

## Bassett Creek Recording Administrator

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**Subject:** BCWMC: Comments on Sweeney Lake TMDL

BCWMC Commissioners, Alternate Commissioners, and TAC Members,

For your information, attached are comments from Chair Michael Welch regarding the Sweeney Lake TMDL study. The comments are for your review and discussion at this Thursday's BCWMC meeting (September 17th, 11:30 a.m.)

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From: Michael Welch <mjewelch@gmail.com>

Date: Wed, 9 Sep 2009 23:34:02 -0500

Subject: Sweeney Lake TMDL

To: Ron Leaf <rleaf@sehinc.com>

Cc: Len Kremer <lkremer@barr.com>, Karen Chandler <kchandler@barr.com>, Amy Herbert <bcra@barr.com>

Ron,

I have a few notes on the Sweeney Lake TMDL draft in advance of the Bassett Creek Watershed Management Commission's meeting at which the TMDL will be discussed next week. My comments are for both your consideration and the commission's:

\* The TMDL implementation plan appropriately identifies a variety of strategies to reduce phosphorus in the lake. The implementation plan should emphasize an adaptive management approach, under which the Municipal Separate Storm Sewer System operators, the BCWMC and any and all others with capacity to contribute to the improvement of Sweeney Lake water quality will continually explore, develop and implement the most cost-effective and ecologically sound means of reducing phosphorus available. The plan should emphasize a hierarchy of strategies, prioritizing first, source-reduction options (street sweeping; implementation, construction and maintenance of best management practices such as infiltration basins/areas, buffer areas, filtration basins and retention ponds; regulatory controls, such as runoff quality and volume-retention requirements; and shoreline management through, eg, buffering); second, in-lake vegetation management or, as may be warranted, carp management; third, lake-inflow treatment, such as in-flow dosing; fourth, other in-lake treatment methodologies, such as aeration and alum treatment. I realize that source reductions are difficult to achieve, but the implementation plan should emphasize such efforts in favor of other management controls to prioritize systemic solutions over temporary ones.

\* The option of regulatory changes to increase runoff-management should be added to the "maximize load reduction through redevelopment" bullet point in 8.2.3. (Regulatory changes already are included in the adjacent table.)

\* The implementation plan should recognize that the BCWMC intends to work with the City of Golden Valley and other partners to seek Clean Water Legacy and other grant funding for the implementation of water-quality improvement

strategies in the Sweeney Lake watershed (and elsewhere in the Bassett Creek watershed).

\* The limited legal mechanisms available to achieve TMDL goals notwithstanding, the report should underscore that regulation of MS4s is not the only means of achieving the goals. Improving water quality in Sweeney Lake will require that the BCWMC, homeowners and other interested parties contribute to finding and implementing all reasonable strategies for reducing phosphorus loading.

\* Whether the BCMWC ultimately decides to recommend a categorical waste load allocation and offer to manage same, record of all contributions of phosphorus to the lake, load allocations and all efforts contributing to the improvement the water quality in the lake should be tracked in a format and system that can be readily accessed by city stake, stakeholders and the public.

Thanks.

---Michael

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