COON CREEK WATERSHED DISTRICT
Request for Board Action

MEETING DATE: August 27, 2018
AGENDA NUMBER: 9
ITEM: Review of Coon Rapids Local Water Plan

AGENDA: Policy

ACTION REQUESTED
Table the plan pending revisions to plan addressing 7 items

BACKGROUND
Minnesota Statutes 103B.235, Subd. 3 requires that each local unit shall submit its water management plan to the watershed management organization for review for consistency with the watershed plan.

The organization shall approve or disapprove the local plan or parts of the plan. The organization shall have 60 days to complete its review; provided, however, that the watershed management organization shall, as part of its review, take into account the comments submitted to it by the Metropolitan Council pursuant to subdivision 3a.

If the organization fails to complete its review within the prescribed period, the local plan shall be deemed approved unless an extension is agreed to by the local unit.

Coon Rapids submitted its revised Local Water Plan on July 12 making the 60 day mark August 26.

Minnesota Rule 8410.160 requires each local plan must, at a minimum, meet the requirements for local plans in Minnesota Statutes, section 103B.235. Each local plan must include sections containing a
1. table of contents;
2. purpose;
3. water resource related agreements;
4. executive summary;
5. land and water resource inventory;
6. establishment of goals and policies;
7. relation of goals and policies to local, regional, state, and federal plans, goals, and programs;
8. assessment of problems;
9. corrective actions;
10. financial considerations;
11. implementation priorities;
12. amendment procedures;
13. Implementation program; and an appendix.

**TIMELINE AND RECORD**

3/14/18 Received Rough DRAFT Local Surface Water Management Plan for review and comment

4/10/18 Review and comments to Coon Rapids on Rough Draft

7/23/18 Receipt of Review DRAFT of Local Water Plan

8/27/18 Board of Manager review of LWP

**FINDINGS**

Does the plan contain the sections required un MR8410.160 General Structure?

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Status</th>
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<tbody>
<tr>
<td><strong>Data and Information</strong></td>
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<tr>
<td>1. An executive summary stating highlights of the local water plan.</td>
<td>Partially meets requirements. By rule the executive summary must “…summarize[s] the highlights of the local water plan.” The draft plan executive summary is simply an overview of the planning purposes, watershed requirements, and broad table of contents. It should include a brief recap of problems and issues and the City’s general strategies to address them.</td>
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<tr>
<td>2. A summary of water resource management-related agreements, including joint powers agreements, into which the LGU has entered with watershed management organizations, adjoining LGUs, private parties or others.</td>
<td>Meets requirements.</td>
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<td>3.</td>
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<td>4. Maps of current land use and future land use.</td>
<td>Meets requirements. Section 2.2.4 and Figure 4 should identify the year and source of the existing land use data – the Met Council 2016 land use dataset?</td>
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<tr>
<td>5. Maps of drainage areas with paths, rates and volumes of stormwater runoff.</td>
<td>Meets requirements. Figure 7 would more clearly show flow paths between drainage areas if the arrowheads indicating the direction of ditch flow were larger. The plan notes that the city’s stormwater modeling has been superseded by the District’s XPSWMM model. Figure 8 depicts the storm sewer system. Outfalls into the Mississippi River should be identified with a distinctive symbol.</td>
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<tr>
<td>6. Identify areas and elevations for stormwater storage adequate to meet the performance</td>
<td>Partially meets requirements. No storage data is provided or referenced in the plan. As in #4 above,</td>
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<tr>
<td>Requirement</td>
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<tr>
<td>standards established in the Watershed Management Plan.</td>
<td>the Plan notes that the District’s XPSWMM model was created to better assess floodplain risks and BMP capacity/performance, however, it is unclear whether any assessment of the adequacy of available storage has been assessed or is planned.</td>
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<tr>
<td>7. Define water quality and water quality protection methods adequate to meet the performance standards established in the Watershed Management Plan.</td>
<td><strong>Meets requirements.</strong> Coon Rapids requires development and redevelopment to meet NPDES permit requirements of no net increase or reduced TP and TSS export post construction, and to infiltrate 1.1” of runoff from impervious surfaces. The city maintains and enforces an Erosion and Sediment Control ordinance. The city encourages development to be consistent with MIDS.</td>
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<td>8. Identifies regulated areas.</td>
<td><strong>Meets requirements.</strong> Section 2.4.4 notes there are two DNR Conservation Corridors in the city, in Bunker Hills Regional Park and along the Mississippi River corridor. These sites of biodiversity significance are designated for protection and conservation of key natural habitats. Figures are presented showing wetlands, public waters, wellhead protection areas, the Mississippi River Corridor Critical Area, and flood zones.</td>
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<tr>
<td>9. A listing and summary of existing or potential water resource-related problems wholly or partly within the corporate limits, including but not limited to areas of present or potential future local flooding, landlocked areas, and future storage needs..</td>
<td><strong>Partially meets requirements.</strong> Section 4 of the Plan provides a good overview of identified issues within the city and proposed corrective actions. An issue should be added to Section 4.2 that the Metro Chloride TMDL lists Pleasure Creek, Sand Creek, and Springbrook Creek as High Risk Streams having at least one chloride concentration value within 10% of exceeding the water quality standard. It should note the chloride management corrective actions the city will be taking to reduce chloride and prevent any further degradation. The plan does note in section 4.11.4 that elevated chloride concentrations generally are a current and developing issue and the city will continue to take salt management BMPs, and has included a water quality policy goal of implementing a salt management plan.</td>
</tr>
<tr>
<td>10. Provides that no application for development within the Watershed shall be determined to be complete by the local unit unless: (1). It contains at least the information required by the District pursuant to policy 4.1: Permit Procedures; and (2). It is consistent with the performance standards contained in the approved and adopted environmental ordinances</td>
<td><strong>Partially meets requirements.</strong> It is unclear whether the City’s stormwater ordinance requires that all permits, including watershed district review, be completed prior to any construction or issuance of a local permit.</td>
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<tr>
<td>Requirement</td>
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<td>of the local unit; and</td>
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<td>(3). It provides that no local permit shall be effective until the</td>
<td>Meets requirements. The plan states that the city will work closely</td>
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<td>review procedures cited in policy 4.1: Permit Procedures have been</td>
<td>with the District to ensure that its local controls are consistent with</td>
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<td>completed.</td>
<td>District requirements.</td>
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<td>11. Evaluation of LGU’s official controls and any planned revisions</td>
<td>Meets requirements. A table of structural and nonstructural actions,</td>
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<td>relative to the requirements of the Watershed Management Plan.</td>
<td>costs, and schedule is provided. Priorities are set forth in Section 4</td>
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<td></td>
<td>Assessment of Issues.</td>
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<td>12. Includes a table that briefly describes each component of the</td>
<td>Meets requirements.</td>
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<td>implementation program and clearly details the priority, schedule,</td>
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<td>estimated cost, and funding sources for each component including</td>
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<td>annual budget totals; and</td>
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<td>13. Contains an implementation program through the year to which the</td>
<td>Meets requirements.</td>
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<td>plan extends, consistent with MN Rules 8410.0160.</td>
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<td>14. A statement of the process to amend the local plan, consistent with</td>
<td>Partially meets requirements. The Plan should be more specific as to</td>
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<tr>
<td>Minnesota Statutes §103B.235.</td>
<td>what defines a major plan amendment, and how the City’s process is</td>
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<td>consistent with Policy 4.7, Certification and Approval of Local Water</td>
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<td></td>
<td>Management Plans Section 1.10 (Appendix E of the CCWD Management Plan).</td>
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<td></td>
<td>The plan should also note that it will be updated as necessary in</td>
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<td>response to updates to the watershed plan.</td>
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</tbody>
</table>

