

BCWMC Review of the City of Crystal Local Surface Water Management Plan

Item 5D.
BCWMC 12-20-18

| WRMP Page(s) June draft | WRMP Text | BCWMC Comment on June 2018 draft LSWMP (orange = required revision) (green = recommended revision) (red = comment pending City data) | BCWMC Review of November 2018 draft LSWMP (orange = comment still requires revision) (green = recommended revision noted) (blue = comment adequately addressed) |
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| Table of Contents | Figure 2.6 - 2030 Land Use Map | Future land use discussion and figures should reference 2040 projections. | Text revised to reference the Comp Plan. |
| Page 8 | Section 2.6.2 - Creeks | This section must be revised to note that the Main Stem of Bassett Creek and the North Branch of Bassett Creek (including Bassett Creek Park Pond) are classified as Priority Streams by the BCWMC, per Section 2.7.2.2 of the 2015 BCWMC Plan. | Comment addressed with revision to Section 2.6.2. |
| Page 9 | <i>Bassett Creek Watershed encourages municipalities to perform a function and values assessment within its jurisdictional area. Crystal's phased approach to performing these assessments will also cover wetlands within Bassett Creek Watershed's jurisdiction.</i> | Policy 65 of the 2015 BCWMC Plan states: " <i>The BCWMC requires member cities to inventory, classify, and determine the functions and values of wetlands, either through a comprehensive wetland management plan or as required by the WCA....</i> " The text in Section 2.6.4 must be revised to be consistent with Policy 65 and note the City's compliance with this policy. | Comment addressed with revision to Section 2.6.4. However, according to the text in Section 2.6.4, Figure 2.2 (misabeled as "2.4") shows NWI wetlands, but it is not clear if the figure actually shows NWI wetlands (no data source given). Please include data source on Figure 2.2 (e.g., USFWS NWI, MDNR PWI) and Figure 2.1. |
| Page 21 | <i>The Bassett Creek Park Pond Watershed Management Plan (completed for the BCWMC in 2000) establishes priorities and provides guidelines for the cities of Crystal, New Hope, Golden Valley, the BCWMC, and citizens for meeting water quality goals set for Bassett Creek Park Pond.</i> | This section must be revised to note that the 2015 BCWMC Plan includes Bassett Creek Park Pond as part of the North Branch of Bassett Creek and is therefore subject to MPCA water quality standards for streams (as adopted by the BCWMC and presented in Table 2.7 of the 2015 BCWMC Plan. | Comment addressed with revision to Section 4.9. |
| Page 22 (November draft) | Section 4.10 - Bassett Creek Park Pond Watershed Management Plan | | This section is outdated and needs to be updated to reflect the current BCWMC Plan and the feasibility study/projects that have been completed for the pond and along the North Branch. |
| Page 22 | <i>On June 27, 1986, an agreement was filed between Bassett Creek Watershed Management Commission, the United States Corps of Engineers, Minneapolis, Golden Valley, Crystal, and Plymouth. ...The agreement also specifies that each municipality is responsible for the operation and maintenance of the flood control projects for those portions of the creek that lie within the City boundary, and enclosed in the agreement was an inspection form that was to be completed on a semiannual basis.</i> | This section must be revised to reference the "Bassett Creek Watershed Management Commission Flood Control Project (FCP) Policies" document approved by the Commission on May 19, 2016 and July 21, 2016. This section of the City Plan should note that the BCWMC FCP Policies document clarifies the maintenance responsibilities for the FCP and assigns routing maintenance to the City for elements of the FCP within the City. | Comment addressed with revision to Section 5.3. |
| Page 27 | Table 6.1 - Stormwater issues | Water quality in the North Branch of Bassett Creek must be included among the stormwater issues. It is listed on the impaired waters list for <i>E. coli</i> . | Comment addressed with revision to Table 6.1. |
| Page 29 | <i>Three waterbodies within the City of Crystal are currently identified on the state list of Impaired Waters: Bassett Creek, Upper Twin Lake, and Middle Twin Lake.</i> | This section must be revised to note that the North Branch of Bassett Creek is listed on the impaired waters list for <i>E. coli</i> . The text should also note that this impairment is addressed by the <i>Upper Mississippi River Bacteria TMDL Study</i> . | Comment addressed with revision to Section 6.4. |
