

2040 WATER RESOURCES POLICY PLAN

*Public Hearing Report
January 14, 2015
through March 27, 2015*



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C O U N C I L

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Public Hearing Report Overview

The 2040 Water Resources Policy Plan Public Hearing Report summarizes the comments received on the draft 2040 Water Resources Policy Plan. The draft plan was released for the purposes of public comment on January 14, 2015 and comments were accepted through March 27, 2015. During that time, the plan was available on the Council's website and through printed copies as requested.

The following spreadsheet summarizes the comments received, who made the comment, the staff response to the comment, and any text changes made to the 2040 Water Resources Policy Plan.

In sum, 24 individuals/organizations provided their comments on the draft 2040 Water Resources Policy Plan during the public comment period. A total of 1 individual provided oral testimony at the public hearing and the remaining submitted written comments.

Individuals who contributed their comments represented a range of constituents, including:

City/Township/Local Government--14

County Governments--5

Watershed Districts -4

Organizations--1

Based on comment content, a total of 166 individual comments were received. The following pages include a list of contributors, followed by the all of the comments received organized by theme.

A written record of all of the comments made via letter, email, or on the phone is available from the Metropolitan Council upon request.

How To Use This Document

This document is quite large and is not intended to be printed.

The public hearing report summarizes the comments received, who made the comment as identified by their comment ID number, and the staff response to the comment.

The comments are organized by theme. Many people made similar comments so a generalized summary of comments is preceded by the identifying number of the persons or groups who made the comment. The contributor is identified with their corresponding comment ID number, which can be located in the far left hand column.

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List of Comment Contributors

Comment ID	Date Received	Organization	Name
1	2/20/15	Dakota County	Thomas Eagan, Dakota County Board Chair
2	3/5/15	Scott County	Jon Ulrich, Scott County Board Chair
3	3/16/15	City of Burnsville	Heather Johnston, City Manager
4	3/16/15	City of Minneapolis	Steven Kotke, City Engineer and Craig Taylor, Executive Director
5	3/19/15	City of Independence	Becky Wozney, Hakanson Anderson
6	3/19/15	Rice Creek Watershed District	Samantha Kreibich, District Technician
7	3/19/15	Hennepin County	Carl Michaud, Director
8	3/20/15	Washington County	Gary Kriesel, Chair
9	3/20/15	City of Rosemount	William Droste, Mayor
10	3/20/15	City of Oak Grove	Rick Juba, City Administrator
11	3/24/15	Carver County	Randy Maluchnik, Chair
12	3/26/15	City of Lino Lakes	Michael Grochala, Community Development Director
13	3/27/15	City of Plymouth	Kelli Slavik, Mayor
14	3/27/15	Metro Cities	Patricia Nauman, Executive Director
15	3/27/15	City of Apple Valley	Todd Blomstrom, Public Works Director
16	3/27/15	City of Richfield	Kristin Asher, Assistant Director
17	3/27/15	City of Roseville, City of Falcon Heights	Kristine Giga, Engineer
18	3/27/15	City of Ramsey	Bruce Westby, Engineer
19	3/27/15	Comfort Lake Forest Lake Watershed District, Browns Creek Watershed District, Carnelian Marine St. Croix Watershed District Joint Letter	Brett Emmons, EOR
20	3/27/15	City of Bloomington	Robert Cockriel, Utilities Superintendent
21	3/27/15	City of Hugo	Rachel Juba, Planner

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Comment ID	Theme	Comment	Response
1, 9	General Comment	The WRPP provides goals and strategies related to wastewater, water supply, and surface water planning, management and operation. These issues are important.	Comment noted. These are important issues for all citizens in the region.
2	General Comment	Pleased to see a more integrated policy between various elements of water management and to see some changes with the Council providing more technical, regional issue facilitation, and implementation assistance.	Comment noted.
4	General comment	Need to define what is meant by economic feasibility which is used throughout the document.	Economic feasibility means 1) funding exists to cover the costs of the improvements or the financing for them is secured, and 2) the net present value of the expected cash flows of the improvement over its life cycle is greater than zero. This definition was added to the appendix.
7	General Comment	The County tracks and participates in efforts that address much of what the WRPP highlights as concerns, needs and/or community roles of promoting partnerships and being responsible stewards of our region's finite natural resources. Examples of actions taken by the County are included in the letter.	Comment noted.
8	General Comment	The Council should include performance measures to track results on the actions of the WRPP.	High level performance measures are being addressed through Thrive MSP 2040. As we begin to implement the policies and strategies, MCES will develop performance measures as appropriate.
8	General Comment	As the Council implements the WRPP, they should work with the County to meet local objectives, using our existing networks and plan structure, where possible. Also included in the letter are specific examples of where action items in the two plans overlap.	Comment noted. The plan stresses the need for collaboration and coordination. It is our goal to continue our efforts and expand on those efforts as we implement the WRPP.
3, 4, 6, 7	General Comment	We support the overall and integrated surface water, water supply and wastewater goals, policies and strategies in the draft WRPP.	Comment noted.
9	General Comment	We appreciate the Council's use of terms such as "an integrated water strategy" or "integrating our roles in wastewater, water supply, and surface water", as there is an increasing concern that our groundwater use for drinking water and our discharge of wastewater to the surface water may not be a sustainable practice.	Comment noted. These are important issues for all citizens in the region.

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Comment ID	Theme	Comment	Response
9, 12	General Comment	There is a number of implementation strategies outlined in the plan; does the Council have a schedule for implementing these strategies? Local governments will be required to begin the comprehensive planning process in the next two years and how these strategies are implemented as well as the Councils' timeline for implementation will be important for local governments to understand.	Implementation strategies will be addressed throughout the life of the plan. There will be ongoing collaboration with communities. The schedule is uncertain for concepts like stormwater and wastewater reuse.
12	General Comment	As local governments begin to plan for their comprehensive planning efforts, the Council should provide the local government units how the scope of the comprehensive planning process will change in accordance with the WRPP. This will be important as funding for the comprehensive planning process comes from each respective community. If the local governments will be required to increase the scope of the comprehensive drinking water, sanitary sewer, and water resources plans compared to the plans that were developed in 2008, cities will need to be aware of the specific changes in scope to properly budget for the comprehensive planning process.	The required elements for local comprehensive plans are included in Appendix C of the Policy Plan. Additional guidance and direction will be included in the Local Planning Handbook and the System Statements both of which will be available in September.
12	General Comment	On page 18, the Plan states that the WRPP will be used by the Council to support and plan; however, it seems as though the WRPP cites other agency jurisdiction and state statutes. Has this Plan been reviewed by all the applicable state agencies' attorney to verify the WRPP is in accordance with all applicable statutes? This review will be important if this document will then be used to assist regional planning efforts as well as make the local government accountable to this plan during local comprehensive plan updates.	The plan was made available to everyone for public comment. No comments have been received from the state agencies. The Council is not proposing to expand its review and oversight authorities. Strategies in the plan refer to authorities already delegated to the Council.
14	General Comment	Appreciate the outreach by MCES staff with community officials and stakeholders during the process of developing the plan. Generally, support the overall goals and direction of the Plan. Our legislative policies generally support the inter-relationships of wastewater, storm water and water supply in regional and local policy considerations.	Comment noted.
14	General Comment	Note that the plan refers to 'water resources' as a regional system on page four of the plan. While we support the integration of water policy areas, our legislative policies oppose making water supply a regional system.	The WRPP includes policies and strategies for our 3 focus areas: wastewater, water supply, and surface water and also includes the required wastewater system plan. The Council is not proposing to make water supply a regional system. The system reference will be changed to "wastewater".
14	General Comment	An executive summary of the plan that outlines key pieces, notes changes in trends and policy from the last plan, and outlines Council priorities is necessary.	Summaries for this plan and the other policy plans are being prepared and will be available later this year.

