

City of St. Louis Park
Draft Surface Water Management Plan - Comment/Response Log
March 2019

Overall Comment No.	Agency/Entity	SWMP Page(s)	SWMP Text	Agency Comments (orange = required revision) (green = recommended revision)	Official Response
1	BCWMC	iii	Glossary: Definition of Floodplain	Part 2 of the definition appears to be in error and should be deleted.	Noted and modified as recommended.
2	BCWMC	Page 1-7	Section 1.4: <i>This SWMP must be complete within two years of the completion of the most recent watershed management organization (WMO) plans. In this case, the MCWD completed revisions to their plans in 2018. Therefore, the applicable deadline for city plans is 2020.</i>	<p>The 2015 updates to Minnesota Rules 8410 no longer require completion of local water management plans within two years of the completion of the most recent WMO plans. Minnesota Rules 8410.0105 Subp. 9.A states that "a [watershed management organization] plan must include a schedule for implementation of local water plans that requires all local water plans to be adopted not more than two years before the local comprehensive plan is due." In addition, Minnesota Rules 8410.0160 Subp.6 also states "Each local water plan shall be adopted not more than two years before the local comprehensive plan is due."</p> <p>The text must be revised to reflect the updated Minnesota Rules 8410.</p> <p>In its 2015 Plan, the BCWMC requires that a City's local controls be consistent with BCWMC requirements within two years of a BCWMC Plan update. This requirement does not necessarily require updates to the City plan. See Section 5.3.1.1 of the 2015 BCWMC Plan. Note that the City must amend its official controls (i.e., ordinances) within 180 days of WRMP approval by the BCWMC, per Minnesota Statutes 103B.235 Subp. 4.</p>	Section 1.4, paragraphs 1, 2 and 3 will be revised to reflect updates to Minnesota rules 8410.
3	BCWMC	Page 2-4	Section 2.1	Consider adding a table of Atlas 14 design storm events to this section or another relevant section.	Noted, this section and Appendix M will be modified to include Atlas 14 Table.
4	BCWMC	Page 2-11	Section 2.6.1	Consider adding the elevation datum to the OHWL elevations in Table 2-2 (i.e., NGVD1929 or NAVD88).	Noted and modified to reflect NGVD 1929.
5	BCWMC	Page 2-14	Section 2.6.2, last sentence of first paragraph	Some words appear to be missing from the middle of this sentence. Consider revising the last part of the sentence so it reads (added words underlined) "...which is now responsible for the maintenance of these ditches, <u>while ditches</u> within the BCWMC remain under the authority of Hennepin County."	Noted and modified as recommended.
6	BCWMC	Page 2-18	Section 2.8.2: <i>The Golden Valley watershed discharges to MnDOT and Louis Park. The first landlocked area is located in the northwestern portion of the City, east of U.S. 169 and north of West 22nd Street. The second landlocked area is the area draining to Wolfe Lake. These subwatersheds have been combined into the Hannan and Bass Lake drainage districts, respectively, because overland flow connections exist during large-scale rain events.</i>	After the first sentence, the text does not apply to this drainage district. The text must be revised to include the information for this drainage district.	Noted and the section has been modified to reflect the Golden Valley watershed attributes.
7	BCWMC	Page 2-20	Figure 2-10	Consider listing all of the drainage districts in the legend.	Noted and modified as recommended.
8	BCWMC	Page 2-21	Section 2.8.5	Table 2-3 appears to be mislabeled and in the wrong location as the table entries include intercommunity flows to other cities, not just Minneapolis. If so, the table heading must be revised and moved to Section 2.8.3 or other relevant location	Noted, this typo has been corrected and the section updated.
9	BCWMC	Page 2-26	Section 2.10.2	The BCWMC appreciates the inclusion of information from the rapid response plan for Westwood Lake. Consider revising the language to note that Barr prepared the report on behalf of the BCWMC.	Noted and modified as recommended.
