

**BCWMC Review of the City of New Hope Local Surface Water Resources Management Plan - DRAFT September 25, 2017**

Comment Number	LSWMP Page(s)	WRMP Text	BCWMC Comment	Response
			(orange = required revision) (green = recommended revision)	
1	Page 5	According to Minnesota Rules 8410, local plans must include sections containing:...	The list of required LSWMP content included in Section 1.3 is not consistent with the 2015 amendment of Minnesota Rules 8410. This section must be revised to be consistent with, or simply reference, Minnesota Rules 8410.0160.	Thank you for the detailed and constructive comments throughout the LSWMP. The content list in Section 1.3 was updated to match Minnesota Rules 8410.0160, and the rule was explicitly referenced.
2	Page 7	General standards for Local Surface Water Management Plans from BCWMC Watershed Management Plan (Rev. August 2017) are, as follows: 1. Describe existing and proposed physical environment and land use. 2. Define drainage areas and the volume rates and paths of stormwater runoff. 3. Identify areas and elevations for stormwater storage adequate to meet performance standards established in the BCWMC Plan. 4. Define water quantity and water quality protection methods adequate to meet performance standards established in the BCWMC Plan. 5. Identify regulated areas. 6. Set forth an implementation program, including a description of official controls and, as appropriate, a capital improvement program.	Items 1 through 6 listed on page 7 of the LSWMP are not specifically listed in the 2015 BCWMC Plan as stated. Items 1 through 6 appear to be based on the general requirements for local water plan contents per Minnesota Statutes 103B.235, which are already listed on Page 5 of the LSWMP. The section describing BCWMC general standards for local water plans must be revised to be consistent with the "Requirements for Local Water Management Plans and Official Controls," described in Section 5.3.1.1 of the 2015 BCWMC Plan and reference that section of the 2015 BCWMC Plan. Consider revising this section to further reference "Member City Responsibilities" described in Section 5.1.2 of the 2015 BCWMC Plan.	The section was revised to be consistent with Section 5.3.1.1 of the BCWMC Plan, which is now directly referenced. Section 5.1.2 of the BCWMC Plan is also now referenced.
3	Page 10	On the west end of the City, Northwood Lake is a man-made lake tributary to the North Branch of Bassett Creek and receives drainage primarily from Plymouth and a smaller portion of New Hope.	Consider revising the text to note that Northwood Lake is a constructed, flow-through lake located along of the North Branch of Bassett Creek. As written, the text implies that Northwood Lake is the headwaters of the North Branch of Bassett Creek.	The text has been revised to reflect this.
4	Page 10	Much of the southern portion of the City (Bassett Creek Watershed) drains directly into Bassett Creek via the North Branch of Bassett Creek.	This section should be revised to note that the southern-most part of the City is directly tributary to the Main Stem of Bassett Creek and Medicine Lake (see Figure 2-9 of the 2015 BCWMC Plan).	The text has been revised to reflect this.
5	Page 12	Table 2.4 lists rainfall frequencies for the Twin Cities area applicable to the City of New Hope.	Consider revising the text or adding a footnote to Table 2.4 noting whether the Atlas 14 values are based on a particular station or interpolation to a specific location within the City.	Text has been added to dispel confusion about this.
6	Page 13	In the southern portion of the City, the North Branch of Bassett Creek discharges into New Hope from Plymouth under TH 169 into Northwood Lake.	This section must be revised to note that the North Branch of Bassett Creek is classified by the BCWMC as a "Priority 1 Stream" per Section 2.7.2.2 of the 2015 BCWMC Plan.	Text has been added to address this.
7	Page 14	Northwood Lake is located southeast of the TH 169 Rockford Road interchange...BCWMC completed the Northwood Lake Watershed and Management Plan for Northwood Lake in 1996, identifying specific Best Management Practices (BMPs) to improve the water quality within the lake. The BMPs identified in the BCWMC plan are included in Section 4 of New Hope's LSWMP.	This section must be revised to note that Northwood Lake is classified by the BCWMC as a "Priority 1 Shallow Lake" per Section 2.7.2.2 of the 2015 BCWMC Plan.  The text must also be revised to note that BMPs identified in the BCWMC plan are included in Section 8 (Implementation) of the LSWMP; the discussion of BCWMC BMPs in Section 4 is only a cross reference to other LSWMP sections.	Text has been added to address this.
8	Page 15	A schematic plan of the drainage system was prepared for this study and is shown on Map 1 attached to this report (Appendix A).	Minnesota Rules 8410.0160 Subp. 3.C requires that "drainage areas and the volumes, rates, and paths of stormwater runoff" must be defined in local water plans. This information is currently missing from the LSWMP. The portion of the City within the BCWMC was recently modeled as part of the BCWMC watershed-wide XP-SWMM model. If modeling results are not to be included in the LSWMP, the LSWMP must be revised to include reference to the BCWMC hydrologic and hydraulic modeling documentation.	A reference was added to the BCWMC's <i>XP-SWMM Phase II Final Report</i> (2017).
9	Page 15	The Bassett Creek Watershed Management Commission (BCWMC) Watershed Management Plan (WMP) identifies BCWMC's adopted 100-year floodplain elevations for waterbodies in New Hope within the jurisdiction of the BCWMC, namely Northwood Lake and the North Branch of Bassett Creek.	Thank you for including a reference to the BCWMC 100-year floodplain.	We appreciate the acknowledgement.
10	Page 17	Section 3.1 City Services	This section lists several City ordinances relative to surface water and stormwater management. This section should be revised to note that the City is responsible for reviewing and permitting proposed projects, in coordination with the applicable WMO.	Text has been added to address this.
11	Page 18	Section 3.3 Watershed Management Organizations	Consider adding a reference to 2015 BCWMC Watershed Management Plan and/or the BCWMC website.	A link to the BCWMC website has been added.