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Comment ID	Theme	Comment	Response
14	General Comment	Note the strong potential for overlap of Thrive MSP 2040, the WRPP and Master Water Supply Plan documents. This document would benefit from additional clarity as to how the plans are connected and distinct.	As stated in the WRPP, Thrive MSP 2040 provided the framework for a shared vision for the future of the region over the next 25 years and established the policy foundation for the WRPP. The WRPP purposely reiterated key elements from Thrive to make this connection. The WRPP provides high level policy direction that will guide the Master Water Supply Plan, such as considering water conservation, stormwater reuse, and wastewater reuse through integrated water planning and collaboration.
14	General Comment	Would like to emphasize the importance of ongoing, concerted collaboration by the Council with local and state entities as the Council continues to coordinate long term work around regional water sustainability. This collaboration should include clear direction, the use of highly accurate data that can evolve with new information, and clear communication with local stakeholders.	Comment noted. The plan stresses the need for collaboration and coordination. It is our goal to continue and expand on those efforts as we implement the WRPP.
16	General Comment	The City supports a watershed approach as the most appropriate and effective way to address the regions needs when considering all aspects of our water use, waste collection and treatment.	Comment noted.
16	General Comment	It is important that policy documents stick with policy-level statements, including overarching goals and direction which allow for future plans (i.e., local comprehensive plans, master water supply plan) to have flexibility on how to meet those goals. The WRPP seems to have a strong focus on specifics that appear inappropriate in a high-level policy document. The policy plan should focus on areas where the Council can help facilitate discussions and provide guidance related to managing the region's water.	Comment noted. Implementation strategies are included to provide direction on actions we need to take to ensure that options are available to meet the needs of the region as it grows and develops. Revisions have been made to ensure that these strategies are appropriate to the high level policies.
16	General Comment	The overall format of the WRPP is confusing. The document should include numbered chapters with an outline format to more easily refer to and reference.	The intent was to integrate the three policy areas of focus in previous plans: wastewater, water supply and surface water. This necessitates a different look than previous plans.
17	General Comment	We encourage the Council to provide technical and financial assistance whenever possible to local governments on water resource issues and management activities. All assistance in streamlining efforts, reducing redundancy in regulation, and identifying additional funding sources is greatly appreciated.	Comment noted. It is our intent to continue to provide technical assistance on water resource issues and management activities. We also intend to seek ongoing financial support to assist with this aspect.
18	General Comment	The City supports the Council's goal of achieving sustainable water systems. However, achieving sustainable water systems across the Twin Cities Metropolitan Area must be achieved in an equitable manner.	Comment noted.

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Comment ID	Theme	Comment	Response
19	General Comment	The overall theme and emphasis of this plan "...is to move toward more sustainable water systems through integration of our roles in wastewater, water supply, and surface water planning, management, and operation." The Council should be commended for taking this forward-looking approach.	Comment noted. Thank you for your support.
19	General Comment	The Council, as part of their regional water resources planning responsibilities, has identified priority lakes, many of which are in the east metro. Other unique and valuable resources including groundwater-fed streams (often trout stream) and wetlands are also located in the east metro and St. Croix River Valley. The on-going planning associated with declining aquifers and the difficult to study groundwater-surface water interactions is a very important and critical topic to the resources managed by many watershed districts, especially in the east metro.	Comment noted.
19	General Comment	In urban areas, it is often practical to infiltrate additional water over background/natural levels to both compensate for loss of evapotranspiration (thus benefit surface waters) and recharge additional water to the aquifers (thus reversing depletion trends). In rural areas, infiltration can be used to compensate for infiltration and aquifer recharge limited by tiling and other drainage infrastructure.	Comment noted.
19	General Comment	Just as the tremendous advancements and improvements that have been attained in wastewater treatment with new techniques and approaches, demonstrated in Figure 4, (showing a 91% reduction in phosphorus wastewater discharge over 14 years), new approaches to water management can have significant beneficial impacts to our water resources and maintain quality of life.	Comment noted.
19	General Comment	Page 18 - could a bullet be added to strengthen the point to include a request for what was considered and discussion by community of how sustainable water management was integrated between the three main community system (water supply plan, surface water management plan, comprehensive sewer plan)? Potentially ask how each system was able to provide a source or benefit for the other two systems? Later, a quantification of this system interchange would be helpful to make sure it is being implemented on a meaningful scale.	There are specific requirements for the local water plans and local water supply plans which the Council does not have the authority to change. The comprehensive planning process is intended to provide the vehicle to make these connections. For comprehensive plan updates, it will be up to the individual communities to determine how they want to define the methods they are intending to use to integrate work in these areas in order to achieve sustainable water.
14	General Comments	Support language in the plan that calls for a collaborative process with local officials when the Council is asked to respond to city-specific issues for which there may be an impact on other cities in the region.	The plan stresses the need for collaboration and coordination. It is our goal to continue and expand on those efforts as issues in the region arise and as we implement the WRPP.

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Comment ID	Theme	Comment	Response
18	Regional Growth Policy	Based on our review we did not identify anything in the draft WRPP that significantly conflicts with the current goals or initiatives of the City. However, based on our other recent Council policy plan reviews we question whether the draft WRPP accurately reflects population growth forecasts for the area, and are therefore unsure about the accuracy of some of the information included in the draft WRPP. Concerns with the population forecasts are not about our future land use vision, but rather how that vision relates to current infrastructure capacities, as well as future infrastructure investments and funding opportunities.	Comments noted. Forecasts in the WRPP were developed using population, household and employment numbers in the approved Thrive MSP 2040.
10	Regional Growth Policy	The sewer service that is planned to extend to and serve the southeastern corner of the city is now in service and struggling to find users. The city requests that the area within the city identified as a long term service area be removed and the entire city be designated Rural Residential.	The designation of southeastern Oak Grove as a long term wastewater service area was made to recognize the potential for regional wastewater services via the East Bethel Wastewater Reclamation facility. After approval of this designation, regional investments were made in East Bethel which includes interceptor capacity for Oak Grove. The area identified in southeastern Oak Grove as long term service area is contiguous with the long term, and current wastewater service areas in East Bethel. MCES encourages the City to utilize interim cluster or ghost platting development techniques to ensure that efficient sewer development can occur once direct wastewater services are provided.
4	Regional Growth Policy	The plan lacks a clear connection to the growth policies outlined in Thrive MSP 2040 and the other three policy plans adopted by the Council. The plan needs to draw a clear connection to Thrive. The plan should reflect the new urban era – one driven by preferences for amenity rich urban neighborhoods and current best practices such as compact development, green infrastructure car and bike sharing, pedestrian access and transit. The WRPP appears to position the Council to accommodate continued decentralization through expanded regional wastewater treatment services. The Council should conduct an analysis of what the most efficient way to develop and serve the region’s wastewater needs in relation to the intended growth pattern.	The WRPP emphasized integrated water planning to achieve water sustainability, which is clearly connected to Thrive MSP 2040 outcomes. Further, the WRPP contains policies on the urban and rural areas, as well as water supply and watershed management, which are consistent with Thrive MSP 2040.
4	Regional Growth Policy	The plan confuses equity with equality and should consider how water resources relate to racial equity objectives in Thrive MSP 2040.	*The Metropolitan Council is committed to looking at all of our programs, including those addressed by the Water Resources Policy Plan, and evaluating actions we can take to improve equity in the future.

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Comment ID	Theme	Comment	Response
15	Reuse and Conservation	Page 12 includes four bullet points describing examples of activities the Council will undertake to promote an integrated strategy. Please consider adding more emphasis on conservation and reuse practices to reduce the per capita consumption demands on potable water sources. Several metropolitan areas within the U.S. are facing similar water supply challenges and are responding with a comprehensive approach that emphasizes aggressive water conservation practices and innovative water reuse projects.	The second and fourth bullets have been modified as follows: Support reliable water supply solutions that promote the wise use of water at the community level through conservation, reuse, and aquifer recharge. Pursue economically feasible opportunities for reusing treated wastewater for non-potable uses, thus reducing the demand on our potable water supplies.
15	Reuse and Conservation	The section titled <i>Policy on Serving the Urban Area</i> provides a list of implementation strategies. Please consider adding an additional strategy indicating the Council's efforts to investigate opportunities for wastewater and stormwater reuse and aquifer recharge opportunities.	This information is included under Policy on Conservation and Reuse.
19	Reuse and Conservation	On page 18, could the Council promote investigating portions of communities including a reuse infrastructure ("purple pipe" systems) to develop a more in-depth reuse approach?	The Council is investigating reuse of stormwater and wastewater as part of implementation of the WRPP. Additional collaboration with communities and agencies will be needed to develop an economically feasible water reuse approach.
19	Reuse and Conservation	Promote research and need for source controls of contaminants that can cause limitations and challenges in wastewater reuse situations.	Agreed. This will be part of our assessment of wastewater reuse that will be done as part of implementation of this plan.
4	Reuse and Conservation	Agree water conservation measures are important. The plan should be clearer about the tools available for water conservation and which entities are best positioned to implement conservation. For example the plan is vague regarding how land use can support conservation.	Additional information on tools available for conservation and reuse will be available through the Land Planning Handbook which is in the process of being updated and will be available later this year.
8	Reuse and Conservation	The county supports the Council's efforts to integrate water conservation and reuse into Council operations, and encourage these activities in local communities. In particular, the county would like the Council to support efforts to remove barriers for water reuse as it relates to the plumbing code, as well as state agency permitting. In addition, the Council should continue to explore use of pumped pollution containment water for reuse or recharge, and work with the Minnesota Pollution Control Agency on this issue.	The Council is currently investigating reuse options in the region. The Council serves on a state-wide team looking into barriers to reuse.
3	Reuse and Conservation	The Council should continue to look at opportunities to reuse treated wastewater for non-potable uses.	The Council is currently investigating reuse options in the region.
2, 3	Reuse and Conservation	The Council should lead by example with water reuse, and work with other state agencies to help remove barriers to reuse.	Comments noted. The Council is currently investigating reuse options in the region and working with state agencies to advance reuse.

