



September 30, 2025

Laura Jester, Administrator
Bassett Creek Watershed Management Commission
P.O. Box 270825
Golden Valley, MN 55427

RE: Bassett Creek Watershed Management Plan – 60 Day Review Period

Ms. Jester,

The Board of Water and Soil Resources (BWSR) staff have completed their 60-day review of the Bassett Creek Watershed Management Commission (Commission) Watershed Management Plan (Plan). We would like to thank the Commission for inviting us to participate in the various meetings that were part of the development of this Plan.

In our review, we found the Plan to be a well-written document, utilizing best practices of plain language, increasing accessibility of the Plan to a broad audience of constituents and partners. Additionally, we would like to thank the Commission for including priorities such as: chloride loading, climate change, addressing inequities, and authentic engagement. We commend the Commission for considering them in the context of your watershed.

Please find enclosed additional comments on the Plan. Some of the comments are primarily editorial while others relate to themes like Plan clarity and measurability of goals. All comments are offered in the spirit of helping strengthen the Plan, supporting the Commission in its efforts, and ensuring the Plan is in conformance with all content requirements of Minnesota Rule 8410.

If you have any questions about the enclosed comments, the next steps in the process, or if I can be of any service, please reach out to me at 651-308-6956 or jen.dullum@state.mn.us.

Sincerely,

Jen Dullum
Board Conservationist, BWSR

Enclosure: BWSR official comments_60-Day Review_Draft BCWMC Plan 2026-2035

CC: Marcey Westrick (Central Region Manager, BWSR, via email)
State Review Agencies and MNDOT (via email)

- Reid Christianson, MDA
- Abby Shea, MDH
- Megan Moore, MnDNR
- Katie Kowalczyk, MnDOT
- Maureen Hoffman, Metropolitan Council
- Melinda Neville, MPCA

Draft Bassett Creek Watershed Management Plan

60-Day Comments		Board of Water and Soil Resources
Section	Page	Comment
General	NA	The Plan is written in plain language, concise, and easy to navigate.
General	NA	Through the course of the review, typographic errors were noted. These will be provided as supplemental, unofficial comments for the Commission's use as they see fit.
General	NA	Where there are website links, consider stating the website name in the Plan, as links can be subject to change.
General	NA	It would be nice to have a comprehensive list of goals.
Executive Summary	All	Excellent use of the executive summary. Great overview, succinct, and easy to read.
2.5 Surface Water Resources	21	Figure 2-1 Is there a way to have the subwatersheds/priority waters stand out more? Maybe this means two maps instead of one so that details don't get lost.
3 Issues and Goals	All	Many of your goals state reduce or improve. A question that comes to mind is, 'By how much'? How will you measure reductions or improvements over the life of the Plan? How will you know if you have been successful? For example, CHL1, how much do you hope to reduce chloride loading/concentrations by? Where do you want to be in 10-years? 8410.0080
3.2 Chloride Loading	35-37	Because chloride impairments are based on long-term monitoring, Table 3-7 may be confusing for the general reader. Consider more explanation as to how chloride data is used to determine impairments.
3.5 Aquatic Invasive Species	42	This is the first time the AIS Rapid Response Plan is mentioned. More information could be provided here, or you could direct the reader to page 85 in the Implementation section, for more on the AIS plan.
3.11 Impact of Climate Change on Hydrology, Water Levels, and Flood Risk	55	The Plan must contain specific measurable goals. Many of the goals and strategies in this plan are general actions and are not considered measurable. Making the goals more quantifiable will aid in assessing your progress toward implementing the Plan. For example, FLD1 & FLD4 could be combined into "Do a study to evaluate and identify...". A complete study will be the measure of success. 8410.0080
3.11 Impact of Climate Change on Hydrology, Water Levels, and Flood Risk	55	Similarly, goals FLD2 and FLD 5, for example, may be difficult to measure. For FLD5, what does "enhance" mean? How much is "the majority"? Could you include specifics such as Atlas 15, policy updates, new development requirements, or other to make this goal measurable?
3.17 Organizational Capacity and Staffing	66	Consider using the Evaluation and Assessment tool as the goal for ORG1. Producing an assessment to understand options, benefits, and challenges in the first year of the plan is a more measurable goal.
4.1 BCWMC Roles, Policies and Tools for Implementation	75	Could you provide more discussion about the BCWMC policies? These seem very closely aligned with future desired conditions/goals/other actions. How are they different? How were they developed? Are they still necessary?
4.1.2 Inter-Agency Planning and Collaboration	77	Throughout the Plan you mention the role/responsibilities of other entities in carrying out the Plan. Have you considered clearly, but succinctly, showing that in the document? This could be called out in Section 4.4 or Figure 1-2 could be amended to reflect agencies roles per the Plan. 8410.0105 Subp1.B.
4.1.3.2 Wetland Conservation Act	82	It is noted that the BCWMC encourages member cities to pursue wetland restoration projects based on local prioritization. Are there plans for watershed-wide wetland prioritization and restoration opportunities? 8410.0060 Subp1.M.
4.1.6 Aquatic Invasive Species Management	84	In the 3rd paragraph, you could make a plan goal from, ..."recruiting and training volunteers to detect zebra mussels on all Priority Lakes, aiming for at least 1 volunteer in each lake quadrant."
4.1.10 Evaluation and Assessment	95	An annual communication is required. If you plan to use your annual report, or the 2-page executive summary contained within the annual report, as this communication tool, how will you ensure that it reaches your Watershed residents? 8410.0105 Subp4.
4.3.1 Funding Sources	98	Last paragraph. It is suggested to be more general when describing the Clean Water Fund grants. Perhaps just stating competitive and non-competitive grants through the CWF.

Draft Bassett Creek Watershed Management Plan

60-Day Comments		Board of Water and Soil Resources
Section	Page	Comment
4.4 Local Water Management and Member City Responsibilities	100	It could be inferred, but would be helpful if it was clear, who was responsible for stormwater system inspection and operation 8410.0105 Subp3.
4.4 Local Water Management and Member City Responsibilities	100	How will you address the process for evaluating implementation of local water plans and the procedure to address an LGU failing to implement its local water plan or parts of its local water plan as part of 8410.0105 Subp1.C.?