| Page 31 | Table 6.6 - Existing City Performance Standards: Floodplain Management | The row describing floodplain management must be revised to include a brief description of the City's minimum building elevations that are consistent with BCWMC requirements. | Comment addressed with revision to Table 6.2, but the table must also note that the City's floodplain requirements are consistent with the BCWMC's requirements regarding no net loss of floodplain storage and no increase in flood level. |

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| Page 31 | Table 6.6 - Existing City Performance Standards: Water Quality | The performance standards described in the water quality row of Table 6.6 are not consistent with current BCWMC requirements for water quality treatment or minimum buffer widths. However, the City revised its ordinances in 2017 and 2018 to be consistent with BCWMC requirements for water quality treatment and buffers. The table must be revised to reflect the City's recent ordinance updates and demonstrate compliance with BCWMC water quality treatment and buffer requirements. | Comment addressed with revision to Table 6.2. |
| Page 31 | Table 6.6 - Existing City Performance Standards: Wetland Management | The minimum buffer width included in the wetland management row of Table 6.6 is not consistent with current BCWMC requirements (or the recently revised City ordinance). The table must be revised to reflect the City's recent ordinance updates and demonstrate compliance with BCWMC buffer requirements. | Comment addressed with revision to Table 6.2. |
| Page 38 | <i>Policy 6.3: In conformance with the BCWMC Policy 7.2.2 the City will encourage restoration of stream and streambank areas where the natural beauty of the creek has been compromised.</i> | Policy 6.3 includes an outdated reference to a policy from the 2004 BCWMC Plan. The 2015 BCWMC Plan does not include this policy or a strict analogue; Policy 62 of the 2015 BCWMC Plan notes: " <i>The member cities are responsible for funding maintenance and repairs that are primarily aesthetic improvements.</i> " Policy 6.3 must be revised to remove the incorrect BCWMC Plan reference. | Comment addressed with deletion of Policy 6.3. |
| Page 38 | <i>Policy 6.4: As per BCWMC Policy 7.2.2 the City will share the results of the stream assessment that identified areas of significant erosion and sediment areas along the North Branch of Bassett Creek trunk system (Appendix C).</i> | Policy 6.4 includes an outdated reference to a policy from the 2004 BCWMC Plan. The 2015 BCWMC Plan does not include this policy of a strict analogue. Policy 6.4 must be revised to reflect current or planned City action related to Bassett Creek erosion sites (or deleted altogether). | Comment addressed with deletion of Policy 6.4. |
| Page 38 (November draft) | <i>Policy 10.1: The City will continue to enforce City Code Section 530.15 regarding wetland protection and in accordance with the WCA standards. The City is the LGU for enforcing the WCA within their municipal boundaries. They also retain the ability to defer enforcement to the SCWMC and BCWMC when the situation warrants watershed assistance.</i> | | The city cannot defer enforcement to the BCWMC. However, Policy 69 of the BCWMC Plan states that the BCWMC will assist the member cities with managing wetlands in accordance with the WCA, as requested. Policy 10.1 must be revised; consider revising it to read: The City will continue to enforce City Code Section 530.15 regarding wetland protection and in accordance with the WCA. The City is the LGU for enforcing the WCA within their municipal boundaries. The city will request assistance from the SCWMC and BCWMC when the situation warrants watershed assistance. |
| Page 39 | <i>Policy 10.2: The City Code currently requires that runoff shall be pretreated prior to being discharged into wetlands, a protective buffer strip of 16.5 feet shall surround all wetlands, and that wetlands be managed according to the WCA.</i> | Policy 10.2 is not consistent with BCWMC requirements (see Policy 68 of the 2015 BCWMC Plan) or recent revisions to the City ordinances. Policy 10.2 must be revised to be consistent with BCWMC buffer requirements. | Comment addressed with revision to Table 6.2 and deletion of Policy 10.2. |

