



March 9, 2010

Mr. Michael Welch
Bassett Creek Watershed Management Commission
c/o Barr Engineering Company
4700 West 77th Street
Minneapolis, MN 55435

Re: Local Surface Water Management Plan - response to BCWMC comments
City of Robbinsdale
Bonestroo File No.: 000143-09004-0

Dear Mr. Welch:

Thank you for taking the time to review and provide comments on Robbinsdale's draft Local Surface Water Management Plan (LSWMP). This response letter will address comments provided in the staff review letter/checklist from Barr Engineering Company dated February 11, 2010. It is our understanding that the Bassett Creek Watershed Management Commission (BCWMC) will be recommending Robbinsdale's LSWMP for approval at their March 18, 2010 meeting, providing the City adequately addressed the Commission's comments in the February 11, 2010 review letter/checklist.

The Commission's comments from the February 11, 2010 review letter/checklist are identified in italics below, followed by the City responses to these comments. Specific pages from the LSWMP revised to address the Commissions comments are attached to this letter.

1. *Commission Comment 2: Issue 10 of Table 6.2 needs to identify the water quality basin construction project as BCWMC CIP project GR-2. Project GR-2 also needs to be added to Table 8.4 (Storm Water System Improvements Activities), with implementation proposed for in 2016. Section 8.8 (Financing) of the LSWMP needs to also discuss that the BCWMC is the source of funding for project GR-2 and that the BCWMC funding is provided through an ad valorem tax collected by Hennepin County.*

City Response: The LSWMP was revised to reference the water quality basin construction project as BCWMC CIP project GR-2 and was also added to Table 8.2. The funding source discussion regarding the ad valorem tax was provided in Section 8.8. See attached pages 36, 59, and 60.

2. *Commission Comment 3: The table does not include the following lakes/impairments:*
 - *Wirth Lake (Golden Valley), which is impaired for nutrients/eutrophication and biological indicators.*

City Response: Robbinsdale is not hydraulically connected to Wirth Lake under normal hydrologic conditions and is not included in the proposed list of MS4's with waste load allocations (see June 22, 2009 Powerpoint presentation by Greg Wilson, Barr Engineering

Company). In addition, we received further clarification from the MPCA indicating that MS4's contributing to Bassett Creek upstream of Wirth Lake, such as Robbinsdale, will not be responsible for waste load allocation. Therefore, the City has not added Wirth Lake impairment to Table 2.5.

3. *Commission Comment 5: It is recommended that the types of water quality BMPs associated with the road reconstruction, the location of the CDS unit installations and the location(s) of the pond sediment removal be specified if known at this time.*

City Response: At this point, plans for future street reconstruction projects are not developed enough to identify types and locations of associated water quality BMPs. No specific pond sediment removal projects have been identified at this time.

4. *Commission Comment 7: It is recommended that the development of [the ordinance to address the propose application of pesticides, herbicides, and fertilizers] be included in the City's Official Control Implementation Actions (Table 8.1).*

City Response: The development of the ordinance to address the propose application of pesticides, herbicides, and fertilizers was included in Table 8.1. Tables 3.1 and 6.1 and Policy 14.6 were also updated to include reference to existing City Code Section 1145. See attached pages 22, 32, 52, and 54.

5. *Commission Comment 8: One or more of policies [3.2, 3.4, or 3.9] needs to be revised to state that there will be no increase in phosphorus load (non-degradation) for redevelopment projects that result in increased impervious surface.*

City Response: The following statement was added to Policy 3.9: "Redevelopment projects that propose to increase the existing impervious area by any amount shall provide water quality treatment for all areas of site disturbance in conformance with BCWMC standards, which states that all redevelopment projects that result in an increase in impervious area must implement BMPs to prevent an increase in phosphorus loading from the site (BCWMC Policy A, Section 4.2.2.4)." See attached page 47.

6. *Commission Comment 9: It is recommended that the development of [the ordinance to address wetland management, including wetland buffer standards, that are consistent with the requirements of BCWMC] be included in the City's Official Control Implementation Actions (Table 8.1).*

City Response: The development of an ordinance to address wetland management is already included in Table 8.1. Language regarding buffers requirements was added to this table. See attached page 54.