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Comment ID	Theme	Comment	Response
9, 12	Reuse and Conservation	<p>Page 42 - The Minnesota Department of Health may need to be consulted when considering options for wastewater reuse as their jurisdiction may overlap the proposed use. This should be recognized in the WRPP as a challenge.</p> <p>Page 42 – The statement "Wastewater treatment with reverse osmosis to remove salts is very costly, and. . ." without additional evaluation appears to preclude continued evaluation and consideration for the enhancement of wastewater treatment for reuse.</p>	<p>The Council is currently investigating reuse options in the region. The Council serves on a state-wide team looking into barriers to reuse.</p> <p>Cost is noted in the information about wastewater reuse challenges. The plan also indicates that we plan to evaluate irrigation as well in future studies.</p>
9	Reuse and Conservation	<p>Page 42 - Additional information should be added to support the statements that "Metro area industries have generally been successful with their own water conservation and reuse programs": and "There are very few high-volume industrial users of reused wastewater." It appears that there may be opportunities for the advancement of water conservation and reuse as initiatives in the metropolitan region and policies should be developed to support this.</p>	<p>The Council is currently investigating reuse options in the region. As options arise, we will look at expanding and updating this section.</p>
9	Reuse and Conservation	<p>Page 42 - "Wastewater uses for irrigation are highly dispersed and seasonal, and account for approximately 20% to 30% of total water use." The intent of this statement is unclear and should be clarified.</p>	<p>Additional language as follows has been included. "Wastewater uses for irrigation are highly dispersed and seasonal, and account for approximately 20% to 40% of total annual municipal water use. Thus, the potential for irrigation use is high, but a costly non-potable water distribution system will be necessary".</p>
11	Reuse and Conservation	<p>The Council should continue to lead by example with stormwater and wastewater reuse, by helping to remove barriers to more reuse, and consider reuse of water pumped for pollution containment. Technical assistance and leadership on implementing feasible reuse systems which meet state standards would be especially useful.</p>	<p>The Council is currently investigating reuse options in the region. Council staff are currently working with state agencies on reuse, working on strategies to remove barriers and clearly identify when and how reuse will be allowed in Minnesota.</p>
7	Reuse and Conservation	<p>The Council should continue to promote stormwater reuse and help provide technical guidance and address regional and statewide obstacles to making it a common tool for stormwater management.</p>	<p>Council staff are currently working with state agencies on reuse, working on strategies to remove barriers and clearly identify when and how reuse will be allowed in Minnesota.</p>
18	Reuse and Conservation	<p>The City vigorously supports further exploration and implementation of water conservation methods, including reusing wastewater and promoting infiltration practices to aid in groundwater recharge.</p>	<p>Comment noted.</p>
19	Reuse and Conservation	<p>Consideration of strong conservation measures, stormwater reuse, and the recent inclusion of wastewater reuse, provide a positive outlook on how water management can reverse negative trends of unsustainable water use.</p>	<p>Comment noted.</p>

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Comment ID	Theme	Comment	Response
9	Roles and Responsibilities	Page 18 states that the plan will be used by the Council to support and plan; however, it seems as though the Plan cites other agency jurisdiction and state statutes; it is not clear what role the Plan will have in the City's development of its comprehensive plans.	The plan is intended to provide guidance and direction to communities as they develop their comprehensive plans. Specific requirements and direction for the local water plans, water supply plans and the comprehensive sewer plan elements of the comprehensive plans are included in Appendix C. The policy has been revised to "the Council will plan for sustainable water resources..."
1	Roles and Responsibilities	The commenter recognizes the overall purpose of the WRPP, and recognizes the Council's authority to conduct water supply planning, wastewater treatment planning and to develop management objectives for watersheds in the metro area. The Draft WRPP proposes to expand the Council's role in water resource planning beyond the statutorily defined roles and responsibilities creating a duplication of efforts already vested to state agencies and local governments.	The Council works closely with state agencies and local governments on water supply, surface water and wastewater issues in the region. The Council is not proposing to expand our role beyond what is already defined in statute and law.
1	Roles and Responsibilities	The WRPP diminishes and undermines the role of local elected officials responsible for the delivery of the region's policies and related public services. Several proposed strategies fall under the jurisdiction of local governments. The proposed review and oversight of these programs results in confusion and a diminishment of the role of local government.	The Council is not proposing to expand its review and oversight authorities. Strategies in the plan refer to authorities already delegated to the Council. Text will be revised to clearly state the Council's existing statutory planning and review authorities, and how they relate to the authorities of state agencies and local units of government.
1	Roles and Responsibilities	The text in the introduction fails to clearly identify the federal requirements for a regional management plan that the WRPP is intended to fulfill as it relates to the 1976 designation by the Governor of Minnesota as the area-wide water quality planning agency under 33 U.S. Code, Section §1288.	Text will be revised to clarify the Section 208 (U.S. Code §1288) planning requirements that are fulfilled by the Council and those that are fulfilled by other units of government, per statutes.
1	Roles and Responsibilities	The specific requirements under Section 208 of the federal Clean Water Act are not cited and the mechanism by which the Council was designated as the area-wide water quality planning agency is not discussed. Additional information on the designation should be included.	Text will be revised to clarify the Section 208 (U.S. Code §1288) planning requirements that are fulfilled by the Council and those that are fulfilled by other units of government, per statutes.
7	Roles and Responsibilities	The Council should work to reduce redundancy in regards to its role in water planning and management and those of state agencies, and other regulatory entities (e.g. wellhead protection, water appropriations, SSTS, and local water plans).	The Council is not proposing to expand its review and oversight authorities. Strategies in the plan refer to authorities already delegated to the Council. Text will be revised to clearly state the Council's existing statutory planning and review authorities, and how they relate to the authorities of state agencies and local units of government.

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Comment ID	Theme	Comment	Response
9	Roles and Responsibilities	There are numerous implementation strategies identified throughout the plan that appear to have the potential to diminish the ability of local government units to control land use within their jurisdictions. The Plan should be developed to establish the Council's role to be the continued establishment of policy in consultation with local units of government.	The Council is not proposing to expand its review and oversight authorities. Strategies in the plan refer to authorities already delegated to the Council. Text will be revised to clearly state the Council's existing statutory planning and review authorities, and how they relate to the authorities of state agencies and local units of government.
11	Roles and Responsibilities	The County is supportive of the Council's role in coordination and providing technical assistance, financial assistance and regional facilitation.	Comment noted.
8, 11	Roles and Responsibilities	The County is concerned about the Council's role in water resource management. We urge the Council to closely examine its role in regards to water management, before expanding it, to make sure it is not duplicative of existing regulatory powers and burdensome to local communities. The county also encourages the Council continuing to work with state agencies to reduce overlap of authority with regards to water management, as well as encourage further collaboration among the Council and state agencies. The Council should include a description from state agencies on their actions to support the WRPP.	The Council is not proposing to expand its review and oversight authorities. Strategies in the plan refer to authorities already delegated to the Council. Text will be revised to clearly state the Council's existing statutory planning and review authorities, and how they relate to the authorities of state agencies and local units of government. Council staff continue to work closely with state agencies on water planning in Minnesota to reduce redundancy and overlap.
9, 11	Roles and Responsibilities	The draft WRPP proposes to expand the Council's role in water resource planning beyond the statutorily defined roles and responsibilities creating a duplication of efforts already vested to state agencies and local governments.	The Council is not proposing to expand its review and oversight authorities. Strategies in the plan refer to authorities already delegated to the Council. Text will be revised to clearly state the Council's existing statutory planning and review authorities, and how they relate to the authorities of state agencies and local units of government.
9, 11, 12, 20	Roles and Responsibilities	Water resource concerns and water policy do not follow typical jurisdictional boundaries and it is important to acknowledge the existence of state-wide agencies that currently have jurisdiction over water resource policy. There is a concern that the Council may be duplicating water resource policy efforts with agencies that have the authority to enforce state-wide policy (MnDNR, MPCA, MDH, and various Watershed Districts).	The Council is not proposing to expand its review and oversight authorities. Strategies in the plan refer to authorities already delegated to the Council. Council staff continue to work closely with state agencies on water planning in Minnesota to reduce redundancy and overlap.