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12	Page 18	The powers and duties of these Minnesota statutory authorities include:...	The bulleted list of watershed management organization authorities appears to be based on, but is not entirely consistent with, Minnesota Statutes 103B.211. Consider omitting the specific bullets and including a reference to Minnesota Statutes 103B.211.	The text has been revised to reflect this.
13	Page 18	In 1992, the BWSR adopted rules (8410) establishing required content for Local Surface Water Management Plans.	This section should be revised to note that Minnesota Rules 8410 were amended in 2015.	Text has been added to address this.
14	Page 19	The 2016 MPCA list of impaired waters identifies 2,660 TMDL reports needed for 1,808 lakes, rivers and streams in the state.	This section should be updated to reference the 2018 impaired waters list.	This section has been updated.
15	Page 26	The City, in conjunction with the BCWMC, constructed a series of stormwater improvement projects that treats stormwater runoff from more than 110 acres of currently untreated urban land.	The text describing the recent Northwood Lake water quality improvement project should be revised to include the dates of construction and reference the corresponding corrective action listed in Table 6.1 (Major Drainage Areas BC-A2).	Text has been added to address this.
16	Page 27	A copy of the revised JPA can be found in Appendix B.	This section must be updated to reference the most recent revision to the Joint Powers Agreement (2014), which should be included as Appendix B. The most recent JPA is available from the BCWMC website.	The most recent Joint Powers Agreement is now included in Appendix B.
17	Page 35	Both the SCWMC Plan and BCWMC Watershed Management Plan also identify in watershed policy statements that the City complete a wetland inventory and assess wetland functions and values.	It is not clear whether "identify" refers to a WMO requirement that the City maintain a wetland inventory, or WMO recognition of an existing City inventory. This statement must be revised to be consistent with Policy 65 of the 2015 BCWMC Plan; this policy states: "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...."	The text has been revised to reflect this.
18	Pages 35-38	Three waterbodies within the City of New Hope are currently identified on the state list of Impaired Waters: Bass Creek, Meadow Lake, and Northwood Lake.	This section must be revised to note that the North Branch of Bassett Creek is listed as impaired for aquatic recreation due to <i>E. coli</i> . The text should also note that this impairment is addressed by the <i>Upper Mississippi River Bacteria TMDL Study</i> . Table 6.3 must also be revised to include this impairment.	The text has been revised to reflect this, and the North Branch of Bassett Creek has been added to Table 6.3.
19	Page 37	Table 6.3 - Impaired Waters in New Hope	Table 6.3 should be revised to note that the Northwood Lake TMDL study is not yet started.	The table has been revised to reflect this.
20	Page 38	Development and redevelopment within New Hope is subject to review and approval from one of the two watershed management organizations having jurisdiction in the City.	Consider adding detail regarding how the process is coordinated between the City and BCWMC, or referencing additional detail added to Section 7.1 (Page 44, see comment below).	Additional detail has been added to Section 7.1; no changes were made to Section 6.6.
21	Page 44	Within the Bassett Creek Watershed Management Commission (BCWMC) jurisdictional area, project review is required for the following:	This text is ambiguous about who is the agent performing the review. The LSWMP must be revised to clarify that the BCWMC reviews proposed activities meeting specific criteria, only after the City has determined that the proposed activity meets City requirements. Following BCWMC review and approval of the proposed activity, the City issues permits. See Section 5.1.1.1 and Section 5.1.2 #3 of the 2015 BCWMC Plan.	The text has been revised to reflect this.
22	Page 46	Policy 3.3: The City will help to enforce SCWMC and BCWMC standards for water quality:....In areas of the City where BCWMC has jurisdiction, to demonstrate compliance with the BCWMC performance goals, the MIDS calculator must be used to demonstrate volume reduction, total phosphorus removals, and total suspended solids removal at the site. For more details, refer to BCWMC standards for water quality.	Policy 12 of the 2015 BCWMC Watershed Management Plan and the BCWMC <i>Requirements for Improvements and Development Proposals</i> (2017) require that stormwater be treated in accordance with MIDS performance goals for non-linear projects. This policy must be revised to from "help to enforce" to "require" or similarly firm language, and should include reference to the appropriate section of the <i>BCWMC Requirements for Improvements and Development Proposals</i> (2017).	The language has been made more firm, and a reference added to Section 6.3.1 of the <i>Requirements for Improvements and Development Proposals</i> .
23	Page 47	Policy 3.7: Prohibit the discharge of foreign material into the stormwater system. Such material shall include, but not be limited to, waste oil, paint, grass clippings, leaves, and ecologically harmful chemicals. This policy is consistent with the MS4 Program and is outlined in the City's SWPPP.	Policy 15 of the 2015 BCWMC Plan states: "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." Policy 3.7 addresses discharges to storm sewers, but must be expanded to encompass land or watercourses tributary to Bassett Creek (or a new policy must be added consistent with Policy 15 of the 2015 BCWMC Plan).	A new policy (3.8) was added to take into account discharge onto land or into any watercourse discharging to Bassett Creek.
24	Page 48	Policy 5.1: The City shall help to ensure that volume management standards are met in the City, based on SCWMC and BCWMC standards.	This policy must be revised to from "help to ensure" to "require" or similarly firm language, and should include reference to the appropriate section of the <i>BCWMC Requirements for Improvements and Development Proposals</i> (2017).	The language has been made more firm, and a reference added to Section 5.0 of the <i>Requirements for Improvements and Development Proposals</i> .

