Commenting Agency	Comment Text (verbatim)	Responses
Metropolitan Council	Staff commends the VRWJPO for developing a watershed management plan that includes an inventory of its land and water resources, prioritization of issues, associated goals, and strategies to address its most important resources through a community guided collaborative scientific approach.	The VRWJPO appreciates your positive feedback.
	Staff commend the VRWJPO for developing a watershed management plan that includes a thoughtful overview of the makeup of the watershed, as well as discussion of what makes this watershed unique, along with a comprehensive listing of issues, associated goals, policies, and strategies.	The VRWJPO appreciates your positive feedback.
	Met Council staff also applaud the inclusion of an implementation plan and action audit that demonstrates progress and supports investment prioritization.	The VRWJPO appreciates your positive feedback.
	Creating a section that highlights what's new would support improved understanding of the plan. This may also be included in the executive summary.	We agree that highlighting what is new in the WMP may better support improved understanding for some outside organizations. During the input gathering and WMP development process, staff were provided comments from numerous stakeholders and the Vermillion River Watershed Joint Powers Board (VRWJPB) to keep the WMP as concise as possible while still being practicable. In trying to balance priorities and direction from all stakeholders and VRWJPB, the various aspects and resulting WMP will be the result of compromise and unfortunately won't perfectly address the wishes of every stakeholder. In this case, adding information into the plan to help outside organizations understand what is new would contradict the comments and direction received from other stakeholders and the VRWJPB.
	Page 4, Groundwater Supply. This section could be strengthened by including language that describes the role groundwater plays in supporting baseflows and ecosystem function in the watershed.	Page 4, the narrative under Groundwater Supply has been updated to address this comment.
	Table E-1. The actions listed in this table could benefit from the identification and inclusion of success criteria. These criteria would support the goals outlined in Figure 1-1, section 2, and the action audit described in section 3.1. These criteria could be informed by additional engagement with partnering agencies, communities, and stakeholders.	Success criteria in the WMP are identified as Measurable Outcomes, and were developed and included in Table 3-16 for the various WMP actions listed (in Table E-1). While these measurable outcomes could be copied for inclusion into Table E-1, it would be duplicative, would create additional formatting issues, and would add length to the WMP. Criteria informed by engagement with stakeholders is a great idea. Unfortunately, other stakeholders requested measurable outcomes (criteria) be developed and included prior to WMP adoption rather than after, so developing measurable outcomes after WMP adoption would conflict with other stakeholder input.
	Section 2.5 Groundwater Supply, Page 21. Lawn and landscape irrigation are major contributors to inefficient water use and likely growing concerns as communities continue to grow and develop within the watershed. While this section identifies agricultural irrigation and indoor appliance efficiency as topics of importance, it could be strengthened by including outdoor water use efficiency.	Outdoor water use efficiency is covered by the following Topic of Importance, ranked as priority level "High", "Residential, commercial, and industrial irrigation efficiency improvements."
	Section 2.6, Page 22, Climate Resilience. This section could benefit from discussion that describes the multiple benefits of adaptive actions and nature-based approaches to stormwater management, stream and habitat restoration, and the watershed's communities.	The second paragraph within this section states, "While the VRWJPO does not have a direct role in minimizing greenhouse gas reductions, water planning entities and local communities are tasked with fostering resilience on the built and natural landscapes. The WMP achieves this through implementation actions that: support engineering best practices for the built environment, improve historic infrastructure to account for climate deviations and promote resilience in the natural environment." VRWJPO staff believe that the language in this section, and the various resulting implementation actions, support what the comment is highlighting with nature-based approaches to stormwater management, stream and habitat restoration, and the watershed's communities.
	Appendix B, Land Use and Water Impacts. The role of groundwater quantity and quality protection could be expanded and clarified. A continual supply of clean cool groundwater is essential for the river and watershed function, and land use changes that drive increased water demands or create additional pollution risk can lead to negative impacts. It's vital that communities proactively consider potential impacts and associated effect on communities and local economies, when land use decisions are being made.	Appendix B, Land Use and Water Impacts, has been updated to better address this comment.
	Section 7.2, Page D-23, Erosion and Sediment Control Standards Regulation. Remove the second acre from the first sentence (change "… more acre…" to … more…). Section 7.3, Page D-23, Erosion and Sediment Control Standards Criteria. Remove the second acre from the first sentence (change "… more acre…" to … more…).	Section 7.2 has been updated to address this comment. Section 7.2 has been updated to address this comment.
	The City is very supportive of the goals, strategies, and intended activities outlined in the plan. Overall, the plan was well-laid out and included useful information on tactics the JPO will utilize to address its goals.	The VRWJPO appreciates your positive feedback.
	WQ-4: Implementing projects identified in the City of Apple Valley East Lake Subwatershed Assessment. Apple Valley will look forward to implementing projects within the subwatershed, especially as redevelopment activities take place.	The VRWJPO concurs.

City of Apple Valley	SW-7: Implementing projects identified withing the Long and Farquar TML and the Long and Farquar Pond Feasibility Analysis. Apple Valley continues to pursue projects identified in these studies and looks forward to continued partnership.	The VRWJPO concurs.
	NE-12: In lake management projects identified within the Long and Farquar TMDL Implementation Plan. Apple Valley is very interested in continuing approaches to tackle internal loading within these lakes.	The VRWJPO concurs.
	Document Usability: A plan with “Clickable” Table of Contents provides a better user experience. Consider utilizing links for the Appendices and Figures.	The Table of Contents has been modified to provide clickable links.
	Alimagnet Lake, B-25: This lake is also regularly aerated with an in-lake aeration system and has a lift station that operates the lake outlet.	The Alimagnet description section in Appendix B has been updated.
	Long and Farquar Lakes, B-25: Farquar Lake is regularly aerated throughout the winter. You may wish to mention this. In addition, Long Lake has been on a 5-year partial drawdown cycle.	The Long and Farquar Lakes section in Appendix B has been updated to reflect the City’s comment.
	This Plan was a pleasure to read; it’s well-written, well-organized, visually appealing, and utilizes plain language for increased accessibility to a broad audience of constituents and partners.	The VRWJPO appreciates your positive feedback.
	Additionally, we would like to thank the VRWJPO for including many of the priorities submitted in our early input letter including climate change and resiliency as well as providing quantifiable targets for pollution reductions in the implementation section.	The VRWJPO appreciates your positive feedback.
	This was a pleasure to read! The plan is extremely well-written, well-organized, and visually appealing. Very nice work!	The VRWJPO appreciates your positive feedback.
	The VRWJPO did an excellent job with the public and stakeholder engagement process and issue prioritization; both are well-documented in the plan and appendix. The goals, objectives, and action items clearly support the priorities that surfaced during the engagement and assessment process.	The VRWJPO appreciates your positive feedback.
	Thank you for considering many of the priorities submitted in our early input letter, particularly climate resiliency and cloride pollution.	The VRWJPO appreciates your positive feedback.
	Consider including a map with labels on the major surface water resources to orient the reader to the watershed. While the reader can identify many of the water bodies by utilizing the text, subwatershed inset maps, and public waters map (among others), it would be helpful to have one overview map that clearly identifies the water resources.	A link to the VRWJPO's Interactive Map has been added to page 1 in the Executive Summary.
	It appears as though the "Local Government Plan Implementation" section is meant to fulfill the content requirement described in MR 8410.0050 F. However, the intent of this requirement is to briefly describe who does what to ensure that the standards in this plan are fully implemented to protect watershed resources, e.g. "LGUs are responsible for permitting and implementation of local controls to ensure they meet or exceed the VRWJPO's standards". This could be a simple statement of responsibility, based on the information provided on pages 43-44 and in Appendix D. Then, you could remove the LWMP process detail and combine it with the information in Section 1.5, p. 14 to minimize redundancy.	The narrative has been revised.
	This chapter does a great job framing the plan, providing big-picture changes that have taken place since the previous plan was developed, summarizing the engagement process, and describing the plan's structure.	The VRWJPO appreciates your positive feedback.
	The main body of the plan is missing a description of the degree to which a LWMP can adopt the JPO's plan by reference. It's noted that the information appears in Appendix D on p. D-5, and this is sufficient to meet plan content requirements. However, appendices are considered part of the plan and, as such, they are subject to amendment procedures should any changes be made during the lifetime of the plan. Therefore, BWSR suggests considering whether policy documents (e.g., standards) should be included by reference rather than as appendices. Regardless of whether the JPO's standards are referenced or attached, also suggested to include the "adoption by reference" language from Appendix D in Section 1.5 for completeness.	Thank you for the suggestion. VRW staff is currently reviewing any potential implications of removing Appendix D from the Watershed Management Plan and referencing the Standards as a stand-alone document.
	Please add the requirement for local water plans to be adopted not more than two years before the local comprehensive plan is due.	This has been incorporated into page 14.