**Metropolitan Council Recommendations**

| 15.                                                                 | Not provided. |

**Other Notes**

<table>
<thead>
<tr>
<th>16. Impaired Waters listings</th>
<th>Table 2.3 Impaired Waters should note the currency of the impaired waters list. Is it the 2018 draft 303(d) list, the proposed 2016 303(d) list, etc?</th>
</tr>
</thead>
<tbody>
<tr>
<td>17. Metro Chloride TMDL</td>
<td>Section 2.3.6 should note that the Metro Chloride TMDL lists Pleasure Creek, Sand Creek, and Springbrook Creek as High Risk Streams having at least one chloride concentration value within 10% of exceeding the water quality standard. Impaired and high risk waters are of top priority for chloride reduction efforts.</td>
</tr>
</tbody>
</table>
OTHER ISSUES/CONCERNS
Attached

PRIOR DECISIONS
NA

OPTIONS

1. Approve Plan: Not advised. The plan submitted has been left intentionally general to provide the city with the maximum amount of flexibility and ability to adapt and adjust to the ever changing political, legislative and financial environments that the city perceives.

2. Table Plan: The plan could be tabled pending a redrafting of the plan and addressing the issues and concerns discussed in this staff report.

3. Deny Plan: Not Advised. The District could deny the plan, forcing the City of Coon Rapids to essentially start over at least with the planning process. This would be the most expensive and least constructive option for the City and would be wholly inconsistent with District actions in the past.

RECOMMENDATION

Table the plan pending revisions to plan addressing the following 7 items:

1. Inclusion in the executive Summary of the problems and issues and the City’s general strategies to address them.

2. Clarify whether any assessment of the adequacy of available storage has been assessed or is planned.

3. An addition to Section 4.2 that the Metro Chloride TMDL lists Pleasure Creek, Sand Creek, and Springbrook Creek as High Risk Streams having at least one chloride concentration value within 10% of exceeding the water quality standard. It should note the chloride management corrective actions the city will be taking to reduce chloride and prevent any further degradation. The plan does note in section 4.11.4 that elevated chloride concentrations generally are a current and developing issue and the city will continue to take salt management BMPs, and has included a water quality policy goal of implementing a salt management plan.

4. Clarify whether the City’s stormwater ordinance requires that all permits, including watershed district review, be completed prior to any construction or issuance of a local permit.