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25	Page 50	Section 7.2.5 - Wetland and Lake Management	A policy must be added to this section noting that the City will annually inspect wetlands classified as "Preserve" for terrestrial and emergent aquatic invasive vegetation and attempt to control or treat invasive species, where feasible (see Policy 72 of the 2015 BCWMC Plan).	A policy (9.10) has been added to account for this policy in the BCWMC Plan.
26	Page 50	Policy 9.8: Encourage natural buffer zones around ponds and wetlands....In areas of the City that require review from the BCWMC, proposed projects that create more than one acre of new and/or fully reconstructed impervious surfaces require wetland buffers.	The LSWMP notes that the City's wetland ordinance will be updated to incorporate current BCWMC buffer requirements. If specific BCWMC stream and wetland buffer standards are not to be included in the LSWMP, Policy 9.8 must be revised to specifically reference Appendix B of the BCWMC Requirements for Improvements and Development Proposals (2017, as amended) for wetland and stream buffer width requirements.  Policy 9.8 must also be revised (or a new policy added) to reference applicable BCWMC stream buffer requirements.	Policy 9.8 has been updated to include streams and now specifically references Appendix B of the BCWMC Requirements for Improvements and Development Proposals.
27	Page 50	Policy 9.10: Where other standards applicable to wetlands are specified by the SCWMC or BCWMC, the City will help to enforce SCWMC or BCWMC standards.	This policy must be revised to from "help to ensure" to "require" or similarly firm language, and should include reference to the appropriate section of the BCWMC Requirements for Improvements and Development Proposals (2017).	The language has been made more firm, and a reference added to Sections 2.9.1 and 4.7.1 of the Requirements for Improvements and Development Proposals.
28	Page 53	Policy 12.5: Where other stormwater management structure standards are specified by the SCWMC or BCWMC, the City will help to enforce SCWMC or BCWMC standards.	This policy must be revised to from "help to ensure" to "require" or similarly firm language, and should include reference to the appropriate section of the BCWMC Requirements for Improvements and Development Proposals (2017).	The language has been made more firm, and a reference has been added to Section B.2 of the BCWMC Requirements for Improvements and Development Proposals.
29	Page 61	Table 8.5 - Implementation Program	Table 8.5 contains the City's implementation program to address the issues identified throughout the LSWMP. Per Minnesota Rules 8410.0160 Subp. 3.E(5), this table must include the proposed funding source.	The proposed funding source has been added to Table 8.5
30	Page 61	Table 8.5 - Implementation Program	The table must also be revised to clarify whether the "budgeted cost" information represents annual costs or cumulative costs over the 10-year planning window.	All annual costs have been noted as "annually" in Table 8.5
31	Page 61	Table 8.5 - Implementation Program	Consider adding a footnote to Table 8.5 (or additional text to Section 8.9) noting that the subwatershed where the implementation activity will be performed is noted in parentheses (e.g., "(BC-A3)" in item #2).	This has been noted.
32	Page 61	Table 8.5 - Implementation Program	Consider adding a line item to "Implement water quality improvement projects based on results of the Northwood Lake TMDL Study (pending) in cooperation with the BCWMC" as a placeholder for future activity.	Line item added in Table 8.5
33	Appendix A	Appendix A - Figures	Consider including a map showing the location and classification of wetlands within the City, using data from the National Wetland Inventory and the City's wetland inventory (as complete).	This map has been added as Figure 7, included in Appendix A, and is called out on page 14.

