account for knowledge loss that is possible during the wave of current and upcoming retirements and reflecting generation changes in job tenure.	Comment noted	Thank you for your comment.
Resource Recovery, Wastewater	City of Minneapolis	Page 68: Metropolitan. The Met Council forecasts that this service area population will grow by over 350,000 new residents by 2050. To serve the growing service area, we are constructing a fourth incinerator to support solids processing.: We are interested to know more about the electricity benefits of the existing and new incinerators. What is the ROI on the cost to add more vs what it will produce.	Comment noted	Thank you for your question. The heat recovery from the fourth incinerator is estimated to save $450k in natural gas heating and $450k in purchased electricity each year. The installed cost of the new waste heat boiler is approximately $16.5M and the estimated maintenance cost is $30,000 per year. The simple return on investment (ROI) is approximately 20 years ($16.5M)/($870k/yr).
Water Supply, Climate	City of Minneapolis	Page 83: Mississippi River: Usually the first supply source to be required to reduce water use during drought.: Please verify that this fact is true. Watering restrictions due to drought have only been implemented once for the city of Minneapolis which is one of the main metro water utilities that sources its drinking water from the Mississippi River. This is not the case with metropolitan communities that have groundwater sources which have been implementing watering restrictions on a nearly annual basis.	Met Council will revise	Thank you for your comment. Per the Minnesota Statewide Drought Plan, drought warning, restrictive, and emergency phases are triggered based on the U.S. Drought Monitor or average daily flow in the Mississippi River. Communities may have their own local water restrictions during drought, which vary across the region. Met Council will revise the description of the Mississippi River to "Usually the first supply source to be impacted during drought".

Engagement	City of Bloomington	Appreciation for Input Opportunities. Bloomington Parks and Recreation and Utilities staff have been meeting regularly with Metropolitan Council staff. We are very thankful for the meetings and the opportunity to contribute to the development of both the Regional Parks and Trails and Water Policy Plans. Given these past input opportunities, we have no additional comments on these draft plans.	Comment noted	Comment noted. Met Council staff appreciate the guidance that you and other stakeholders from across the region contributed to the draft Water Policy Plan and Metro Area Water Supply plan.
Integrated Water	Carver County	Overall approach. Carver County commends the Metropolitan Council on the inclusion of water planning, depth of analysis of the several layers of water related governance, and depth of technical review of the many water related issues in the policy plan. The specific actions that the Metropolitan Council will require from local government seem to get lost in this large document however. This is particularly important as local governments are subject to state (BWSR) and watershed requirements. To help local governments, action strategies should be highlighted and summarized more clearly in the document.	Comment noted	Thank you for your comment. We have included the required water elements for local government within the Appendices.
Pollution Prevention, Integrated Water	Carver County	"Objective 7: Pollution Prevention and Contaminant Management Policy - Actions: Partner. (a) Develop potential water quality standards with stakeholder groups, state agencies, local utility organizations, researchers, and regional water professionals." Carver County Comment: More detail is needed here on what water quality standards the Met council is proposing over and above what are required by the state. Is the goal to collaborate with these stakeholders or have the Met Council adopt new standards?	Met Council will revise	Thank you for your comment. We agree. The Met Council does not have the authority to create new statutes, rules, or water quaility standards, but we do have a role in the development of these new statutes and standards to represent the needs of metro area residents and stakeholder groups. We will modify the language to better reflect our intention to support the organizations that have the authority to make these decisions.
Pollution Prevention, Integrated Water	Carver County	Objective 7 - Pollution Prevention and Contaminant Management Policy – Actions: Partner. (i) Partner with local public works and city planners to ensure stormwater infrastructure helps protect and enhance receiving waterbody quality. Carver County Comment: This statement needs more clarification on the Met Council's role. Regulation, standards,	Met Council will revise	Thank you for your comment. The Met Council will clarify our language. We have a role in making recommendations in the development of future regulation or standards, but have the largest influence on developing technical assistance, research, and potential funding to further

		tech assistance, research, monitoring, implementation, etc.? Overall, the Council's identified role in stormwater involvement at the local level needs to be more straightforward.		the region's stormwater management actions.
Water Monitoring, Priority Waters	Carver County	"Objective 8: Water Monitoring, Data, and Assessment Policy – Actions: Plan. (g) Explore and identify data sources to support the understanding of water value and use to support the Priority Waters List and its use by our stakeholders." Carver County Comment: The County recommends adding language that the Priority Waters List should reflect priorities identified in Watershed Management Plans.	Comment noted	Thank you for this comment. The Priority Waters List is intended to help the Met Council direct its funding and monitoring efforts at the regional scale. The Priority Waters List is intended to complement the current way many other organizations allocate resources. Additionally, the Priority Waters List focuses on waterbodies deemed regionally significant.
Water Supply, Subregional Engagement	Carver County	Figure 3.7: Subregional water supply planning areas, from the Water Supply Planning Atlas. Carver County Comment: The organization of these area should reflect local planning more accurately. For example, the Counties are allowed to create GW plans that align with county areas. These new areas could increase confusion on planning authority.	Met Council will revise	Thank you for your comment. Met Council will revise the introduction to the subregional action plans to clarify that the subregional planning areas are primarily for the purpose of supporting collaboration, relationship building and resource sharing across jurisdictional boundaries. They are not intended to add another layer of planning; rather, they are intended to support outreach and collaboration around existing planning efforts. The introduction to the subregional action plans will also be revised to clarify how the subregional boundaries were developed and will be expected to change.
Water Supply, Subregional Engagement	Carver County	Table 3.9: Subregional water supply stakeholders proposed several actions. Carver County Comment: The planning section doesn't mention counties' role per state statute as mentioned earlier in document.	Met Council will revise	Thank you for your comment. We will revise all Metro Area Water Supply Plan subregional action plans to add an early work task to clarify participants' (including

