



Bassett Creek Watershed Management Commission

May 16, 2014

Mr. Brent Rusco
Hennepin County, Housing Community Works and Transit
Attention: Bottineau Transitway
701 Fourth Avenue South, Suite 400
Minneapolis, MN 55415

Re: **Bottineau Transitway – Draft Environmental Impact Statement**
BCWMC #2014-07

Dear Mr. Rusco:

Thank you for providing the Bassett Creek Watershed Management Commission (BCWMC) with the opportunity to review and to provide comments on the Bottineau Transitway Draft Environmental Impact Statement (EIS). On behalf of the BCWMC, we reviewed the Draft EIS and offer the following comments on the areas potentially impacted by the project that are within the BCWMC jurisdiction.

General/Background

As shown in Figure 5.9-1, portions of three of the proposed alignment alternatives are located in the jurisdiction of the BCWMC:

- Nearly all of Alignment D1 (part of the preferred alternative), from about Russell Ave. N. in Minneapolis to the intersection of Alignment D1 and Alignment C at 34th Ave. N. near the Robbinsdale/Crystal border. As noted in the Draft EIS, stormwater runoff from the existing railway corridor along this route discharges directly into surrounding ditches and is conveyed to adjacent waterbodies, including Bassett Creek, Grimes Pond, North Rice Pond and South Rice Pond (which eventually drain to Bassett Creek).
- Portions of Alignment D2, from about 17th Ave. N. and Penn Ave. N. to West Broadway and Xerxes Ave. N. in Minneapolis (Robbinsdale/Minneapolis border), and along 34th Ave. N. from just west of France Ave. N. to the intersection with Alignment C. Stormwater runoff from this portion of the route will also discharge directly to Bassett Creek, via storm sewer systems.
- A small portion of Alignment C (part of the preferred alternative), from 34th Ave. N. to 36th Ave. N.

Floodplain Issues

Alignment D1 follows the Burlington-Northern Santa Fe (BNSF) railroad corridor. A portion of this route in Golden Valley (and Wirth Park in particular) is located along the Main Stem of Bassett Creek and South Rice Pond. In Robbinsdale, the route is located along Grimes Pond, North Rice Pond and South Rice Pond. The BCWMC's 100-year floodplain elevation for Bassett Creek along Alignment D1 ranges from elevation

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826.0 ft. (NGVD29) at the upstream end of TH 55 to 832.0 ft. (NGVD29) at the downstream side of Bassett Creek Drive. In addition, the BCWMC's 100-year floodplain elevation for Grimes Pond/North Rice Pond is 838.0 ft (NGVD29) and for South Rice Pond is 831.5 ft (NGVD29).

The preferred alternative (Alternative B-C-D1) will result in 18,700 cubic yards of total floodplain impacts. Of this, 11,000 cubic yards will be within the Bassett Creek floodplain, along Alignment D1.

As discussed in previous correspondence, the BCWMC will not allow filling within the BCWMC-established floodplain without mitigation. Proposals to fill within the floodplain must obtain BCWMC approval and provide compensating storage (1:1 basis) and/or channel modifications so that the flood level is not increased at any point along the creek due to fill. Figure 5.2-6 in the Draft EIS identifies two areas within Theodore Wirth Regional Park as potential sites to provide compensating floodplain storage. As noted in Section 5.2.5 of the Draft EIS, the design of the compensatory storage sites would need to be coordinated with the Minneapolis Park and Recreation Board, appropriate city/cities, and the approving agencies (including the BCWMC). We encourage the Metropolitan Council to contact BCWMC as early in the design process as possible to discuss these storage sites.

In addition to reviewing proposals for floodplain fill, the BCWMC must review and approve crossings of the Bassett Creek trunk system, including changes to existing crossings. The Draft EIS notes (Section 5.3.4.1) that Alignment D1 will cross a backwater channel of Bassett Creek, just north of TH 55.

Floodplain management policies are listed in Section 5.2.2.2 of the BCWMC's 2004 Watershed Management Plan. Please also see the BCWMC's submittal and design requirements for projects ("Requirements for Improvements and Development Proposals," 2008). These documents can be found on the BCWMC website: www.bassettcreekwmo.org.

Runoff and Rate Control

The BCWMC regulates stormwater runoff discharges and volumes to minimize flood problems, flood damages, and future costs of stormwater management systems along the Bassett Creek trunk system. The selected alternative for the Bottineau Transitway project will increase impervious surface 31% within the overall project area. Within the Bassett Creek watershed (Alignment D1), the project will increase the amount of impervious surface by 15 acres, a 40% increase within the Alignment D1 project area (from Technical Report Stormwater in the Draft EIS). The increased impervious surface will be in close proximity to the creek itself and will result in increased runoff rates if not controlled. Best management practices must be implemented to ensure flood profiles are not increased along Bassett Creek.