Unofficial Draft Bassett Creek Watershed Management Plan

60-Day Comments		Board of Water and Soil Resources
Section	Page	Comment
General	All	Review lists for additional comma needs.
General	All	Review for extra spaces between words or slashes. Also look for missing periods.
General	NA	Consider using a more specific word/phrase instead of etc. throughout the Plan.
1.3 BCWMC Location and Boundary	8	3rd paragraph, 3rd sentence. The watershed ten priority... It there a word missing 'watershed' and 'ten'?
1.6 Coordination with agencies and Partners	15	Figure 1-2 Bassett Creek/Haha Wakpandan - order is reversed from elsewhere in the plan.
1.7 BCWMC Plan Development, Vision, and The Next 10 Years	16	Reminder to complete Table 1-2 Service Period dates.
3.6 Streambank and Gully Erosion	45	Haha Wakpandan is not co-labeled in the photo caption.
4.1.7.2 Flood Control Project Inspection, Maintenance, and Repair/Rehabilitation /Replacement	87	2nd paragraph under Policy 26, 3rd sentence. Cities must perform regular, <u>routing</u> maintenance... Should this be routine maintenance...?
4.1.8 Capital Improvement Program (CIP)	90	Figure 4-2 Could add a footnote that external grant programs may require different elements to be eligible for funding?
4.4 Local Water Management and Member City Responsibilities	99	2nd paragraph, 2nd sentence. ...in order to the city's comprehensive plan... Is there a word missing between 'to' and 'the'?
Section 4 Implementation Program	105	Table 4-5 Consider calling out the new activities differently for less confusion with the new goals.

*Please note this list may not fully address all edits.

September 18, 2025

Laura Jester
Bassett Creek Watershed Management Commission
16145 Hillcrest Ln
Eden Prairie, MN 55346

RE: Bassett Creek Watershed Management Commission Watershed Management Plan 60-Day Review Period

Dear Laura Jester:

The Minnesota Pollution Control Agency (MPCA) appreciates the opportunity to review the draft Bassett Creek Watershed Management Commission (BCWMC) Watershed Management Plan (Plan) dated August 2025, as well as providing input throughout your Plan development process. We are providing the following comments as part of the official 60-Day review and comment period.

1. Nice job of incorporating the Native American stream name into the Plan.
2. Several areas nicely demonstrate past projects and completed work. The Executive Summary Implementation Tools section was helpful to see what is new and what has been happening.
3. Appendix Table A-22
 - a. Including the MPCA ID numbers somewhere may be helpful - this may be the best place.
 - b. The TMDL target completion date for Northwood is 2024; adjust to be 2027. Update Lost Lake information also.
4. Table 3-3 and 3-4:
 - a. Adjust descriptor of months that were averaged. Not everyone may be aware of what "summer" months means in reference to the standards.
5. Several goals could include a numerical target.
 - a. Example – LK2: How much of a percent increase and what depth of buffer?
 - b. Review the goals and assess opportunities to include numerical goals that will help evaluate success.
6. Section 3.11 – Source NOAA, 2013 – there are newer sources that you could reference, including the UMN. <https://climate.umn.edu/climate-change-east-central-minnesota>.

Again, thank you for the opportunity to review and comment on your amendment. If we may be of further assistance, please contact me, Amy Timm, at 651-757-2632.

Sincerely,



This document has been electronically signed.

Amy Timm
Environmental Specialist
Watershed Division

AT:jdf

September 30, 2025

Laura Jester, Administrator
Bassett Creek Watershed Management Commission
P.O. Box 270825
Golden Valley, MN 55427
Laura.jester@keystonewaters.com

Dear Ms. Jester,

Subject: Minnesota Department of Health 60-Day Review of the Bassett Creek Watershed Management Plan

The Minnesota Department of Health (MDH) Source Water Protection (SWP) Unit appreciates the opportunity to review the Bassett Creek Watershed Management Commission (BCWMC) Draft Watershed Management Plan (Plan). MDH SWP staff also appreciated the opportunity to be involved in the TAC and provide preliminary feedback during the development of the Plan.

Overall, the Plan is written in plain language, is well-organized, and contains helpful figures and other visualizations, which will allow readers to more easily understand and navigate the Plan. In particular, Chapter 3: Issues and Goals is laid out very nicely; it is easy to follow, has all of the important information, and is visually appealing.

Enclosed, please find an Excel spreadsheet with detailed comments on the 60-day draft of the Plan. Some of these comments include:

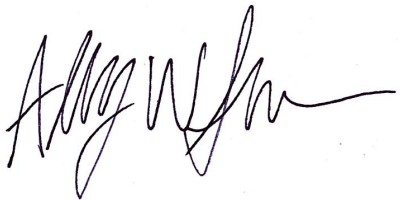
- The Executive Summary is very helpful and is a great overview of the Plan.
- Consider revisions to various statements regarding MDH's roles and responsibilities throughout the Plan. Suggestions are included in the detailed comments.
- Ensure all goals in the Plan are specific and measurable. MDH SWP staff are available to assist with this regarding groundwater-related goals, if that would be helpful.
- Consider, when discussing chloride loading, that chloride is also an issue in groundwater. This is specifically mentioned in the Groundwater Atlas of Hennepin County.
- MDH commends BCWMC for inclusion of various references to multiple benefits. Specifically, including groundwater improvements as a "secondary benefit" for the CIP prioritization matrix helps elevate multiple benefits projects for completion. If we can ever be of assistance in this determination, please do not hesitate to reach out.
- Consider if it may be useful to mention surface water contribution areas (SWCAs) within drinking water supply management areas (DWSMAs) in the watershed. In these areas,

data indicates a direct connection between surface water and municipal well water, which is an example of an important groundwater-surface water interaction in the watershed.

- Although not explicitly part of the Plan, MDH commends BCWMC for their consideration of groundwater and drinking water quality impacts in the Requirements for Improvements and Development Proposals.

Thank you again for the opportunity to review and comment on the Plan. If you have any questions or if MDH can be of any assistance, please feel free to contact me at (651) 201-4386 or abby.shea@state.mn.us. We look forward to working together with BCWMC during implementation of the Plan to achieve mutual goals.