10	BCWMC	Pages 2-37, 2-39, 2-40	Section 2.12.2.1, Table 2-5, Table 2-6 and subsection "a. BCWMC"	The tables and text refer to an outdated BCWMC waterbody classification system. The tables and text must be revised to reflect the BCWMC's current classification system (see Section 2.7.2.2 and Table 2-6 in the 2015 BCWMC Watershed Management Plan).	Noted. The tables and text will be modified to reflect the reference information

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11	BCWMC	Page 2-43	Section 2.12.3	Consider adding information to this section about the BCWMC's P8 water quality model (see Section 2.7.3.1 in the 2015 BCWMC Watershed Management Plan).	Section 2.12.3 will be modified to include information about BCWMC's P8 WQ Model.
12	BCWMC	Page 3-7	Section 3.2: <i>The city's current floodplain management ordinance requires that compensatory storage be located outside of the affected floodplain. In the future, the city would prefer that compensatory storage be provided within the affected floodplain. The city will address this issue with the city council.</i>	The city's current floodplain ordinance requires compensatory storage for alterations within the floodplain and no increase in stage for projects in the floodplain, which appears to meet the BCWMC's floodplain requirements. However, the text on page 3-7 conflicts with the city's ordinance regarding compensatory storage and stage increase; the text must be revised to reflect the city's ordinance and the BCWMC requirements.	Section 3.2, page 3-7 will be revised to reference the City's ordinance.
13	BCWMC	Page 3-7	Section 3.2: <i>In addition, stormwater discharge rates from new developments or redevelopments may not exceed the existing 10-year release rate.</i>	Per Policy 4.2.2 – 31 in the 2015 BCWMC Watershed Management Plan, cities must “manage stormwater runoff so that future peaks of stormwater runoff leaving development and redevelopment sites are equal to or less than existing rates for the 2-year, 10-year, and 100-year events.” The standards in the BCWMC Requirements for Improvements and Development Proposals (2017, as amended) further require that the storm events must be based on Atlas 14 precipitation amounts and use a nested 24-hour rainfall distribution, The text must be revised to meet the BCWMC requirements.	The last two paragraphs of section 3.2 will be removed.
14	BCWMC	Page 3-8	Section 3.2.1: <i>The results of the updated hydrologic and hydraulic SWMM analyses are presented in Appendix G, including the approximate extents of surface flooding and pipe capacities in the City.</i>	Appendix G of the SWMP is empty and noted as “Reserved.” However, Appendix F includes the September 2018 report “Hydrologic, Hydraulic, and Water Quality Modeling for The City Of St. Louis Park, Draft Topical Report RSI-2858”. The text must be revised to reference Appendix F or the additional report must be provided in Appendix G. The final version of the report should also be included in the appendix.	Noted and modified to reference the correct appendix.
15	BCWMC	Page 4-1	Section 4.1, Policy 4.1.4: <i>Continue to use the BCWMC and the MCWD to permit activities within the city that fall under the jurisdiction of these agencies.</i>	The BCWMC does not have a permit program. This policy must be revised to correctly reflect the city's permitting role and the BCWMC's review role with respect to development and other proposed projects.	Noted and modified as recommended.
16	BCWMC	Page 4-2	Section 4.1, Policy 4.1.5: <i>Manage Westwood Lake cooperatively with the BCWMC in accordance with the Westwood Lake Watershed and Lake Management Plan (BCWMC, 1995).</i>	The referenced plan is outdated. Consider deleting this policy, as Policy 4.1.8 broadly addresses the intent of Policy 4.1.5.	Noted and modified as recommended.
				Also consider adding a policy to this section or to Section 4.7 regarding cooperating/coordinating with BCWMC in implementing the BCWMC AIS Rapid Response Plan for Westwood Lake.	Modified to replace 4.1.5 as recommended.
