

City of Golden Valley Surface Water Management Plan

Draft Response to Comments

September 4, 2018

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|--------|------------------------|-----------------------------|--|--|----------------|
| BCWMC | Suggested | Section 3.10.1.2 | It could be noted that South Rice Pond is no longer monitored by the BCWMC. | South Rice Pond has been removed from the bulleted list of BCWMC-monitored waterbodies. The text has been revised to note that the BCWMC monitored the water quality of South Rice Pond in the past. | Y |
| BCWMC | Suggested | 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 . | The only lake within the City monitored via CLMP (Wirth Lake) was last monitored via CLMP in 1992. A link to the River Watch website has been added. | Y |
| BCWMC | Suggested | Section 4.1.1, paragraph 3 | Consider including chloride as another "major concern" for all waterbodies. | A paragraph describing the ecological impacts of increased chloride loading has been added to Section 4.1.1. | Y |
| BCWMC | Suggested | Section 4.5, paragraph 3 | Consider adding chloride from deicers as a potential groundwater contaminant. | Chloride from deicing practices has been added to the list of potential groundwater contamination sources. | Y |
| BCWMC | Suggested | 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 5.6 has been updated to note that: <i>"The City also financially contributes to educational activities performed by the BCWMC."</i> | Y |
| BCWMC | Suggested | 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. | The line item in Table 5-2 refers to the City's efforts to enforce its ordinances and official controls. This sentence has been revised to read: <i>"The City's enforcement of ordinances and official controls is incorporated into Table 5.2."</i> | Y |
| BCWMC | Required | 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. | The last paragraph of Section 3.8.2 has been revised to note that: <i>"The City maintains a database of wetland function and value information."</i> | Y |
| BCWMC | Required | 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 3.10.2 has been revised to explicitly state: <i>"The City has assessed the need for further waterbody classification and has not assigned classifications beyond those of the BCWMC or MPCA."</i> | Y |
| BCWMC | Required | 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 3.10.2 has been revised to explicitly state: <i>"The City will provide this information [capital improvements and BMP information] to the BCWMC annually."</i> | Y |

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| BCWMC | Required | Section 3.11 | <p>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:</p> <p>(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.</p> | <p>The City maintains detailed hydrologic and hydraulic modeling information based on the BCWMC watershed-wide XP-SWMM model. This information is maintained in digital format and includes flow rates and storage volumes. The BCWMC maintains the model and performs annual updates. The City will coordinate with the BCWMC to update the shared model. The City prefers not to publish model results in printed tables or figures due to the frequent updates to the model.</p> <p>The text of Section 3.11.5 has been updated to note that flow rates and peak water surface elevations for portions of the City along the BCWMC Trunk System are published in the "Bassett Creek Hydrologic and Hydraulic Analyses - Phase 2 XPSWMM Model" report. The text also notes that similar information for other parts of the City (i.e., not part of the BCWMC Trunk System) is available from the City.</p> <p>Text has also been added to Section 3.11.5 describing hydrologic modeling efforts within the MCWD.</p> | Y |
| BCWMC | Required | Table 3.7 | <p>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</p> | <p>Table 3.7 has been revised to reference the completed TMDL.</p> | Y |
| BCWMC | Required | Section 4.1.2 | <p>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</p> | <p>This section has been updated to note the EPA's approval of the TCMA Chloride TMDL in 2016.</p> | Y |
| BCWMC | Required | Section 4.3.2, paragraph 4 | <p>The BCWMC Requirements Document does not describe the MCWD review process. Please reword.</p> | <p>The text has been revised to reference the MCWD Rules for the MCWD review process.</p> | Y |
| BCWMC | Required | Section 5.3.1 | <p>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.)</p> | <p>Section 5.3.1 has been revised to note that the City will "<i>report maintenance and repair actions to the BCMWC.</i>"</p> | Y |

