

Surface Water Management Plan - Comments Received

Item 5E.
BCWMC 11-14-18

Date Received	Received From	Affiliation	Comment Page #	Watershed Local Plan Requirement / SWMP Text	Comment	Plymouth Staff Comment Response	Are Changes needed and reflected in the plan?	Reflected on Page(s)	Suggested or Required?	Date Addressed
10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Page 9	The City of Plymouth's strategy for improving water quality focuses on pollution prevention first and storm water treatment second. The plan goes beyond reacting to problems after they occur by implementing proactive programs and policies to protect surface water	The Executive Summary focuses on the City's approach to addressing surface water quality issues. The Executive Summary does not discuss water quantity issues facing the City. Consider revising the Executive Summary to highlight a broader range of the existing and potential issues (also see comment regarding Page 41).	The City will consider adding language into the Executive Summary that outlines water quantity issues facing the city	Yes. Added language in the plan to outline water quantity and invasive species issues	pg 9	Suggested	10/31/2018
10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Page 11	Partners with the City of Plymouth in improving water resources include the State of Minnesota, the Metropolitan Council, Hennepin County, Three Rivers Park District, the Bassett, Elm, Minnehaha and Shingle Creek Watersheds	Please revise the text to refer to the BCWMC and similar entities as "Watershed Management Organizations", or "WMOs" versus "Watersheds" to avoid confusion between the organization and the physical watershed.	Yes, change will be included in the revised plan	Yes. Changed WMO names as noted in comment	pg 11	Suggested	10/31/2018
10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Page 15	The soil in Plymouth can be generally described as dense clay with occasional lenses of mixed sand and gravel (Figure 22). The three basic soil types are sandy clay till from the Des Moines ice lobe of the Wisconsin glaciation, natural silty sand and topsoil and organic silt deposits.	Consider revising this section to describe the relationship between soil types, infiltration capacity, and runoff and referencing Figure 22 (Hydrologic Soil Group Information).	The City will consider adding language into the Executive Summary that outlines water quantity issues facing the city	Yes. Added language to discuss infiltration rates and runoff	pg 15	Suggested	10/31/2018
10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Page 16	Additionally, each of these smaller watershed units is further broken down in the City of Plymouth into sub-watershed areas (Figure 4)	The figure reference to Figure 4 is incorrect and should be revised to reference Figure 23 (Subwatershed Boundaries).	Yes, change will be included in the revised plan	Yes. Made the change as suggested	pg 16	Suggested	10/31/2018

10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Page 41	Assessment of Existing or Potential Water Resource Related Problems	This section describes only surface water quality issues facing the City. Minnesota Rules 8410.0160 Subp. 3.D. states that local plans must contain the following: "An assessment of existing or potential water resource-related problems must be summarized. The problem assessment must be completed for only those areas within the corporate limits of the local government unit and similar to the process under part 8410.0045, subpart 7." Section 5.3.1.1 of the 2015 BCWMC Plan also requires local plans to address the problems identified in the 2015 BCWMC Plan applicable to the City. The Plan must be revised to describe water resource issues within BCWMC's jurisdiction beyond those limited to water quality impairments. Issues relevant to the portion of the City within the BCWMC are described in Section 3 of the 2015 BCWMC Plan and include: water quantity and flooding, erosion and sedimentation, stream management, wetland, habitat, and shoreland management, groundwater, and stormwater system maintenance. These issues, to the degree they are relevant within areas subject to BCWMC jurisdiction, must be discussed in the City Plan.	Yes, the city will review the BCWMC Plan Section 3 and changes will be included in the revised plan	Yes, made change per comment	pg 41/42	Required	11/2/2018
10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Page 48 - Table 7	Streams with approved TMDLs	This table must be revised to note that the fecal coliform impairment of Bassett Creek and the <i>E. coli</i> impairment of Plymouth Creek are addressed by the <i>Upper Mississippi River Bacteria TMDL Study and Protection Plan</i> completed in 2014.	Yes, change will be included in the revised plan	Yes Made the change as suggested	pg 48 & 258	Required	10/31/2018
10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Page 49 Figure 24	Figure 24 - Minnesota DNR Protected Waters, Wetlands and Creeks	Consider revising the title of Figure 24 to reflect the current MDNR Terminology of "Public Waters" versus "Protected Waters"	Yes, change will be included in the revised plan	Yes Made the change as suggested	pg 49	Suggested	10/31/2018