17	BCWMC	Page 4-2	Section 4.1, Policy 4.1.14, item b.ii: <i>Per BCWMC: Redevelopment projects that result in increased impervious surfaces shall achieve nondegradation (i.e., no increase in phosphorus load).</i>	The text does not reflect the most current BCWMC requirements, which now require that development, redevelopment, and linear projects meet the following BCWMC performance goals: <ul style="list-style-type: none"> · For new development: Proposed new, nonlinear developments that create more than one acre of new impervious surface on sites without restrictions shall capture and retain onsite 1.1 inches of runoff from the new impervious surfaces. · For redevelopment: Nonlinear redevelopment projects on sites without restrictions that create one or more acres of new and/or fully reconstructed impervious surfaces shall capture and retain onsite 1.1 inches of runoff from the new and/or fully reconstructed impervious surfaces. · For linear projects: Linear projects on sites without restrictions that create one or more acres of net new impervious surfaces shall capture and retain onsite 1.1 inches of runoff from the net new impervious surfaces. The policy must be revised to reflect the BCWMC's most current requirements, as specified in the BCWMC Requirements for Improvements and Development Proposals (2017, as amended).	Noted. This section will be revised to removed everything after the first sentence. BCWMC requirements will be addressed in Appendix M.

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18	BCWMC	Page 4-4	Section 4.3, Wetlands and Appendix D (Wetland Management Plan)	The policies in Section 4.3 and the attached Wetland Management Plan do not include wetland buffer standards that meet the BCWMC's requirements (see Policy 68 in the BCWMC Watershed Management Plan and Appendix B in the BCWMC Requirements for Improvements and Development Proposals (2017, as amended)). The city must maintain and enforce the buffer standards through inclusion in the city's local controls. The text must be revised to reflect the BCWMC's requirements. Per an 11/28/18 email from city staff, "the current city ordinance references Appendix M, which includes updated buffer and water quality requirements. The ordinance was set up this way so that rule changes could be accounted for by updating Appendix M, without having to update the ordinance." Appendix M must be revised to incorporate the BCWMC's wetland buffer requirements (likely as a new section).	Appendix M will be modified to include BCWMC wetland buffer requirement.
19	BCWMC	Page 4-5	Section 4.4, Policy 4.4.3: <i>Continue to use the BCWMC and the MCWD to permit activities within the city that fall under the jurisdiction of these agencies.</i>	See above comment #15 regarding Section 4.1, Policy 4.1.4.	Noted and modified as recommended.
20	BCWMC	Page 4-5	Section 4.4, Policy 4.4.4: <i>Require new and redevelopment to apply best management practices to reduce the rate and volume of stormwater runoff to the maximum practical extent.</i>	See above comment #13 regarding Section 3.2 and stormwater runoff rates.	Noted.
21	BCWMC	Page 4-6	Section 4.4, Policy 4.4.16: <i>Work to maintain zero net loss of floodplain storage and manage floodplains to maintain critical 100-year flood storage volumes.</i>	See above comment #12 regarding Section 3.2 and floodplain management. The language of this policy must be strengthened to meet the BCWMC requirements.	Noted and modified as follows: <i>Maintain zero net loss of floodplain storage and manage floodplains to maintain critical 100-year flood storage volumes.</i>
22	BCWMC	Page 4-7	Section 4.4, Policy 4.4.23: <i>Review and update the city's floodplain ordinance to be consistent with the requirements of the watershed management organizations and this plan.</i>	The city's floodplain ordinance must be updated to meet the BCWMC's minimum building elevation requirements (i.e., the lowest floor must be at least two feet above the 100-year flood elevation for new and redeveloped structures).	Noted. No changes made to the referenced section and policy. However, the City will review and update its official controls, following Plan approval.