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| Page 39 | Section 7.2.7 Wetland, Lake, and Stream Management | <p>This section must include a policy to satisfy Policy 72 of the 2015 BCWMC Plan, which states:</p> <p><i>"The BCWMC requires that member cities 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."</i></p> <p>Comment pending wetlands figure. If there are no "Preserve" wetlands, text could be revised to note that and state "If identified in the future..."</p> | Comment addressed with new Policy 10.2. |
| Page 40 | <i>Policy 11.1: The City of Crystal adopts the waterbody classifications, goals and subsequent water quality management standards developed by the BCWMC and SCWMC. Within the BCWMC the North Branch of Bassett Creek and Bassett Creek Park Pond are identified as Level III waterbodies. Consistent with BCWMC WMP requirements, all regulated stormwater activities within the jurisdiction of the BCWMC must be treated to Level I water quality standards. Meeting these requirements is done using the document: Requirements for Improvements and Development Proposals, July 17, 2008 as revised.</i> | Policy 11.1 contains outdated references to the 2004 BCWMC Plan. This policy must be revised to be consistent with current BCWMC waterbody classifications identified in Section 2.7.2.2 of the 2015 BCWMC Plan. This policy must also be revised to reflect current BCWMC water quality performance standards (see Policy 12 of the 2015 BCWMC Plan) and reference the most recent version of the BCWMC Requirements for Improvements and Development Proposals (2017, as amended). | Comment addressed with revision of Policy 11.1; however, the second sentence of Policy 11.1 should be revised to read (change in <u>underline text</u>): Additionally, the City adopts the water quality performance standards and the current version of the BCWMC <u>Requirements for Improvements and Development Proposals (2017, as amended)</u> . |
| Page 42 | Section 7.2.9 Pollution Prevention | <p>This section must be revised to include Policy 15 of the 2015 BCWMC Plan:</p> <p><i>15. Member cities shall 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.</i></p> | Comment addressed with new Policy 13.7. |
| Page 43 | <i>Policy 14.3: The City Code Section 530.09 will be updated to require developers to provide a minimum one-year guarantee that stormwater management facilities are properly installed, maintained and functioning</i> | This policy must be revised to be consistent with the City's update City Code Section 530. As written, it implies that developers are only required to maintain BMPs for one year. | Comment addressed with new Policy 14.4, but policies should be renumbered. |
| Page 43 | <i>Policy 14.5: The City will maintain the Bassett Creek flood control project features and related structures, including removing debris, vegetation, etc. This maintenance responsibility pertains to Crystal's jurisdiction only.</i> | This policy must be revised to reference the "Bassett Creek Watershed Management Commission Flood Control Project (FCP) Policies" document approved by the Commission on May 19, 2016 and July 21, 2016. | Comment mostly addressed with revision to Policy 14.5, but the policy must be revised to specifically call out the policy document (revised text <u>underlined</u>), as these policies have not yet been included in the BCWMC Plan as an amendment: The City will maintain the Bassett Creek flood control project features and related structures, including removing debris, vegetation, etc in accordance with the Bassett Creek Watershed Management Commission Flood Control Project (FCP) Policies <u>document approved by the Commission on May 19, 2016 and July 21, 2016.</u> |

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| Page 43 (November draft) | Section 8.1 - Overview | | The LSWMP states: <i>The implementation program consists of the following components:</i> <i>1. Capital Improvements (CIP)</i> <i>2. NPDES MS4 Permit Compliance (MS4)</i> <i>3. Operation and Maintenance (OM)</i> <i>4. Official Controls (OC)</i> The implementation table in Appendix B includes only capital improvements. The implementation table must be expanded to include nonstructural and programmatic implementation tasks, e.g., MS4-related tasks (system inspection/maintenance, education, etc.) and administration/enforcement of city regulations. |
