



Bassett Creek Watershed Management Commission

June 21, 2018

Jason Zimmerman
City of Golden Valley
7800 Golden Valley Rd.
Golden Valley MN 55427

Dear Jason,

Thank you for the opportunity to comment on the Surface Water Management Plan (SWMP) (Appendix 5A) within Golden Valley's draft 2040 Comprehensive Plan. The Bassett Creek Watershed Management Commission (BCWMC) has the following comments which include recommended revisions as well as changes required to be consistent with the 2015 Bassett Creek Watershed Management Plan.

Recommended revisions:

Section 3.10.1.2. It could be noted that South Rice Pond is no longer monitored by the BCWMC.

Section 3.10.1.4. If there are or were lakes monitored through the CLMP, please consider listing them. Also, you could include a link to more information and reports of the River Watch Program here: <https://www.hennepin.us/riverwatch>.

Section 4.1.1, paragraph 3: Consider including chloride as another "major concern" for all waterbodies.

Section 4.5 paragraph 3: Consider adding chloride from deicers as a potential groundwater contaminant.

Section 5.6 could also include acknowledgement of the city's financial contributions to the education materials and programs of the BCWMC. (For example, see letter of understanding addressed to Jeff Oliver outlining 2017 BCWMC educational activities dated February 21, 2018.)

Section 5.8, last sentence: Sentence indicates that Table 5-2 includes the city's ordinance implementation and official controls. This is not an accurate description of Table 5-2, consider rewording.

Required revisions to these or similarly appropriate sections:

Section 3.8.2 should indicate that the city is maintaining a database of wetland functions and values assessment results as required by BCWMC policy #65.

Section 3.10.2 should include an assessment of the need for a local waterbody management classification system (other than BCWMC) as found in policy #3 and section 5.3.1.1 of the BCWMC Watershed Management Plan.

Section 3.10.3.2 should more explicitly indicate that the city will annually provide the BCWMC with plans for BMPs constructed in the city in order for the BCWMC to accurately update its P8 model. (As per BCWMC Policy #16)

Section 3.11 The Plan is required to conform to Minnesota Statutes 103B.235. Minnesota Statutes 103B.235 Subd. 2 include specific requirements for local plan contents including:

(2) Define drainage areas and the volumes, rates, and paths of storm water runoff. Figure 3-2 shows drainage districts and direction of flow. Figure 3-13 shows the storm sewer network and components. The plan describes the BCWMC XP-SWMMM model but volumes and rates for critical events are not set forth in the Plan. Please add volumes or rates or reference them in another document.

Table 3.7. The table should be revised to note that the Wirth Lake chloride impairment was also addressed in TCMA chloride TMDL <https://www.pca.state.mn.us/sites/default/files/wq-iw11-06g.pdf>

Section 4.1.2: The MPCA's Twin Cities Metro Area Chloride TMDLs were approved by the EPA in June 2016. This should be noted in this section as the TMDL to address chloride impairments in Sweeney Lake, Wirth Lake and Bassett Creek. Here is the official approval letter from EPA: <https://www.pca.state.mn.us/sites/default/files/wq-iw11-06g.pdf>

Section 4.3.2, paragraph 4, last sentence: The BCWMC Requirements Document does not describe the MCWD review process. Please reword.

Section 5.3.1 should include the requirement that the city not only perform the routine maintenance of Flood Control Project structures, but also report the maintenance and repair actions to the BCWMC. (Consistent with policies regarding FCP adopted in 2016 found at <https://www.pca.state.mn.us/sites/default/files/wq-iw11-06g.pdf>.)

Table 5-1 includes the project: "Main Stem Channel Restoration, Minnaqua Pond to Golden Valley Road (SS-54)" and is cross referenced as BCWMC Project 2021CR-M. This project description is inconsistent with the description of BCWMC 2021CR-M in Table 5-3 of the BCWMC Plan. Further, the description of BCWMC 2021CR-M is different yet again in the current [BCWMC 5-year CIP](#). Effort should be made to align the project descriptions among the three tables.

Section 5.0 should include (or reference an ordinance that includes) a policy that the city does not allow the drainage of sanitary sewage or non-permitted industrial wastes onto any land or into any watercourse or storm sewer discharging into Bassett Creek, to be consistent with BCWMC Policy #15.

Section 5.0 should include (or reference a different document that includes) an activity of the city to annually inspect wetlands classified as Preserve for terrestrial and emergent aquatic invasive vegetation, such as buckthorn and purple loosestrife, and attempt to control or treat invasive species, where feasible, to be consistent with BCWMC Policy #72.

Please contact BCWMC Administrator, Laura Jester, if you have any questions. The BCWMC will consider approval of your final Surface Water Management Plan upon completion of these revisions.

Sincerely,

Jim de Lambert
Chair

CC: Jeff Oliver, City of Golden Valley
Eric Eckman, City of Golden Valley