Sincerely,



Abby Shea, Principal Planner
Minnesota Department of Health
Source Water Protection Unit
PO Box 64975
St. Paul, MN 55164-0975
www.health.state.mn.us

Enclosure: MDH-BCWMC 60-Day Comments

CC: Anneka Munsell, MDH Source Water Protection Unit
Dereck Richter, MDH Source Water Protection Unit
Danielle Luzinski, MDH Source Water Protection Unit
Steve Robertson, MDH Source Water Protection Unit
Jen Dillum, BWSR Board Conservationist
Reid Christianson, MDA
Megan Moore, DNR
Katie Kowalczyk, MnDOT
Water Resources Planning, Metropolitan Council
Melinda Neville, MPCA

BCWMC Watershed Management Plan 60-Day Review Comments - Minnesota Department of Health

Comment ID	Section	Page	Comment
1	Exective Summary		1 The Executive Summary is very helpful and is a great overview of the plan.
2	Figure 1-2		15 Consider adding to MDH's list of responsibilities: well permitting and fish consumption guidance. The MDH SWP Metro Planner, Abby Shea, can assist with a reword of this blurb if necessary.
3	2.4 Geology and Groundwater		20 The Tunnel City Group should be included in the list of the major bedrock aquifers, resulting in five major bedrock aquifers.
4	2.4 Geology and Groundwater		20 The way that the third full paragraph on this page is worded is a bit off. MDH's responsibility is to ensure safe and adequate drinking water to protect human health, including both groundwater and surface water sources of drinking water. In order to clearly distinguish between MDH and MPCA responsibilities, we suggest the following reword starting with the second sentence: "The Minnesota Department of Health (MDH) protects sources of drinking water by defining the protection areas managed by public water suppliers (called drinking water supply management areas, or DWSMAs), developing protection strategies through creation of source water protection plans, and supporting protection activities through technical and financial assistance. Additional drinking water programs focus on well permitting, water operator training, monitoring, testing, and treatment. Public water suppliers with their own groundwater source of drinking water are required by MDH to develop Wellhead Protection Plans (WHPPs) to manage their DWSMAs. In addition, stormwater management..."
5	Chapter 3: Issues and Goals	overall	Ensure all goals in the plan are specific and measurable. If the watershed would like any assistance with this regarding the groundwater-related goals, please reach out to the MDH SWP Metro Planner, Abby Shea, and we will be happy to brainstorm.
6	Chapter 3: Issues and Goals	overall	Really like how this chapter is organized. It is easy to follow, has all the important info, and is visually appealing. Great work!
7	3.2 Chloride Loading		35 Other sections of the plan note that there are some private well users in the watershed. If any of these users are also on a septic system, consider rewording the top of the second column on this page, as this discharge would not enter a municipal wastewater treatment plant. The "tools to address chloride loading" section lists studies to evaluate sources of chloride pollution. Is there more to be done regarding these studies? If so, should that be a goal in the plan, to evaluate sources of chloride pollution? Currently, the issue statement implies only road salt is an issue.
8	3.2 Chloride Loading		35 Consider mentioning that chloride is also an issue in groundwater. Chloride in groundwater is explicitly called out in the Groundwater Atlas of Hennepin County. They do state that elevated and anthropogenic chloride in groundwater in the county appears to coincide with dense road networks, but also consider the studies mentioned in the previous comment.
9	3.7 Groundwater-Surface Water Interaction		48 There are no goals related to the second part of the desired future condition of Hennepin County developing and implementing a county groundwater plan. Can a goal be created for this, even if focused on advocacy for the plan?
10	3.7 Groundwater-Surface Water Interaction		48 Consider if it may be useful to mention the surface water contribution areas (SWCAs) within the watershed that are part of the new West Metro Multi-Community DWSMA. In these areas, data indicates a direct connection between surface water and municipal well water, which is an example of an important groundwater-surface water interaction in the watershed. If you would like to discuss this or would like assistance with wording this, please reach out to the MDH SWP Metro Planner, Abby Shea.
11	3.10 Groundwater quality		52 Consider adding unused, unsealed wells to the middle paragraph when listing potential sources of contamination. This is one of the biggest sources and is a source that is relatively straightforward to address with education and outreach, along with cost-share dollars (Hennepin County has a cost-share program already established to refer property owners to). Acknowledging this in the plan may allow for additional funding opportunities.
12	3.10 Groundwater quality		52 In the last paragraph in the left column, suggest changing "To limit groundwater contamination" to "To limit contamination of drinking water sources" in order to more accurately convey MDH's roles and responsibilities.
13	3.11 Impact of Climate Change		53 When discussing what can be damaged due to flooding from increased precipitation, consider also explicitly including water wells. Or explicitly including wells in "infrastructure" if that is defined.
14	3.12, 3.18, and Table 4-5	57, 67, 105	Really like to see the call out of multiple benefits projects!
15	3.13 Groundwater Quantity		58 Consider noting that some residents get their drinking water from private wells here like in other sections
16	3.14 Public Awareness and Action		60 For these goals, do you have the baseline data to know if you have increased knowledge? If not, is there a metric metric to use than just an increase?
17	3.16 Recreation Opportunities		63 Consider noting that the Lakefinder website referenced in this section also includes any fish consumption guidance that may differ from the statewide guidance for a particular lake. More information is available on the MDH website: https://www.health.state.mn.us/communities/environment/fish .
18	4.1.1 Inter-Agency Planning and Collaboration		78 It is unclear what kind of "groundwater action plan" the watershed is looking for here, as it is not mentioned elsewhere in the plan. Is this referring to a county groundwater plan? Or other types of plans? If the latter, there are other plans such as source water protection plans and the Met Council Water Supply Plan (within the new Water Policy Plan within Imagine 2050) that already exist and can be implemented with assistance from the watershed.
19	4.1.3.1 Project Review and Permitting Process		81 Consider briefly explaining what the BCWMC will look for when reviewing applications to the MDNR.
20	4.1.8 CIP		91 Really like to see groundwater improvements included as a "secondary benefit" for the CIP prioritization matrix. This helps elevate multiple benefit projects. If we can ever be of assistance in this determination, please do not hesitate to reach out.
21	4.3.1 Funding Sources; Grants		98 Consider calling out MDH's Groundwater Protection Initiative-Accelerated Implementation Grant (https://www.health.state.mn.us/communities/environment/water/groundwater/accimprgrant.html) as an example of an MDH grant program applicable to the watershed's work. Cities with a source water protection plan are also eligible for Source Water Protection Grants (https://www.health.state.mn.us/communities/environment/water/swp/grants.html) that can be used to complete common objectives between their plan(s) and the watershed plan.
22	A.5.2.1 Bedrock Aquifers	A12	The Tunnel City Group should be included in the list of the major bedrock aquifers, resulting in five major bedrock aquifers.
23	A.5.2.1 Bedrock Aquifers	A12	Check with each city to ensure their water supply information is correct, including number of wells and aquifers used.
24	A.5.3 Wellhead and Drinking Water Protection	A13	Suggest applying the language provided in comment 4 in this section of the plan as well.
25	A.5.3 Wellhead and Drinking water protection	A13	Really appreciate the inclusion of Figure A-5! Since these areas change over time, consider also linking to MDH's Source Water Protection Map Viewer in the text for future reference: https://www.health.state.mn.us/communities/environment/water/swp/mapviewer.html . The map viewer also includes non-municipal DWSMAs and surface water DWSMAs (many currently in the progress of being updated). Note that there are two non-municipal groundwater systems with highly vulnerable DWSMAs in the watershed. This may be worth mentioning as these public water systems often need more partnerships and assistance to protect their source water.
26	Figure A-5	A14	Consider adding surface water contribution areas (SWCAs) to the map. These are important for groundwater-surface water interactions, as noted in comment 10 above. At this time, the only SWCAs would be those in the West Metro Multi-Community DWSMA. A shapefile can be sent upon request. You may request this from Abby Shea or the MDH SWP Metro Hydrologist, Anneka Munsell.
27	BCWMC Requirements	n/a	MDH commends the watershed for their consideration of groundwater and drinking water quality impacts in their Requirements for Improvements and Development Proposals. The flow chart is really helpful and is consistent with infiltration requirements and recommendations in the MPCA stormwater manual. Also, the first step is site review which includes reviewing the county geologic atlas, local groundwater levels, DWSMA/wellhead protection maps, potentially contaminated sites, etc.
28	Overall	overall	MDH SWP staff have appreciated the opportunity to be involved in this watershed planning process through participation in various TAC meetings. We remain available for technical assistance and look forward to continuing to work together in the future!