23	BCWMC	Page 4-9	Section 4.7, Policy 4.7.5: <i>Require infiltration of the first 0.5 inch of runoff from impervious areas greater than 25 percent for redevelopment of parcels adjacent to public water lakes and streams.</i>	This policy may not be consistent with the BCWMC's standards (see above comment #17 regarding Section 4.1, Policy 4.1.14); the policy must be revised if not consistent with BCWMC standards.	Noted and revised as follows: <i>Require infiltration of runoff from developed and redeveloped areas creating new impervious surfaces.</i>
24	BCWMC	Page 5-5	Section 5.6.2.4, Watershed Funding: <i>The BCWMC funds water quality improvement projects that are identified in the BCWMC capital improvement program.</i>	The BCWMC funds different kinds of projects, not just water quality projects. Delete the words "water quality" and replace with "capital."	Noted and modified as recommended.
25	BCWMC	Page 5-7	Section 5.7, Local Controls and Regulatory Responsibilities	This section must be revised to include more information about the project review and permitting 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 document are subject to BCWMC review and that the City coordinates these reviews according to the sequence described in Section 5.1.1.1 of the BCWMC Plan.	Noted. Section 5.7 will be modified to generally discuss coordination with BCWMC and MCWD. Appendix M will be revised to include details about the process.
26	BCWMC	Pages 5-13 and 5-14	Table 5-1, Implementation Program	Entries for the Westdale Sedimentation Basin and Otten Pond projects note "the rehabilitation and maintenance plan developed by Barr"; consider referencing the plan in the text.	Noted and modified as recommended.
27	BCWMC		Chapter 6.0, References	Consider adding the BCWMC's Rapid Response Plan and XP SWMM Phase II report to the reference list.	Noted and modified as recommended.

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28	BCWMC	App F; Page B-10	Table B-29, Westwood Lake Modeled Water Surface Elevations	The Atlas 14 100-year 24-hour modeled water surface elevation is 1.3 feet lower than the BCWMC-adopted 100-year flood elevation of 890.0 NAVD88 (889.8 NGVD1929). The BCWMC's floodplain requirements are based on the BCWMC-adopted flood elevations. The BCWMC's modeled flood elevations are based on the existing (2017) outlet and outlet channel conditions. Sediment build up in the outlet channel keeps the water level at about Elevation 887.7 (NAVD88). The surveyed high point in the channel is 887.65 (NAVD88). The text must be revised to acknowledge the BCWMC's higher flood elevation. Please also inform us if the outlet channel conditions have changed.	Noted and modified to include a note to table B-29 to acknowledge BCWMC's higher regulatory elevation.
29	BCWMC	App M2; Page 1	Paragraph 1 of stormwater management requirements	Revise "Bassett Creek Watershed Management Organization" to "Bassett Creek Watershed Management Commission"	Noted and modified as recommended.
30	BCWMC	App M2; Page 1	Stormwater management plan requirement no. 1	Add additional language to clarify that phosphorus removal (75% or 60%) may be required for projects with site restrictions within the jurisdiction of the BCWMC.	Noted and modified to include a bullet specific to areas within BCWMC jurisdiction.
31	BCWMC	App M2; Page 2	Stormwater management plan requirement no. 3	Consider revising the beginning of the requirement as follows: "The stormwater management system must be designed so that the water quality volume will discharge through the soil surface..."	Noted and modified as recommended.
32	BCWMC	App M2; Page 2	Stormwater management plan requirement no. 4	The text must be revised to meet the BCWMC requirements. Per Policy 4.2.2 – 31 in the 2015 BCWMC Watershed Management Plan, cities must "manage stormwater runoff so that future peaks of stormwater runoff leaving development and redevelopment sites are equal to or less than existing rates for the 2-year, 10-year, and 100-year events." The standards in the BCWMC Requirements for Improvements and Development Proposals (2017, as amended) further require that the storm events must be based on Atlas 14 precipitation amounts and use a nested 24-hour rainfall distribution.	Noted and modified to include a bullet specific to areas within BCWMC jurisdiction.