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Comment ID	Theme	Comment	Response
1, 2, 3, 11, 12, 20	Roles and Responsibilities	The Council's role in water supply need to be clearly stated. The Council's role should be limited to planning, technical assistance and coordination with the DNR. The authority to conduct the tasks in the implementation strategy related to collaborating with agency partners to develop and implement local water supply plans, local water plans, plans for groundwater management areas, wellhead protection plans, review water appropriation permits, and aquifer recharge projects is already delegated to state agencies. The Council may be duplicating efforts of state authorities.	The Council is not proposing to expand its review and oversight authorities. Strategies in the plan refer to authorities already delegated to the Council. Text will be revised to clearly state the Council's existing statutory planning and review authorities, and how they relate to the authorities of state agencies and local units of government.
12	Roles and Responsibilities	It is unclear in this document how the Council will implement the strategies outlined when there are other State and local agencies with jurisdiction over water resources and water policy in Minnesota.	The Council is not proposing to expand its review and oversight authorities. Strategies in the plan refer to authorities already delegated to the Council. Text will be revised to clearly state the Council's existing statutory planning and review authorities, and how they relate to the authorities of state agencies and local units of government.
13	Roles and Responsibilities	The City fully supports the need for a regional role in planning for our wastewater system.	Comment noted.
13	Roles and Responsibilities	The plan appears to shift toward a more regulatory approach to addressing potential system impacts. State law clearly provides that the Council can require a change in a local plan, based on an identified substantial impact on the wastewater system or a substantial departure from the wastewater plan. The law does not give the Council the authority to dictate how a local plan must be changed to eliminate the impact or departure. In the draft policy plan, the Council is requiring that communities served by the regional system include a program to mitigate sources of inflow and infiltration from private property. How a community regulates its residents is not part of the council's legislated mandate.	The Council reviews plans for conformance with system plans. If plans have the potential to impact the regional wastewater system plan, a system impact can be declared. Excessive inflow and infiltration has the potential to cause an impact to the regional system. The Council does have statutory authority to regulate use of the regional wastewater system.
13	Roles and Responsibilities	The City is concerned about the Council's move toward integrating roles in wastewater, water supply and surface water. The Council does not have the statutory authority to require local water supply and surface water management plans to be consistent with regional plans. Moreover, there are already a myriad of agencies responsible for surface water planning.	The Council has review and comment authority on local water plans and water supply plans. The Council does have the authority to ensure plans are consistent with Council policy and the wastewater system plan. The WRPP language is being revised to state that the local water supply plans shall be informed by the Master Water Supply Plan.

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Comment ID	Theme	Comment	Response
14	Roles and Responsibilities	A higher level of specificity as to the direction the Council will pursue in integrating wastewater, water supply and surface water is critical. Integration of these areas of water policy will require sustained collaboration with local governments and other stakeholders. There are also myriad agencies with regulatory roles in these areas to which cities must be responsive. It is important that as integration of these areas occurs, the Council operates in a highly collaborative manner, and that roles and responsibilities of the Council and state and local entities are clearly identified.	Comment noted. The plan stresses the need for collaboration and coordination. It is our goal to continue our efforts and expand on those efforts as issues in the region arise and as we implement the WRPP. The plan has been revised to clarify roles and responsibilities.
20	Roles and Responsibilities	Make it clear that the WRPP is a document that is limited to informing other agencies such as the Board of Water and Soil Resources specifically in areas such as performance standards for watershed plans in the metropolitan area including standards relating to the timing of plan revisions as specifically outlined in Minn. Stat. 473.157. Statute 473.157 only directs the Council to make performance standards recommendations to the Board of Water and Soil Resources or management objectives for watersheds. The statute does not direct the Council to develop specific requirements for local water suppliers. Statute 473.145 only directs the Council to prepare and adopt -after appropriate study - a comprehensive development guide for the metropolitan area. While this policy plan document may compile goals and standards for development, any prescriptive direction must also include adequate study and public input opportunities. The public process used for this document should not be considered adequate for future regulatory requirements.	Comments noted. The Council is not proposing to expand its review and oversight authorities. Strategies in the plan refer to authorities already delegated to the Council. Text will be revised to clearly state the Council's existing statutory planning and review authorities.
20	Roles and Responsibilities	The Draft Water Resources Policy Plan makes numerous references for the need to develop requirements and make decisions about water supply, surface water management, and wastewater collection and treatment, natural resources, land use, etc. It is important that policy documents stick with policy-level statements, including overarching goals and direction which allow for future plans (i.e., local comprehensive plans, master water supply plan) to have flexibility on how to meet those goals. The Council should delete references to implementation strategies or requirements pertaining to water supply management and surface water resources.	The Council is not proposing to expand its review and oversight authorities. Strategies in the plan refer to authorities already delegated to the Council. Text will be revised to clearly state the Council's existing statutory planning and review authorities.

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Comment ID	Theme	Comment	Response
20	Roles and Responsibilities	The Council should consider continuing to use its review authority of local comprehensive planning efforts to ensure that regional goals are being met without expanding regulatory authority, policies, or implementation measures with particular emphasis on regional wastewater services.	The Council is not proposing to expand its review and oversight authorities. Strategies in the plan refer to authorities already delegated to the Council. Text will be revised to clearly state the Council's existing statutory planning and review authorities.
4	Specific Comment	Page 7, last paragraph and page 8, question the text on regional parks and rural service areas.	Language referring to the regional parks has been deleted.
4	Specific Comment	Page 21, need to define low impact development.	A definition of low impact development was added to Appendix E.
4	Specific Comment	Page 21 appears to overstate the infiltration process.	Comment noted.
4	Specific Comment	Page 26, last line on the page -Change a lot that can ...to more that can be done	The language has been changed.
4	Specific Comment	Page 28, - change treated, unnecessarily, at wastewater ... to treated at wastewater treatment plants	The word unnecessarily was included to indicate that excessive I/I should not be treated at wastewater treatment plants. We will revise the language.
4	Specific Comment	Page 29, second full paragraph - add ... accommodate existing flow and new development Page 29, third full paragraph - add the following sentence. In these communities the additional challenge is the risk of an overflow to the Mississippi River.	Added existing flow. Modified the language as follows: "Because of this, these communities continue to face additional challenges in eliminating sources of inflow in addition to the risk of an overflow to the Mississippi River".
4	Specific Comment	Page 37, Capital Improvement section bullets - it appears that a 4th objective about meeting regulatory requirements should be added or incorporated into one of the other 3 bullets	Costs to meet future regulatory requirements are intentionally excluded. These potential costs are discussed later in the wastewater system plan.
4	Specific Comment	Page 39, Minneapolis Interceptor 310/320 Diversion -wouldn't that project also benefit growth long-term?	Comment noted. System capacity is controlled by the downstream Joint Interceptor.
4	Specific Comment	Page 41, - suggest using reducing water quality risks rather than avoiding Page 41, phosphorus fertilizer is one of the nonpoint sources of phosphorus that creates water quality issues. This has the potential to conflict with water quality goals.	Changed language to reducing. Phosphorus fertilizer is still necessary for crops grown on certain soils.
4	Specific Comment	Page 42 - Does this mean that regionally 20- 30% of all water is used for irrigation purposes on an annual basis? If not, what does it mean?	Yes, annual basis.
4	Specific Comment	Page 53 - Table A-3 - There is an asterisk by Minneapolis in the table, but no explanation of what that asterisk refers to.	Typographical error. Asterisk removed.
4	Specific Comment	Page 90 -Should include a definition for nonpoint source pollution Page 90 -The first letter of the Open Space definition is a zero, not an 0	The definition for nonpoint source pollution has been added to Appendix E. The typo has been corrected.

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Comment ID	Theme	Comment	Response
4	Specific Comment	Page 93 - Map is useful, but legend and labels are very hard to read, even when magnified	The map will be available at a larger scale in the Land Planning Handbook and in each Community's system statement.
9	Specific Comment	Page 17 - in the second Sustainable Water Supplies Implementation Strategies, please consider adding "and public, industrial and agricultural water demands" after "transcend community boundaries".	No change made
7	SSTS and Communal Systems	Is the Council planning on establishing obligations for SSTS above and beyond MN Rules Chapter 7080?	No
2	SSTS and Communal Systems	<p>The language in the Private Wastewater treatment section is confusing with respect to SSTS and community systems. Don't think the Council's land use authority can enforce SSTS compliance.</p> <p>Also, the strategy allowing failing systems to hook up to the regional system at the community's expense conflicts with the strategy stating the Council will acquire wastewater facilities when requested.</p>	<p>In order to reduce potential impacts for early expansion of or the expansion of our system into unplanned areas, the Council needs to be aware of the condition of SSTS and private systems throughout the region. The first strategy will be revised to make it clear about the intent and reason for asking for information on this topic area. The Council is not proposing to regulate or enforce any regulations in this area but we do need to keep track of the potential issues in the region related to SSTS and private system use.</p> <p>Related to the second issue, our policy on acquiring wastewater facilities when requested only applies to non-Council community wastewater treatment facilities and not SSTS or private communal systems.</p>
2	SSTS and Communal Systems	Communal and SSTS put the water back into the ground close to where it is extracted. Thus, there may be situations where this is of value to recharge. We think there should be a conversation about this issue with legislation that potentially pursues enabling Counties and Townships to set up subordinate service district to manage Community Septic Programs	Staff agree that this would be a valuable conversation to have and are willing to discuss this further with the County.
1, 2	SSTS and Communal Systems	The implementation strategy on Page 20 related to the Council using its review authority for local comprehensive plans to ensure that communities fulfill their current and future obligations regarding SSTS and other private wastewater systems is a duplication of effort of local government.	Council staff have been working collaboratively with the PCA on this issue for years. Council staff require this for all communities knowing that many are doing a good job at implementing this state requirement but also knowing that others are not. Council review of this item helps to ensure systems are properly maintained and thus reducing the risk to early expansion or unplanned expansion of the regional wastewater treatment system to address problem areas.
3	Surface Water	Technical and financial assistance are critical for success in protecting surface water resources.	Agree. Council staff will continue to provide technical assistance in this area. Council staff work closely with the other state agencies in further developing programs to help fund projects to protect and restore our water resources.