Water Quality

The BCWMC and its member cities have committed significant resources to the improvement of the quality of stormwater runoff reaching the Mississippi River, by reducing nonpoint source pollution carried as stormwater runoff. The BCWMC strongly encourages the Metropolitan Council to implement best management practices to treat transitway runoff to ensure that the project does not increase pollutant-loading to adjacent water bodies. The BCWMC's water quality policies are listed in Section 4.2 of the Watershed Management Plan.

The BCWMC expects the Bottineau Transitway project design to include stormwater treatment and erosion control measures that will reduce the amount of phosphorus and sediment carried by stormwater

runoff to Bassett Creek. The BCWMC also expects the Metropolitan Council to consider measures to minimize the amount of increased impervious surfaces resulting from the project.

Additional pollutants of concern to the BCWMC include chloride from road salting, fuel, oils, metals and construction runoff which could enter storm drains and downstream water resources. Adequate permanent and temporary construction BMPs must be implemented as part of the project.

The Draft EIS proposes the construction of infiltration basins in ditches adjacent to the transitway to provide some water quality treatment before runoff is discharged to Bassett Creek. All proposed water quality treatment facilities will be reviewed for conformance to the design requirements outlined in the "Requirements for Improvements and Development Proposals," (2008). These documents can be found on the BCWMC website: www.bassettcreekwmo.org. The BCWMC is in the process of updating its Watershed Management Plan, which could include significant new standards for stormwater management. We expect approval of the BCWMC Plan sometime in fall 2015, which means the new standards will likely be in place before engineering design begins on the transitway project.

Maintenance

Maintenance of stormwater management (water quality and flood control) features is critical to ensure proper operation. The Draft EIS does not appear to include the maintenance measures the Metropolitan Council proposes to undertake to ensure the effectiveness of stormwater management features. The final EIS should describe the maintenance measures and it should also identify the parties responsible for inspections, the parties responsible for maintenance, and the inspection and maintenance schedules. The BCWMC is concerned that if these operation and maintenance responsibilities are not clearly laid out, the responsibility will fall on the member cities or BCWMC to perform the duties.

Erosion Control

A BCWMC goal is to prevent erosion and sedimentation to the greatest extent possible to protect the BCWMC's water resources from increased sediment loading and associated water quality problems. Temporary and permanent best management practices must be implemented to control construction and post-development erosion and runoff from the site. The BCWMC is particularly concerned about erosion and sediment control during construction because of the proximity of Alignment D1 to numerous water resources, Alignment D1 is immediately adjacent to Grimes Pond and South Rice Pond, and adjacent to or very near Bassett Creek and its adjacent wetlands. Extra care will need to be taken during construction to avoid sediment and other pollutants from entering these water resources. The EIS should acknowledge the extra difficulty in preventing erosion and sedimentation along the portions of the route with numerous water resources in close proximity, such as Alignment D1.

In addition to the NPDES Construction Stormwater Permit from the MPCA (as noted in Section 5.9.5 of the Draft EIS), the BCWMC reviews projects for erosion and sediment control. The BCWMC's erosion and sediment control plan requirements are outlined in "Requirements for Improvements and Development Proposals" (2008). The BCWMC's erosion and sediment control policies are also listed in Section 6.2 of the BCWMC Watershed Management Plan. These documents can be found on the BCWMC website: www.bassettcreekwmo.org.