	Despite the excellent prioritization of the objectives and topics of importance (TOI), having two different, yet related, frameworks seems to muddle the implementation priorities. For example, on p. 18, projects that reduce nutrients, including nitrate, is a high priority TOI. But, protecting GW quality is a medium priority objective. How will the JPO decide what priority level to assign to a project where the primary pollutant reduced is nitrate with primary benefit to GW? Another example is on p. 19: Implementing infiltration practices is a high priority objective, but infiltration BMPs are a medium-priority TOI. Yet, infiltration practices in the implementation table (SW1-SW3) are high priorities. Or on p. 23, where improving high-priority water resource environments is a high priority objective, but in-stream habitat and in-lake resotrations are medium and low TOIs, respectively. However, the TOIs are GREAT in Section 3 when utilized to illustrate project targeting. See related comment on Section 3, below.	In writing the WMP, staff understood there would be some level of overlap in terms of benefits achieved with surface water and groundwater quality TOI. In our watershed, surface water often impacts groundwater and vice versa, so overlapping benefits are inherent, but staff did their best to prioritize while trying to distinguishing one from another. The stakeholder engagement process incorporated ratings of relevance and priority for various issues/TOI. During this engagement process, stakeholders and the JPB emphasized the need to recognize what the VRWJPO's role is concerning various TOIs and issues, including what the VRWJPO's capabilities and strengths are. Specifically relating to groundwater quality, staff were provided the direction that lead groundwater agencies and organizations should be the primary implementers for groundwater quality initiatives, with the VRWJPO providing support when possible.

Minnesota Board of Water and Soil Resources	Regarding measurable goals: BWSR acknowledges and greatly appreciates the inclusion of target pollution reductions as part of the implementation section. However, these are not quite the same as having measurable goals for the plan. The outcomes of action items can - and should - contribute to setting measurable goals, but they are only a part of the overall plan outcome. In general, most of the plan goals, as written, are unclear in how they will achieve *measurable progress* in protecting and restoring VRWJPO's resources. How will you know how much progress you are making on "protecting and improving" resources without quanifiable benchmarks? The great news is that you've compiled much of the data needed to create metrics for these goals, noting that Table 3-1 does an excellent job summarizing past measurable accomplishments and Table 3-16 includes potential measurable outcomes (e.g. pollution reductions) and outputs (e.g. number of projects) for action items. These data could be used to reframe the goals into something objectively measurable; specific examples for some of the goals are provided in comments, below. For more information and examples regarding measurable goals, see "Setting Measurable Goals" on this page: https://bwsr.state.mn.us/planning-information	The VRWJPO disagrees with BWSR's interpretation that the plan does not contain measurable goals. Actions were developed specifically to achieve each respective goal, and the measurable outcomes for each action are the measurable aspect of the goals. Table 3-16 details the level of measurable outcomes that have been calculated for each unique action ID. However, to try to accommodate this request without creating a delay in the adoption of the plan, nor to add a significant amount of staff time and cost to re-engage with stakeholders to redraft various parts of the plan, staff have transferred measurable outcomes tabulated in Table 3-16 to respective goals within the six issue categories. For each respective issue category goal, staff took metrics detailed in Table 3-16 and applied a challenging yet achievable success rate percentage that accounts for uncertainties such as: budget (i.e. grant success rate, partner funding, local funding), landowner willingness, property acquisition, project and/or partner support, on-site conditions differing from modeled assumptions, uncertainty related to estimated measurable outcomes. In the case of the stormwater management issue category, the percentage factor utilized information from Table 3-1 (Pollutant Reductions Achieved Through Implementation Action Completed from 2016-2025).
	Surface water quality goals of "protect and improve" all surfacewater and groundwater resources are vague. While the JPO has an abundance of monitoring data that can demonstrate steady or improving conditions, the goal lacks metrics by which to measure success or failure. Consider using data from Tables 3-1 and 3-16 to inform the goals, e.g. "Protect and improve surface water quality by removing XXXX tons of TSS and YYY pounds of TP per year from surface waters." You've done the hard work of estimating reductions; now just use those estimates to create a target for pollution reductions. Alternatively, you could focus on monitoring data and/or priority resources, e.g. "remove XYZ lake and ABC tributary from the impaired waters list".	Please reference the response above. Measurable outcomes tabulated in Table 3-16 have been transferred to water quality goals. Goals now read: 1) Protect and improve surface water quality by reducing 234.5 lbs/yr TP and 823.9 lbs/yr TSS; and 2) Protect and improve groundwater quality by reducing 1,323 lbs/yr NO_3
	Goal of "reduce runoff rate and volume" is also vague. Reduce by how much? Where? How will you measure success?	Using data presented in Table 3-16, goal has been revised to read: Reduce runoff rates and volume by 110 ac-ft/yr.
	Similarly, "protect and improve groundwater aquifer supply" is vague. Groundwater goals can be tricky to quantify, particularly when there are many other partners also doing groundwater work. However, where and how can the JPO specifically support these efforts? Are there areas of the watershed that could be targeted for BMPs, particularly those areas and/or actions outlined in the County Groundwater Plan and other relevant plans?	Using data presented in Table 3-16, goal has been revised to read: Protect and improve groundwater aquifer supply through partnerships with other organizations to implement of 2 groundwater conservation assessments and 8 groundwater conservation projects. These efforts would be focused on areas targeted primarily by those agencies and organizations who are considered the lead for groundwater efforts. Many of these organizations already target their efforts, and these targeted areas can be found in their respective plans.
	BWSR greatly appreciates the inclusion of proactive resiliency-related goals that promote adaptation to our rapidly changing climate. These actions will help preserve natural resources, protect property, and foster smart development within the Vermillion River Watershed. However, as Atlas 15 is rolled out, how will the JPO ensure that municipalities are utlizing the most up-to-date data for planning and design to ensure resiliency and resource protection within their jurisdictions?	Once released, Atlas 15 will supersede NOAA Atlas 14 as the national standard and will become the authoritative source for precipitation frequency information across the United States. While the VRWJPO cannot force municipalities to implement Atlas 15, the VRWJPO would consider a Technical Advisory Committee process to engage these organizations to discuss the use of Atlas 15 in local regulations. If found to be acceptable to the Technical Advisory Commitee and associated municipalities, then the VRWJPO would plan incorporation of Atlas 15 into its Standards, which would then be adopted into ordinances by municipalities. We will note however, that the VRWJPO is proposing to include Atlas 15 projections within the scope of the proposed Climate Resiliency Plan to determine target areas where projects could be pro-actively implemented to reduce the risk of climate impacts.
	Please add goals for wetland management to meet plan content requirements. This section contains a TOI for wetland restoration and the implementation table has at least two wetland management goals (NE-6 and NE-7), so perhaps you can adapt identified action items into a measurable goal for wetlands.	Wetland goal metrics have been incorporated into the natural environments goals by reflecting the goal of restoring 40 acres of wetland.
	Excellent summary and evaluation of accomplishments in the previous plan, particularly Table 3-1; can't wait to see what you accomplish over the next 10 years!	The VRWJPO appreciates your positive feedback.
	Can you clarify what is meant by "greatest VRWJPO benefit" with respect to the first bullet point?	This meaning varies depending on the type of practice/program. Examples include: optimized pollution reduction, high engagement of stakeholders, diverse native communities in restorations, etc.
	In this section, the targeting by TOIs is excellent and much less confusing than in Section 2. This section is great for providing direction to the JPO to help meet the overall Plan goals and objectives and provides a roadmap for prioritized implementation.	The VRWJPO appreciates your positive feedback.
	Please provide a reference to the Watershed Project Partner Maintenance Policy, e.g., is it on the VRWJPO web page?	Although the Policy has been adopted by the VRWJPB, VRW staff are developing a program framework that will also require VRWJPB approval. In the meantime, the approved Policy will be provided to BWSR at the following link: https://www.vermillionriverwatershed.org/wp-content/uploads/2025/11/Exhibit-3-VRWJPO-Partner-Project-Maintenance-Assistance-Policy.pdf
	Thank you for providing a clear, concise description of how the JPO's standards will be implemented and for clearly distinguishing between the responsibilities of the JPO and local governments.	The VRWJPO appreciates your positive feedback.
	BWSR appreciates the inclusion of target resource/audience, priority level, objective, and outcome columns in the implementation tables. While not required, these are important components for public transparency, prioritization, and tracking progress. If it's possible to combine the information from Tables 3-14, 3-15 and 3-16 into one big table, it would be easier to see the full scale of implementation over time and associated outcomes without having to flip from one page to another to another.	The VRWJPO appreciates your positive feedback. Staff recognize how it could be beneficial to combine these areas for ease of review; however, with the current formatting of the WMP, moving these metrics would create issues with table sizing.