| Page 43 (November draft) | Section 8.1 - Overview | | The LSWMP states: <i>Official Controls include ordinance and policy revisions intended to achieve water quality benefits. Each proposed implementation item has a specific impetus and is identified in the tabulated implementation program later in this section. In order to achieve these water quality benefits and provide standards that are in conformance with the Watershed Management Organizations, MPCA, or the DNR, the City will be adopting and/or revising the following ordinances:</i> <ul style="list-style-type: none">• <i>Storm water Management</i>• <i>Erosion and Sediment Control</i>• <i>Illicit Discharge Detection and Elimination</i>• <i>Floodplain Management</i> The third sentence and bullets must be revised to reflect the city's recent revisions to its city code. |
| Page 44 | <i>Capital improvements consist of “on-the-ground” projects intended to remedy issues identified as current problems. The capital projects focus on phosphorus and chloride reduction within the following regulated areas:</i> <ul style="list-style-type: none">• <i>Twin and Ryan Lakes (approved TMDL)</i>• <i>Shingle Creek (approved TMDL)</i> | Consider including North Branch Bassett Creek or Bassett Creek Park Pond need to be in this list? North Branch Bassett Creek is a "regulated area" if TMDL is the criteria, but City CIP likely does not address bacteria impairment. Comment pending review of City implementation table (i.e., are North Branch projects included?). | Comment addressed with revision to text on page 43; however, the text only addresses water quality issues; consider revising text to include water quantity or other issues addressed by the city's implementation program. |

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| Page 45 | <p><i>The City faces many challenges as it moves forward, due to the Twin and Ryan Lakes Chain TMDL and impairments to Bassett Creek and Shingle Creek. It will be imperative that the City adopt a volume management standard to help offset these impairments.</i></p> <p><i>As defined in the NPDES construction activity permit, sites discharging to impaired waters will be required to provide a one-inch water quality volume, and at least ½-inch of the water quality volume must be infiltrated.</i></p> | <p>This section must be revised to describe BCWMC water quality performance standards based on MIDS and described in Policy 12and Policy 32 of the 2015 BCWMC Plan. The City Code section 530 has already been revised to adopt this standard by reference within BCWMC jurisdiction</p> | <p>Comment partially addressed with revision to text on page 43, which now reads: <i>The City has current regulatory standards for storm water management, and these can be found in City Code. The City faces many challenges as it moves forward, due to the Twin and Ryan Lakes Chain TMDL and impairments to Bassett Creek and Shingle Creek. BCWMC water quality performance standards based on MIDS is also included in the most recent version of the BCWMC Plan.</i></p> <p>The last sentence of this paragraph must be revised to state: BCWMC water quality performance standards based on MIDS are included in the most recent version of the BCWMC Plan and are adopted by reference in city code.</p> |
| Page 45 | <p><i>Crystal's current erosion and sediment control regulatory program addresses a number of these requirements, however it falls short in some areas or the existing language is not consistent with the most recent version of the NPDES construction activity permit. It will be necessary to monitor and update the program to be compliant with current regulations.</i></p> | <p>It is unclear from the text whether the City's erosion and sediment control program remains inconsistent with the 2013 NPDES permit update or whether the program will need to be updated to be consistent with the anticipated 2018 NPDES permit update. This must be clarified. Any planned ordinance updates must be included in the City's implementation table (Table 8.2).</p> | <p>Comment partially addressed with revision to text on page 43, which now reads: <i>The City's current regulatory program for Erosion and Sediment Control can be found in City Code. The City is a designated MS4; therefore they are required to develop an erosion and sediment control program and support the program through ESC ordinance adoption at a minimum. The ordinance needs to have provisions for plan review, erosion prevention, sediment control, pollution prevention, inspection and maintenance, and enforcement .</i></p> <p>This paragraph must be revised to clarify whether the city's erosion and sediment control programremains inconsistent with the 2013 NPDES permit update or whether the program will need to be updated to be consistent with the anticipated 2018 NPDES permit update.</p> |