33	BCWMC	App M2; Page 2	Stormwater management plan requirement no. 5a	The end of the sentence appears to include additional, unnecessary words. Consider revising the last part of the sentence so it reads (words to delete shown as stricken): "...unless prohibited by BCWMC requires the stormwater management limitations."	Noted and modified as recommended.
34	BCWMC	App M2; Page 2	Stormwater management plan requirement no. 5	The text does not reflect the most current BCWMC requirements, which now require that development, redevelopment, and linear projects meet the following BCWMC performance goals: <ul style="list-style-type: none"> · For new development: Proposed new, nonlinear developments that create more than one acre of new impervious surface on sites without restrictions shall capture and retain onsite 1.1 inches of runoff from the new impervious surfaces. · For redevelopment: Nonlinear redevelopment projects on sites without restrictions that create one or more acres of new and/or fully reconstructed impervious surfaces shall capture and retain onsite 1.1 inches of runoff from the new and/or fully reconstructed impervious surfaces. · For linear projects: Linear projects on sites without restrictions that create one or more acres of net new impervious surfaces shall capture and retain onsite 1.1 inches of runoff from the net new impervious surfaces. The policy must be revised to reflect the BCWMC's most current requirements, as specified in the BCWMC Requirements for Improvements and Development Proposals (2017, as amended).	Noted and modified to include a section specific to areas within BCWMC jurisdiction.

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35	BCWMC	App M2; Page 2	Stormwater management plan requirement no. 6	The BCWMC prohibits infiltration when rates exceed 8 inches per hour. The requirement must be modified to match the BCWMC requirements.	Noted and modified as recommended.
36	BCWMC	App M2; Page 2	Stormwater management plan requirement no. 9d	This statement appear to state generally the same thing as requirement no. 9.d.ii. Consider deleting this requirement in favor of requirement no. 9.d.ii.	Noted and modified as follows: 9.d. will be deleted and replaced with 9.e. The current language in 9.d will replace ii.
37	BCWMC	App M2; Page 2	Stormwater management plan requirement no. 9.e.iii	This statement does not seem to fit under requirement 9.e. Consider separating this statement as a separate lettered item within requirement no. 9.	Noted and modified as recommended.
38	BCWMC	App M2; Page 5	Restricted infiltration areas no. 1	Consider deleting in favor of restricted infiltration areas no. 4	Noted and modified as recommended.
39	BCWMC	App M2; Page 5	Restricted infiltration areas no. 3	Consider moving this item to the "Prohibited infiltration areas" section.	Noted and modified as recommended.
40	BCWMC	App M2; Page 5	Restricted infiltration areas no. 4	The BCWMC prohibits infiltration when rates exceed 8 inches per hour. The requirement must be modified to match the BCWMC requirements, or the clause "above 8.3 inches per hour" could be deleted.	Noted and modified as recommended.
41	BCWMC	App M2; Page 5	Restricted infiltration areas no. 5	Consider deleting the words "prohibited areas" as this is the restricted infiltration section.	Noted and modified as recommended.
42	BCWMC	App M2; Page 5	Prohibited infiltration areas no. 4	Consider deleting the words "Zoning, Setbacks" as this is covered in the restricted infiltration section.	Noted and modified as recommended.
43	BCWMC	App M2; Page 5	Mitigation provisions section	The text must be revised to meet the BCWMC requirements. Per Policy 4.2.1 – 12 in the 2015 BCWMC Watershed Management Plan, "The BCWMC requires all stormwater to be treated in accordance with the MPCA's Minimal Impact Design Standards (MIDS) performance goal for new development and redevelopment. If the MIDS performance goal is not feasible and/or is not allowed for a proposed project, then the project proposer must implement the BCWMC flexible treatment options, as shown in the BCWMC Design Sequence Flow Chart. The BCWMC revised its performance goals for linear projects in May 2017; they can be found in the BCWMC's Requirements for Improvements and Development Proposals document (BCWMC, 2015, as revised)."	Noted and modified to include a section specific to areas within BCWMC jurisdiction.
