

Information Item

Metropolitan Area Water Supply Advisory Policy and Technical Committees



Meeting Date: October 23, 2024

Topic

Public comments and possible responses on the draft Metro Area Water Supply Plan.

District(s), Member(s):	All
Policy/Legal Reference:	Minnesota Statute 473.1565
Staff Prepared/Presented:	Lanya Ross, Environmental Analyst, 651-602-1803
Division/Department:	Environmental Services

Background

This document summarizes public comments received by the Met Council from August 15 through October 7, 2024 on the draft Metro Area Water Supply Plan and possible Met Council responses to each comment.

The information is intended to support MAWSAC and TAC discussion and recommendations to revise and finalize the draft Metro Area Water Supply Plan based on public comments.

Comment contributors

Approximately 12 communities, three counties, two nonprofit organizations, one state agency, and several individuals provided detailed comments related to the draft Metro Area Water Supply Plan.

Comments received and proposed responses

Approximately 50 detailed comments were received on the draft Metro Area Water Supply Plan and water supply planning content. 27 comments request changes, 18 comments were advisory that are not likely to result in changes to the draft Metro Area Water Supply Plan, and 6 comments were water supply related but submitted as part of comments on the Water Policy Plan (4) or land use policy (2).

Table 1 includes those comments with no changes needed.

Table 2 includes those comments with proposed staff responses, to support MAWSAC and TAC discussion. Comments are grouped by themes (policy change, technical change, response to question, no change). Comments that are most likely to result in revisions are listed first.

Responses to comments are expected to generally fall into the following response categories:

- Comment noted.
 - Met Council will continue to [take this approach].
 - This topic is highlighted on page [#].
 - Met Council will not do this, for these reasons [such as statutory authority, resource limitation, etc.].
- Met Council will revise [this content].
- The comment will be shared with [this entity, for these reasons].
- In response to your question, Met Council offers [this answer].

Table 1. Some public comments received on the draft Metro Area Water Supply Plan from August 15 to October 7, 2024 do not warrant any changes. Proposed Met Council responses are included.

Comment ID	Comment	Possible Met Council response
NC1 Individual	Concerns about spreading pollutants into and possible depletion of our aquifers	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.
NC2 Individual	Concerns about spreading pollutants into and possible depletion of our aquifers	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.
NC3 Individual	Concerns about lead pipe contamination of drinking water for some	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 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 supporting.
NC4 Individual	Concern about impacts of climate change on surface water (and our peoples)	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.
NC5 Individual	Groundwater needs to be more responsibly conserved.	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.

Comment ID	Comment	Possible Met Council response
NC6 Individual	<p>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.</p>	<p>Comment noted. Thank you for highlighting an area of the metro region where water supply planning resources need to be focused. The Metro Area Water Supply Plan commits the Met Council to supporting subregional, collaborative water supply planning.</p>
NC7 Inver Grove Heights	<p>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.</p> <p>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).</p>	<p>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; 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.</p>
NC8 Hugo	<p>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.</p>	<p>Comment noted. Thank you for your support for integrated water planning.</p>
NC9 Bloomington	<p>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.</p>	<p>Comment noted. Met Council staff appreciate the guidance you and other stakeholders from across the region contributed to the draft Water Policy Plan and Metro Area Water Supply plan.</p>

Comment ID	Comment	Possible Met Council response
NC10 City of Corcoran	<p>City of Corcoran staff is concerned with the outline of 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.</p>	<p>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.</p>
NC11 City of Corcoran	<p>We 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.</p>	<p>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.</p>
NC12 City of Corcoran	<p>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 for the Mississippi River.</p>	<p>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.</p>

Comment ID	Comment	Possible Met Council response
NC13 Cottage Grove	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 activities related to both water quality and water supply.	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.
NC14 Freshwater	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 challenges, opportunities, and actions outlined in the Southwest Metro subregion.	Comment noted.
NC15 Freshwater	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 measures were clear and concise.	Comment noted.



Comment ID	Comment	Possible Met Council response
NC16 Edina	<p>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.”</p> <p>Check the Crow river, I thought that was more northwesterly.</p>	<p>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.</p>
NC17 Metro Cities	<p>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.</p>	<p>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.</p>
NC18 Metro Cities	<p>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.</p>	<p>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</p>

Table 2. Some public comments received on the draft Metro Area Water Supply Plan from August 15 to October 7, 2024 may warrant changes. Proposed Met Council responses are included, with space for MAWSAC and TAC to provide recommendations as responses are finalized.

Comment ID	Comment	Possible Met Council response	MAWSAC/TAC recommendations are requested
C1 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)	May revise the regional action work plan item to develop, track on measure to include developing targets as well (page 3-91). Met Council will continue to support regional modeling as highlighted in the regional action plan.	
C2 City of Corcoran	The northwest metro region 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.	Thank you for your comment. Met Council water supply planning staff will share this with land use policy staff to coordinate responses.	
C3 Carver County	<p>Figure 3.7: Subregional water supply planning areas, from the Water Supply Planning Atlas.</p> <p>Carver County Comment: The organization of these areas 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.</p>	May revise text to clarify that the subregional planning areas are primarily for the purpose of supporting collaboration, relationship building and resource sharing across jurisdictional boundaries.	

