

**City of Minneapolis Summary Comments
Minnehaha Creek Watershed District (MCWD) Plan Amendment**

1. The City of Minneapolis requests an extension to submit comments on the MCWD plan amendments.
2. It has not been shown that additional reports will lead to improvements in the water bodies. We believe that additional reporting requirements may have the opposite effect as a result of diverting resources from actual water quality work to reporting work
3. Annual report time frame is different than our Minnesota Pollution Control Agency (MPCA) Municipal Separated Storm Sewer System (MS4) Permit and would require significant staff time with no benefit to the management of the stormwater system being shown.
4. Language in the proposed plan amendment requiring meetings is not necessary for collaboration and adds unnecessary regulatory requirements. The City will continue to collaborate with the MCWD.
5. The proposed Plan amendment language requires the City of Minneapolis to update our Local Surface Water Management Plan after each watershed organization approves their Plan. This is an expensive and time consuming process since we have four watershed organizations in the City that may update their plans at different times. We believe that the provisions of Minnesota Rules account for this local government dilemma and are clear that the legal requirement is that we only have to update our Local Surface Watershed Management Plan within two years of approval of the last of the four watershed management plans of watershed organizations located within the City. This interpretation of Minnesota Rules is supported by correspondence we received in the past from Minnesota Board of Soil and Water Resources staff.
6. Items the District proposes to review in our Local Surface Water Management Plan appear to be in excess of the actual authority of the MCWD.
7. The proposed MCWD review of the City's implementation of its Local Surface Water Management Plan appears to be unnecessarily punitive in nature and undermines the spirit of cooperation and common commitment which is essential to best manage and preserve our water resources.