As previously noted, BWSR greatly appreciates the inclusion of outcomes and outputs associated with implementation activities. However, success is difficult to measure when the metric is "up to X" reductions/projects/reports, etc. Is doing 1 out of 4 things sufficient, or 1 of 12 things? Suggest providing a single number or a range as a benchmark by which to measure progress toward plan goals over the next 10 years.	The intention of putting "Up to X" within the table was to provide implementation outcomes assuming there are numerous uncertainties regarding implementation (budget, grants, partners, access, conducive soils, etc.) . As noted in the plan, many projects included within the implementation table are dependent on these uncertainties being addressed or resolved, and as such, we cannot guarantee full measurable outcome potential will be achieved with these uncertainties.
Recommend rounding the estimated pollutant reductions to whole numbers.	Table 3-16 pollutant reductions were calculated using completed feasibility studies. To align with these various studies, the VRWJPO is presenting the same number in this table.
There's a mix of "reductions" and "removals" for the same pollutants. Is there a difference, or should they all be the same? If there's a reason for the difference, please clarify.	Yes, thank you for pointing this out. They should be the same. The table has been revised to include consistent nomenclature.
What is the Vermillion River Watershed Stewardship Grant? I don't see anything on the website about it.	The Vermillion River Watershed Joint Powers Organization (VRWJPO) Stewardship Grant program is for short-term, community-based activities that restore and protect the Vermillion River Watershed's natural resources. The VRWJPO sought applications in 2012 and 2015-2018. The VRWJPO did not have support for the Stewardship Grant from 2019-2023; however, the program is planning to being revived in 2026.
Appreciate the comprehensive list of references, including assessments, studies, and local, regional, and state plans. However, there are no Met Council planning documents, e.g. the Metropolitan Area Master Water Supply Plan, on the list.	The 2015 Twin Cities Metropolitan Area Master Water Supply Plan has been included.
The land and water summary provides a comprehensive yet broadly accessible overview of the watershed's resources, demographics, climate etc. and provides an essential framework for developing plan priorities. The maps, also, are very well done. That being said, some maps could be a little larger, e.g. B-5, where the legend font is small (granted, the reader can zoom in on a screen, but bigger would be nice!).	Should sizing of maps change, the WMP's formatting would be altered. Considering most, if not all, users will be accessing the plan electronically, users have the ability to zoom if they would like maps bigger.
Figures B-21, B-22, and B-23 appear to be *average* annual (or January) min/max temps, not just min/max temps, correct? It's not clear from the text or the captions, however.	Figure B-21, B-22 and B-23 are just min/max temperatures, not average. Average is not referenced in the title, caption and related narrative.
The subwatershed inset maps are great! Also suggest including a larger map that shows all of the subwatersheds in one panel.	A link to the VRWJPO's Interactive Map has been added to page 1 in the Executive Summary.
Note that the DNR is in the process of updating the Public Waters Inventory over the next several years: https://www.dnr.state.mn.us/waters/watermgmt_section/pwi/update.html	Noted.
Are there any water bodies that are nearly/barely impaired? If so, could these help inform your implementation priorities, e.g. the objectives that focus on removing water resources from the impaired waters list and preventing new impairments? Which water bodies fall into these categories?	VRWJPO staff are aware of water bodies that are nearly/barely impaired. However, the MPCA is the agency responsible for determining whether a water body is impaired or not. As such, agencies such as the MPCA who have such authority are the best source of information related to these matters. The VRWJPO chose to link to as much agency data sources as possible (such as the MPCA's Impaired Waters Viewer) knowing that they would be updated regularly compared to a VRWJPO-created static figure that could be outdated as soon as the plan is published. VRWJPO staff were not able to find figures, sources, or other information on the MPCA's website to indicate waters that are not impaired, but are close to provide a link to. We beleive the format of our plan and providing links as noted above allow readers access to the best, and most up to date information. Links will be assessed annually to ensure continued functionality.
Figure B-92 is great; it's very helpful for understanding stormwater infrastructure within the watershed. Note that MN DOT within the metro is also covered under an MS4 general permit.	Noted.
Please include data for or references to 100-year flood levels and 100-year discharges of key locations.	A new section has been added to Appendix B (B-10) titled Flooding/Floodplain Management.
Executive Summary (page 1): The first paragraph states that the Vermillion River Watershed is one of the state's 81 major watersheds, as denoted by an 8-diget Hydrologic Unit Code (HUC). However, it does not appear that 8-digit HUC is identified anywhere in the Plan. If the HUC is referenced, recommend providing that number.	The HUC number has been added.
Section One (page 10): States there was moderate to severe drought in 2022, 2023, and 2024. Should this be 2021, 2022, and 2023?	That is correct. The error has been fixed.
General Comment, Section Two and Section Three: The 2020-2030 Dakota County Groundwater Plan, and subsequent Agriculture Chemical Reduction Effort (ACRE) Plan, identified agriculture as a major source of nitrate contamination in groundwater within the Vermillion River Watershed. In addition, the draft Minnesota Nutrient Reduction Strategy (July 2025) identified agriculture as a major source of phosphorus (56%) and nitrogen (78%) to the Mississippi River. Both the ACRE Plan and the Minnesota Nutrient Reduction Strategy identified one of the key practices to reduce nutrient leaching and runoff is increased adoption of continuous living cover across the landscape (e.g., additional perennial corps and cover crops). However, it does not appear that actions to support increasing continuous living cover are incorporated into the Water Quality priorities or implementation plan (page 18, 45- 46). Soil health initiatives appear to be incorporated into other goals, but there is some confusion of the priority level. Specifically, (1) soil health initiatives, such as cover crops, are identified as a high priority topic under Groundwater Supply in Section Two (page 21), but medium priority in the implementation table (page 49); (2) soil health is also identified as a medium priority under Natural Environments (page 23, 51).	The VRWJPO promotes greater adoption of continuous living cover in farming systems through partnerships with the Dakota County Soil and Water Conservation District (SWCD) and Scott SWCD. This is reflected in the following Actions: WQ-5, WQ-6, WQ-7, WQ-8, WQ-12 and NE-9. WQ-12 has also been modified to now read, "Assist lead groundwater organizations with projects, programs and practices that protect or improve groundwater quality, such as soil health initiatives, increasing continuous cover and other actions identified within the Dakota County Agricultural Chemical Reduction Effort (ACRE)."

Dakota County Environmental Resources Department	Consider if soil health initiatives, such as continuous living cover, should be a higher priority under the Water Quality Goal since this strategy has been identified as a key component to improving water quality in both the Dakota County Groundwater and ACRE Plans, and the Minnesota Nutrient Reduction Strategy for nitrate leaching, total phosphorous runoff, and sediment loss. Recommend reviewing the priority level for soil health initiatives and ensure this is consistent across sections two and three; and if it is identified as an action in different goals, consider if it should have the same priority level to reduce any conflicts.	The ranking of various goals, objectives and topics of importance were informed by the stakeholder engagement process (detailed in Appendix C). The stakeholder engagement process included members of the VRWJPO Technical Advisory Committee (TAC), Community Advisory Committee (CAC) and Joint Powers Board (JPB). Modifying priority of topics at this point in plan development would require additional stakeholder engagement. Language was added to provide clarification of actions containing soil health practices, as noted in the previous response, and actions incorporating soil health and continuous living cover practices that are ranked as high priority include WQ-5, WQ-6, WQ-7 and WQ-8.
	Section Three (page 39): The plan identified priority projects in "Areas that have pesticide and/or herbicide concentrations above health risk standards based on 2001-2019" monitoring data. The Minnesota Department of Agriculture (MDA) has continued to conduct annual pesticide monitoring in Dakota County. Recommend updating this sentence to state "Areas that have pesticide and/or herbicide concentrations above health risk standards based on 2001-2024 Dakota County and MDA monitoring data, and future monitoring results".	The narrative has been revised.
	Section Three (page 40): The Metropolitan Council Master Water Supply Plan aquifer drawdown model is referenced here and several other places in the document. The aquifer drawdown model was developed as part of the 2015 Master Water Supply Plan, this 2015 plan was updated as part of the Imagine 2050 Water Supply Plan. The aquifer drawdown map was developed with Metro Model 3, which is in the process of being updated over the next 1-2 years to incorporate updated data and projections in accordance with Imagine 2050. Since updates to the Metro Model could impact priority areas, recommend changing this reference to include future model predictions. For example, could refer to the resources as "Metropolitan Council Master Water Supply Plan and updated Metro Models…"	The narrative has been revised.
	Section Three, Table 3-15, CR1: Consider if the Climate Resiliency Plan could be moved up in the timeline since the MPCA has Grants to prepare Minnesota for climate change, with applications starting in fall 2025.	The VRWJPO is currently administering a Request for Proposals (RFP) for a Changing Climate and Flooding Resiliency Study. If VRWJPO budget is available and if the VRWJPO receive the above-identified grant funding, the Study would take place in 2026 and 2027.