Comment ID	Comment	Possible Met Council response	MAWSAC/TAC recommendations are requested
C4 Carver County	<p>Table 3.9: Subregional water supply stakeholders proposed several actions.</p> <p>Carver County Comment: The planning section doesn't mention counties' role per state statute as mentioned earlier in document.</p>	May revise all subregional plans to add an early work task to clarify participants' (including counties') roles as part of work plan development before other tasks.	
C5 Edina	<p>Page 89/95, water conservation section "There will be regional watering restrictions."</p> <ul style="list-style-type: none"> • 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. 	The text may be revised to "Triggers, outreach, and actions for drought response will be developed and implemented across the region, taking into consideration different water sources and users"	
C6 Edina	<p>Page 89,90/96 Meeting demand section "Cities will not have to be the heavy hand, because residents will make better choices."</p> <ul style="list-style-type: none"> • This language may be better as part of an outreach/education section, if there is one in the west metro. 	The west metro subregional chapter will be revised to move this action into an outreach/education section.	
C7 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. The process is already underway. This could also go on page 3-162 for the West Metro subregional plan.	May revise the central and west subregional chapters to include this project.	



Comment ID	Comment	Possible Met Council response	MAWSAC/TAC recommendations are requested
C8 Richfield	On page 3-152, regarding the subregional sections, in general many of the listed goals lack specificity. Statements such as “Deal with PFAS in a coordinated way” or “Extend plans to 7 generations (~150 years)” are too vague or impractical to implement effectively.	May revise all subregional action plans to include some initial work plan development tasks, to clarify goals and establish working structure before starting other work.	
C9 Richfield	The decision to break the water supply plan down into subregional plans is reasonable, but in practice it has led to a lot of redundant language in the plan. This could be greatly simplified.	May work with Met Council communications staff to determine a more concise approach to subregional chapter language. May also revise introduction to subregional chapters to clarify how they should be used.	
C10 Richfield	On page 3-104, the objective “Work with the legislature to take pressure off 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.	<p>The wording in subregional chapters reflects what stakeholders shared as chapters were drafted; the wording reflects local perspectives, not the Met Council.</p> <p>The text may be revised along the lines of “Support understanding by state economic development groups of the metro area water supply opportunities and limitations compared to other parts of the state, to make strategic planning decisions”</p>	



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C11 Belle Plaine	<p>City residents and community members have for years 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 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 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.</p>	<p>May revise content in the Water Resources Plan Appendix A to clarify expectations for water supply information in comprehensive plans and local water supply plans, to be sure that that information about local infrastructure investments is capitalized on and can provide for growth.</p>	



Comment ID	Comment	Possible Met Council response	MAWSAC/TAC recommendations are requested
C12 Hastings	<p>PFAS is an emerging contaminant that is crippling the City of Hastings with financial burden and time commitment. Removal of PFAS from 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 2050 Plan should include commitments to addressing the 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.</p>	<p>May revise the regional action plan mitigation measure evaluation actions to include evaluation of the feasibility and effectiveness of a range of upstream mitigation options for PFAS and/or other emerging contaminants (page 3-90). The Wastewater System Plan will also be reviewed with this comment in mind.</p>	



Comment ID	Comment	Possible Met Council response	MAWSAC/TAC recommendations are requested
C13 MDH	<p>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:</p> <ul style="list-style-type: none"> • Source water protection: Source water protection also includes water quantity not just water quality. • Contaminants of Emerging Concern (CECs): 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." 	<p>May revise definitions in section 5 of the Water Policy Plan (page 5-165). 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 may be revised (page 3-97).</p>	
C14 MDH	<p>Consider additional wording changes to ensure public health is considered when evaluating stormwater management and determining the feasibility of water reuse.</p>	<p>May revise discussion of stormwater reuse in the Metro Area Water Supply Plan to acknowledge public health (pages 3-86, 3-124, 3-128, 3-151, 3-152, 3-153, and 3-162).</p>	

Comment ID	Comment	Possible Met Council response	MAWSAC/TAC recommendations are requested
C15 MDH	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.	May revise the Metro Area Water Supply Plan summary of different community water supply types to ensure that all DWSMAs are accurately included (pages 3-80 through 3-82).	
C16 MDH	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.	<p>May revise the Metro Area Water Supply Plan description of sustainable water supply to include that that planned land use and related water demand <i>protects source waters and</i> is consistent with long-term design capacity for water supply infrastructure, when that design capacity is based on sustainable sources (page 3-83).</p> <p>The Metro Area Water Supply Plan may also be revised to include a table of communities that Priority A DWSMAs encompass in the ‘Locations of different water sources’ section (page 3-80).</p>	