10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Pages 51-52 and Appendix B	Entities currently having some level of administration responsibility within the City of Plymouth include the City of Plymouth, Bassett Creem WMO... the four watershed management organizations (Bassett, Elm, Minnehaha, Shingle) are responsible for: Water Quality, Lake, and stream Monitoring; local plan review and approval; projects of regional significance; education activities	The SWMP generally notes that the BCWMC has some authority in the City and references City Official Controls. The text in Appendix B - Regulatory and Complaine Program further lists City Policies and Performance Standards. However, the SWMP does not describe the City's permit review process and cooperation with WMOs relating to permitting. The City Plan must outline the city's permitting process and must describe the City's collaborative role in the BCWMC review of development and improvement projects, as described in Section 5.1.1.1 and Section 5.3.1 of the 2015 BCWMC Plan.	Yes, change will be included in the revised plan	Yes Made the change as suggested	pg 51 & 259	Required	10/31/2018
10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Appendix A	Watershed Assessments	The SWMP is required to conform to Minnesota Statutes 103B.235. Minnesota Statues 103B.235 Subd. 2 include specific requirements for local plans, including: define drainage areas and the volumes, rates, and paths of storm water runoff existing and proposed physical environment. This information is incomplete in the SWMP, although much of this information may be incorporated by reference to the BCWMC watershed-wide XP-SWMM modeling results. The SWMP must be revised to reference this data.	Yes, change will be included in the revised plan	Yes The City is committed to updating the model in Elm, Shingle and Minnehaha Creek Watersheds as well as providing the BCWMC information to continually update their model.	pg 58	Required	10/31/2018
10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Appendix A	Watershed Assessments	BCWMC Priority Waterbody Classifications for lake and streams in the City are included on Page 59 of the City Plan. Consider including the BCWMC classification in the descriptions of each waterbody in the applicable subwatershed sections in Appendix A	Yes, change will be included in the revised plan	Yes made change per suggestion	Pages: 64,72,88,92,100,120,125,129	Suggested	11/1/2018

10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Page 64 Appendix A Table 11	Waters that do not meet their designated uses because of water quality standard violations are impaired (Table 11) and ultimately a Total Maximum Daily Load will be established at the maximum amount of a pollutant the water body can assimilate before becoming impaired. The City of Plymouth uses these assessments to develop nonstructural, programmatic, and structural solutions to improving the water quality.	Consider adding a footnote to Table 11 noting that the E. coli impairment of Plymouth Creek is addressed by the <i>Upper Mississippi River Bacteria TMDL Study and Protection Plan</i> completed in 2014.	Yes, change will be included in the revised plan	yes made change per suggestion	page 65	Suggested	11/1/2018
10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Page 66 Appendix A	The Upper Plymouth Creek Sub-watershed has one known impairment through the 2018 Impaired Waters list produced by the State of Minnesota. The TMDL Implementation Plan was approved by the Minnesota Pollution Control Agency in March, 2016 and will be implemented during the course of this 10-year Surface Water Management Plan	This section must be revised to note that there are two known impairments (in one waterbody) - the chloride impairment of Plymouth Creek and the E. Coli impairment of Plymouth Creek. The text must also be revised to clarify the TMDL(s) to which the text refers. If the reference to the approved 2016 TMDL refers to the Twin Cities Metro Area Chloride TMDL, the text must also note that the E. Coli impairment of Plymouth Creek is addressed by the <i>Upper Mississippi River Bacteria TMDL Study and Protection Plan</i> completed in 2014	Yes, change will be included in the revised plan	Yes, made change per comment	page 67	Required	11/1/2018
10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Page 74 Appendix A	The Middle Plymouth Creek Sub-watershed has one known impairment through the 2018 Impaired Waters list produced by the State of Minnesota. The TMDL Implementation Plan was approved by the Minnesota Pollution Control Agency in March, 2016 and will be implemented during the course of this 10-year Surface Water Management Plan.	This section must be revised to note that there are two known impairments (in one waterbody) - the chloride impairment of Plymouth Creek and the E. Coli impairment of Plymouth Creek. The text must also be revised to clarify the TMDL(s) to which the text refers. If the reference to the approved 2016 TMDL refers to the Twin Cities Metro Area Chloride TMDL, the text must also note that the E. Coli impairment of Plymouth Creek is addressed by the <i>Upper Mississippi River Bacteria TMDL Study and Protection Plan</i> completed in 2014	Yes, change will be included in the revised plan	Yes, made change per comment	pages: 73 & 75	Required	11/1/2018