	Appendix B, B-10 Groundwater Resources (page B-77 – B-79): Recommend including discussion and a map with vulnerability of Drinking Water Supply Management Areas (DWSMAs) within the watershed. Understanding this connection is especially important due to sensitivity of the groundwater aquifers to surface water pollutants and the river's direct impacts to the City of Hastings drinking water supply. The Minnesota Department of Health (MDH) also has a Source Water Protection Map Viewer.	Narrative has been added to identify VRWJPO DWSMAs and to link the SWP Map Viewer.
	Appendix B, B-10 Groundwater Resources (page B-78): Section states that the Department of Natural Resources (DNR) does not allow appropriation from the Mt. Simon-Hinckley in metropolitan counties unless it is for potable water. Please note this statute was updated in recent years. This now applies to the whole state, not just the metropolitan area.	The narrative has been revised.
Dakota County Transportation Department	The Transportation Department has no additional comments regarding the Vermillion River Watershed Management Plan. The Plan's stated objectives and proposed actions align with the strategies and policies identified in Dakota County's 2040 Transportation Plan.	The VRWJPO appreciates your positive feedback.
Minnesota Department of Natural Resources	Our Area Hydrologist Taylor Huinker participated in the Technical Advisory Committee as well as provided a DNR priorities letter at the beginning of the process. In addition to the plan being consistent with DNR goals and priorities, the plan provides a strong framework for the Vermillion River Watershed Joint Powers Organization to implement its goals to preserve and improve the overall health of the watershed.	The VRWJPO appreciates your feedback.
	Though the plan incorporates most of the DNR goals and priorities, I want to emphasize when projects or education opportunities present themselves, to consider all components of a healthy watershed: hydrology, biology, connectivity, geomorphology, and water quality. For example, when implementing wetland restorations, consider coupling wetland restoration with surrounding native upland vegetation areas to increase water quality, as well as habitat.	When considering the actual implementation of actions identified within the WMP, the VRWJPO will consider the various components of a healthy watershed DNR has noted.
	An important note to consider is that the VRWJPO does have a role in groundwater protection. Topics to think about and consider include infiltration, soil health initiatives, and the significant issue of nitrate contamination in local drinking water. Please note that nitrate is not only an issue in the Quaternary aquifers, but in some bedrock aquifers as well, particularly in the Prairie du Chien Group in this watershed.	The VRWJPO recognizes its role in groundwater protection. However, during the stakeholder engagement process, the VRWJPO was provided feedback that groundwater initiatives should primarily be led by lead groundwater agencies such as Dakota County, the Department of Agriculture, Metropolitan Council and the Department of Health. WQ-12 has also been modified to now read, "Assist lead groundwater organizations with projects, programs and practices that protect or improve groundwater quality, such as soil health initiatives, increasing continuous cover and other actions identified within the Dakota County Agricultural Chemical Reduction Effort (ACRE)." Additional verbiage has been added in Appendix B, B-10 Groundwater Resources to address nitrate being an issue in more than just the Quaternary aquifers.
	While there is an action item in the implementation table regarding a Drinking Water Supply Management Area (DWSMA) and these important protection areas are noted a couple of times in Section 3.4 regarding targeting, DWSMAs are not defined or explained anywhere in the Plan. There is no reference to how many DWSMAs are in the watershed, what their vulnerabilities are, or any implications regarding these areas.	Additional verbiage has been added in Appendix B, B-10 Groundwater Resources relating to DWSMAs.

	In particular, two DWSMAs in the watershed have been listed by the Minnesota Department of Agriculture as Mitigation Level 1 or 2 DWSMAs under the Groundwater Protection Rule. See the detailed comments spreadsheet for suggestions as to how these can be incorporated into the Plan and where there may be opportunities for multiple benefits projects.	Within the Draft WMP, Issue Category 1: Water Quality, Projects that Address Nutrients (phosphorus and nitrate) targeted areas including "Areas that are identified as priority agricultural chemical reduction areas within the Dakota County Groundwater Plan". These priority areas target all DWSMA's, encompassing both Level 1 and Level 2.
	As briefly mentioned above, nitrate contamination exists in both the Quaternary aquifers as well as bedrock aquifers, such as the Prairie du Chien Group. Nitrate contamination of drinking water is a significant concern in the watershed that should be acknowledged in the Plan.	Additional verbiage has been added in Appendix B, B-10 Groundwater Resources to address nitrate being an issue in more than just the Quaternary aquifers.
	Infiltration appears to be the preferred stormwater management strategy for the VRWJPO. However, proper care should be taken to ensure infiltrating waters do not significantly increase the risk to drinking water quality. The VRWJPO should review projects for compliance with state rules and guidance, including water well setback guidance and source water protection guidance. Additional, specific comments are included in the detailed comments spreadsheet.	The VRWJPO ensures that project siting take into consideration any regulatory controls and set back guidance, including those for infiltration.
	Overall, the Plan is written in plain language and is well-organized. In particular, the implementation table is easy to follow. We also appreciated the various references to groundwater with regard to chloride and the inclusion of private wells in the Plan.	The VRWJPO appreciates your positive feedback.
	While there is an action item in the implementation table regarding a Drinking Water Supply Management Area (DWSMA) and they are noted a couple of times in section 3.4 regarding targeting, DWSMAs are not defined or explained anywhere in the plan. There is no reference to how many DWSMAs are in the watershed, what their vulnerabilities are, any implications, etc. Strongly suggest including this information, at minimum, in Appendix B: Land and Water Resources Inventory. This inventory should include DWSMA information as it is to present "the condition of resources within [the watershed' boundaries, helping to inform issues, and actions to address said issues". MDH SWP staff are happy to provide definitions and/or other relevant wording upon request. Additionally, consider including a figure of the DWSMAs in the watershed and their vulnerability in the plan and/or linking to MDH's online map viewer: https://www.health.state.mn.us/communities/environment/water/swp/mapviewer.html. Shapefiles are available for download at the link below, with the exception of Emergency Response Areas (ERAs). Shapefiles of ERAs can be provided upon request, however, they are considered non-public information, so they should not be included in any figures in the plan.	Narrative has been added to identify VRWJPO DWSMAs and also to link the SWP Map Viewer.
	Overall, consider the potential for multiple benefits, especially within the implementation table. Some opportunities are noted in individual comments below, but for assistance with identifying opportunities to add or note groundwater benefits in other projects, please reach out to MDH SWP staff.	The VRWJPO understands that several actions within the implementation table will have multiple benefits. Per guidance of the Joint Powers Board (JPB), staff aimed to keep the 2026-2035 Vermillion River Watershed Management Plan (WMP) concise and easy to follow. Identifying multiple benefits that many actions intrinsicly have rather than their primary benefit would create confusion, and would be contrary to JPB guidance.
	The VRWJPO has a part to play in protecting groundwater, as noted on page D-4 within the VRWJPO Standards. Infiltration appears to be the preferred stormwater management strategy. However, proper care should be taken to ensure infiltrating waters do not significantly increase the risk to drinking water. The VRWJPO should review projects for compliance with state rules and guidance including water well setback guidance and source water protection guidance. Additional, specific comments are included throughout the remainder of our comments.	The VRWJPO ensures that project siting take into consideration any regulatory controls and set back guidance, including those for infiltration.
	There are instances where reuse may not be appropriate or safe for human health. When discussing reuse, suggest adding "where protective of human health". The following are instances where reuse is discussed: • Stormwater Management Issues, Goals, Objectives, and Topics of Importance (pages 19-20, 33, 40) • Climate Resilience Issues, Goals, Objectives, and Topics of Importance (pages 22, 35, 41) • Table 3-14: Implementation Plan items WQ-3, WQ-4, SW-4, SW-5 (pages 45-48). A particularly place where this should be emphasized is within the targeting section on pages 40 and 41).	It is not necessary to state this in the WMP. The VRWJPO takes these factors into consideration when siting, designing, and implementing reuse projects in locations that could have adverse impacts to human health.
	Consider if a clearly labeled subwatershed map with other relevant layers like city boundaries could be added to the plan. It was a bit difficult to figure out where certain projects are planned to take place when reviewing the implementation table.	A link to the VRWJPO's Interactive Map was placed within Appendix B (when discussing subwatersheds) as well as within Section 3.2 Implementation Plan Structure. The reader is provided this link to orient themselves in the watershed while reviewing proposed implementation activities.
	Ensure that goals are measurable. Having measurable outcomes in table 3-16 is helpful, but without it being very clearly paired with a goal, it is difficult to assess the goals.	Actions were developed specifically to achieve each respective goal, and the measurable outcomes for each action are the measurable aspect of the goals. Table 3-16 details the level of measurable outcomes that have been calculated for each unique action ID. However, to try to increase clarity, staff have transferred measurable outcomes tabulated in Table 3-16 to respective goals within the six issue categories. For each respective issue category goal, staff took metrics detailed in Table 3-16 and applied a challenging yet achievable success rate percentage that accounts for uncertainties such as: budget (i.e. grant success rate, partner funding, local funding), landowner willingness, property acquisition, project and/or partner support, on-site conditions differing from modeled assumptions, uncertainty related to estimated measurable outcomes. In the case of the stormwater management issue category, the percentage factor utilized information from Table 3-1 (Pollutant Reductions Achieved Through Implementation Action Completed from 2016-2025).