September 25, 2025

Laura Jester
Bassett Creek Watershed Management Commission
16145 Hillcrest Ln
Eden Prairie, MN 55346

RE: Bassett Creek WMC 2026-2035 Watershed Management Plan 60-day Draft
Metropolitan Council Referral File No. 23115-1

Dear Ms. Jester:

The Metropolitan Council (Met Council) has completed its 60-day review of the Bassett Creek Watershed Management Commission's (BCWMC) 2026-2035 Watershed Management Plan (Plan), as required under Minnesota Statute 103B.231. The Bassett Creek Watershed Management Commission's Plan is consistent with Met Council policies and the Council's *Water Policy Plan*.

Staff commend the WMC for developing a watershed management plan that includes a thoughtful overview of the makeup of the watershed, as well as discussion of what makes this watershed unique, along with a comprehensive listing of issues, associated goals, policies, and strategies.

Met Council staff applaud the ambitious chloride loading goals which are consistent with the TCMA Chloride Management Plan. Met Council staff would also like to highlight partnership efforts and innovative implementation that led to the removal of Wirth Lake (2017) and Sweeney Lake (2024) from the list of nutrient impaired lakes.

Met Council staff also welcome the Plan's focus on water equity through priority issues in Sections 3.15 and 3.20, while also adopting usage of a social vulnerability index to prioritize water equity work within the watershed.

While the Plan is consistent with Met Council policies, the following comments are offered to highlight potential improvements to the Plan:

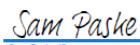
- **Section 2.1 Climate and Precipitation.** This section could benefit from added discussion focusing on increased freeze/thaw cycles which influences use of chloride use for de-icing.
- **Section 2.9 Pollutant Sources.** The Plan makes reference to contaminated land and sites enrolled in the Voluntary Investigation Cleanup (VIC) program. The Council encourages BCWMC to work with its partner cities, when appropriate, to support applications for [Met Council Tax Base Revitalization Account](#) grants for funding site cleanup to enhance surface and groundwater quality within the watershed.
- **Goals language.** The Met Council encourages the BCWMC to review the goal language within the Plan to add specificity to goals where appropriate. For example, goal language in BCV1 is specific and therefore

measurable because it applies to a given geography. The Met Council recognizes that goals that are watershed-wide are more difficult to ascribe measured outcomes to, given different characteristics across watershed projects. Goals focused on specific lakes, like goal WQ2 could be strengthened by adding specificity to the term 'statistically significant improvement'.

- **Conditional language.** The Plan would be strengthened if conditional language was revised to more active and concise verbs across some goals, like REC2, WQ24, CF1.
- **Section 3.7 Groundwater-Surface Water Interaction.** The Met Council is performing studies and research on the topic and would welcome collaboration with BCWMC.
- **Section 3.9 Degradation of Upland Areas.** The Met Council is developing a tool that will assist local governments in meeting their natural systems requirements in the 2050 planning cycle which will include identification of areas for natural systems protection or enhancement. This tool should be available for stakeholder use in early 2026. The Met Council recommends that BCWMC work with partner cities to identify natural systems opportunities, both territorial and aquatic, with city 2050 comprehensive plans.

Thank you for the opportunity to participate in the TAC for this effort—we appreciate seeing comments and suggestions offered through our letter or participation in that committee reflected in the draft content. Also, thank you for the opportunity to review and comment on this plan. If you have any questions regarding these comments or wish to discuss them in greater detail, please contact Eric Wojchik at 651-602-1330 or email at eric.wojchik@metc.state.mn.us.

Sincerely,


Sam Paske (Sep 23, 2025 08:19:37 CDT)

Sam Paske
Assistant General Manager, Environmental Services Division

cc: Jen Dullum, Minnesota Board of Water and Soil Resources (BWSR)
Judy Johnson, Metropolitan Council District 1
Reva Chamblis, Metropolitan Council District 2
Dr. Tyronne Carter, Metropolitan Council District 3
Robert Lilligren, Metropolitan Council District 6
Yassin Osman, Metropolitan Council District 7
Anjuli Cameron, Metropolitan Council District 8
Amber Turnquist, Metropolitan Council Sector Representative
Shawn James, Metropolitan Council Sector Representative
Freya Thamman, Metropolitan Council Sector Representative
Eric Wojchik, Metropolitan Council Water Resources Planning
Metropolitan Council Reviews Coordinator
Michael Sund, Metropolitan Council Community Relations Consultant
Elias Montesa, Metropolitan Council Community Relations Consultant

HENNEPIN COUNTY

MINNESOTA

September 30, 2025

Attn: Laura Jester
Bassett Creek Watershed Management Commission
Administrator
c/o 16145 Hillcrest Lane
Eden Prairie, MN 55346

RE: Bassett Creek Watershed Management Plan – 60-day Notice

Dear Laura,

Thank you for the opportunity to review the draft Bassett Creek Watershed Management Commission (BCWMC) Comprehensive Watershed Management Plan (CWMP). The level of thoughtfulness and detail described in the plan reflects the significant effort the Commission and its partners put into its development. We'd like to specifically highlight these items:

