Bassett Creek Watershed Management Commission

August 29, 2024

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Dear Mr. Pearce and Mr. Powell:

The Bassett Creek Watershed Management Commission (BCWMC) appreciates the opportunity to provide comments on the draft wetland assessment tool. The BCWMC is the Local Government Unit (LGU) responsible for administering the Minnesota Weland Conservation Act in the City of Medicine Lake and the portions of the cities of Robbinsdale and St. Louis Park that are within the BCWMC.

You may notice that the following comments mirror those of the Valley Branch Watershed District (VBWD). Both the VBWD and the BCWMC contract with Barr Engineering for WCA administration. Hence, the BCWMC respectively submits comments based on the review of the draft assessment tool completed by Karen Wold at Barr Engineering.

The following comments are cursory based on testing the assessment of one wetland in the VBWD. As the draft spreadsheet was not available until the beginning of August (the busiest month of the year for reviewing projects), Barr Engineering staff were not able to complete a thorough review, and they did not review the functional ratings and calculations. Having more time to test ongoing field projects would be helpful.

Unreasonable Time: Estimating that one day is needed for each assessment area (AA) is not a rapid method of assessment. This is an unreasonable amount of time that will result in excessive costs for applicants submitting for agency review and creates an unreasonable budget for an LGU to conduct assessments on a watershed scale. A rapid assessment should take no more than one hour to complete, not one day.

Ease of Use: The Excel spreadsheet is cumbersome to use in the field. Data entry flow should allow for "tabbing" to the next cell for entry. Dropdown boxes appear like they are in the question below it. It would be better to move the box, so it appears to the right of the question instead of below it.

Access: It would be better to have a cloud-based app, or Survey 123 form, for field use. An app would allow for the desktop data to be auto populated and the data entry flow to be more field friendly, which could provide a significantly more efficient process and would allow for a reasonable amount of time to generate a rapid assessment. The Floristic Quality Assessment could also be incorporated into this app, so it isn't a separate cumbersome spreadsheet to enter in the field.

Formatting: This tool is formatted for one wetland at a time on one spreadsheet. Plus, an additional spreadsheet is used for the FQA data. LGUs need an efficient method of batching and downloading

data from hundreds or thousands of wetlands for a watershed wide scale, bringing results into GIS, creating maps, etc.

Rating: BCWMC wetland buffer requirements and some wetland management policies rely on one overall rating for the wetland. This assessment method does not allow for one overall rating of the wetland. What are the recommendations for watershed use of these results?

Specific Items:

On the Info tab, there is a white box covering over a portion of the workflow diagram, so the text below it can't be read.

Questions 6-12: EnviroAtlas was usable as a source for the Location Details section but it is a bit clunky. There is no layer already loaded that contains city boundaries or Public Land Survey lines, so you need to search those out in ArcGIS Online.

Question 13: It is possible to calculate (size of catchment area) but the Raindrop tool in the map that's needed is unreliable and fails more often than not.

Questions 16-18: Using EnviroAtlas in the Land Cover and Connectivity section was frustrating.

- The EnviroAtlas tool allows you to import shapefiles (for the AA, catchment area, etc.) but it doesn't allow you to select those boundaries for the land cover summary. You must freehand draw the area you want to summarize which is tedious for complex boundaries and hard to replicate if ever needed.
- Overall, the desktop process is much more efficient using ArcGIS desktop software than EnviroAtlas to complete the majority of this form. Especially for an LGU or a large project, which likely already has project-specific basemaps and data generated and compiled. It is much quicker and more accurate to use watershed wide or large project specific data. The only situation where EnviroAtlas is more useful is to compete Rows 17 and 18 that require layers displayed in the interactive map.
- Land Cover and Connectivity, Surrounding Land Cover Adjacent to AA - For the one wetland AA that we evaluated, EnviroAtlas results identify "Developed, open space" in a natural preserve area that has been designated by the city for protection and not for development. So, rather than documenting natural land cover, the results for the area identify 100% Total Developed Cover and a low percent of Natural Land Cover. This is not representative of the area. It also appears to affect the wildlife habitat rankings.

Question 25: An option should be provided to choose more than one, or to break down approximate percentages. A wetland can have a primary source of surface water from overland flow, and also an inlet structure directing stormwater into the wetland, even if that isn't the primary source of surface water.

Spelling error: Please fix "overflos" to "overflows".

Question 26: Same comment as 25. Provide the option for multiple answers to characterize water flow through.

Questions 36 and 37: Map Unit is locked, and password protected, so we can't enter the map unit. Is that causing the "Incomplete table" results? There are also not enough rows in the soils section, and we can't insert a row. Using the web soil survey for the OM content was very quick and easy though.

Question 37: There is no option for sandy loam or silt loam. Also, Mucky-Sandy, Mucky-loamy, sandy, and Loamy/clayey are not soil textures. Words ending in a "y" are descriptors, not textures.

Question 40: Provide the illustration as a link to click on so we can see it while answering the question instead of having to look it up in the manual.

Question 42: If the AA does not have any sphagnum cover, do we leave this blank? Answering <50% would be incorrect if there is no sphagnum in the AA. Does leaving this blank cause errors resulting in incomplete tables?

Spelling error on cell K108 – fix "Excepitonal" to "Exceptional".

Question 54: Grammar correction to "Are" instead of "Is".

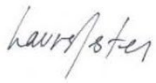
Results Summary:

- Carbon – Existing Carbon Storage Capacity Indicator and Functional Group Rank – Rank result says, "Incomplete table". Why is that?
- Results Summary – Functions Organized by Ranking: Table is all blank.
- Climate – Carbon Sequestration – Functional Capacity Rank and Overall Rank say, "Incomplete table"
- Water Quality Overall Rank says "Incomplete table"

Other suggestions for functions:

- Is there a function that provides a rating for flood control or flood protection?
- Why isn't amphibian habitat part of the assessment?

Sincerely,



Laura Jester
Administrator

CC: Catherine Cesnik, BCWMC Chair
BCWMC Consulting Engineers at Barr Engineering