**Metropolitan Council Review of the City of New Hope Local Surface Water Resources Management Plan**

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			(orange = required revision) (green = recommended revision)	
1	5	The Minnesota Rules 8410 discussion under the Purpose and Scope should be updated to be consistent with the new rules adopted in 2015. Currently the language in the plan reflects the last version of the rules.	See the BCWMC comment on this topic included in the above table (referencing page 5 of the LSWMP).	Thank you for the detailed and constructive comments throughout the LSWMP. The content list in Section 1.3 was updated to match Minnesota Rules 8410.0160, and the rule was explicitly referenced.
2		The new rules required plans to include the drainage areas, volumes, rates, and paths of stormwater runoff. The storm sewer index map includes some but not all of this required information. If this information is available for the entire city through modeling or work of the Watersheds, this should be identified in the plan and the specific document that this information is in should be referenced in the plan.	See the BCWMC comment on this topic included in the above table (referencing page 14 of the LSWMP).	The BCWMC comment now references pg 15.

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3	35, 61	Throughout the plan there is mention of the need to update the City's 1999 Wetland Inventory and Management Plan to meet requirements for wetlands in the 2008 planning cycle. It is not clear if this work has been completed or not. With the fully developed nature of the City it is important to have good policies, standards, and requirements for how wetland impacts will be addressed as redevelopment and any future development occurs. If the plan was not updated to meet the requirements from 2008, it should be added to the list of projects to complete over the next 10 years.	Section 6.3 of the LSWMP notes that "it is the City's intent to revise this 1999 document to comply with Met Council requirements." Consider revising this statement to reference "current Met Council and WMO requirements," similar to the wording included in Policy 9.2 of the LSWMP. The planned update to the Wetland Inventory and Management Plan is also described in the text of Section 8.4; consider adding this activity as a line item in Table 8.5 - Implementation Program.	Line item added in Table 8.5. The text in Section 6.3 has been updated.