- The Commission's development of a Land and Water Acknowledgement and goals and actions listed throughout the plan including incorporating Dakota names, history, and knowledge into programming and working more earnestly to establish relationships with underrepresented communities to better enrich environmental outcomes for those communities. This aligns very well with the county's goal of eliminating disparities and actions the county has recently taken since declaring racism a public health crisis in 2020.
- The Commission including chloride reduction as a high priority with goals to address chloride loading across the watershed and to decrease average chloride concentrations in Bassett Creek by 10% during the plan period. The inclusion of a requirement for development projects to have a chloride management plan is novel but necessary to begin addressing chloride runoff at scale.
- Development of a watershed-wide wetland inventory and assessment and identification of priority wetlands. The county is also focusing on the importance of wetlands for water quality, habitat value, and climate resiliency and we look forward to partnering with the watershed on opportunities to further protect and restore our critical wetland resources.
- Continued support for preventing the introduction of new aquatic invasive species (AIS) into lakes and creeks. The county, watershed, and partners have worked hard to minimize new infestations, notably including the rapid response to the Eurasian Watermilfoil infestation discovered at Sweeney Lake which was noted on page 44 of the plan.
- Continued support for education and community engagement and our partnership with the West Metro Water Alliance (WMWA), which was noted as part of several goals throughout the plan, reflecting well the value the partnership brings in addressing many of the Commission's plan goals.

Hennepin County Environment & Energy
300 South 6th St, MC 679, Minneapolis, MN 55487
www.hennepin.us/environment



In addition, we're excited to see the Commission better consider the carbon footprint of their projects. We'd also encourage that, when making this assessment, the Commission consider the climate resilience co-benefits of your projects, such as but not necessarily limited to: stormwater management, supporting biodiversity, flood mitigation, air quality improvements, and reduction of the urban heat island. An understanding of these benefits will help the Commission and its partners better determine and communicate their contribution to climate impacts and our progress building long-term climate resilience.

The goals and actions listed above are but a few of the goals and actions laid out in the plan but represent important intersections in our work and opportunities for continued collaboration that my colleagues and I look forward to working on with you in the years ahead.

We applaud BCWMC commissioners and staff on their work to create a plan that thoroughly summarizes the Commissions' goals and strategies for the next 10 years. Thank you for providing this opportunity to provide feedback on the draft CWMP. We look forward to continuing our work with your great organization.

Sincerely,

Kris Guentzel

Land & Water Supervisor

612-596-1171

Kristopher.Guentzel@hennepin.us

MPRB comments on Bassett Creek Water Management Commission 2025 Plan Update

Item	Section	Page	Comment
	Exec Summary	3	Table on Page 3 is critical to the plan, consider adding a column with page # references to the plan sections that address the goals or links in the pdf version. Consider adding a table with the naming rubric of the goal abbreviations.
	Exec Summary	4	Is the bulleted list of medium and low priority issues in an order? It is not alphabetized, so it appears to be in an order. If there is a reason behind the order, can a sentence be added to state this?
	Exec Summary	6	Table that refers to policy numbers - May want a table in the appendix or elsewhere that clearly states the policy numbers and names and the goal abbreviations and titles to make the document more useful for a casual user or for use at-a-glance.
	Introduction 1.4	13	MPRB supports the Commission's desire to ensure that the governance structure best meets the goals of the organization.
	Introduction 1.7	16	Thank you to BCWMC and the Plan Steering committee for a robust process to gather feedback and ideas on the next generation plan.
Accessibility			Alt text is not present for all of the figures, where alt text is present, it is not descriptive, this may be something that was planned to add before final publication, but I thought I would mention. You may want to add more specificity to the BCWMC to the alt text for better context for readers using accessibility tools.
	Land and Water Res	18	Thank you for the detailing the effects of climate and precipitation on water resources and the additional stressor that extreme weather events and climate change poses to natural water systems in addition to the effects of climate change on flood control systems.
Minor clarification		26	Final paragraph, do you want to specify that grit is for traction and not deicing? Statement could read, using traction products rather than chloride-based deicers and/or sweeping up salt
	3.15	62	MPRB commends BCWMC on making equity and engagement of diverse communities a priority in this plan. To serve the entire commission population, all groups must be engaged. Co-naming the resource with Dakota place-names is a good first step toward educating residents on the long history of the landscape and stewardship of its resources.
	3.3	39	MPRB agrees with the idea that there should be a baseline expectation of lake shore conditions, and that it makes sense for lakes in a watershed to be assessed similarly. Will there be a BCMCW fund to assist in restoration?
	3.4	41	MPRB agrees with the idea that watershed-wide assessment of wetlands is important. MPRB parkland may have areas that could be priority for restoration, like South of Glenwood, where volunteer efforts could assist in long term upkeep. The former Gention Meadow site outside of Eloise Butler Wildflower Garden is one area where collaboration on a restoration project could be possible.
	3.5		MPRB agrees with prioritizing Aquatic Invasive Species detection and management due to these species impacts on water quality and ecological integrity. One suggestion would be to include species that could impact wetland and waterway function and integrity like invasive phragmites, or other potential invaders like water soldier or water chestnut.
	3.6	45	MPRB appreciates BCWMC's attention to the issue of streambank integrity and gullyng. We appreciate the past partnership on capital projects addressing Bassett Creek bank stabilization along MPRB lands in both Golden Valley and Minneapolis and look forward to future partnership. Additionally, it is appreciated that the the issue is tackled watershed-wide and prioritized in projects and programs as sediment eroded upstream causes environmental degradation downstream.
	3.8-3-9		Degradation of riparian and Upland areas: MPRB appreciates the acknowledgement in the plan of the importance of both upland and wetland riparian areas in the watershed. MPRB's Natural Areas Plan will be guiding the park system's priorities for management and restoration and could assist in determining where MPRB and BCWMC can partner to meet common goals. https://www.minneapolisiparks.org/wp-content/uploads/2022/05/MPRB-Natural-Areas-Plan_Phase2_FINAL.pdf
	3.11		MPRB appreciates the BCWMC's attention o the impacts of climate change on hydrology, as MPRB park and natural assets are also impacted by this issue. For example, more frequent floodplain utilization impacts playability in certain areas of Wirth Golf, as well as path/riparian corridor use along the creek itself. We look forward to continuing partnerships in the area of adaptation within the watershed.
	3.12	56	MPRB agrees that coordination between the agencies is needed to best guide the development and redevelopment along the Bassett Creek Corridor. High-quality and well-maintained riparian parks could be one of the multiple benefits achieved via close coordination.
	3.14	60	The goals listed in this section have reference numbers listed, which is helpful when reading the table 4-5. But table 4-5 also uses the Activity ID codes that can only be found in the Appendix C of a separate document. Also, as far as getting any direction to complete educational activities to fulfill the goals, having 22 goals listed in a clump of 6 different activities would make that very difficult. Is there a possibility of breaking out the educational goals in a smaller spreadsheet or table to help make connections more clear?
	3.16	63	MPRB Environmental Education provides free introductions to water recreation along with stormwater education via free canoeing sessions at Wirth Lake. This and other events could be an opportunity to partner on the shared goal of providing recreational opportunities to watershed residents. It should also be noted that proximity of a waterbody is important to its recreational use and desirability to the surrounding community. The commission may want to create a separate ranking method to assess recreational desirability and opportunity to use when ranking restoration projects.
	3.17	65	Historically BCWMC has been able to carry out its mission in its current format; however, this structure has limitations. MPRB supports the goal of right-sizing the organization and ensuring that the structure is capable of meeting future needs. With better information, the Commission can determine what structure is best to meet goals and better understand the level of prioritization needed if the structure cannot meet all goals.
	3.19	69	The BCWMC plan goals are ambitious and many projects are front loaded in the 10-year plan period. Planned reassessment and recalibration of goals will be important to stay on track and ensure progress is made in priority areas. Writing reassessment directly into the plan is a smart way to ensure that reassessment is timely and used to adapt management strategies.
	3.2	70	Ensuring that projects and programs are equitably driven will serve BCWMC into the future as this will ensure that that the residents who fund the commission are educated on the benefits of BCWMC's mission. As the Commission makes progress towards this goal, the progress assessment step may be utilized to adapt to changing conditions and better knowledge of needs and desires of the communities within the Commission boundaries. The outcome would be a more effective, greener, and more equitable watershed.
	3.21	72	From Page 72, and Figure A-7, it was unclear how many County ditches there are that the Commission is responsible for. A table with the ditch segments, current ownership, and number could clarify this. The description of ditches on Page 78, within implementation, is more clear and could be referenced.