Minnesota Department of Health	Consider expanding on the reference(s) to the Dakota County Groundwater Plan. Currently, it appears the groundwater plan is only referenced in terms of groundwater supply/quantity. Are there items in the groundwater plan related to quality that the VRWJPO can incorporate?	Within the Draft WMP, Issue Category 1: Water Quality, Projects that Address Nutrients (phosphorus and nitrate) targeted areas including "Areas that are identified as priority agricultural chemical reduction areas within the Dakota County Groundwater Plan. Another targeted area included is, "Subwatersheds that have been modeled to produce the highest nitrate pollutant yield." WQ-12 has also been modified to now read, "Assist lead groundwater organizations with projects, programs and practices that protect or improve groundwater quality, such as soil health initiatives, increasing continuous cover and other actions identified within the Dakota County Agricultural Chemical Reduction Effort (ACRE)."
	There is very minimal mention of nitrate contamination in groundwater in the plan. Nitrate contamination of groundwater is a significant issue in the watershed and is not limited to surficial/Quaternary groundwater. See other comments below with more specific recommendations.	Additional verbiage has been added in Appendix B, B-10 Groundwater Resources.
	While what is included for groundwater is true, the VRWJPO can also ensure projects do not negatively impact drinking water quality. Consider noting this as another role for the VRWJPO.	The VRWJPO takes this into consideration when implementing projects, and would only implement projects that do not negatively impact groundwater quality.
	While infiltration is an important tool for stormwater management, it can negatively impact groundwater quality in some areas. Ensure that infiltration is promoted in areas that make sense and align with MDH and MPCA guidelines, even when a Construction Stormwater General Permit is not required. This includes restoring or enhancing "natural infiltration" in some cases. More info is available here, or feel free to contact MDH SWP staff: https://stormwater.pca.state.mn.us/stormwater_and_wellhead_protection.	The VRWJPO takes this into consideration when implementing projects. The VRWJPO would not implement a project in a location that would have adverse impacts to natural resources.
	This section states that "Communities within the Watershed rely primarily on groundwater aquifers for drinking water, whether supplied via municipal or private wells." It is assumed that this is referring to the City of Burnsville obtaining some of its drinking water from the Kramer Quarry, but this is not explained. Consider explaining this statement.	The section has been modified to identify the Kramer Quarry.
	While infiltration is an important tool for stormwater management that can benefit groundwater quantity in some areas, it can negatively impact groundwater quality in some areas as well. Ensure that infiltration is promoted in areas that make sense and align with MDH and MPCA guidelines, even when a Construction Stormwater General Permit is not required. This includes restoring or enhancing "natural infiltration" in some cases. More info is available here, or feel free to contact MDH SWP staff: https://stormwater.pca.state.mn.us/stormwater_and_wellhead_protection.	The VRWJPO takes this into consideration when implementing projects. The VRWJPO would not implement a project in a location that would have adverse impacts to natural resources.
	Soil health initiatives can also benefit groundwater quality, particularly within the Hastings DWSMA, which has been listed by MDA as a Mitigation Level 2 DWSMA under the Groundwater Protection Rule. MDA has established a Local Advisory Team for the area and, in consultation with them, has developed and approved a list of BMPs and Alternative Management Tools that are practicable and appropriate for protecting groundwater within this DWSMA. These are voluntary at this time, but have the potential to be required in the future if enough practices are not implemented. Consider the benefits to groundwater quality from soil health in addition to just quantity, which is the subject of the Groundwater Supply Issue Category. Contact MDA for more information or visit this webpage: https://www.mda.state.mn.us/hastings-dwsma. MDH SWP staff can also connect watershed staff with Minnesota Rural Water Association staff that specialize in agriculture and source water protection.	WQ-12 has also been modified to now read, "Assist lead groundwater organizations with projects, programs and practices that protect or improve groundwater quality, such as soil health initiatives, increasing continuous cover and other actions identified within the Dakota County Agricultural Chemical Reduction Effort (ACRE)."
	This section notes that "Groundwater sensitivities and supplies" were used to establish priority issues, referencing Appendix B, but DWSMAs were not defined or explained in the main body of the plan nor in Appendix B. See comment #1.	Per guidance of the Joint Powers Board (JPB), staff aimed to keep the WMP concise and easy to follow. Repeating information in Appendix B in the WMP main body would be redundant and go against the guidance of the JPB.
	For nutrients, consider targeting vulnerable groundwater areas, particularly the DWSMAs for Rosemount and Hastings, which have both been listed by MDA as Mitigation Level 1 and 2 DWSMAs, respectively. Multiple benefits projects can allow for additional funding and efficient use of resources.	Within the Draft WMP, Issue Category 1: Water Quality, Projects that Address Nutrients (phosphorus and nitrate) targeted areas including "Areas that are identified as priority agricultural chemical reduction areas within the Dakota County Groundwater Plan". These priority areas do target vulnearable groundwater areas, particularly the DWSMAs for Rosemount and Hastings. Another targeted area included is, "Subwatersheds that have been modeled to produce the highest nitrate pollutant yield."
	Like to see groundwater chloride included here - great!	We appreciate the positive feedback.
	The filtration BMPs section implies that infiltration BMPs will not be used in the areas listed in the fourth bullet point, which is good, but consider that there are other areas where infiltration is not recommended, not allowed, or not allowed without a higher level of engineering review. See other comments regarding infiltration for the link to MDH and MPCA guidance/requirements. MDH SWP staff are available to assist at a high level and at a project level as needed. However, the special section in the next column about requirements is noted and appreciated. Consider if this could be relocated or laid out differently to note that is applies to various areas of this section, as opposed to being its own type of project and targeting criteria.	The VRWJPO takes this into consideration when implementing projects. The VRWJPO would not implement a project in a location that would have adverse impacts to natural resources.
	It is appreciated that soil health initiatives including DWSMAs as a targeting criteria. Consider specifically calling out the Rosemount and/or Hastings DWSMAs, as they have been listed by MDA as Mitigation Level 1 and 2 DWSMAs, respectively. Other vulnerable DWSMAs could also be good places to focus these efforts if options in these two DWSMAs are exhausted.	The Draft WMP included targeting soil health practices within MDH-designated DWSMAs, which is inclusive of the Rosemount and Hastings DWSMAs.
	See previous comments regarding considerations for infiltration projects and practices.	The VRWJPO takes this into consideration when implementing projects. The VRWJPO would not implement a project in a location that would have adverse impacts to natural resources.

It is unclear exactly where in the subwatershed these projects will take place, so please note that this subwatershed includes a fair amount of highly vulnerable DWSMA, some of which is within an Emergency Response Area. Even if a Construction Stormwater General Permit is not required, MDH and MPCA guidelines should still be followed. Suggest adding "where protective of drinking water" when discussing infiltration. This could also add the objective "Support and implement projects, programs, and practices to protection or improve groundwater quality." MDH SWP staff would be happy to assist with evaluating specific infiltration projects for their appropriateness regarding groundwater and drinking water protection. Note that geospatial data for Emergency Response Areas is not publicly available, but you may request this from MDH directly.	The VRWJPO takes this into consideration when implementing projects. The VRWJPO would not implement a project in a location that would have adverse impacts to natural resources.
It is unclear exactly where in the subwatershed these projects will take place, so please note that this subwatershed includes a fair amount of highly vulnerable DWSMA, some of which is within an Emergency Response Area. Even if a Construction Stormwater General Permit is not required, MDH and MPCA guidelines should still be followed. Suggest adding "where protective of drinking water" when discussing infiltration. This could also add the objective "Support and implement projects, programs, and practices to protection or improve groundwater quality." MDH SWP staff would be happy to assist with evaluating specific infiltration projects for their appropriateness regarding groundwater and drinking water protection. Note that geospatial data for Emergency Response Areas is not publicly available, but you may request this from MDH directly.	The VRWJPO takes this into consideration when implementing projects. The VRWJPO would not implement a project in a location that would have adverse impacts to natural resources.
This is a great project! Please feel free to reach out to MDH for any assistance or collaboration requests. We would be happy to partner with the watershed on this. The Minnesota Rural Water Association staff that works closely with Hastings is also a potential partner - MDH SWP staff would be happy to introduce them to watershed staff. There may also be opportunities for MDH or other drinking water related funding for this project.	We appreciate the positive feedback and will keep MDH SWP and Hastings partners in-mind when pursuing the assessment.
Note that street sweeping can also meet the objective "Support and implement projects, programs, and practices to protection or improve groundwater quality." when completed in a highly vulnerable DWSMA, especially when there is a surface water contribution like with Hastings.	The VRWJPO understands that several actions within the implementation table will have multiple benefits. Per guidance of the JPB, staff aimed to keep the WMP concise and easy to follow. Identifying multiple benefits that many actions intrinsicly have rather than their primary benefit would create confusion, and would be contrary to JPB guidance.