44	BCWMC and Metropolitan Council	Table 5-2, Page 5-21	1. The Plan states (Table 5-2) that the Bassett Creek Watershed Management Commission (BCWMC) requires peak runoff rate control for the 2-year storm event. We recommend that the City include in the Plan peak runoff rate control for the 24-hour precipitation event with a 2-year frequency for the entire city, that is, by including the MCWD watershed in addition to the BCWMC watershed to further strengthen the Plan.	Table 5-2 correctly states that the "BCWMC requires cities to manage stormwater runoff so that future peaks of stormwater runoff leaving development and redevelopment sites are equal to or less than existing rates for the 2-year, 10-year, and 100-year events." However, other parts of the plan must be revised to reflect the BCWMC's rate control requirements. See the BCWMC comment on this topic included in the above table (referencing page 3-7 and page 4-5 of the SWMP).	Noted and applicable section will be modified as addressed here to minimize inconsistencies.
45	BCWMC and Metropolitan Council	Pages 4-5 and 5-7	2. The City's support and promotion for Low Impact Development (LID) techniques is commendable (Policy 4.4.5 and Chapter 5.7). The Plan also mentions Minimum Impact Design Standards (MIDS) in Table 5-2, but only for the BCWMC watershed. We recommend that the City adopt MIDS in the Plan for the entire city by including the MCWD watershed in addition to the BCWMC watershed, to further strengthen the Plan.	Consider adopting MIDS for the entire city, as recommended.	Considered and MIDS will adopted within BCWMC jurisdiction.

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46	BCWMC and Metropolitan Council	Appendix M	3. We recommend that the City update the storm event criteria to Atlas 14 in the city's Stormwater Management Plan (Appendix M) which currently is showing TP-40 event statistics.	Appendix M must be updated to include Atlas 14 storm events. See the BCWMC comment on this topic included in the above table (referencing App M2, page 2, stormwater management plan requirement no. 4).	Appendix M will be modified to reflect Atlas 14 storm events and a table within BCWMC jurisdiction.
47	BCWMC and Metropolitan Council	Table 5-1, Pages 5-9 through 5-11	4. Please clarify the meaning of the "Ongoing" column header in Table 5-1. Is this a yearly cost or a 10-year cost (2018-2027)?	Consider changing "ongoing" to "annually" (if these are annual costs).	Noted and modified as recommended.
48	MCWD	Section 1.5, Appendix A		Please reference and include Agreements related to the Reach 20 Restoration Project and the Powell Road Pipe Diversion Project	Noted and modified as recommended.
49	MCWD	Section 2.14, Figure 2-16, Figure 2-16		Please discuss the role of water resources and this plan in Land Use planning and achieving "livable community".	Additional clarifying information required from MCWD to address the comment/request.
50	MCWD	Section 2.7		A sentence should be added to section 2. 7 indicating that the City maintains an up to date GIS geodatabase that includes the required information.	Noted and modified as recommended.
51	MCWD	Section 3.5, 3.6.4, 5.2, Appendix B		Provide inventory of public and private stormwater management facilities	Noted. An inventory of public and private stormwater management facilities and the city's stormwater assets are managed in a geodatabase and Fig. 2.8 presents the system.
52	MCWD	Appendix B		An actual inventory of city-owned property and water resources issues associated with the properties is not provided.	Noted. An inventory of public and private stormwater management facilities and the city's stormwater assets are managed in a geodatabase and Fig. 2.8 presents the system.
52	MCWD	Appendix B		Opportunities for coordination with other agencies and especially MCWD are presented throughout SWMP, and specifically in the City's Policies (Chapter 4).	Noted. The City's coordination plan as Appendix N.
53	MCWD	Appendix B		A list of some of the facilities is provided, but an actual inventory of city-owned/operated facilities that may contribute pollutants to ground and surface waters is not provided.	Noted. An inventory of public and private stormwater management facilities and the city's stormwater assets are managed in a geodatabase and Fig. 2.8 presents the system.