| Page 45 | Section 8.1 - Overview | <p>This section must be revised to include a more detailed description of the project review process coordinated between the City and the BCWMC. This section must note that projects meeting triggers identified in the BCWMC Requirements for Improvements and Development Proposals are subject to BCWMC review and that the City coordinates these review according to the sequence described in Section 5.1.1.1 of the BCWMC Plan.</p> | <p>Comment partially addressed with addition of new section 8.4 - Project Review, the last sentence of which states: <i>For Bassett Creek Watershed Management Commission the requirements are outlined in the Improvements and Development Proposals section of the BCWMC Plan.</i></p> <p>The sentence must be revised to clarify that these are two separate documents and to note the process: For Bassett Creek Watershed Management Commission, the requirements are outlined in the BCWMC Requirements for Improvements and Development Proposals (2017, as amended), and the review process is outlined in Section 5.1.1.1 of the BCWMC Plan and Section 3 of the Requirements document.</p> |
| Page 44 (November draft) | Section 8.1.4 - North Branch Bassett Creek | | <p>This section is outdated and needs to be updated to reflect the current BCWMC Plan and the projects that have been completed along the North Branch.</p> |

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| Page 45 (November draft) | Section 8.2 - Ten-Year Implementation Program | | In second paragraph, the fourth bullet should be deleted as it is not applicable. |
| Page 50 | Table 8.2 | The Plan must include an implementation table covering a 10 year period. City must provide table before completing review. | Partially addressed by addition of new Appendix B - Capital Improvement Plan. However, as noted earlier, Appendix B includes only capital improvement projects. The implementation table must be expanded to include nonstructural and programmatic implementation tasks, e.g., MS4-related tasks (system inspection/maintenance, education, etc.) and administration/enforcement of city regulations. Also, the Bassett Creek Park Pond and Yunkers Park project entries should reference the BCWMC CIP project names, as the BCWMC CIP is an important source of funding for these projects. |
| Page 7 | Table 2.5 - Minnesota DNR Public Waters in Crystal | Table 2.5 should include public water number 27-0629P in the Winnetka Hills Neighborhood. It would be helpful to identify Unnamed Wetland #27-0646P as "Bassett Creek Park Pond" in parentheses or as a footnote. | Comment addressed with revision to Table 2.1; but recommend adding "Unnamed Wetland" in front of "Winnetka Hills Neighborhood" and "Bassett Creek Park Pond" names in the table. |
| Page 8 | Impaired waters are discussed in more detail in later sections of this plan as well as the following websites: • Bassett Creek WMO website https://www.pca.state.mn.us/water/minnesotas-impaired-waters-list | The link for the BCWMC website is incorrect and should be: http://www.bassettcreekwmo.org/ | Comment addressed. |
| Page 10 | The majority of the City's storm sewer was constructed prior to the mid 1970s, and as was the practice at that time, stormwater management relied heavily on large diameter trunk storm sewer to route stormwater away from impervious areas quickly and discharge this stormwater directly into nearby wetlands, lakes, and streams. | Consider adding a brief description of the BCWMC Flood Control Project (FCP) or cross-reference portions of the City Plan that discuss the BCWMC FCP. | Comment addressed with addition of text. However, consider revising the last sentence of the first paragraph of Section 2.7 to read: More information on this is available in Section 5.3 of this plan and in the Bassett Creek Watershed Management Commission's 2015 - 2025 Watershed Management Plan. |
| Page 19 | Section 4.2 2015 BCWMC Watershed Management Plan | Consider adding a link to the BCWMC website and/or 2015 BCWMC Plan. | Comment addressed. |
| Page 32 | As a requirement of the BCWMC WMP, the City completed a stream inventory of North Branch Bassett Creek in 2008 (Appendix C) | This statement should be revised to note that the inventory was a requirement of the 2004 BCWMC Plan. | Comment addressed. |