Wetland Management

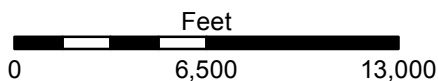
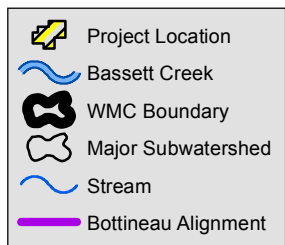
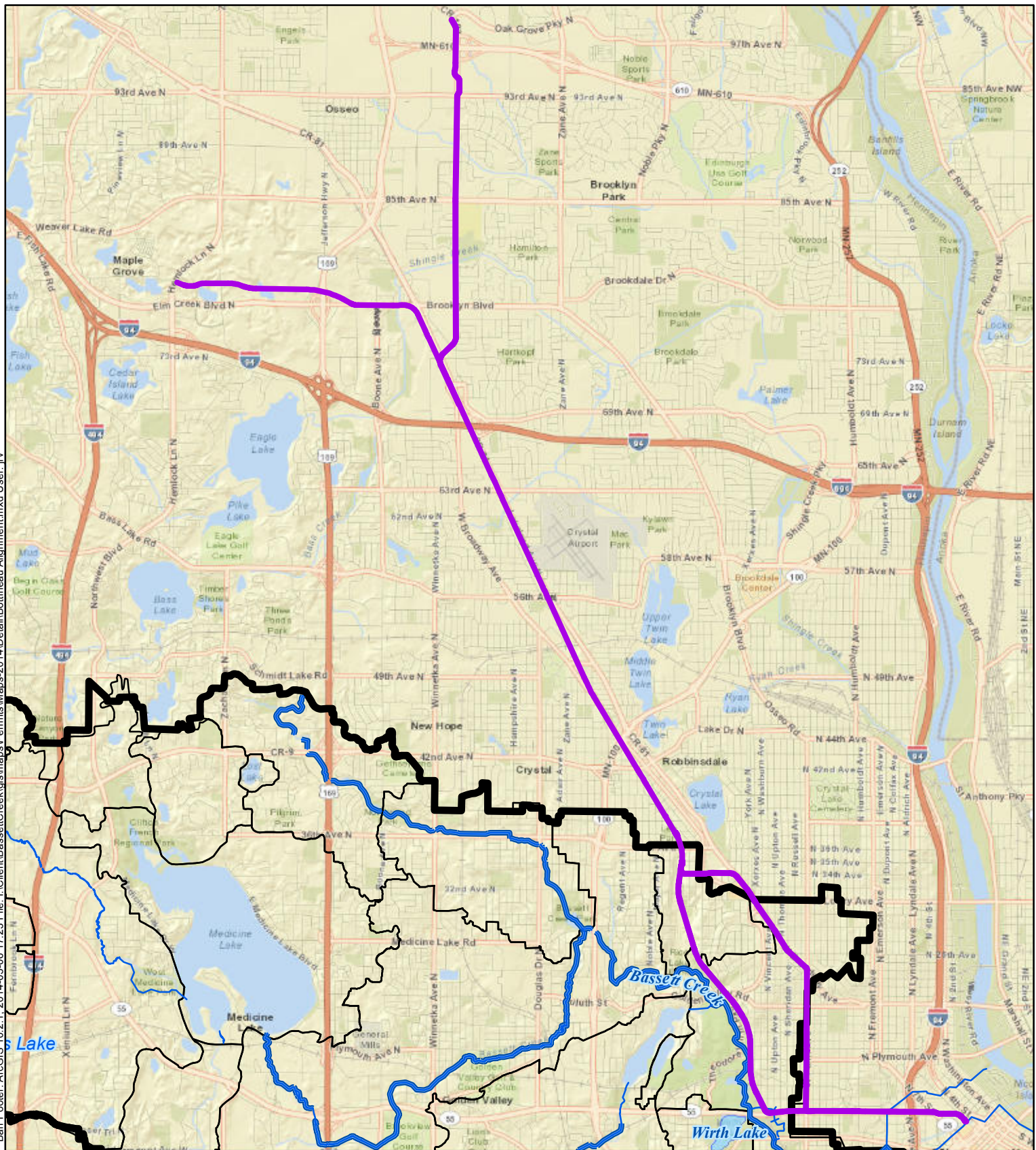
The BCWMC wetland goal is to achieve no net loss of wetlands in the Bassett Creek watershed in conformance to the Minnesota Wetland Conservation Act (WCA) and associated rules (Minnesota rules 8420). The portion of the preferred alternative (B-C-D1) and Alternative B-C-D2 in BCWMC is in Minneapolis, Golden Valley and Robbinsdale. Minneapolis and Golden Valley are the local governmental units (LGUs) responsible for administering the WCA in their cities; BCWMC is the LGU for administering WCA in Robbinsdale. Table 5.3-4 in the Draft EIS shows the total wetland disturbance or fill for Alignment D1 (part of preferred alternative) to be 6.1 acres. All of this wetland disturbance or fill along Alignment D1 is within BCWMC. At least two acres appears to be in Robbinsdale. For the portion of Alignment C within BCWMC, there appears to be 0.4 acres of wetland disturbance or fill; this is located in Robbinsdale. Alignment D2 includes 0.7 acres of wetland disturbance or fill, all of which is in BCWMC and in Robbinsdale. BCWMC will be responsible for administering WCA for the Robbinsdale portions of the alignments. Wetland management policies are listed in Section 8.0 of the BCWMC Watershed Management Plan. The BCWMC's submittal and design requirements for projects are included in "Requirements for Improvements and Development Proposals" (2008). These documents can be found on the BCWMC website: www.bassettcreekwmo.org.

The BCWMC appreciates the opportunity to provide these comments and looks forward to working with you to restore and protect the health of the BCWMC's water resources. Please feel free to contact the BCWMC Engineer, Karen Chandler at 952-832-2813 (or kchandler@barr.com), or the Commission Administrator, Laura Jester, at 952-270-1990 (or laura.jester@keystonewaters.com), if you have questions or would like further information.

Sincerely,

Jim de Lambert, Chair
Bassett Creek Watershed Management Commission

c: BCWMC Commissioners and Alternate Commissioners
BCWMC Technical Advisory Committee



LOCATION MAP **Bottineau Alignment** **Golden Valley, MN**