Comment ID	Comment	Possible Met Council response	MAWSAC/TAC recommendations are requested
C17 MDH	<p>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.</p>	<p>May revise the Metro Area Water Supply Plan to include this description along with a table of communities that Priority A DWSMAs encompass in the 'Locations of different water sources' section (page 3-80).</p>	
C18 MDH	<p>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 these areas and their corresponding vulnerabilities. This would help integrate source water protection within the comprehensive planning process.</p>	<p>May revise Appendix A of the Water Policy Plan to more explicitly include source water protection areas as official controls addressing water supply (page 6-170).</p>	
C19 Woodbury	<p>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.</p>	<p>May revise description of desired outcomes on pages 3-85 and 3-86 X to "... use declines compared to previous 5 years".</p>	

Comment ID	Comment	Possible Met Council response	MAWSAC/TAC recommendations are requested
C20 Washington County	The Council should consider consistency and more clarity around “possible involved parties” column in subregional actions plans. Definitions will be necessary for implementation. For example, there is not definition of “local” in this context. It is unclear who is responsible for these actions when no one is listed.	May refine subregional chapters and/or Water Policy Plan list of definitions to include terms like “local” and other organizations with roles to play implementing water supply plans. May also revise subregional chapters to include an early task to define roles for all prioritized actions as part of subregional engagement and plan implementation.	
C21 Washington County	Add the corresponding subregion name into the heading of the subregional actions plans.	May revise formatting of subregional action plans.	
C22 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	May revise subregional action plans to identify a support role for Washington County on tasks related to funding of privately owned wells and septic system repair and replacement.	
C23 Freshwater	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.	May revise the performance measures on page 3-93 to “Develop 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.	

Comment ID	Comment	Possible Met Council response	MAWSAC/TAC recommendations are requested
C24 Freshwater	There are 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 roles of these ecosystems?	<p>May revise the Water Policy Plan Water Monitoring, Data, and Assessment Policy (page 1-42) to ensure resources are being monitored to support questions like these.</p> <p>May also revise regional action plan system assessment items (page 3-89) to add more detail about these research questions to related actions.</p>	
C25 Freshwater	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.	May revise climate and weather section of challenges (page 3-73) and opportunities (page 3-74) to address disaster preparedness and emergency response.	
C26 Freshwater	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.	May revise subregional sections to include links and/or references in a bibliography to specific laws and examples.	
C27 Freshwater	There is little reference to integration of innovative technologies or other advancements. Given this is a long-term plan, there will be changes in 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.	May revise regional action plan to incorporate more description of potential system assessment projects (page 3-89).	



Comment ID	Comment	Possible Met Council response	MAWSAC/TAC recommendations are requested
WSP1 SPRWS	<p><i>Water Policy Plan comment related to water supply:</i></p> <p>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.</p>	<p>May revise text to include more information about where adequate water supplies are feasible.</p> <p>May also or alternatively update the Water Supply Planning Atlas with this information and refer planners to that technical resource.</p>	
WSP2 Dakota County	<p><i>Water Policy Plan comment related to water supply:</i></p> <p>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 users such as industrial, or non-community (non-municipal) wells.</p>	<p>May work with Water Policy Plan authors to revise text.</p>	

Comment ID	Comment	Possible Met Council response	MAWSAC/TAC recommendations are requested
WSP3 Minneapolis	<p><i>Water Policy Plan comment related to water supply:</i></p> <p>Page 16: 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?</p>	<p>May work with Water Policy Plan authors to revise, incorporating any advice from MAWSAC and TAC.</p>	
WSP4 Minneapolis	<p><i>Water Policy Plan comment related to water supply:</i></p> <p>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.</p>	<p>May revise to clarify that the Mississippi River is the first Water Supply source to trigger water use reduction measures in the State Drought Plan.</p>	





Comment ID	Comment	Possible Met Council response	MAWSAC/TAC recommendations are requested
LU1 Bloomington	<p><i>Land Use Policy comment related to water supply:</i></p> <p>Infrastructure needs. A focus of the Land Use Policy Plan is establishing the minimum densities that cities must use to guide future growth. The single largest constraint for built-out cities like Bloomington to redevelop in a denser fashion is infrastructure capacity. In cities like Bloomington, vital infrastructure such as the sanitary sewer system was designed in the 1950s and 1960s with limited capacity for future growth. Redeveloping at higher densities requires replacing that infrastructure at great cost. To help cities add density, Bloomington requests that Met Council Policy Plans acknowledge the relationship between increased density and expanding infrastructure and suggest resources for cities that need to expand infrastructure.</p>	<p>May revise content in the Water Resources Plan Appendix A to clarify expectations for water supply information in comprehensive plans and local water supply plans, to be sure that that information about local infrastructure capacity is included in local plans to support consideration of density changes on that infrastructure.</p>	
LU2 Minnetrista	<p><i>Land Use Policy comment related to water supply:</i></p> <p>Infrastructure considerations: Any changes to density requirements should take into account the capacity of local infrastructure to support higher-density developments. In communities like Minnetrista, where infrastructure is designed for lower densities, mandating higher densities without providing adequate resources for infrastructure improvements would create long-term financial challenges.</p>	<p>May revise content in the Water Resources Plan Appendix A to clarify expectations for water supply information in comprehensive plans and local water supply plans, to be sure that that information about local infrastructure capacity is included in local plans to support consideration of density changes on that infrastructure.</p>	