				counties') roles as part of work plan development before other tasks.
Wastewater, SAC	City of Blaine	The City supports efforts to modify the SAC calculation for affordable housing to more appropriately reflect modern affordable housing construction norms.	Comment noted	Thank you for your comment. The SAC program is continually seeking feedback to improve the program and meet the needs of our region. This comment and show of support will be shared with the SAC department and Community Development, as they work together on this important issue.
Water Supply	City of Corcoran	City of Corcoran staff is concerned with the outline of the policy and how it may be utilized in regional planning and regulation. Currently, water supply systems are permitted and regulated at the State level to ensure these valuable resources are properly monitored and protected. The City of Corcoran should be responsible for the stewardship of this water system with State government continuing to regulate these resources.	Comment noted	Comment noted. Met Council will continue to recognize the responsibility and authority of local water suppliers to provide water. A regional perspective is also important, because the effects of local water supply decisions do not stop at community boundaries. Met Council's role regarding water supply is to support regional planning including technical work to provide a base of technical information for sound decision-making, and to provide local planning and plan implementation assistance. The Met Council is not a water supply utility nor a regulator. The Met Council's water supply planning work is guided by the Metro Area Water Supply Plan, which provides a framework for water supply planning at the regional and local level in a way that supports local control and responsibility for water supply systems and is developed in cooperation and consultation with local, regional, and state partners.

Water Supply	City of Corcoran	The northwest metro is a growing area in which the communities are at various stages of establishing their water system with several neighboring communities which are significantly more built out than the City of Corcoran. By incorporating water planning into a subregional approach, we are concerned that regional planning may be used as a tool to restrict local land control in favor of the already established communities.	Met Council will revise	Thank you for your comment. Met Council water supply planning staff have shared this with land use policy staff to coordinate responses. Met Council will revise the introduction to the subregional action plans to clarify that the intent of regional and subregional water supply planning is not to restrict local land control in favor of already established communities. The Metropolitan Council upholds the responsibility and authority of local water suppliers in managing water resources while recognizing the importance of a cohesive regional perspective, as local water supply decisions impact neighboring communities. The Met Council's role is to support regional water planning by delivering essential technical resources to guide sound decision-making and by offering planning assistance to local entities. As neither a water utility nor regulator, the Met Council's water supply planning follows the Metro Area Water Supply Plan, a cooperative framework that strengthens local control and accountability, developed in partnership with local, regional, and state stakeholders. The introduction to the subregional action plans will also be revised to clarify how the subregional boundaries were developed and will be expected to change.
Water Supply	City of Corcoran	Staff appreciate promoting regional stewardship however the City of Corcoran has been able to accomplish this already with existing water agreements with the City of Maple Grove along with participating in a NW metro community study of a regional water system from the Mississippi River.	Comment noted	Comment noted. The Metro Area Water Supply Plan provides a framework to support efforts like those in the City of Corcoran to work with neighbors where feasible on water agreements and multi-

				community water supply feasibility studies.
Water Supply	City of Corcoran	Staff ask that the Met Council continue to promote regional partnerships and responsible stewardship of the natural resources but not venture into regional water planning and regulation, which we feel will be the end result of this plan.	Comment noted	Comment noted. Met Council will continue to recognize the responsibility and authority of local water professionals to make local water decisions. The Met Council has a statutorially defined role in water supply, wastewater, and surface water planning already. This regional perspective is important, because the effects of local water decisions do not stop at community boundaries. The Met Council is not a water supply utility nor a regulator, and we do not intent to ask for any new water regulatory authorities. The Met Council's water planning work is provides a framework for water planning at the regional and local level in a way that supports local control and responsibility for water and is developed in cooperation and consultation with local, regional, and state partners.
Wastewater	Met Council American Indian Advisory Council	The Council will analyze and reduce operational effects of environmental services infrastructure on sacred sites. a. In preparation for the opening of the Wakan Tipi Center in summer 2025, the Council will proactively work alongside Wakan Tipi Awanyankapi to prioritize innovative solutions to minimize the operational impact and relocate the wastewater receiving station. The Met Council will ensure that Wakan Tipi is consulted as a priority during construction planning for any projects near the site.	Comment noted	Thank you for this recommentation. The Met Council commits to minimizing the operational impacts at the Wakan Tipi Center and other sacred sites throughout the region. We will explore options in the design and construction of our system with Wakan Tipi Awanyankapi leadership about this site specifically, and with others impacted by future system changes.

Integrated Water	Met Council American Indian Advisory Council	The Council will advocate for a new political imagination of how water policy and standards are created and implemented that integrates a framework based on water as a relative. a. The Council will take a leadership role in coordinating between Tribal staff and relevant state agencies' staff including Tribal Liaisons.	Met Council will revise	Thank you for this recommendation. The Met Council commits to coordinating with our colleagues at other agencies to incorporate Tribal perspectives into the work we do. We can include the recommended action into our Integrated Water Policy.
Wastewater	Met Council American Indian Advisory Council	The Council will explore ways to include Tribes and American Indian organizations in funding opportunities while removing barriers to providing regional sewer service to Tribes, when requested.	Comment noted	Thank you for this recommendation. We will work to explore this topic forward with Tribal representatives and others within the Met Council.

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*If Organization is blank, comment was submitted by an individual.