Item	Section	Page	Comment
	4.1.5.1	83	MPRB values the monitoring partnership with BCWMC, and will continue Wirth and Spring Lake Monitoring on the MPRB's regular schedule. MPRB also conducts beach monitoring at the Wirth Lake Public Beach, AIS monitoring in all MPRB waterbodies, and in some years MPRB's regular stormwater monitoring evaluates stormwater within the BCWMC boundaries. We look forward to the continued partnership that has been productive in meeting both organizations' shared goals to protect and enhance natural resources.
	4.1.6	84	MPRB supports the Commissions AIS management strategies. MPRB conducts a robust AIS management and early detection program, and values the partnership of the BCWMC. Expanding surveillance to include species that may impact free flow of water or riparian quality may be an area the Commission would consider in the future.
	4.1.7	85	Management of the Flood Control Project is central to the mission of the WMC. Although the flood control project is outlined in the implementation section, there was no corresponding flood control goal. Is this a missed opportunity to ensure that programs are supported by clear organizational goals? Education of the public on the presence and importance of the flood control project may also be necessary to ensure that the public understands the importance of funding the Commission's programs that are central to maintenance of the flood control project.
	4.1.9		Fully agree with statements of augmenting but not duplicating activities - we would all benefit from this! Also, would definitely want to partner with Watershed tours on MPRB parklands and have MPRB educators involved as appropriate.
	4.3		Commission funding is complex. Section 4.3 is a good overview with details of all of the funding sources. Is there a way to put all of the sources in a table so they can be seen at a glance? This may make it easier to ingest the details.
	Table 4-5		Given the scope of the new plan it is prudent to assume administrative costs will increase.
	Table 4-5		The new focus areas in Planning and Collaboration may include new opportunities to collaborate on water resources issues and opportunities on and adjacent to MPRB parkland.
	Table 4-5		MPRB is excited for the outcomes of the high priority studies the Commission may undertake, particularly around the subjects of groundwater, wetlands, and lakeshores.
			MPRB also values water quality monitoring and looks forward to continued monitoring, partnerships, and data sharing in the Bassett Creek Watershed. New Streambank monitoring efforts may inform future projects or changes in management practices.
		AIS-1 FCP-2	minor comment: typo in Description column of AIS 1 and FCP-1 and 2, add the section reference
		EE-7	Once cost share programs are developed per EE-7, it seems there would be opportunities for partnership to enhance MPRB efforts in many of these areas
	Table 4-6		It should be noted there is potential for wetland restoration in the Wirth Lake watershed, on example is the wetland South of Glenwood and North of Eloise Butler Wildflower Garden. As of Fall 2025, MPRB staff are currently exploring options with the Friends of Eloise Butler, and U of M. This area was termed "Gentian Meadow" in the time of Eloise Butler, and has altered hydrology since the construction of Glenwood Avenue. The area has potential for high quality and sustainable restoration.
	Table 4-6	ID 28	MPRB could also be a partner in streambank restoration in portions of the Creek in Minneapolis where there is parkland.
	Table 4-6	ID32	MPRB is also a potential partner in chloride reduction as a multi-site landowner.
	Appendix	Definitions	Minneapolis Park and Recreation Board (no S on park)
		A5.2.2	Surficial aquifers: May want to point out the existence of multiple flowing springs in the lower watershed, as it is an interesting feature of this area, and the high mineral content of BCWMC groundwater which can be seen in iron floc in wetlands and lakes in at least the lower section of the district (and is visible during recreational access).
	Table A-3		Should Birch Pond be included in this table? Birch is shown on some figures but not on others. At 2.6 acres it is similar in size to the smaller ponds on the list, 7M deep, and publicly accessible
	Figure A-8		It is difficult to discern the "moderate" from Wetland in this map on a screen
	A.6.4		May consider adding Birch Pond to the inventory, as it is on public land and accessible to the public.
	A.7.1.5		Please Add MPRB Water Resources website for additional information and reports. It may also be noted that MPRB conducts beach monitoring at Wirth lake within BCWMC, and MPRB's stormwater monitoring program in some years monitors withing BCWMC (example: Heritage Park) https://www.minneapolis-parks.org/park-care-improvements/water_resources/annual-water-resources-reports/ https://minneapolis-parks.maps.arcgis.com/apps/webappviewer/index.html?id=88319f73c7904adcbabccacdf38bbf1
	A.8.6.1		MPRB collects lake level data on Wirth Lake weekly, this level of data is the minimum needed to detect potential backflow events from Bassett Creek into Wirth Lake. This phenomenon occurs only in extreme events after the commission funded project at the outlet instead of regularly.
	Appendix C		The goals listed in section 3.14 have reference numbers listed, but not in Appendix C - would be nice to have the consistency. Like that the goals supported and Activity code are listed at the top of each section. Section 10.0 Program Evaluation lists measurable tasks for evaluation, but does not tie to specific activities or goals, which again I think would be helpful from a planning standpoint for how the educational activities are set up and run. Also, in the Overview paragraph (perhaps elsewhere in this appendix) the Table is listed as 4.5, but should be 4-5 as it is labeled in the Management Plan document.
	Appendix D		MPRB appreciates that the Level II performance review noted that there is a good working partnership between BCWMC and MPRB. The Review noted that increased collaboration was also desired with MPRB. As close collaboration between our organizations benefits MPRB park users, watershed residents, and residents of our region, and ecological resources we also wish to work towards even better collaboration in the next plan term.
	Appendix F		MPRB appreciated the level of outreach and engagement to the public and with MPRB in the development of this plan, and appreciated the multiple opportunities to engage and comment. As the watershed plans are so detailed, and have a long life, the length of the engagement and writing process was appropriate.
	3.12	56	MPRB wholeheartedly supports the categorization of the Bassett Creek Valley Flood Risk Reduction item as high priority. MPRB has collaborated with partners for years on improving development potential, recreational access, water quality, and habitat improvements throughout the Valley. We are interested in expanding and enhancing parkland in the context of this collaborative vision. Specific mentions of MPRB might be included in this section, particularly on page 57: Inter-agency planning