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| BCWMC | Required | 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. | Item SS-54 in Table 5-1 has been updated to reflect the project name included in the BCWMC draft 2018 5-year CIP. The name of the project has also been revised in Section 5.9.1. | Y |
| BCWMC | Required | 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. | The following policy has been added to Section 2.2: <i>"The City prohibits the drainage of sanitary sewage or non-permitted industrial wastes onto any land, watercourse, or storm sewer draining to Bassett Creek (see also City Code Chapter 4.31 subd. 7)."</i> | Y |
| BCWMC | Required | 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. | The following policy has been added to Section 2.6: <i>"The City annually inspects wetlands classified as Preserve for terrestrial and emergent aquatic invasive vegetation, such as buckthorn and purple loosestrife, and attempts to control or treat invasive species, where feasible."</i> | Y |
| MCWD | Partially meets requirements | | 7. Figure 3-15 shows City-owned and maintained BMPs and the location of private BMP facilities where maintenance agreements exist, where a street sweeping agreement is in place, or where there is a private/other agency buffer. While the plans states that the City requires maintenance agreements on all private/other agency BMP facilities, it is not clear whether this figure is a comprehensive inventory of private facilities or simply those where agreements exist. The Plan does not state whether the inventory information also includes the specific party responsible for maintenance. | The City's BMP inventory is comprehensive and includes private facilities regardless of where an agreement exists. The inventory also includes the specific party responsible for maintenance. The text describing the City's BMP inventory in Sections 3.9.3 and 4.1.5.3 have been revised to note this information. | Y |
| MCWD | Does not meet requirements | | 10. There is no inventory of real property in the Plan or the Comp Plan. However, within the MCWD it appears the only publicly-owned real property may be South Tyrol Park and South Tyrol Pond. | The City's Comprehensive Plan identifies public land throughout the City. Text has been added to Section 3.3.5 - Minnehaha Creek Drainage District noting that public land within the MCWD includes South Tyrol Pond and South Tyrol Park. | Y |
| MCWD | Optional | | 14. Private practices not addressed, The Plan states that the City has a regular maintenance and systematic replacement program for City facilities. | The City requires maintenance agreements for private BMPs. The agreements specify the required maintenance and outline the enforcement process when maintenance is not performed. | NA |

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| MCWD | Partially meets requirements | | 15. Within the MCWD a few parcels in the southwest quadrant of I-394 and TH 100 are identified as the South Areas in the I-394 Corridor Redevelopment Plan. It is stated that the now-vacant parcels are slated to become a parking deck to support adjacent office uses. | The area located within the MCWD is currently well into the redevelopment process. Presently, there is no further redevelopment opportunity within this area. | NA |
| MCWD | Does not meet requirements | | 16. Only one small area (see #15) is located within the MCWD. Coordination with MCWD staff with regards to future redevelopment of the South Areas should be referenced in the Plan. | See response to #15 above. Text has been added to section 4.9.5 - Redevelopment Opportunities and noting that the City will continue to coordinate with the MCWD to identify potential partnership opportunities associated with redevelopment. Existing text in section 5.4 - MCWD Roles and Responsibilities also notes this collaborative relationship. | Y |
| MCWD | Partially meets requirements | | 17. The City has an ongoing Infrastructure Renewal Program that is systematically updating aging infrastructure across the City. The City also has a separate Natural Resources Management Plan that identifies one natural area in the MCWD: South Tyrol Pond....More detail could be provided regarding how projects are identified , prioritized, and selected for implementation and the relationship to protecting and improving water quality and water resources. | The area of the City located within the MCWD is not slated for imminent redevelopment or infrastructure renewal. The City will continue to evaluate opportunities for improvements to address water quality and flooding as capital projects are pursued. | NA |
| MCWD | Partially meets requirements | | 21. Note that the CIP presented in the Plan shows only relative project costs (i.e., low, medium, high) rather than specific costs and does not specify a specific year but rather a range of years in which the project may be completed. Detail is provided in the City's annual CIP published separately. | The City prefers to reference the annually-updated overall City CIP for specific project costs and implementation schedule, as it is more frequently updated. The City also references the BCWMC CIP (Table 5-3 in the 2015 BCWMC Plan) which is also updated approximately annually. Specific project costs by planned year of implementation are included in both referenced tables. | NA |
| MCWD | Partially meets requirements | | 22. [LGU/District coordination Plan] is included as Appendix B. | The Plan includes an LGU/District coordination Plan as Appendix B. The City will continue to coordinate with MCWD to pursue common goals, although this activity may be limited by the lack of immediate redevelopment or infrastructure renewal planned within the MCWD portion of the City. | NA |
| MCWD | Does not meet requirements | | 24. Identify any District rules for which the LGU wishes to assume sole regulatory authority | The City does not desire to assume sole regulatory authority for any MCWD Rules. Text has been added to note this in Section 5.4 - MCWD Roles and Responsibilities. The City will continue to act as the LGU for administering the Wetland Conservation Act (see Section 5.8 of the Plan). | Y |