Like to see groundwater chloride included here - great!	We appreciate the positive feedback.
Note that MDH SWP has a new Drinking Water Ambient Monitoring Program that has the ability to work on special projects. There may be projects related to this implementation action that the program would be interested in partnering on. Please contact MDH SWP staff if interested and we can introduce you to staff from that program.	We appreciate the positive feedback and will keep MDH SWP partners in-mind.
It appears that a significant portion of this subwatershed, and nearly the entire city of Hastings, is within a highly vulnerable DWSMA. Suggest adding "where protective of drinking water" when discussing infiltration. This could also add the objective "Support and implement projects, programs, and practices to protection or improve groundwater quality."	The VRWJPO takes this into consideration when implementing projects. The VRWJPO would not implement a project in a location that would have adverse impacts to natural resources.
Note that soil health initiatives are also often beneficial to groundwater quantity and could address the objective of "Support and implement projects, programs, and practices to protection or improve groundwater quality." as well.	The VRWJPO understands that several actions within the implementation table will have multiple benefits. Per guidance of the JPB, staff aimed to keep the WMP concise and easy to follow. Identifying multiple benefits that many actions intrinsicly have rather than their primary benefit would create confusion, and would be contrary to JPB guidance.
Ensure any alterations to the landscape, floodplain, etc. do not place wells within a floodplain. Work with Dakota County to evaluate this.	The VRWJPO takes this into consideration when implementing projects. The VRWJPO would not implement a project in a location that would have adverse impacts to natural resources.
Consider a targeted "adopt a drain" campaign within Hasting's highly vulnerable DWSMA surface water contribution area.	Adopt a drain is meant to address phosphorus pollutant sources, not nitrate. The rural communities located within the Hastings DWSMA do not have curb and gutter, so a targeted Adopt a Drain campaign would not provide positive impacts to nitrate.
The action items and action ID do not match with Table 3-14. It appears WQ-9 was jumped over and listed as WQ-10 instead, shifting the rest of the table to be off.	This error has been corrected.
Consider including "Agricultural production and waste disposal practices have introduced contamination into groundwater" as a notable way that water resources have been altered through land-use activities.	This has been added.
This section states that all residents get their drinking water from groundwater, however, page 21 says that "Communities within the Watershed rely primarily on groundwater aquifers for drinking water, whether supplied via municipal or private wells." It is assumed that the statement on page 21 was taking into consideration that the City of Burnsville obtains some of its drinking water from the Kramer Quarry. The appendix should match the body of the plan.	This has been revised.
Consider removing "injection wells" as a source of water to an aquifer. This does not apply in the watershed.	This has been removed.

	Check with DNR regarding the source of groundwater that supports the Vermillion River's trout populations. MDH SWP staff believe it should be the Prairie du Chien Group, which is a bedrock aquifer.	It's not one or the other in all cases. In the watershed area upstream of Hastings, the quaternary aquifers are directly connected to the Vermillion River. While previous DNR pump test results indicated there is a connection between the Prairie du Chien Group and the water table present in the quaternary aquifers, bedrock layers and their associated aquifers, are not visible or directly connected to the Vermillion River until you reach the City of Hastings and downstream. Language has been revised in the plan to reflect that depending on the location in the watershed and aquifer connectivity, quaternary aquifers and/or bedrock aquifers provide cool groundwater that support the Vermillion River's trout populations.
	The Quaternary Aquifers section states that "Quaternary aquifers are not used for municipal or public drinking water supply". However, there are public water suppliers, including municipal suppliers, that use Quaternary aquifers. This should be reworded to state that "Quaternary aquifers are not often used for municipal or public drinking water supply" in the watershed.	This has been revised.
	This section (B-77) notes that high nitrate is an issue in the quaternary aquifers, but does not note that high nitrate is also an issue in the Prairie du Chien Group bedrock aquifer. This is a significant concern in the watershed that should be acknowledged in the plan.	This has been incorporated into the WMP.
	Consider removing "in metropolitan counties" to bring the statement up to date with current legislation: https://www.revisor.mn.gov/statutes/cite/103G.271.	It has been removed.
Minnesota Pollution Control Agency	The Action Audit section was interesting and a great summary of some of the completed work. Great job of displaying reductions of pollutants (Table 3-1).	The VRWJPO appreciates your positive feedback.
	The tables summarizing the Implementation, Measurable outcomes, and priority areas are in different spots throughout the document. Would it be helpful to accumulate that information in one place. For example: Table 3-16 has WQ-2, up to 3 assessments. To know what those are, a person would have to go find the WQ-2 goal, and then find if there were priority areas for the assessments.	It would be beneficial to combine these areas for ease of review; however, with the current formatting of the WMP, moving these metrics would create issues with table sizing.
	Some of the prioritized areas are based on the modeled results that are in the appendix. Summarizing the yearly outputs and stating where the prioritized areas are would be helpful.	The main body of the WMP is meant to be a concise document used for planning purposes accounting for trends described in further detail in Appendix B. Yearly trends can be seen using tables, maps and graphics incorporated into the Appendix, which can be used to prioritize implementation areas. While having all of this information in one area of the WMP would be ideal, it would require duplicative information and reformatting resulting in a longer plan to digest for the user and staff felt it was important to include the most important information in the main body of the WMP with supplemental information in the appendices.
	Some of the measurable outcomes could have more details that would help link to the CIP table. It's good to see the goals with numeric targets (i.e.. TSS reductions) in addition to the number of projects. Are there other opportunities to add details like those to Table 3-16.	The measurable outcomes relating to pollutant reductions (i.e. TSS, TP, NO3) and shown in Table 3-16 were incorporated using modeled pollutant reductions within completed feasibility studies, inventories and assessments. Not all Actions within the WMP have modeled pollutant reductions.
	While reviewing the draft plan, some potential typos, formatting errors, omissions, and errors were found. Please see the comments on the attached draft for minor corrections to consider addressing. (included below in this spreadsheet starting in row 132)	Responses can be found below.
	The City of Rosemount's top stormwater management priority continues to be providing flood protection for homes within our bounds. Currently, hundreds of Rosemount homes are at greater risk of flooding because intercommunity discharge limits set by the VRWJPO do not allow The City to direct stormwater south to the Vermillion River. As such, the City of Rosemount requests VRWJPO consider modifying the established intercommunity flow rates to allow for a temporary or permanent outlet option to the Vermillion River. While Rosemount is currently installing a trunk storm sewer east to the Mississippi River, it may take a significant amount of time to complete, leaving the previously mentioned homes at greater risk.	Currently, the VRWJPO does not have information indicating the VRWJPO not allowing the City to direct stormwater to adjacent LGUs within the Vermillion River Watershed. It is our understanding that if the City wanted to discharge stormwater to an adjacent community where an outlet doesn't currently exist, an intercommunity flow standard would need to be established to protect the downstream community from flooding. To move forward, the VRWJPO will coordinate one or more meetings with Rosemount staff to discuss this matter, refresh our collective memories, review modeling data, and evaluate potential flow management options. The intent is to reach a mutual understanding of appropriate flow rates and, once consensus is achieved, to formalize a plan of action to address this matter.
	As the City of Rosemount is not the only community with flooding and stormwater quantity concerns, we urge that the VRWJPO provide greater prioritization for water storage and flood management at a coordinated regional intercommunity scale. Developing a Climate Resilience Plan is a great first step, but investigating the feasibility of a watershed-wide pond smart pumping plan is critical to providing flood relief for upstream communities that doesn't put downstream communities at greater risk.	The VRWJPO is currently administering a Request for Proposals (RFP) for a Changing Climate and Flooding Resiliency Study. Should budget align with available VRWJPO budget, and should the VRWJPO receive the above-identified grant funding, cities regulated by the Municipal Separate Storm Sewer System (MS4) General Permit will be involved in the study process. Communication was sent to City of Rosemount staff on October 28, 2025, regarding the RFP, which includes evaluation of stormwater smart pumping technology.
	The City of Rosemount urges the VRWJPO to continue its collaborative approach with cities and other LGUs in the Watershed. As the VRWJPO completes the proposed Climate Resilience Plan, updates to modeling that affect intercommunity flow, feasibility studies for projects, and any other projects or studies that affect LGU operations, it is key to continue including those communities affected. Not only does it ensure that plans/projects are workable, but it also ensures that there is buy-in when funding and other forms of support are sought.	The VRWJPO will continue to collaborate with watershed LGUs as the Climate Resilience Plan and any resulting identified projects move forward.

