



Bassett Creek Watershed Management Commission

July 12, 2023

Mr. Phil Olson
City of Minnetonka
14600 Minnetonka Blvd.
Minnetonka, MN 55345

Dear Phil,

The Bassett Creek Watershed Management Commission (BCWMC) reviewed the city's proposed amendment to the Minnetonka Water Resources Management Plan aimed at incorporating updated flood modeling results based on recently completed stormwater management models for the city. The BCWMC has the following comments:

Overall: We concentrated our review on the sections presented with tracked changes. However, in skimming other parts of the text, we find many areas and statements that are outdated and hence are no longer true or accurate. We think it will be confusing to a reader to discern which pieces of information are current (revised through this update) and which pieces are from the original plan. Consider finding a way to make that distinction within the final document.

1. Section 1.5 General Approach to Planning: In section 3 (Flood Control), second to last sentence: Change "watershed districts" to "watershed management organizations" for accuracy and consistency with terminology later in the document.
2. Section 3.13.2 WMO Flood Control Criteria, 3rd paragraph – Change "flood management envelope" to read "flood elevations" as the 2015 Bassett Creek Watershed Management Plan does not use the flood management profile language but rather lists flood elevations.
3. Section 3.13.4.1 City-Wide Modeling—2023 XP-SWMM & PCSWMM, 2nd paragraph, page 33 and 1st and 2nd paragraphs, page 34 - table numbering is off; change "Tables 3-3, 3-4, 3-5, and 3-6" to either "Tables 3-2, 3-3, 3-4, and 3-5" or "Tables 3 -2 through 3-5"
4. Section 3.13.4.3 Watershed Management Organization Modeling BCWMC, 1st paragraph, page 39 – Revise "The BCWMC is still going through the FEMA mapping process and the date of final model and mapping approval is unknown." to read "The MnDNR is still going through the FEMA mapping process for the Bassett Creek watershed and the date of final model and mapping approval is unknown."

The BCWMC completed its work with the MnDNR on the FEMA model and the FEMA mapping process is now in the MnDNR's hands.

5. Section 3.13.4.3 Watershed Management Organization Modeling BCWMC, 2nd paragraph page 39 – Reword for clarity and accuracy: ~~In 2022, the draft FEMA model was updated to incorporate significant projects between 2018 and 2021 (23 projects identified) based on information provided by the member cities. The updated model was approved by the BCWMC in August 2022. In July 2022, the BCWMC adopted an updated model that utilized the draft FEMA model along with the incorporation of significant projects completed between 2018 and 2021 (23 projects identified) based on information provided by the BCWMC member cities.~~
6. Figure 3-22: Crane Lake does not meet state standards for chloride and is likely to be listed for a chloride impairment in 2024. It is worth noting.
7. Tables 3-2 through 3-9: Consider including date/year of data collection or completion of modeling as some tables were updated and some were not.
8. Table 3-2, page 63, subwatershed number 425 (Crane Lake) – The BCWMC 2022 XPSWMM model lists the Crane Lake NWL as 917.31 NAVD88 or 917.13 NGVD 29 (high point in front of 21” pipe, 21” pipe invert at 917.28 NAVD88). Table 3-2 shows the NWL as 917.2 NGVD29, which is higher than that shown in the BCWMC XPSWMM model. Either revise table or let us know if changes to the BCWMC XPSWMM model are needed.
9. Section 4.1.1 Watershed Summary, bottom paragraph on page 123, continued on page 124 – Regarding the text below, it appears the City used the 2017 model and not the updated BCWMC 2022 XPSWMM; please confirm. If not correct, please revise the text:

“In 2017, the Bassett Creek Watershed Management Commission (BCWMC) Phase 2 XPSWMM model update was published for the entire watershed, including the portion in Minnetonka. This model incorporated more detailed subwatershed, storage and storm sewer information for the watershed, including the major ponds and wetlands. The results and recommendations of this model are available from the BCWMC and will be used by the city as the starting model for the recent city-wide Atlas 14 modeling updates.”
10. Section 4.1.2.1 – 4.1.2.3 Under Flood Control: Should the flood elevations in these sections be updated? This seems like very outdated information.
11. Section 5.3.1 BCWMC Issues, 3rd paragraph: Consider adding: In July 2022, the BCWMC adopted an updated hydraulic and hydrologic model that utilized the draft FEMA model along with the incorporation of significant projects completed between 2018 and 2021 (23 projects identified) based on information provided by the BCWMC member cities.
12. Section 5.3.5 City of Minnetonka Issues, page 198, 1st paragraph – Regarding the text below, please add something about the City’s process to ensure that the proposed changes (i.e., upsizing of pipes) will not increase flood risk in the downstream city.

“However, implementing future stormwater infrastructure modifications to minimize flood potential will be challenging given the need to balance upstream and downstream flood risk...”
13. Section 5.3.5 City of Minnetonka Issues, page 198, 1st paragraph – change “Watershed Districts” to “watershed management organizations.”

14. Appendix E: Hydrologic/Hydraulic Models, Description of 2023 Watershed Models, page 214 – Please clarify if the City updated the models referenced in this statement: “The updated hydrologic and hydraulic models were developed on a watershed basis.” Also, regarding this phrase later in the same paragraph, please confirm the version of the BCWMC XPSWMM model that the city used (2017 approved or 2022 approved): “Bassett Creek watershed model updates in 2021.”
15. Appendix E: Hydrologic/Hydraulic Models, Description of 2023 Watershed Models, page 215, “updates to the existing conditions models” at the end of 2nd paragraph and continuing on the rest of the page – Please inform us if there were changes to the Bassett Creek model that need to get incorporated into the next BCWMC XPSMM model update (if not already in the 2021 update/adopted 2022).

Thank you for the opportunity to comment. We look forward to continued cooperation with the City of Minnetonka. Please contact Laura Jester at laura.jester@keystonewaters.com or 952-270-1990 if you have questions.

Sincerely,

Catherine Cesnik
BCWMC Chair