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Comment ID	Theme	Comment	Response
3	Surface Water	Current regulations and requirements being implemented by agencies often conflict. What is required for stormwater management can have negative impacts on groundwater. Cities need clear direction.	Comment noted. Council staff are and will continue to work closely with state agencies to resolve conflicts.
16	Surface Water	The Council is encouraged to address the agricultural impacts that are affecting the region's water quality and sustainability by utilizing positive partnership approaches and striving for outcomes where progress in this area can serve as an example for other regions on how to achieve measureable results through education and partnerships. Include a strategy supporting education efforts and partnership opportunities with agriculture communities (in and outside of the metro area) to address watershed goals. Consider regional solutions in agricultural areas.	Agree, a new strategy has been added.
19	Surface Water	Could regional water budgets be developed that better outline large scale water trends, quantify risks, and identify opportunities for solutions? Could groups of watersheds, along with communities, combine to develop these regional water budgets?	Council staff have been working on trends in stream quality over the last few years and will be completing a river trends assessment next year. A full-scale regional water budget and trends assessment would require partners and potentially additional data but would be a good discussion item with area watershed organizations.
1	Surface Water	Page 25 includes an implementation strategy on monitoring the region's water resources in partnership with others and one on investigating the need to develop and/or recommend water monitoring and assessment protocols and other standard operating procedures for partners to use. Watershed Management Organizations are already accomplishing water monitoring and assessment, and using Technical Advisory Committees to develop protocols.	Council staff collaborate with state agencies, local governments and watersheds on monitoring efforts in the metro area to reduce duplication of these efforts. The strategy to investigate the need to develop standard protocols will be dropped from the plan and pursued through over avenues if determined to be a regional need.
11	Surface Water	The plan relies heavily on WMOs to ensure local water plan implementation. There needs to be more clarity on Council expectations for "complete" local comprehensive plans and what expected implementation is at the local level.	Comprehensive plans will be complete for the local water plan requirement if the plan contains information on all of the 8410 rule requirements and is consistent with Council policy.
2	Surface Water	There is confusion over the language related to the requirements for local surface management plans in Appendix C-2.	Council staff is waiting on final promulgation of BWSR's new 8410 rule which include the requirements for local water plans. Once promulgated, the language in the WRPP will be changed to match that of the new rule.
4	Surface Water	Need more explanation on the surface water quality monitoring program purpose.	Council staff work closely with state agencies, communities, and watershed organizations and others in the metro area on surface water monitoring – to coordinate monitoring and to fill gaps.

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Comment ID	Theme	Comment	Response
11	Surface Water	The WRPP references areas where the Council will continue to monitor lakes, streams and determine "priority" lakes. Water monitoring activities are currently implemented by local watersheds, the MN Pollution Control Agency, and the MN Department of Natural Resources, The plan should allow flexibility in the approach, particularly when local watersheds have active monitoring programs. It should also strive to reduce duplication and share water quality data in a more timely and transparent fashion. Carver County has had an active monitoring program for nearly 20 years and the Council could take advantage of this strong local network to accomplish regional monitoring efforts.	Council staff collaborate with state agencies, local governments and watersheds on monitoring efforts in the metro area to reduce duplication of these efforts. The Council's Environmental Information Management System (EIMS) is currently undergoing an upgrade which will provide better access to our data. We would be happy to meet with you and discuss further collaboration efforts in this area.
5	Surface Water	Lake Sarah should also be considered a priority lake. This lake appears to meet the high recreational value criteria used to identify priority lakes.	Lake Sarah was added to the list.
4	Sustainability	The Plan makes a strong commitment to environmentally sustainable practices at Council facilities. The plan should also comment on how these efforts might be promulgated by other jurisdictions and the private sector, to support overall sustainability goals.	This is a policy document so sustainable water management practices have been addressed at a high level and have recognized the roles of our numerous government partners who jointly work toward a common goal of sustainable water resources.
9	Sustainability	Working toward "Sustainability of our Water Supplies" states that there are large industrial and agricultural demands in the region and particularly Dakota County. How will the Council engage these industrial and agricultural users in the discussion and development of sustainable water supplies?	These issues will be addressed as part of the sub-regional water supply collaboration.
14	Sustainability	The definition of sustainability carries various meanings and applicability for regional and local stakeholders. Having a commonly understood definition, backed by highly accurate data and science, with ongoing input by local governments, will be crucial as solutions to ensuring future water sustainability are developed.	Comment noted.
15	Sustainability	Page 6 describes activities the Council will undertake to promote sufficient and high-quality ground and surface water. Please consider adding a bullet point emphasizing efforts to promote wastewater and stormwater reuse as an effective strategy to managing demands on potable source water.	Reuse is addressed in the conservation and reuse section.
19	Sustainability	Under Sustainability Stewardship, 2 nd bullet environmental sustainability at wastewater systems operation (pg. 6), could green site design and features be added?	A bullet has been added that states "green design features".
19	Sustainability	Can energy be integrated into the evaluation of "sustainability" of water management solutions?	This will be noted for our future work in this effort.

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Comment ID	Theme	Comment	Response
2, 7, 8	Sustainability	The policies with respect to aquifer drawdown appear to only address stormwater recharge and water supply. The impacts of wastewater collection and treatment should also be acknowledged. The Council should carefully consider the tradeoffs between centralized and decentralized wastewater management and whether or not centralized management is creating externalities and additional costs to water suppliers and the environment.	This will be addressed through integrated water planning. The Regional wastewater system to serve through 2040 is essentially complete. However, we are evaluating reuse, as well as future wastewater reclamation facilities, as the region grows. Specifically we are looking at facilities in the Northwest, Northeast and western Scott County. Preserving our options for the future, particularly in areas where groundwater and surface water use and quality is an issue, is critical to achieving regional water sustainability goals.
8	Sustainability	The county supports efforts regarding sustaining our water supplies, and recognizes the impact that higher groundwater use is having on our aquifer system. The county would like to see the Council acknowledge the role centralized wastewater treatment has played in changing the overall water budget for the region. Where appropriate, the Council could look at more opportunities for localized wastewater treatment and/or reuse of wastewater discharge, similar to the demonstration projects proposed in East Bethel.	Council staff is undertaking a wastewater reuse study right now that will provide insight and direction on next steps in this area. Council staff are also looking into other opportunities throughout the region for localized wastewater treatment and wastewater reclamation facilities.
4	Wastewater	Page 74 in the Requirements for Areas Not Served by the Regional System - It seems like agencies should provide similar information as the areas served by the regional system including but not limited to capital improvement programs, maintenance schedules, I/I and how do they plan to accommodate growth	Many of these communities do not own or operate municipal wastewater collection or treatment facilities and are served entirely by SSTS. Therefore, the required information is specific to SSTS management. For those communities with their own wastewater treatment plants, much of the information noted in your comment is required.
4	Wastewater	Investment policy seems mislabeled. How does it relate to wastewater system maintenance, expansion or the CIP?	The investment policy was intended to be an overall policy on how we allocate our resources now and into the future for all areas of the plan – wastewater, surface water and water supply. The specifics on wastewater system asset preservation and expansion are included in the wastewater system plan section.
8	Wastewater	The County appreciates the Council's research into cost estimates for upgrading wastewater treatment facilities to meet lower phosphorus standards. We encourage the Council to stay engaged with the Minnesota Pollution Control Agency, and relay the tremendous economic impacts this would have for communities served by centralized wastewater.	Comment noted.

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Comment ID	Theme	Comment	Response
9	Wastewater	Page 85 -The Met Council should address how the Inflow and Infiltration goals are established and in what year each City can expect to serve as a baseline. To date, the Inflow and Infiltration goals have been established on a rolling average; however, this policy may need to be refined as Inflow and Infiltration concerns are continuing to decline.	I/I goals will be established through the development of the Council's I/I procedures. We will consider another I/I task force in the near future.
3	Wastewater	Continued emphasis on long-term planning and rate stability are critical to continuing to provide high quality cost-effective services.	Comment noted.
3	Wastewater	Flexibility for developed cities is necessary for successful inflow and infiltration programs. Provide goals and allow cities to select the measures to meet the goals.	Comment noted.
3	Wastewater	More advanced planning and community engagement is needed for interceptor rehabilitation projects.	Agreed. MCES is committed to increasing outreach and community collaboration on our interceptor rehabilitation program.
3	Wastewater	How are future TMDLs and their impacts on costs of wastewater treatment factored into long-term financial planning? Rate impacts?	This is discussed in the wastewater system plan regarding long-term capital improvement plan and regulatory scenarios sections. See investment policy.
2	Wastewater	We support the Council's long-term wastewater service area planning and are pleased that the collaboration between the Council and County is advanced in this plan.	Comment noted.
2	Wastewater	We support the Council's plans to acquire and secure a site between Jordan and Shakopee to construct a post-2040 regional WWTP.	Comment noted.