City of Rosemount	The City is requesting greater financial assistance for flood control and stormwater volume management projects. Financial assistance offered in the past has typically focused on water quality improvements. Putting in projects that reduce flood risk can be expensive and complex. The nearly exclusive focus on providing funding for water quality projects alone, has meant that providing flood protection for critical infrastructure and homes is unnecessarily delayed. This results in a situation where Rosemount residents and businesses are paying taxes to fund projects in other communities without receiving reciprocal benefits to address real high priority concerns that affect human safety and quality of life in their own community. Rosemount was not afforded the privilege of being able to direct stormwater to the Vermillion River because we developed later, adding a significant financial burden to find a solution to storage and flooding concerns that other communities that were afforded that privilege don't have. Let's not forget that the primary concern that drove the creation of watershed law in Minnesota was flooding; providing assistance to address flooding and water quantity concerns should have at least equal weight.	Priority ranking of Actions within the WMP is based on feedback received during the stakeholder engagement process (detailed in Appendix C), including feedback from the VRWJPO Technical Advisory Committee (TAC), Community Advisory Committee (CAC) and Joint Powers Board (JPB).
	The City would appreciate assistance from the Watershed with regards to reviewing conformance of its Comprehensive Surface Water Management Plan (CSWMP) to that of the 2026-2035 VRWJPO WMP.	The VRWJPO can assist with the review.
	The City requests flexibility with timing in regards to bringing its CSWMP into conformance with the VRWJPO WMP. The City is beginning the process of updating its 10-year comprehensive plan, of which it CSWMP is a part, as required by state law. The City would like to avoid a situation where it is updating its CSWMP and sending it out for comment for conformance with the VRWJPO WMP, only to have to do it again a short time later with regards to the Met Council Comp Plan process. The City's Comp Plan update is not due until late 2028.	The VRWJPO understands the City's concerns and will accommodate however we can, though that flexibility may be limited as the timelines specified in Minnesota Rule 8410.0105, Subpart 9 were set by the State of Minnesota and not the VRWJPO
	Page 4: Indent/tab/margin formatting error	Formatting has been corrected.
	Page 13: Punctuation: remove comma	Punctuation has been corrected.
	Page 21: Will VRWJPO be providing an evaluation to cities on whether local plans conform to the watershed plan?	The VRWJPO can assist with evaluating local plan conformance with the WMP.
	Page 26: inconsistent capitalization	Capitalization has been corrected.
	Page 45: Punctuation is off	Punctuation has been corrected.
	Page 45: I think this would be better: Temporary storage sedimentation BMPs that pond water and allow for sediment to settle from the water column: wet ponds, stormwater wetlands, hydrodynamic separators, etc. (in reference to an item in the Prioritized Stormwater Management Topics of Importance)	Table 3-5 has been updated to incorporate suggested text.
	Page 52: What does this mean??? (in reference to "Watershed-Wide LGU CIP collaboration")	The VRWJPO may participate or assist the LGU's with the design, construction, and maintenance of Infiltration BMP's.
	Page 63: Where is this map showing where these are??? (in reference to item NE-7 in the Implementation Table)	Previously completed wetland restoration studies can be found under the "Wetland Assessments" tab on the VRWJPO's Assessments, Inventories, and Studies site.
	Page 69: Did you miss one??? (blank space in table)	No. BMP performance monitoring was not included within 2027 expenditures due to lack of budget.
	Page 76: Did you miss one??? (blank space in table)	No. BMP performance monitoring was not included within 2027 expenditures due to lack of budget.
	Page 85: Didn't this fall through??? (regarding establishing another wetland bank)	That is correct. This narrative has been removed.
	Page A-1: It would be nice if links were included to these plans. (Appendix A)	The VRWJPO has revised the plan to include as many links as it could find for the various studies and plans listed that are provided online.
	Page A-2: Where's this? (Potential Wetland Restoration Inventory)	Previously completed wetland restoration studies can be found under the "Wetland Assessments" tab on the VRWJPO's Assessments, Inventories, and Studies site.
	Page B-4: Twin Cities Metro Area might be a better term to use since it's defined in statute	The narrative has been revised.
	Page B-4: It would be nice if there was some indication in here of percentage funding coming from each community.	Dakota County and Scott County Taxpayer Services do not provide the information requested broken down by community.
	Page B-7: Ravenna Township??? (in regards to bullet point on communities projected to transition out of rural agriculture to large-lot rural residential by 2040)	The Dakota County Office of Planning did not identify Ravenna township as a community projected to transition out of rural agriculture to large-lot rural residential by 2040.
	Page B-13: Shouldn't there be a full-sized map showing all the subwatersheds???	A watershed-wide view of political subwatersheds can be found on VRWJPO's Interactive Map.
	Page B-16: These links don't work.	These have been fixed.
	Page B-20: Needs edit (regarding a sentence in the climate data section of Appendix B)	This has been fixed.
	Page B-23: Where is the map showing subwatersheds?	A watershed-wide view of political subwatersheds can be found on VRWJPO's Interactive Map.
	Page B-25: [Alimagnet] Lake was stocked with channel cats and possibly other game fish previously. Bass maybe??? Has a winter aerator to improve game fish survival for top down water quality affects.	Text has been updated to reference the winter aerator. Staff do not have the capacity to track fish stocking (completed by varying entities at varying frequencies and times) at all VRWJPO lakes. For this reason, only those lakes with known annual/regularly scheduled stocking programs are highlighted in Appendix B.
	Page B-26: Farquar [Lake] has been stocked with walleyve and has an aerator. Also has CLP (curlyleaf pondweed)	The current text states that the lake has curlyleaf pondweed. Staff do not have the capacity to track fish stocking (completed by varying entities at varying frequencies and times) at all VRWJPO lakes. For this reason, only those lakes with known annual/regularly scheduled stocking programs are highlighted in Appendix B.
	Page B-26: Is this still true with some of the wetter years we've been having? (regarding the pump operation in Cobblestone Lake)	The narrative in the WMP was provided by the City of Apple Valley's Natural Resources Coordinator.
	Page B-26: I think the DNR stocks this one (Cobblestone Lake). Also has eurasian watermillfoil	Text has been updated to reference the Eurasian watermilfoil. Staff do not have the capacity to track fish stocking (completed by varying entities at varying frequencies and times) at all VRWJPO lakes. For this reason, only those lakes with known annual/regularly scheduled stocking programs are highlighted in Appendix B.
	Page B-65: Shouldn't mainstem be one word? Also, should it be capitalized.	This has been corrected.

	Page B-65: Consistency with dashes?	This has been corrected.
	Page B-66: One word? (referencing "water body")	This has been corrected.
	Page B-69: Is this labeled incorrectly?	This has been corrected.
	Page B-69: this station doesn't do stage? (referring to image of stream flow data at the Vermillion River near Empire gaging station)	Yes, the location does stage.
	Page B-70: Birger Pond in Innisfree Park has been monitored through CAMP since 2022. Due east of Farquar.	The section referenced only describes lakes monitored through CAMP.
	Page B-75: Incorrect label (on a Figure)	This has been corrected.
	Page B-75: Then our system shouldn't be shown on the map. Our system largely does not drain to the Vermillion River. (regarding a map of MS4 systems)	The section referenced reads, "Note: due to the scale of the VRWJPO, the map only shows stormwater system piping and structures that drain directly to the Vermillion River or principal connectors (when available)." All piping is included; only structures that drain directly to the Vermillion River or principal connectors are shown.
	Page B-83: Did you forget a subsection? Isn't Oak Savana one of the [Ecological Classification] subsections for a large chunk of the watershed?	Correct. Text relating to the Oak Savanna subsection has been added.
	Page B-87: In Empire. (referring to Dakota Woods Dog Park)	This has been corrected.
	Page B-87: This does not appear to be available to the general public. Requires an ArcGIS account and password. (referring to a link to a public water access map)	This has been corrected.
	Page C-1: Does this require further indent and a differently formatted bullet? Looks like it's a sublist to the the bullet point.	This has been corrected.
	Page C-7: I think the Visitor Center is actually in Eagan. None of Lebanon Hills Park is in Rosemount, although parts of Rosemount drain there.	This has been corrected.
	Page C-7: Not in the Rosemount or Apple Valley libraries?	The VRWJPO stakeholder engagement consultant's limited resources led them to choose libraries closest to the Vermillion River for the display. promotion.
	Page C-13: missed citation	This has been corrected.
	Page C-16: Is this a sublist that should be indented?	This has been corrected.
	Page D-5: Ordinances aren't required per se. What are required are regulatory controls, and in some cases the LWP and agreements or permit conditions may be sufficient.	Text has been updated to "regulatory controls".
	Page D-7: Might be a good idea to clarify if construction of structures is included: barns, silos, etc.	Added additional language under items 2 and 3 to include structures for the activities.
	Page D-22: This map (Figure D-1) could maybe use some updating. I see at least 1 water quality corridor that doesn't exist any longer, the North Creek extension into Apple Valley.	Updates to the figure are made twice yearly and changes are made using input from watershed partners. Thank you for mentioning the WQ corridor designation on North Creek extension into Apple Valley. This will be reviewed during the next map audit.
	Page D-23: The dash is inconsistent with use of this term in other locations in this document.	The document now reads "MS4"
	Page D-23: LGUs that aren't MS4s are not required under state regulations to ensure that a CSW NPDES Permit is required by a project. This sentence is confusing.	Statement has been deleted.