54	MCWD			See #7 above; provide map and inventory of stormwater management facilities, including responsible party and maintenance condition and schedule	Noted. An inventory of public and private stormwater management facilities and the city's stormwater assets are managed in a geodatabase and Fig. 2.8 presents the system.
55	MCWD			Information related to the issue of deferred maintenance of public and private stormwater management practices, to inform a cooperative approach to addressing the issue (OPTIONAL).	Noted. The City's coordination plan is in Appendix N.
56	MCWD	Section 1.6		Section 1.6 spells out the regulatory framework the City uses for other units of government, including MN DOT. Details on the procedures by which City plans, programs and implements transportation infrastructure are not provided.	The regulatory framework used for development and redevelopment projects address the intent of this comment.

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56	MCWD	Section 5.8/Table 5-1		Table 5-1 covers the capital implementation plan, and Section 5.8 indicates the table may be revised as new issues or needs arise.	Noted
57	MCWD			Provide links to small area/ redevelopment plans, capital implementation programs, and land acquisition and management plans listed in item #17	Noted and modified as recommended.
58	MCWD	Section 2.12.22		Table 2-7 does not note that the TMDLS have been completed and SLP has been assigned categorical wasteload reductions	Noted and modified as recommended.
59	MCWD	Section 2.12.22		Table 2-7 does not include the Lake Hiawatha Nutrient TMDL	Noted and modified as recommended.
60	MCWD	Section 3.1.3		Section 3.1.3 indicates the City responsibilities associated with impaired waters, but does not note the city's assigned specific and categorical wasteload reductions	Noted and modified as recommended.
61	MCWD	Various sections and Table 5.1		E. coli and Lake Hiawatha TMDLs were approved in 2013, chloride in 2016 - specific implementation actions should be identified and incorporated into this plan	Noted and modified as recommended.
62	MCWD	Chapter 4, Table 5.1		Coordination with MCWD is listed throughout SWMP and is particularly reflected in the City's policies listed in Chapter 4. However, numerous capital projects set forth in Table 5.1 that appear to be potential TMDL implementation or other load and volume reduction projects, and it is unclear whether the City is interested in pursuing partnerships with the District to complete any of them.	Noted. The City's coordination plan is in Appendix N.
63	MCWD	Section 5.7		Section 5.7 notes that all redevelopment occurring within the City must also comply with the rules established by MCWD. The manner in which applicants are made aware of MCWD permitting requirements is not explicit.	Noted. Appendix M will be modified to include details of the process.
64	MCWD	Chapter 4, Appendix B		Extensive cooperation with MCWD is implied throughout document, particularly throughout Chapter 4; Site Plan Review is covered in Appendix B (City SWPPP); however, neither Appendix B nor the SWMP are explicit of how MCWD will receive notice on development/redevelopment actions.	Noted. Appendix M will be modified to include details of the process.
65	MCWD	General, Appendix B		Coordination efforts with MCWD regarding improvement projects, education opportunities, potential partnerships, etc. are referenced throughout Plan. However the plan does not provide details on how the District will receive notice regarding planning, infrastructure, park and rec, and CIP efforts.	Noted. The City's coordination plan is in Appendix N.
66	MCWD	General, Appendix B		The Plan and/or appendices either state or suggest that coordination for the listed elements will occur, but it does not explicitly state how that coordination with MCWD will look.	Noted. The City's coordination plan is in Appendix N.
67	MCWD	General, Chapter 4, Appendix B		For items listed in Comment 24, describe when and how the communication will occur and indicate the department and position for proposed communications plan.	Noted. The City's coordination plan is in Appendix N.
68	MCWD	Section 1.4		Please correction Section 1.4 per MN Rule and Statute and please note if St. Louis Park has requested a six month extension that Metropolitan Council has offered.	Noted. Section 1.4 has been updated.