September 29, 2025

Bassett Creek Watershed Management Commission
c/o Laura Jester, Administrator

Subject: City of Minneapolis Comments on 10-year Watershed Management Plan

Laura,

Thank you for the opportunity to comment on the Bassett Creek Watershed Commission's 10-year Plan. While we appreciate this statutory comment period we especially appreciate the many, varied opportunities provided to participate in the creation of this Plan.

Overall, the Plan is comprehensive and well-written. There was a lot of time and care taken in ensuring that a significant update like this had the input and support from the Commissioners, member cities, and the participating public through the plan steering committee and development workshops.

Please find attached comments from the City of Minneapolis. If you have any questions or need any additional information please contact me at Elizabeth.Stout@MinneapolisMN.gov. Thank you.

Sincerely,



Elizabeth Stout, PE, Principal Professional Engineer
Minneapolis Public Works – Surface Water & Sewers

General comments:

- The co-naming of places with native Dakota names is appreciated. This acknowledgement of the history of Ĥaĥá Wakpádaŋ / Bassett Creek is, as is stated in the Commissions land and water acknowledgement, “a step toward healing for the land, watershed, and peoples who live in the watershed today.”
- If it has not already been done I highly recommend utilizing resources from the State Office of Accessibility or other tools to ensure that the Plan is accessible for everyone. For example, adding more specificity to the alt text for readers using accessibility tools.
- Acronyms and abbreviations are not well defined, including the naming rubric for the goal abbreviation. Please consider adding more comprehensive definitions and explanations.

Executive Summary

- **Page 3:** The table on this page contains significant information on the prioritization of goals within the plan. Please consider a page # references to the plan sections that address the goals or links in the pdf version.

Section 1

- **Section 1.4, Page 13:** The City of Minneapolis fully supports the Commission’s plans for an organizational assessment to evaluate options for changing governance structures and/or funding options.

Section 3

- **Table 3-1, Page 27:** The City appreciates the clear prioritization of issues as high/med/low. The Commission will need to ensure that these prioritizations will be reflected in future work and funding allocation over the life of the plan.
- **Section 3.1, Page 34:** While studies and monitoring have their place as tools to address Impaired Waters, capital projects that actually improve water quality should be a higher priority on the list.
- **Section 3.2, Page 36:** The City appreciates having clear and measurable goals such as reducing average chloride concentrations by 10%. Please explore setting more numeric, measurable goals like this for other part of the plan implementation.
- **Section 3.5, Page 43:** The BCWMC’s AIS Rapid Response Plan is an effective tool for addressing early AIS infestations. Please consider providing a link in the Watershed Management Plan to make it more easily accessible.
- **Section 3.11, Page 54:** The Plan lists Atlas 14 as an additional resource. There is currently an Atlas 15 under development. The Commission should commit to using the most up to date climate data for modeling and floodplain management when that new standard is adopted.
- **Section 3.12, Page 56:** The Bassett Creek Valley Area is a high priority for the City of Minneapolis, and we appreciate seeing that priority reflected in the BCWMC’s Plan.

- **Section 3.14, Page 60:** The BCWMC should continue to support clear and consistent public education and engagement. A better-informed public generally leads to better water quality outcomes and more support for future capital funding for project implementation.
- **Section 3.17, Page 65:** The City of Minneapolis strongly supports the assessment of the current BCWMC governance structure. The plan has very aggressive goals and to meet those goals changes may be needed in the operation and organization of the BCWMC. The BCWMC should work to develop a clear timeline for this assessment and for making any possible future changes well ahead of the next JPA cycle.
- **Section 3.19, Page 69:** With such aggressive goals program assessment will be a critical component of keeping the BCWMC's work moving forward. The cycle of assessment, recalibration, and trying amended approaches will be important to keeping a 10-year plan relevant for the long term.
- **Section 3.20, Page 70:** the City of Minneapolis commends the BCWMC in recognizing that equity and diversity are important goals for achieving watershed protection. As the BCWMC begins to implement and make progress towards this goal ongoing assessment of successes and barriers will need to be implemented to further this work.

Section 4

- **Section 4.1.1, Page 77:** While describing the timeline for the necessary organizational structure and staff capacity assessment the Plan should also acknowledge that changes to the JPA and buy-in from member cities will likely be necessary to implement change.
- **Section 4.1.7, Page 87:** Management of the Flood Control Project is central to the mission of the BCWMC. Although the flood control project is outlined in the implementation section, there was no corresponding flood control goal. Is this a missed opportunity to ensure that programs are supported by clear organizational goals? Education of the public on the presence and importance of the flood control project may also be necessary to ensure that the public understands the importance of funding programs that are central to maintenance of the flood control project.

From: [Dave Stack](#)
To: [Laura Jester](#); jmplzn@gmail.com
Cc: [Olson Fred-email](#)
Subject: Watershed Management Plan comments
Date: Monday, September 22, 2025 10:18:18 PM

Hello Laura and Jodi,

I have some ideas for comments for the 10-year plan. Is it ok for me to submit comments in an email like this? My apologies if any of my comments are redundant with ideas already in place with the Watershed Commission. Please feel free to let me know if any of my comments are off base in any way.

Here are a few comments:

--- I like the idea of keeping disturbance of the flowing creek bed to a minimum. This is to maintain long term establishment of habitat for fish, minnows, mussels, macroinvertebrates, etc.