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| Metropolitan Council | Required | | Include drainage areas, volumes, and rates of stormwater runoff for City subwatersheds. The Plan indicates this information is available from the BCWMC. If the Plan is adopting this information by reference, the specific document needs to be referenced that explicitly includes this information | Please see response to BCWMC comment addressing Section 3.11 above | Y |
| Metropolitan Council | Recommended | | Tie the implementation items in Table 5-1 to problems identified in the Plan, and provide more detail and context for implementation items. For example, some of the projects identified clearly address identified problems (e.g., SS-48 addressing long-term flooding along Medicine Lake Road). Other items (e.g., SS-41: Bobcat toolcat) are not explained or tied to a specific problem. | Where appropriate, notes have been added to the implementation table to further specify the problem addressed by each implementation task. Implementation tasks related to general equipment purchases (e.g., radios) are necessary to maintain City staff capacity to perform a wide range of stormwater responsibilities. | Y |
| Metropolitan Council | Recommended | | Provide greater detail on costs in Table 5-1. We understand that any costs identified in the Plan are estimates and that it can be hard to estimate costs for projects scheduled several years in the future. However, the implementation plan will be more useful to the City if the table includes actual dollar estimates on projects anticipated for the first 5 years of the Plan life, and a dollar range to the low, medium, and high cost estimates included for subsequent years. This will facilitate a better understanding of project capacity five current and future financing options. | Please see response to MCWD comment #21 above. | Y |
| Metropolitan Council | Recommended | | Focus more specific problem identification and implementation items on chloride. Sweeney and Wirth Lakes and Bassett and Minnehaha Creeks are impaired for chloride. The Plans states that the City will work with BCWMC to implement recommendations in the TCMA Chloride Management Plan, and it appears several of the implementation items, including SS-25 and SS-26 are intended to address chloride. As a highly developed watershed, chloride is likely to continue to be an increasing concern for Golden Valley and the Plan should reflect that. | Where appropriate, notes have been added to the implementation table to identify activities and equipment purchases to address chloride loading. The text describing the City's education program also includes "de-icing chemical and salt best management practices" among the topics addressed by the City. | Y |
| Metropolitan Council | Recommended | | Amend the information about the BCWMC and Metropolitan Council's WOMP station on Bassett Creek at Irving Avenue (Section 3.11.5.3) to add that water quality monitoring occurs regularly at the site, including measuring concentrations of nutrients, chlorides, solids, and E. coli. Just downstream of the City, this station serves an important role in assessing how projects and practices in Golden Valley are affecting water quality over time. | This information has been added to Section 3.11.5.3. | Y |
| Metropolitan Council | Recommended | | Update Section 4.1.3 Metropolitan Council Issues to remove the Policy Plan goal of "Develop target pollution loads for the major watershed basins." This is not a goal of the current Policy Plan. | The outdated policy has been removed from Section 4.1.3 | Y |

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| Metropolitan Council | Recommended | | Add the 1984 Wildwood Weir Association gate outlet agreement to Section 1.3 Water Resources Agreements. | The City prefers to reference the "agreement" in Section 4.3.4.1 as part of the discussion regarding the DeCola Ponds flooding issues. | Y |