69	MCWD	Section 1.4		Please explicitly note MCWD coordination of all plan amendments, including minor changes. This can also be discussed in the required coordination plan to be prepared.	Noted and modified as recommended.
70	MCWD	Section 1.6.2.2		MCWD jurisdiction includes 27 cities and 2 townships, not 3.	Noted and modified as recommended.

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71	MCWD	Section 1.6.2.2		Section would benefit from a more robust description of MCWD philosophy and goals	Noted and updated to include the information provided by MCWD.
72	MCWD	Section 1.7.3		Numbering seems off - part of section 1.6	Noted and modified as recommended.
73	MCWD	Section 1.7.3		This section would benefit from a discussion of the regional frame, being the Metropolitan Councils' 2040 Water Resources Policy Plan and it's connection to Thrive MSP 2040 and tie into the City's comprehensive plan	Noted and modified as recommended.
74	MCWD	Section 2.14		Please discuss the role of water resources and this plan in Land Use planning and achieving "livable community".	Noted and modified as recommended.
75	MCWD	Section 2.12.2.1		This section would benefit from a discussion of the District's E-Grade program which considers overall ecological health.	Noted and modified as recommended.
76	MCWD	Section 2.9		Please clarify the reference to Minnehaha Parkway	Noted and modified as recommended.
77	MCWD	Figure 2.9		Please include the size of each watershed management area within the City	Noted and modified as recommended.
78	MCWD	Comp Plan Section 7-275		Consider including MCWD as a coordinating jurisdiction	Noted.
79	Public	Hannon Lake		Hannon Lake has changed and become clogged with milfoil and lily pads so as to be unusable for recreational use....What can we do about this? Can SLP budget for lake treatments or other improvements?	The city will consider the request.
80	Public	Hannon Lake		Could SLP partner with MCWD to continue the chemical measurement (phosphorus) of the lakes so we can better understand how they are changing?	The city has developed a coordination plan framework with MCWD and BCWMC and during their first planned meeting this topic will be considered.
81	Public	General		When was the last inspection of the drainage system on the north side of Hannon Lake? Is it operating properly, does it need to be cleaned/improved?	Hannon Lake was last inspected in 2015. The report suggests it needs maintenance.
82	Public	General		MCWD is developing a new Ecosystem Evaluation Assessment Program (E-Grade). Can we get our lakes on this?	Noted. Section 2.12.2.1 has been revised to include MCWD's E-grade program.
83	Public	Hannon Lake		Noted in the engineering CIS analysis, large parking lots which would likely have a significant impact on estimated surface water quality were not represented. For example, 7 acre parking lot of Westwood Church which runs directly and unimpeded into Hannon Lake.	This is private property and the city doesn't have authority on the site. Nevertheless, the city will engage the church about way to implement stormwater practices.
84	Public	Section 3.1.3		Is Hannon Lake considered "Impaired"?	No. Impaired waters within the City of St. Louis Park are presented in Table 2-7 and discussed Section 3.1.3
85	Public	General		I wish that homeowners could be encouraged more to incorporate a BMP project on their property. I know we have the Rainwater Rewards Program, but it would be good to "catch" people who are at a point where it is easy (less expensive) to install a BMP. One idea would be to make it part of the permitting process. That is, to require that a homeowner at least price out the cost of a BMP before their permit is approved. A different idea would be for the City to provide information on BMPs that are related to a certain home improvement (like a driveway) or a list of contractors who are experienced in BMPs and why they are important.	Noted.
86	Public	General		It would be great if the businesses/multiunit residences/faith communities (with large hard surface parking lots) that are adjacent to the roads which are being torn up anyway for resizing could be encouraged to incorporate a BMP.	Stormwater management is required on redevelopment projects.
87	Public	General		I hope that we Water Stewards can help with something. I'm very interested in water and would like to do something to help. Maybe when the Adopt a Drain Program is rolled out, we could help somehow?	Noted.