	Page D-23: Remove dash	This has been fixed.
Scott County	Generally, Scott County finds the proposed plan well written, and we appreciate the hard work that has gone into developing the plan.	The VRWJPO appreciates your positive feedback.
	Section 2.3: Water Quality Topics of Importance: Projects that address bacteria - Low Priority. Scott County supports this level of priority for the JPO. It aligns with Scott County's priority level. It is important that the VRWJPO remain consistent with this priority level in communications and activity. Changes to the priority level should be discussed with Scott County prior to adopting.	The VRWJPO is pleased that there is agreement with the priority level identified by stakeholders and staff regarding the bacteria topic of importance. Should a change to the priority level be considered, that would be done in coordination with Scott County staff. The VRWJPO will note that even though projects that address bacteria were identified as a low-level priority, there is one action (WQ-15) in the WMP that targets the abnormally high bacteria levels found only in the Scott County portion of the watershed. The project may not be as high of a priority as others in the WMP, but due to this specific water quality issue only occurring in this geographic area, an action was still deemed important for implementation.
	Table 3-15: WQ-15 Projects that address E.coli Upper Mainstem Subwatershed: Scott County will continue to support this VRWJPO project. Scott County will not lead, coordinate, or dedicate funds associated with this low-level project. Scott County will support VRWJPO efforts that align with the level of priority and effort identified in the WMP and provide County staff resources when available.	Language in the Joint Powers Agreement (JPA) between Scott County and Dakota County that formed the VRWJPO specifies, "Scott County shall provide staffing of a co-administrator (Co-Administrator) for the VRWJPO to act as a liaison and to assist the Administrator regarding VRWJPO activities including but not limited to managing the general operations and activities of the VRWJPO, implementation of the watershed plan in Scott County, project planning and staffing under the direction of the VRWJPB, and any other role generally described in the Vermillion River Watershed Management Plan." Based on the language in the JPA, it's Scott County staff's responsibility to assist with implementation of the WMP in Scott County. While projects to address bacteria were identified as a low-level priority in the WMP, action WQ-15 exists in the WMP due to abnormally high bacteria levels present only in the Scott County portion of the Vermillion River. Any VRWJPO project(s) located in Scott County require Scott County staff to take the lead and coordinate the project(s) as Scott County is the one with governmental authority to do so.
	Table 3-14: CMR-5 Partner Programs: Please revise the reference to the Scott SWCD Clean Water Education Program to remove the SWCD. The official name of the program is the Scott Clean Water Education Program (SCWEP).	The error has been corrected.
	FMR is largely pleased with the draft plan. The plan is straight forward, easy to follow, and focuses on what the JPO deems as most important for water quality.	The VRWJPO appreciates your positive feedback.

Friends of the Mississippi River	However, the plan largely ignores the impact of upland habitat on water quality and focuses on the benefits of in-stream restoration and green infrastructure improvements. While other watershed districts are recognizing the importance of watershed-level upland habitat protection and restoration and taking a more active role in this work – districts like South Washington Watershed District and the Mississippi Watershed Management Organization, for example – the VRWJPO is not taking this same approach. The benefits of upland habitat protection and restoration for water quality, in-stream habitat quality, and overall resilience are documented and clear: https://iwaponline.com/wqrj/article/59/2/89/101761/Impacts-of-land-use-land-cover-on- water-quality-A Moreover, we have seen these benefits play out in the Vermillion River watershed, where upland habitat restoration projects at places like the Kasel parcel of the DNR's South Branch Vermillion River AMA have resulted in improved in-stream trout habitat and population numbers, due in part to reduced sedimentation and increased provision of diverse insect food sources.	The VRWJPO applauds FMR for its work in land conservation and enhancement of natural communities. The VRWJPO recognizes that watershed-level upland habitat plays an important role in water quality and that other Watershed Management Organizations (WMOs) in the state include such initiatives in their operations. WMOs in Minnesota are diverse with their programs and projects, and the diversity in programs and practices are a result of identified goals and priorities of each respective WMO and their stakeholders. During the stakeholder engagement process (detailed in Appendix C of the WMP), the VRWJPO Technical Advisory Committee (TAC), Community Advisory Committee (CAC) and Joint Powers Board (JPB) ranked "Coordinate with others to implement projects, programs and practices that improve disturbed landscapes," as Low Priority. As a result, associated implementation actions are a lower priority compared to others that ranked higher.
	However, there is little to no information in the plan that speaks to intact habitats and landscapes, or to a watershed-level focus on land use or habitat protection. For example, in the 'climate resilience' section, there is no mention about landscape-level resilience and the role that intact and healthy habitat – be it grasslands or forests – can plan in water retention, filtration, and mediation. Further, in the 'natural environments' section, a low priority is placed on both improving disturbed landscapes and on upland restoration. If these are both low priority, but intact and restored landscapes offer the benefits identified above, then the plan should at least contain strategies that encourage or engage partners to pursue restoration of disturbed landscapes and the protection and restoration of upland habitat. This doesn't have to be a burden that the JPO pursues alone, but the plan should identify potential partners and roles that the JPO could plan in this important work.	We concur that the concept of upland habitat restoration can have a role in improving in-stream trout habitat and population. While the VRWJPO places a lower priority on upland habitat restoration, it does mean we still plan to direct resources towards such initiatives. Other examples of VRWJPO-funded upland restoration in recent years include the Valley Lake Park Pollinator Garden installed in 2019, the East Lake Habitat Improvements in 2021, and numerous upland restoration projects implemented by the Dakota County Soil and Water Conservation District (DCSWCD) and Scott Soil and Water Conservation District (SSWCD) that are supported by VRWJPO. FMR's comment on the Natural Environments section showing low priority for improving disturbed landscapes and upland restoration is recognized. As mentioned above, the TAC, CAC and JPB provided input and voted to place low priority on these categories. Ultimately, the JPB are decisive body on assigning priority relating to goals and objectives identified in the WMP. The WMP also includes partner potential within the Implementation Table relating to each Action. NE-13: Upland Restoration Adjacent to Water Resources identifies "Many" potential partners.
	Lastly, the plan presents the itemized priorities of the watershed's property tax levy. Priority #7 is identified as "Protect and enhance fish and wildlife habitat and water recreational facilities." If protecting and enhancing habitat is included as an express priority or purpose of the JPO's funding, then that should be reflected more clearly in the goals and methods of the JPO's work. The VRWJPO's mission is to "Collaboratively provide education, science, and support to **restore and protect** the Vermillion River watershed's **natural resources** for all who live work and play within its boundaries." Natural resources don't stop at water resources and related infrastructure – nor does the connection of the land and landscape to the health and resiliency of the water.	The Metropolitan Surface Water Management Act (Minnesota Statute 103B) established the purposes of all WMOs to include the eight purposes listed that you noted. However, it is up to each WMO through a goal setting and prioritization process to determine how to best utilize the resources available to accomplish the goals. As noted previously, the goals setting and prioritization process implemented by the VRWJPO to develop this WMP identified a higher priority on some objectives compared to others, which resulted in a WMP that reflects this in our implementation plan. VRWJPO concurs.
	In addition to a focus on upland habitat, the plan's focus on agricultural lands is also important. As noted in Table B2, agricultural/undeveloped land accounts for over two-thirds of the acreage within the JPO's purview, and "[a]griculture is projected to remain the predominant land use in the watershed for the foreseeable future." The document also notes that agricultural practices such as crop rotation, cover crops, and reduced tillage can mitigate farming's negative impacts to hydrology and soil health [B-9]. We recommend that the Plan echo the findings of the updated MN Nutrient Reduction Strategy (currently in draft) by emphasizing the need for greater adoption of "continuous living cover" farming systems, which prioritize living roots and/or groundcover year-round; continuous living cover systems deliver significant benefits for water quality and can provide habitat for wildlife and diversify farm income streams. For example, the City of Hastings has leased land around its DWSMA for cultivation of Kernza perennial grain and alfalfa, dramatically reducing nutrient leaching to public water supplies; LGUs should work with area farmers to introduce continuous living cover practices at all scales, and seek ways to support the development of supply chains and markets for perennial and winter annual crops.	The VRWJPO promotes greater adoption of continuous living cover in farming systems through partnerships with the DCSWCD and SSWCD. This is reflected in the following Actions: WQ-5, WQ-6, WQ-7, WQ-8, WQ-12 and NE-9. Additionally, subwatershed assessments reflected in the Actions above and include projects such as native grasses, filter strips, grassed waterways and others. In the implementation table, the word "such" associated with various agricultural practices is used deliberately to leave room for other potential identified projects as assessments are updated. Actions WQ-12 and NE-9 encompass portions of the VRWJPO's annual DCSWCD and SSWCD workplans including pass through funding for best management projects such as cover crops, harvestable covers, grassed waterways, filter strips and more.