

Memorandum

To: Bassett Creek Watershed Management Commission
From: Laura Adler, Engineering Program Coordinator
Subject: Response to Bassett Creek Watershed Management Commission Comments on the City of St. Louis Park *Surface Water Management Plan*
Date: September 8, 2009
c: Karen Chandler, Barr Engineering

Thank you for taking the time to review the City of St. Louis Park's draft *Surface Water Management Plan* (SWMP). Comments on the city's draft SWMP were provided in a written memo dated July 7, 2009 and were discussed with Karen Chandler via telephone on July 7, 2009. Provided below are the city's responses to the Bassett Creek Watershed Management Commission's (BCWMC) comments and any associated changes to the SWMP. Any additional or revised SWMP text is shown in italics.

The city requests that the BCWMC approve the St. Louis Park SWMP, assuming that the BCWMC agrees that the responses and suggested SWMP revisions are satisfactory.

Impaired Waters

The SWMP lists impaired waters within the city and that the city discharges to, with the exception of Sweeney Lake. The BCWMC recommended that Sweeney Lake be referenced specifically in the following locations in the SWMP:

- Page 1-5 – Summary Table of Issues
- Page 3-19 – MPCA Impaired Waters (303(d)) List
- Table 3-13 – Impaired Waters in the City of St. Louis Park.
- Page 4-8 – Chapter discussing impaired waters and TMDL issues (Chapter 4.2.1.3)

The specific references to Sweeney Lake suggested by the BCWMC will be addressed in the plan in the following ways:

- Page 1-5 – This chapter of the SWMP discusses the regulatory aspects of the MPCA's TMDL program. This discussion is general in scope, and the text does not refer to any specific impaired waters. Sweeney Lake will be referenced with other impaired waters in Table 3-13 and Chapter 4.2.1.3 (page 4-8), but will not be added to the general discussion of TMDLs included in Chapter 1.
- Page 3-19 – This page includes a bulleted list of impaired waters within the city. A second list will be added to that chapter that includes impaired waters located downstream of the city:

There are also several impaired water bodies located downstream of the city of St. Louis Park that are indirectly impacted by runoff or discharge from the city. These water bodies include:

- *Bassett Creek*
 - *Sweeney Lake*
 - *Lake Hiawatha*
 - *Lake Pepin*
- Table 3-13 – The following row will be added to Table 3-13 (which lists impaired waters within or downstream of the city) for Sweeney Lake:

<i>Water Body</i>	<i>Reach</i>	<i>Affected Use</i>	<i>Pollutant/ Stressor</i>	<i>Year Listed</i>	<i>Target Start</i>	<i>Target Completion</i>	<i>Comments</i>
<i>Sweeney Lake¹ (27-0035-01)</i>	<i>Lake</i>	<i>Aquatic Recreation</i>	<i>Nutrient/ Eutrophication Biological Indicators</i>	<i>2004</i>	<i>2006</i>	<i>2009</i>	

¹*-Not located within the City of St. Louis Park but the city is tributary to these water bodies*

- Page 4-8 – This page discusses each impaired water/TMDL included in Table 3-13 in greater detail. The following text will be added or revised in Chapter 4.2.1.3 to reference the Sweeney Lake TMDL:

There are also impaired lakes and streams outside the city that receive stormwater from St. Louis Park and will be the subject of TMDL studies, including Sweeney Lake, Lake Hiawatha, Bassett Creek, and Lake Pepin (see Table 3-13).

Sweeney Lake is outside and downstream of the city of St. Louis Park. It is on the impaired waters list for excess nutrients and eutrophication biological indicators. The TMDL study was started in 2007 and is scheduled to be completed in 2009. The TMDL will identify phosphorus load reduction strategies for the Sweeney Lake watershed.

Land Use/Redevelopment and TMDL Implementation

Chapter 3.4 generally discusses land use and redevelopment within the city and references Figure 3.8 (future redevelopment areas) and Figure 3.9 (pavement management areas). The BCWMC recommends that this section include a brief discussion of how these areas could be higher priorities related to TMDL Implementation Plans for Sweeney Lake and other impaired waters.

The second paragraph in Chapter 3.4 will be revised as follows to reflect this:

There are several areas within the city of St. Louis Park that have been identified for redevelopment. Figure 3-8 shows the general areas that are expected to be redeveloped within the city of St. Louis Park. Figure 3-9 shows the pavement management areas within the city of St. Louis Park as well as the planned construction year. Redevelopment provides the opportunity to improve stormwater

management and implement various management techniques, including TMDL implementation. For example, the planning study area near Interstate 394 shown in Figure 3-8 may provide an opportunity to reduce phosphorus loading to Sweeney Lake, an impaired water.

It is the recommendation of the BCWMC that Table 5-1 (Implementation Program) include references to redevelopment areas that may be used to implement TMDL load reductions, specifically in reference to Sweeney Lake load reduction goals.

Line 15 in Table 5-1 addresses achieving phosphorus load reductions from TMDLs or assigned by the watershed management organizations. That line item will be revised to be more inclusive, but does not list specific water bodies:

No.	Project Name/Description	Priority	Location	Cost ¹	Proposed Year	Financing	Comments
15	Work towards achieving phosphorus load reductions specified by MCWD, BCWMC, current and future TMDLs	High	City-wide	Varies	Ongoing	Stormwater Utility, Grants	Includes implementation of BMPs associated with redevelopment

Impaired Waters – Figure 3-22

Figure 3-22 identifies impaired waters within the city of St. Louis Park. The BCWMC suggests including a note that refers to impaired waters downstream of the city.

The following note will be added to that figure:

NOTE: *Impaired waters downstream of the city of St. Louis Park include Bassett Creek, Sweeney Lake, Lake Hiawatha, and Lake Pepin; these are not shown on map.*

Watershed Boundaries – Figure 3-4 and Figure 3-5

The BCWMC asks that the watershed boundaries of subwatersheds MTKA1 and MPLS2 be reviewed to confirm the direction of flow and that the WMO boundary be reviewed.

Review of the city’s storm sewer GIS data confirms that the flow direction from subwatersheds MPLS1 and MPLS2 is as shown on Figure 3-5. St. Louis Park storm sewer data and the Minnetonka *Water Resources Management Plan* confirm that the flow direction from subwatershed MTKA1 is as shown on Figure 3-5. The WMO boundary included on Figure 3-4 and Figure 3-5 represents the jurisdictional boundary based on GIS data provided by Minnehaha Creek Watershed District (thus it does not match up exactly with the hydrologic boundaries presented in Figure 3-5). The legends of Figures 3-4 and 3-5 will be revised to specify that this boundary is a jurisdictional boundary.