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Comment ID	Theme	Comment	Response
1	Wastewater	<p>The WRPP diminishes and undermines the role of local elected officials responsible for delivery of the region’s policies and related public services. The following implementation strategies were referenced in this comment.</p> <ul style="list-style-type: none"> • Page 15, “through the review process for comprehensive plans, local water plans, and watershed management plans, make water resources management a critical part of land use decisions, planning protocols and procedures to ensure these plans are making progress toward achieving state and regional goals for protection and restoration of water resources”. • Page 19, “Potentially implement early land acquisition and work closely with communities to preserve utility corridors when it is necessary to expand its facilities or locate new facilities needed to implement the wastewater system plan. Preserve unsewered areas inside the Long-Term Wastewater Service Area for future development that can be sewered economically. Extend wastewater service to suburban communities if the service area contains at least 1,000 developable acres. Require that all communities currently served by the regional wastewater system remain in the system. Accept the wastewater service request only when specified criteria are met.” • Page 20, Preserve areas outside the Long-Term Wastewater Service Area for agricultural and rural uses, while protecting significant natural resources, supporting groundwater recharge, protecting source water quality, and allowing limited unsewered development. • Dakota County supports the concept of local land use authority. The strategies above erode the ability of local governments to control land use within their jurisdictions. The Council’s role should be that of setting policy in consultation with local units of government. 	<p>Council staff work closely with local governments on the strategies listed.</p> <p>Many of these strategies directly are needed to ensure that our wastewater system is not adversely impacted by individual activities throughout the region.</p> <p>The intent is not to undermine local elected official’s responsibilities but to work together on these issues for the greater region.</p>

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Comment ID	Theme	Comment	Response
12	Wastewater	Page 19 – Policy on Servicing the Urban Areas: the Plan states that wastewater service to suburban communities would be extended if the service area contains at least 1,000 developable acres. If during the exercise of quantifying a sustainable water balance it is deemed that the collection of groundwater for use as a water supply and treating the wastewater for discharge to surface water is not a sustainable practice, will the Council explore options for localized wastewater treatment or water reuse options for urban communities?	Yes. For example, Rogers, is a community that qualifies under this criteria. The Proposed Crow River Wastewater Reclamation Plant will eventually serve Rogers. Water reuse is part of the planned implementation program.
12	Wastewater	The WRPP includes community forecasts of sewer population, households, and employment for cities located in the Metropolitan Area in Table A-3. The sewer projection calculation methods as compared to the City’s total population, household, and employment projections do not align with calculation methods used in previous versions of comprehensive plans. The City has not disputed the total City population, household, and employment projections as outlined in the Council’s Thrive MSP 2040 Plan; however, the City does not agree with the sewer population, household, and employment projections outlined in the MCES WRPP.	We agree that the assigned sewer forecasts that appear in Table A-3 are in error and reflects a greater assignment of “unsewered” growth within the City than is realistic. Revised numbers will be included in the WRPP to better reflect the split between sewer and unsewered growth. We would like to request that the City provide some input as to its vision for unsewered growth.
12	Wastewater	The WRPP includes total community wastewater flow projections in Table A-4. MCES has traditionally recommended utilizing an average day wastewater flow generation assumption of 100 gallons per capita per day for planning purposes. If that assumption is used to project the City’s total residential wastewater flow using the total sewer population projection outlined in the WRPP, the total residential wastewater flow should be approximately 2.08 million gallons per day (MGD). The non-residential flow projections based on a per acre usage should then be added to the residential flows. As such, the reported City’s total projected wastewater flow of 1.44 MGD for the year 2040 outlined in the WRPP should be increased substantially and should be more consistent with previous planning calculation methods.	MCES acknowledges that sanitary sewer design standards require design based on average wastewater flow generation of 100 gallons per capita per day. However, the regional wastewater system is designed to serve and accommodate flows on a larger geographic basis and considers land use, transportation, development density and other relevant factors. Flow projections in the system plan reflect actual experience and project continuation of water conservation and I/I reduction.
14	Wastewater	Support language in the plan that notes that the Council will provide sufficient capacity in the wastewater system to meet growth.	Comment noted.

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Comment ID	Theme	Comment	Response
16	Wastewater	The City supports the Council's efforts to capture and reuse any effluent leaving the wastewater treatment plants and encourages regional groundwater recharge projects wherever safe, cost-effective, and feasible.	Comment noted.
17	Wastewater	The City is one of the many cities working to reduce inflow and infiltration. We are pleased to see that improvements to the City Interceptor are identified in the long-term capital improvements. This will be a significant step forward to reducing I/I in our city.	Comment noted. With the wastewater system essentially built out. MCES is placing greater emphasis on system renewal and rehabilitation. One benefit to these efforts is increased assessment and mitigation of I/I within the regional disposal system.
19	Wastewater	When discussing "economic feasibility" and "cost effective" (e.g., pg. 20 on wastewater and pg. 22 in Implementation Strategies), how will long-term water risk be accounted for in the evaluation? Some work by Dr. William Holahan in Wisconsin has provided some insights into putting economic values on resources at risk of depletion that might give economic basis for consideration.	Thanks for the reference. We intend to consider all available options and concerns when making decisions on long-term feasibility.
19	Wastewater	On economical and beneficial wastewater service options and requirement to connection via a regional interceptor (pg. 20), could this be in conflict with subregional reuse of wastewater for more sustainable water management?	Preserving our options for the future, particularly in areas where groundwater and surface water use and quality is an issue, is critical to achieving regional water sustainability goals.
21	Wastewater	All of the eastern part of the City, outside the MUSA, should be identified as a study area for potential future wastewater service.	MCES is willing to partner with the City to study this area from the integrated water planning perspective.
21	Wastewater	It is the City's intention to plan for the full build-out of the existing MUSA by the year 2040, based on the fact that the MUSA line is a defined limit to sewer growth	Comment noted.
21	Wastewater	The projected 2040 sewer flow included in the WRPP is 1.98 MGD (average flow). The City's current Comprehensive Plan includes a projected average flow of 5.3 MGD, based on the full build-out within the MUSA as discussed in our previous comments.	The City's current average daily wastewater flow is below 1.0 MGD. The 2040 projected flow of 1.98 MGD reflects the potential for sewer development to nearly double within the 25-year planning period. MCES recognizes that full build-out of the City will occur after 2040.
4	Wastewater (rates)	Encourage the Council to maintain reasonable wastewater rates while prioritizing sound investments with regional benefit. For example, we are encouraged by the transparent policy of soliciting customer input and conducting a public hearing when a municipality requests Council acquisition of a treatment plant.	Comment noted.

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Comment ID	Theme	Comment	Response
8	Wastewater (SAC)	In the previously reviewed policy plans, equity was an important component often coming as a financial burden placed upon local units of government. However, in the draft WRPP, equity with regard to SAC charges is going to be ignored, seemingly because the expense of attaining it would directly impact the Council. While the county agrees with the policy direction on SAC charges, we urge the Council to re-examine other policy plans by considering who bears the costs related to attaining "equity" in those services. It is important that the Council be clear and consistent in its policy setting.	<p>*While the other policy plans have been adopted, the Council looks forward to ongoing conversations with local units of government on these issues.</p> <p>SAC pays for a portion of wastewater system debt service, pursuant to statute. A 2013 task force of communities served by MCES strongly recommended that SAC be utilized solely for wastewater purposes. The Council intends to convene a work group of stakeholders to evaluate opportunities, including SAC credits, to support affordable housing.</p> <p>It is also noted that the cost of any sort of waiver or reduction of SAC for affordable housing or other good causes that have requested such (veteran's development, churches, sports, LEED buildings) is not a cost to the Council but does require that SAC rates to other development in the region would be higher.</p>
4	Wastewater (SAC)	The SAC policy is based on equality not equity. Highly urbanized areas are subsidizing those areas that are less urbanized. There are also unanswered questions of equity in the Council's policy of a flat SAC rate for all. The Council should conduct an analysis that examines inequity in relation to the regional growth policies, and reconsider the policy of uniformity in SAC charges. Reforming SAC has been a topic of regional conversation for years. This policy document should address this issue broadly and set the stage for future changes aimed at achieving equity, simplicity, low rates, and promoting sustainable development.	<p>*The SAC system, specified in MS 473.517, is a cost of service (for the availability of capacity) user fee on communities. Communities have some local authority to make their charges different at the individual company level (as City SAC is based on a different statute). The Council is not involved in local government decisions on this matter.</p> <p>That said, the Council has had many task forces and work groups to make SAC better and information on those efforts is available on our web site at: http://www.metrocouncil.org/SearchResults.aspx?searchtext=sac+work+group&searchmode=allwords#tab_Data_Publications</p> <p>Additional work force/task forces may be called for and will be pursued in collaboration with community partners.</p>
14	Wastewater (SAC)	During the development of the draft plan, language in the original draft that discussed using SAC for specific Council goals was removed, and the Council elected to establish a separate group to examine these issues. We support the removal of the SAC language and proposal ideas from this plan.	Comment noted.