7. *Comment 10: The LSWMP needs to be revised to clarify the status of shoreland regulation in the city (e.g., how will the city enforce DNR shoreland protection regulations without a shoreland ordinance).*

City Response: Policy 12.2 has been added stating, "Robbinsdale will develop a shoreland ordinance consistent with the DNR Shoreland Protection Regulations and any additional shoreland regulations of the local WMC's". Table 8.1 has been updated to include the

development of a shoreland ordinance as an implementation item. This action would fall under Activity #18 on Table 8.4. See attached pages 51 and 54.

8. *Commission Comment 11: Appendix C needs to be revised to 1) include all of the types of projects that require Commission review and 2) clarify the Commission standards for nondegradation, infiltration/filtration, wet ponds, rate control, and floodplain alteration. Section 3.0 of the BCWMC's Requirements for Improvements and Development Proposals (July 17, 2008, as revised) lists the types of projects requiring BCWMC review.*

Commission Comment 11: It is recommended that the LSWMP include a policy describing permissible floodplain land uses or stating compliance with the BCWMC requirements and referencing those requirements.

Commission Comment 11: It is recommended that a similar policy [3.2] be included in the Water Quantity policies section of the LSWMP.

City Response: Appendix C (see attached) has been revised to 1) include all of the types of projects that require Commission review and 2) clarify the Commission standards for nondegradation, infiltration/filtration, wet ponds, rate control, and floodplain alteration. Section 3.0 of the BCWMC's Requirements for Improvements and Development Proposals (July 17, 2008, as revised) lists the types of projects requiring BCWMC review.

City Response: Policy 2.9 was added stating "Robbinsdale will enforce the permitted uses defined in City Code (Section 530.01 Floodplain Management District Ordinance)". See attached page 45.

City Response: The City acknowledges this comment, however Policy 3.2 is directed specifically at nondegradation and is most appropriate in the Water Quality Section (Section 7.4) of the LSWMP.

9. *Commission Comment 15: It is recommended that a policy with similar intent [to Policies 4.2 and 4.3] be included in the Water Quantity policy section of the LSWMP.*

City Response: The City acknowledges this comment, however feels as though the most appropriate section to address runoff volume reductions is in the Volume Management Section (Section 7.5) in the LSWMP.

10. *Commission Comment 18: The LSWMP does not address permitted land uses within the floodplain, or reference the policies of the BCWMC regarding this issue. The floodplain-related policies of the BCWMC are not referenced within the LSWMP.*

City Response: Permissible floodplain land uses are described in City Code Section 530.01 and Policy 2.9 was added stating "Robbinsdale will enforce the permitted uses defined in the Floodplain Management District of the City Code (Section 530.01 Floodplain Management District Ordinance)". See attached page 45.

11. *Commission Comment 20 and 21: It is recommended that the performance standards are summarized in Section 6.0 of the LSWMP.*

City Response: To address the intent of this comment, the following text has been added to Section 6.4: "In addition, the performance standards included in City Code addressing the six minimum control measures identified above can be found on the City's website (see Table 3.1 for Code Sections): <http://www.ci.robbinsdale.mn.us/citycode.shtml>". See attached page 41.

12. *Commission Comment 24: Section 6.3.2 and Appendix B adopt the wetland buffer standards as presented in the Comprehensive General Guidance Manual for MnRAM, version 3.0; however, the LSWMP does not identify specific buffer requirements for other water resources.*

City Response: All waterbodies within Robbinsdale are identified as wetlands on the NWI wetland map (Figure 2.4) and as such would be required to meet the wetland buffer standards in accordance with their respective management classifications.

13. *Commission Comment 34: Storm water flow directions are not specified in Figure 2.7 (which includes storm sewer data and storm sewersheds). It is recommended that flow directions be added to Figure 2.7.*

City Response: The storm water flow directions within the jurisdiction of the BCWMC have been added to Figure 2.7. See attached page 18.

We trust these responses will adequately address the comments presented in the Commission's review letter/checklist dated February 11, 2010. Again, thank you for your efforts in reviewing the City's LSWMP. Please contact me at 651-604-4801 if you have any questions regarding our responses.

Sincerely,

BONESTROO



Bradley P. Schleeter, PE
Project Manager

Attachments: LSWMP revised pages

cc: Richard McCoy, City of Robbinsdale
Karen Chandler, Barr Engineering Company