10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Page 90 Appendix A	The Parkers Lake Sub-watershed has two known impairments (Chloride & Mercury) through the 2018 impaired waters list produced by the State of Minnesota. Implementation of best management practices consistent with the TMDL Implementation Plan for Chloride will be implemented during the course of this plan.	The text is inconsistent with Table 25 which lists mercury as the only impairment for Parkers Lake. Table 25 must be revised for consistency.	Yes, change will be included in the revised plan	Yes, made change per comment	page 89	Required	11/1/2018
10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Page 102 Appendix A	The Lower Plymouth Creek Sub-watershed drains to three known impairments through the 2018 impaired waters list produced by the State of Minnesota. A TMDL plan has been approved for Medicine Lake and future TMDL plans will be developed for Plymouth Creek and Bassett Creek	This section must be revised to note that the E. Coli impairment for Plymouth Creek and the fecal coliform impairment of Bassett Creek (which is referenced as a downstream waterbody in this section) are addressed by the <i>Upper Mississippi River Bacteria TMDL Study and Protection Plan</i> completed in 2014.	Yes, change will be included in the revised plan	Yes, made change per comment	page 103	Required	11/1/2018
10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Page 127 Appendix A	The Bassett Creek Sub-watershed drains to one known impairment through the 2018 Impaired Waters List produced by the State of Minnesota. A future TMDL plan will be developed for Bassett Creek	The Main Stem of Bassett Creek is subject to three impairments: chloride, fish bioassessments, and fecal coliform (see table 2-5 of the 2015 BCWMC Plan). This section must be revised to clarify the applicable impairments and reference the <i>Upper Mississippi River Bacteria TMDL Study and Protection Plan</i> completed in 2014.	Yes, change will be included in the revised plan	Yes, made change per comment	page 128	Required	11/1/2018
10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Page 135 Appendix A	The North Branch Sub-watershed has no known impairments through the 2018 Impaired Waters List produced by the State of Minnesota	Consider revising this section to note that Northwood Lake, immediately downstream of the City, is listed as impaired due to nutrients.	Yes, change will be included in the revised plan	Yes, made change per comment	page 138	Suggested	11/1/2018
10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Page 249 Appendix B	Water Quality Policies	Policy 4.2.1-16 of the BCWMC Plan requires that member cities annually provide the BCWMC with plans for BMP construction within their City (to facilitate updates to the BCWMC watershed-wide water quality model). The SWMP must be revised to include this requirement	No Change necessary, already in plan	Already in plan	Page 250	Required	10/31/2018

10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Page 250 Appendix B	Erosion Control Policies	Policy 4.3.4-54 of the BCWMC Plan requires, in part, that the member cities annually report to the BCWMC regarding compliance with BCWMC standards as part of annual MS4 reporting or as requested by the Commission. The SWMP must be revised to include this requirement	Yes, change will be included in the revised plan	Yes Made the change as suggested	Page 251	Required	10/31/2018
10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Page 251 Appendix B	Wetland Policies	Policy 4.2.6-66 of the 2015 BCWMC Plan states: "For wetlands classified as Preserve or Manage 1, member cities shall implement standards for bounce, inundation, and runoff control that are similar to BWSR guidance; member cities are encouraged to apply standards for other wetland classifications." The City's wetland ordinance does not include standards for bounce or inundation period for Preserve or Manage 1 wetlands (referred to as "exceptional" or "high" in the City wetland inventory and code). The SWMP must be revised to include bounce and inundation standards, or reference City Official Controls including these standards.	Yes, change will be included in the revised plan	Change to City of Plymouth Zoning Ordinance - Wetlands District will be needed. This change is expected in early 2019	page 252	Required	10/31/2018
10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Page 251 Appendix B	Erosion Control Policies or wetland policies	Policy 4.2.5-64 of the 2015 BCWMC Plan states: "Member cities shall maintain and enforce buffer requirements adjacent to priority streams... buffer widths adjacent to priority streams must be at least 10 feet or 25 percent of the distance between the ordinary high water level and the nearest existing structure, whichever is less." The SWMP must be revised to include this requirement or reference City Official Controls that include this requirement.	Yes, change will be included in the revised plan	Change to City of Plymouth Zoning Ordinance will be needed. This change is expected in early 2019	page 252	Required	10/31/2018
10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Page 253 Appendix B	Maintenance and inspection policies	Policy 4.2.2-24 of the BCWMC Plan requires that member cities are responsible for routine maintenance and repair of BCWMC Flood Control Project structures located within each City. The SWMP must be revised to include this requirement	Yes, change will be included in the revised plan	Yes Made the change as suggested	pg 253	Required	10/31/2018
10/19/2018	Karen Chandler	Bassett Creek Watershed Management Commission	Page 258 Appendix C Table 11	Streams with approved TMDLs	See below comment regarding Page 48, Table 7 This table must be revised to note that the fecal coliform impairment of Bassett Creek and the E. coli impairment of Plymouth Creek are addressed by the Upper Mississippi River Bacteria TMDL Study and Protection Plan completed in 2014.	Yes, change will be included in the revised plan	Yes Made the change as suggested	pg 258	Required	10/31/2018