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Comment ID	Theme	Comment	Response
14	Water Supply	Recently advocated for the establishment of a technical advisory group of local staff to work with the Council and other agencies on issues concerning science, analysis and data around water supply. This is an important component to the work around these issue areas, and we appreciate the Council's willingness to establish this group.	Comment noted.
16	Water Supply	<p>Policy on Serving the Urban Area Implementation Strategies</p> <ul style="list-style-type: none"> • What is meant by "framework" that the future Master Water Supply Plan will be providing? • Restate "review local water supply plans to ensure consistency with the Metro Area Master Water Supply Plan" to "... ensure consistency with <i>council guidance</i>". • Remove the statement "and in reviewing water appropriation permits". 	Water supply related strategies have been clarified and consolidated under the policy on sustainable water supplies. The last statement has been moved to this section and clarified by adding "as requested by the DNR". The phrase "framework for coordinated water supply planning" has been deleted. The phrase "ensure consistency" has been deleted.
18	Water Supply	The draft WRPP does not appear to create any new mandates for the City, but instead appears to perpetuate and expand upon existing policies that could ultimately direct the City's future water supply source towards surface waters instead of groundwater aquifers. The City completed a study which showed that a surface water treatment facility may indeed be technically feasible, but it would not be economically feasible if the intent is to serve only the needs of the City, unless significant outside financial assistance was received.	The strategy on promoting resiliency by identifying and pursuing options to increase surface water use... has been removed and replaced with an approach that works closely with communities on defining options to support sustainable water supplies. The strategy has been revised: "support community efforts to improve water supply resiliency by cooperatively identifying economically and technically feasible water supply alternatives".
9	Water Supply	Page 17 - states that the region can be roughly divided into six aquifer areas or subregions. The City encourages the Council to consider the opportunities and constraints in each subregion when evaluating the local water supply plans and discourages adoption of one size fit all strategies for the entire region.	Comment noted
4	Water Supply	Look forward to coming discussion on water supply as the Council prepares the Master Water Supply plan.	Comment noted.

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Comment ID	Theme	Comment	Response
8	Water Supply	With regards to the Council's strategy to "promote water supply resiliency by identifying and pursuing options to increase surface water use, when economically feasible," the county encourages the Council to also work with communities on options to interconnect existing systems, as well as recognize the work many communities have already done to explore interconnection. The Council should also recognize the burden that may be placed on communities who were mandated growth by the Council, and may now be asked to explore new and expensive infrastructure for water supply.	This strategy has modified to read "support community efforts to improve water supply resiliency by cooperatively identifying economically and technically feasible water supply alternatives". The intent of these changes was to allow for discussions with communities on the water supply issues and to work together to find economically feasible solutions.
8	Water Supply	The Council should consider a moratorium or an extended time period for communities to complete their local Water Supply Plans, when the Council begins the comprehensive planning process with communities in the fall of 2015. Uncertainty exists about future direction on water supply sources due to external factors like the Council's own encouragement of surface water use, along with the DNR White Bear Lake settlement.	The Council is limited to review and comment on local water supply plans. The deadline for local water supply plans is determined by the MnDNR. We will pass this request on to the appropriate staff at the MnDNR.
9	Water Supply	The draft WRPP has been released without the updated Twin Cities Metropolitan Area Master Water Supply Plan. Without this information, it is difficult to support the draft WRPP, in particular the first bullet implementation strategy on page 19 that states: "(r)eview local water supply plans to ensure consistency with the Twin Cities Metropolitan Area Master Water Supply Plan."	The intent of the policy plan is to provide high level policy guidance and implementation strategies. There will be a formal public review process for the Master Water Supply Plan beginning in May, 2015 where there will be an opportunity to comment on the details of that plan. The strategy has been modified to read "review and comment on local water supply plans as required by Minnesota Statutes".
9	Water Supply	The effect that the Council water supply planning and strategy development has on the local units of government that have traditionally been tasked with water supply should be recognized. The local governments have implemented funding mechanisms to build water infrastructure improvements and some of the strategies outlined would affect local governments' water supply jurisdiction as well as already established financial assets.	The Council is committed to working closely with communities on identifying all options for water supply in order to have sustainable water sources now and into the future. The Council is committed to its role in regional water supply planning and respects local government role in ownership, maintenance, and operation of municipal water supply systems. The strategy on sustainable water supplies has been modified to read "support community efforts to improve water supply resiliency by cooperatively identifying economically and technically feasible water supply alternatives".

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Comment ID	Theme	Comment	Response
11	Water Supply	The County encourages the Council to not adopt "one-size fits all" policies and strategies when it comes to regional water supply. The groundwater supply issues facing the communities in the County are greatly different than those facing eastern areas of the Twin Cities Metro Area. Technical assistance and facilitation at a more sub-regional level are supported.	The Council is committed to working closely with communities on identifying all options for water supply in order to have sustainable water sources now and into the future. A strategy has been added to the policy on assessing and protecting water resources: "Support community efforts to improve water supply resiliency by identifying subregional approaches to increase water conservation, enhance groundwater recharge, and make the best use of groundwater, surface water, reclaimed wastewater, and stormwater".
3	Water Supply	Clear and concise guidance is needed for cities charged with delivering safe and sustainable water supplies to the public.	The Master Water Supply plan expands on the guidance and direction in this area. Community specific water supply technical information from the Council's modeling efforts will be provided to each community as part of the system statements and local planning handbook for their use in updating their local water supply plans and planning for sustainable water supplies.
1	Water Supply	Page 2, describes the Metropolitan Area Water Supply Advisory Committee. It would be more accurate to describe the make-up of the committee by referencing the requirements in Minnesota Statutes 473.1565, Subd. 2.	The reference to MAWSAC has been deleted.
1	Water Supply	The current title of figure 2 on Page 16, does not accurately reflect what the figure is depicting.	The title was updated to better reflect the intent of the figure.
3	Water Supply	State funding resources for the costs associated with implementing long-term strategies for a sustainable water supply are critical.	Comment noted. Council staff aggressively pursue water supply funding from the Clean Water Fund to help the region implement projects and studies needed for a sustainable water supply. Investment policy includes strategies to identify regionally beneficial water supply projects.
3	Water Supply	The Council should continue to serve as a technical and planning resource as they continue to work with subregional work groups on issues in those areas.	Comment noted. Community specific water supply technical information from the Council's modeling efforts, as well as other technical resources, will be provided to each community as part of the system statements and local planning handbook for their use in updating their local water supply plans and planning for sustainable water supplies.
3	Water Supply	The Master Water Supply Plan Community Technical Work Group can provide valuable insight to the Council on water supply issues and should be expanded to include the DNR.	MnDNR has been added to the Technical Work Group.
3	Water Supply	Don't limit cost effective investments to multi-community water supply infrastructure. There may be instances where investments in individual communities should be considered.	Comment noted. Regionally beneficial projects are not limited to multi-community projects.
3	Water Supply	Continue to look at maximizing conservation and incentives to reduce water use as a first step.	We agree.