--- I would like to hear from the experts about the idea of sporadic vegetated wetland floodplain areas adjacent to the flowing stream and with a water connection to the flowing stream. I am thinking this would be good for flood control, filtration of pollutants, habitat, and a refuge area for fish and minnows during torrential high flow events.

--- I would like to hear from the experts about the possibility of planning and constructing sporadic self-scouring habitat pools. I am thinking these could occur on the down-stream side of culverts and rock cross-vanes.

--- I like the idea of having the thalweg of the main stem as kayak friendly as possible: kayak friendly culverts, rock cross-vanes, etc.

Please let me know if these comments are not ok or relevant for one reason or another.

David Stack
ds329ds@hotmail.com
612-250-0724
3306 W. 46th St., Minneapolis, Mn 55410

Note: I lived in the Bassett Creek watershed for 23 years in a house that I still own. My son is living in this house now, and I still spend a lot of time there.

From: [Dave Stack](#)
To: [Laura Jester](#); jmplzn@gmail.com; [Adair Dick](#); [Olson Fred-email](#)
Subject: Re: Watershed Management Plan comments - (part 2)
Date: Thursday, September 25, 2025 3:28:31 PM

Hello again Laura and Jodi,

I See there will be a Fruen Mill tour 4:00 on Monday 29 Sept. I would like to attend, but have a prior commitment earlier that afternoon and maybe won't make it.

On the subject of the Fruen Mill area, I have a few comments:

--- I am wondering if additional flood plain could be constructed between the mill and Hwy 55? If so, could this new flood plain area be traded off against existing flood plain in the rough path area across the creek from the mill? And then could it be feasible to raise that path across from the mill a foot or two? I am wondering if this could be a way to construct a nice path there?

--- I am not a fan of dams that no longer serve a good purpose such as electricity generation, or with a lock for navigation, etc. I am thinking that a scenic rocky kayak friendly rapids chute could replace the little dam at the mill. Please correct me if I am wrong on this, but I am thinking this would be beneficial in a few ways. (1) this could lower the water level a few inches above the dam which would make the rough path across the creek higher and dryer. (2) this would remove the un-natural impoundment above the dam which would improve the natural stream habitat. (3) lowering the creek above the dam would add to flood water holding capacity. (4) lowering the water level above of the creek may lower the nearby groundwater level, which might be beneficial for commercial activity in the mill, Utepils area. (5) This would make the creek more kayak friendly in this area. And would give kayakers a little fun thrill floating down the chute. (6) This would improve fish passage in this area. I am thinking that native fish and minnows will thrive better if they have more connected stream habitat to swim up and down in. This would improve the mussel population because mussels need fish to survive.

Ok, this is all for now. I would love to get some feedback on my ideas whether confirming or correcting.

Thanks again,
Dave Stack -- ds329ds@hotmail.com
612-250-0724

From: Dave Stack <ds329ds@hotmail.com>
Sent: Monday, September 22, 2025 10:18 PM
To: Jester Laura <laura.jester@kestonewaters.com>; jmplzn@gmail.com <jmplzn@gmail.com>

Cc: Olson Fred-email <fholson@cohousing.org>
Subject: Watershed Management Plan comments

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David Stack
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612-250-0724
3306 W. 46th St., Minneapolis, Mn 55410

Note: I lived in the Bassett Creek watershed for 23 years in a house that I still own. My son is living in this house now, and I still spend a lot of time there.

From: [Eloise Butler](#)
To: [Laura Jester](#)
Cc: [Rachael C. Crabb](#); [Susan Work Wilkins](#); [Jennifer Olson](#); [James Shaffer](#); [Michael L. Jones](#); [Daniel Shaw](#); [Gabriel Bertilson](#); [Lauren Stromquist](#); [Sean Durbin](#); [Gary Bebeau](#)
Subject: Friends of the Wildflower Garden comment for BCWD Ten-year plan
Date: Wednesday, October 1, 2025 11:14:54 AM

Eloise Butler recognized the importance of preserving wetlands for biodiversity and for education--so much so that she and other school teachers successfully established what is today the Eloise Butler Wildflower Garden and Bird Sanctuary, centered on a pothole wetland in today's Theodore Wirth Park.

The Sanctuary once included the wetlands north and west of today's Garden boundaries, referred to as "The North Meadow" and "Gentian Meadow." They were likely a complex mix of some or all of the following: open water, emergent marsh, sedge meadow, shrub carr, rich spring fen, forested swamp and wet prairie. Today these wetlands are heavily degraded, with common and glossy buckthorn dominating much of the area. Most of the peat has decayed. Groundwater flow has dropped over the years, and the powerful springs that drew water-gatherers throughout history are dry. However, significant groundwater seeps and springs still flow along the edges of the surrounding hills. This means to us that actions to preserve this resource are urgently needed, and that restoration of this historic and inspiring landscape is still possible.

We encourage the BCWD add the restoration of these wetlands to its ten-year plan.

Our volunteers have been removing buckthorn and restoring uplands adjacent to these wetlands for 20 years. We have recently started work along the edges of these wetlands. Our efforts have reduced erosion of soils and excess nitrogen from the uplands and diminished the flow of invasive species seeds into the wetlands. However, volunteers alone cannot accomplish the restoration needed here.

We believe a hydrology study would be of significant value to understand the water budget for all of South Wirth Park. The results of such a study could be the basis for restoration, education and interpretation of what we believe is an important "hydrologic reserve"--in addition to its premiere status as an urban nature preserve.

The benefits of restoring the ecosystems of this area will be tremendous, particularly for carbon storage, groundwater retention, water quality, biodiversity, equity, accessibility, and education, among other important shared values.

Climate: restoring peatlands here will reverse the status of this area from carbon source to carbon sink. We believe this could be the most significant climate action we could take in Minneapolis Parks.

Groundwater: restoring peatlands and rewetting the site will improve water storage and help meter water out into the system more gradually.

Water quality: degrading peat sends excess nitrogen downstream—this would be reversed with restoration.

Biodiversity: restoring this complex would create one of the most biodiverse areas in the city.

Equity: Theodore Wirth Park has the highest priority in terms of equity ranking in the region.

Accessibility: the relatively flat trails here will be repaired by MPRB in the next year, creating an opportunity for one of the highest quality wheelchair-accessible nature experiences in the region.

Education: Proximity to Eloise Butler Garden and its comprehensive interpretive infrastructure enables significant educational opportunities for the public.

Thank you for considering this addition to your important work.

Friends of the Wildflower Garden