| Page 37 | Policy 4.5: The City will update its City Code Section 530 to include performance standards for volume management. | The City's updated Code Section 530 does not explicitly include a volume reduction requirement, but instead references the BCWMC water quality standards. The reference to BCWMC water quality standards satisfies the BCWMC requirement, but consider removing this policy unless a future update to City Code 530 to further incorporate volume reduction is planned. | Comment addressed with removal of Policy 4.5. |

Metropolitan Council Review of the City of Crystal Local Surface Water Management Plan (November 29, 2018 letter)

| LSWMP Page(s) - November draft | Metropolitan Council Comment | BCWMC Comment (orange = required revision) (green = recommended revision) |
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| Section 2 | MN Statute 8410.0160 requires local surface water management plans to include descriptions of the existing and proposed physical environment and land use, including drainage areas and the volumes, rates, and paths of stormwater runoff. The Plan does include adequate descriptions of the physical environment, but does not include information on the volumes, rates, and paths of runoff in the City. It is likely that Shingle Creek Watershed Management Commission and Bassett Creek Watershed Management Commission have completed hydrologic and water quality models for their districts. The results of those models should either be summarized in the Plan or included by reference. | Section 2.8 of the LSWMP notes that 100-year flood elevations are available in the BCWMC watershed management plan and Figure 2.2 shows the drainage area. However, the plan must provide information about volumes, rates, and paths of stormwater runoff. For the BCWMC portion of the city, this information may be incorporated by reference to the BCWMC watershed-wide XP-SWMM modeling results. The LSWMP must be revised to reference this data (i.e., the 2017 BCWMC Bassett Creek Hydrologic and Hydraulic Analyses – Phase 2 XPSWMM Model Report). |
| Pages 25 - 27 | MN Statute 8410.0160 requires local surface water management plans to include a 10-year local implementation program that includes nonstructural, programmatic, and structural solutions to water resources problems identified in the plan. We recommend that the City assign proposed completion dates to actions identified in Table 6.1 - Storm Water Management Issues and Possible Corrective Actions. | Consider adding proposed completion dates to Table 6.1. |
| Appendix B | MN Statute 8410.0160 requires local surface water management plans to include a 10-year capital improvement program that includes schedule, estimated costs, and funding source for each item. The Plan does contain a tabulated capital improvement plan, but it covers only 6 years and does not identify potential funding sources. | The city's implementation program must extend for 10 years. See the BCWMC comment on this topic included in the above table (referencing page 50 of the LSWMP, June draft and Appendix B of November draft). |
| | A few additional changes would help strengthen the Plan. We recommend: | |
| Page 11, 15 | - labeling all water bodies on Figures 2.1 and 2.2 | Consider labeling water bodies as recommended. |
| Page 12 | -referencing the City's comprehensive plan land use map or including the land use map as a figure in the Plan. | Section 2.9.2 must be revised to either reference the land use map in the city's comprehensive plan or the map must be included in the LSWMP. |
| Page 9 (Section 2.6.4) | -including the function and value assessment results for those wetlands that have been assessed. | Consider including the function and value assessments as recommended. |
| Page 43 | -indicating deadlines for ordinance adoption and/or revision. For example, page 43 indicates that the City will be adopting or revising its ordinances for stormwater management, erosion and sediment control, illicit discharge detection and elimination, and floodplain management. MN Statute 8410.0160 indicates that local official controls must be enacted within six months of plan approval. | City ordinances have been updated and text must be revised accordingly. See the BCWMC comment on this topic included in the above table (referencing page 43 of the LSWMP). |