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Comment ID	Theme	Comment	Response
12	Water Supply	<p>The WRPP details a number of minimum requirements for the local water supply plans. It will be important for the Council to more clearly define how the comprehensive planning process will change as local governments are beginning to plan for their comprehensive planning efforts. Items No. 3 through 5 detailed in the minimum requirements have not been specifically required previously and could require the local government to commit a significant financial investment for additional work and further study. In addition, if a local government is required to plan for alternative water sources, how will the plans be integrated and communicated to the neighboring communities early on in the process.</p>	<p>Appendix C-3: Local Water Supply Plan elements was revised as follows:</p> <p>Public water suppliers serving more than 1,000 people, and all communities in the Twin Cities metropolitan area, are required to prepare and implement water supply plans consistent with Minn. Stat. 103G.291 and Minn. Stat. 473.859. The Master Water Supply Plan (Minn. Stat. 473.1565) provides information to consider during plan development. A local water supply plan template has been developed by the MnDNR and the Council to meet the plan requirements of both agencies. Additional benefits of completing this template include:</p> <ul style="list-style-type: none"> • Fulfills the demand reduction requirements of Minnesota Statutes, section 103G.291 subd 3 and 4. • Fulfills the requirements for contingency planning for water supply interruption in Minnesota Administrative Rules 4720.5280. • Will ensure that a community is prepared to handle droughts, water emergencies, and to resolve water conflicts. • Will allow for submission of funding requests to the Department of Health for their revolving funds and other grants and loan programs. • Will allow community to submit requests for new wells or expanded capacity of existing wells. <p>The local water supply plan should encourage conservation and include information about water use by customer category. The water supply plan also should include an implementation program that includes at least the following:</p> <ul style="list-style-type: none"> • a description of official controls addressing water supply and a schedule for the preparation, adoption and administration of such controls • a capital improvement program for water supply
15	Water Supply	<p>The fourth paragraph on page 15 states that <i>"After public water supply, industrial and agricultural water demands are the biggest."</i> In relation to the preceding paragraph, please add an estimated percentage of groundwater demand by industrial and agricultural uses to provide some context in relation to public water supply.</p>	<p>Industrial and agricultural use varies year to year. For 2010, 88% was municipal use, 1% industrial, 2% agriculture, 4% private wells, and 5% other.</p>

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Comment ID	Theme	Comment	Response
15	Water Supply	The first paragraph on page 17 concludes by stating "Groundwater limitations have been and continue to be the main focus of these work groups ." Please consider that the main focus of these work groups has been to study the broader topic of source water management strategies, and is not confined simply to "groundwater limitations".	WRPP language has been revised.
15	Water Supply	Page 17 provides a list of implementation strategies. It states "Promote water supply resiliency by identifying and pursuing options to increase surface water use, when economically feasible." Water supply resiliency will require a comprehensive approach to identifying feasible solutions, not simply increasing surface water use. Please consider adding additional language indicating the Council efforts to develop comprehensive management strategies for water supply including conservation, aquifer recharge, and water re-use.	This strategy has modified to read "support community efforts to improve water supply resiliency by cooperatively identifying economically and technically feasible water supply alternatives". The intent of this change was to allow for discussions with communities on the water supply issues and to work together to find economically feasible solutions.
16	Water Supply	The language related to water supply takes on a more regulatory nature than seems appropriate in this document. Statements like "a plan for action" (pg. 2) in a policy document are alarming when considering the Council's role and the direction the policy seems to be taking related to water supply sources.	This section has been revised. The phrase "plan for action" has been deleted.
16	Water Supply	The metro area relies on groundwater as its primary source simply because it is the most cost-effective way to provide quality drinking water. This document reads like there is an intention to move towards an unsubstantiated need to "rebalance" water supply sources and shift to sources other than groundwater. The City considers this a direct threat to our communities highly valued water source. Instead, the Council is encouraged to move toward a policy focused on education, conservation, reuse, stormwater harvesting, and regional recharge opportunities.	Policies and implementation strategies have been revised to focus on water conservation and reuse and to omit specifics, such as rebalancing water supply sources. The sustainable water supply strategy has been revised: "support community efforts to improve water supply resiliency by cooperatively identifying economically and technically feasible water supply alternatives".
16	Water Supply	The Council shall support and plan for the sustainable use of water sources [that focuses on the implications of increasing groundwater use including impacts to surface waters, wetlands, and ecological areas] while ensuring that supplies of potable water are sufficient for the region's current population and projected growth. The highlighted, inserted portion of the statement seems very "focused" which is not appropriate for a policy statement.	The water supply policy has been revised as follows to address this comment (and similar comments from other units of government). "The Council will work with our partners to develop plans that meet regional needs for a reliable water supply that protects public health, critical habitat and water resources over the long-term, while recognizing local control and responsibility for owning, operating, and maintaining water supply systems".

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Comment ID	Theme	Comment	Response
16	Water Supply	Policy on Sustainable Water Supply Implementation Strategies - Remove "review of water appropriation permits". This task is appropriately assigned to the Department of Natural Resources.	This role has been clarified, and now refers to review of water appropriation permits as requested by DNR.
17	Water Supply	Figure 2 identifies communities served by the Prairie du Chien Jordan Aquifer. The cities of Roseville, Falcon Heights, Lauderdale, Arden Hills, Little Canada and Maplewood all purchase their water from St. Paul. These cities should be included as cities served by the aquifer.	Comment noted. Figure 2 has been updated.
18	Water Supply	The City would like to stress that developing regional water supply system partnerships can be extremely difficult and time consuming, particularly when local agencies are expected to take the lead. We therefore request that the Council consider actively supporting an effort to analyze the viability of regional partnerships from a service and funding perspective.	Comment noted.
18	Water Supply	The City would like to stress the financial difficulties associated with converting groundwater supply systems to surface water supply systems. Due to the high costs associated with such system conversions, local agencies are simply unable to pay for such improvements on their own and would require financial assistance to comply with such requirements. We would also like to emphasize the need to maintain groundwater supply systems for supplemental or emergency water supply needs, such as when pollutants are released in surface waters triggering temporary facility shutdowns.	This strategy related to this issue has modified to read "support community efforts to improve water supply resiliency by cooperatively identifying economically and technically feasible water supply alternatives". The intent of this change was to allow for discussions with communities on the water supply issues and to work together to find economically feasible solutions.
19	Water Supply	Conservation, as a first-tier, at-the-source-solution, could be better benefitted if there were tangible targets provided as benchmarks to communities. What are considered "good, sustainable" water use rates, possibly in gallons of potable water use/person/day? Is 50, 60, 80 gal/person/d a good target?	The Master Water Supply Plan will provide guidance to communities on issues such as this as well as other technical information for the communities to use as they prepare their local water supply plans.

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Comment ID	Theme	Comment	Response
19	Water Supply	<p>Wise use of water on pg. 6 under 4th bullet, could it indicate the need to set specific goals (numeric) for the listed parameters? For example:</p> <p>Surface water – infiltration similar to natural conditions (and more if possible)?</p> <p>Groundwater (gw) use – target groundwater pumping rates per service population?</p> <p>Conservation - target water use for average household (or person)? Targets based on a reasonable summer/winter water volume used (i.e. 2/1)?</p> <p>Reuse – target proportion of irrigation use using reuse source?</p> <p>Aquifer recharge – develop target goals by soils and geomorphic setting or based on water budget (see below)?</p> <p>See also 1st bullet on page 7.</p>	Comment noted. Numeric goals were not included in this plan but will be considered in future plans and plan updates as more information is gathered to help define these goals.
19	Water Supply	<p>It should be noted that two on-going initiatives are ones that the local watershed districts are very interested in being involved in, both for the formative planning as well as the follow up implementation:</p> <ul style="list-style-type: none"> • Regional Master Water Supply Plan • North and East Metro Groundwater Management Area Plan 	Comment noted.
20	Water Supply	<p>The last policy in this section states, "Promote water supply resiliency by identifying and pursuing options to increase surface water use, when economically feasible." It is important that policy documents stick with policy-level statements, including overarching goals and direction which allow for future plans (i.e., local comprehensive plans, master water supply plan) to have flexibility on how to meet those goals. This statement seems to have a strong focus on specifics that appear very inappropriate in a high-level policy document. Consider revising this statement to, "Promote water supply resiliency by identifying economical and technically feasible water supply alternatives."</p>	The strategy has been revised: "support community efforts to improve water supply resiliency by cooperatively identifying economically and technically feasible water supply alternatives".
21	Water Supply	<p>Until our groundwater supply is more fully understood, our hope is that the Council will help find ways to eliminate barriers and provide assistance to communities that would like to implement innovative methods for responsibly managing the resource.</p>	Comment noted.

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21	Water Supply	Appendix C includes new requirements for cities that were not required of the 2010 Comprehensive Plan process. We strongly urge the Council to eliminate all requirements listed under items 3 through 5.	Appendix C has been revised.
21	Water Supply	The section requires communities to address any water supply "issues" that will be later identified when the master water supply plan is written. We would ask that whatever issues are identified be firmly grounded in science as legitimate issues that can be proven to be caused by changes in use of the water supply.	Comment noted.
21	Water Supply	The section also contemplates a required evaluation of alternate municipal water supplies, which will cause the city to consider the extension of infrastructure into other cities, requiring cooperation from potentially unwilling participants. Instead, it would be far more productive for the Council to sponsor joint planning efforts between municipalities.	Text has been revised to set forth a collaborative process where issues are discussed and the most economical/effective solutions are designed with our partners.
12	Water Supply	The effect that the Council's water planning and strategy development has on the local units of government should be recognized. Local government has traditionally been tasked with supplying sufficient quality and quantity of drinking water to residents. Local governments have implemented funding mechanisms to build water infrastructure improvements in accordance with previous comprehensive planning efforts and some of the strategies outlined in the WRPP would affect the local government's water supply jurisdiction as well as already established financial assets.	The Council is not proposing to expand its review and oversight authorities. Strategies in the plan refer to authorities already delegated to the Council. The Council is not proposing to make water supply a system or require communities to switch to surface water as their source but rather is proposing a collaborative process to work on water supply issues in the region.

*Response to comment was updated by staff on 4-28-15.



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