5. Specify what defines a major plan amendment, and how the City’s process is consistent with Policy 4.7, Certification and Approval of Local Water Management Plans Section 1.10 (Appendix E of the CCWD Management Plan).
The plan should also note that it will be updated as necessary in response to updates to the watershed plan.

6. Table 2.3 Impaired Waters should note the currency of the impaired waters list. Is it the 2018 draft 303(d) list, the proposed 2016 303(d) list.

7. Section 2.3.6 should note that the Metro Chloride TMDL lists Pleasure Creek, Sand Creek, and Springbrook Creek as High Risk Streams having at least one chloride concentration value within 10% of exceeding the water quality standard. Impaired and high risk waters are of top priority for chloride reduction efforts.
Corrections

Section 2: Land and Water Resource Inventory

- Page 5, 2.3.4: add “Springbrook Creek” to explanation of drainage system
- Document Page 7, 2.2.1 2nd paragraph- CCWD took on parts of Coon Rapids, Fridley, Blaine, and Spring Lake Park after Six Cities WMO dissolved
- Page 11, 2.6: Could add JPA with CCWD for the Lower Sand Creek Corridor Restoration Project
- Document Page 13, 2.3.7: When will WHPP Part 2 be adopted? It was completed Spring 2018
- Document Page 14, 2.3.8: add that Bunker Hills also has a city-owned Golf Course that is adding drought-tolerant fescue species to reduce irrigation need.

Section 3

- Section 3 Page 1-2: “WD” acronym used in Table 3.1 does not match description on page 2, “CCWD” – or add “WD” to Glossary on page 57
- Document Page 20, 3.3.2: CCWD Rules – replace “adaptation” to “adoption” of Atlas 14 by CCWD
- Document Page 20, 3.3.2: CCWD Rules – replace “wetland management” with WCA so it reads, “CCWD is also the LGU for WCA (see 3.3.3).”
- Document Page 21, 3.3.3: – put subtitle on page 21: Add, “Since 2014, CCWD has been the LGU…”
- Document Page 21, 3.3.3: – replace “fill” with “impacts”: so it reads, “WCA regulations generally focus on the prevention or mitigation of wetland impacts, while…”

CIP Table 6.1:

- Consider adjusting the cost estimates for projects identified in the SRA reports for inflation. Many of those projects are in 2009-2016 dollars. The footnote at the bottom on the table indicates everything is in 2017 dollars.
- #20: Remove from list; this pond slated for 2022 was already constructed in 2012 in partnership with CCWD
- #21-23: A couple dozen rain gardens have already been installed in these areas; I’m not sure how many more sites are feasible. There are also DWSMA conflicts in the area. Perhaps just include one line item for “neighborhood bioretention retrofits in undertreated catchments” to maximize flexibility to take advantage of opportunities that arise
- #24-25: Remove from list; these pond modifications have already been completed in partnership with CCWD
- #27: The bank stabilizations identified in the SRA have already been completed by CCWD. Could change to a general line item about supporting bank
stabilization efforts where active erosion is identified during routine ditch inspections by CCWD.

- #31: CCWD asked Wenck to explore this project. They said it likely not feasible due to elevation conflicts with existing storm sewer infrastructure.
- #34: I do not recall mention of the City playing a role in water quality monitoring elsewhere in the plan; I recommend providing more details

### Appendices

- 1427 pages? Seems like a lot. Can some of this be referenced and stored elsewhere.
  - Much of this information is outdated; example, page 430-1- Remove “Appendix H- Coon Creek Wetland Project Development Plan” (Coulee site at Hanson & US 10)
  - **Appendix TOC is not accurate; for example, note Figure 11**
  - Appendix A Figure 16 legend is confusing- is purple actually “Parcels not affected by CCWD’s Atlas 14 model and previously affected by FEMA Floodplain”
  - **Appendix B – Add ordinance 8-111**
  - Appendix C MS4 pond inventory pages 6-13 blank-can be removed?
  - Appendix C I think the SWPPP dated June 1, 2006 can be removed

### TMDL

- Section 2, Page 6, 2.3.4: Does SWAMP have the ability to track E. coli load reductions? If so, please include in bullet discussing TP and TSS reduction tracking

### Section 4: Assessment of Issues

- Page 1, 4.2.3: These creeks are impaired for recreation based on E. coli, not fecal coliform. Fecal coliform is no longer used as an indicator.
- Page 1, 4.2.3: TMDL approved by EPA, WRAPS approved by MPCA
- Page 1, 4.2.3. Add language to sentence: Coon Rapids was assigned categorical wasteload allocations “for each applicable pollutant (i.e. TSS, TP, & E. coli)” for each creek.
- **Document Page 28, 4.7.2: Corrective Action: Add – City will consider partnering with CCWD on watershed-wide projects**

### Section 5: Goals and Policies

- Page 1, 5.1: Add new section 5.13 to chapter outline
- Section 5.3: Consider adding a policy related to establishment/enforcement of proper pet waste disposal ordinances and/or implementation of pet waste clean-up stations within City-owned parks & trail corridors
• Document Page 38 - 5.6 Overall Goal 1: Add TMDL needs: and how to address them so it reads, “To inform and educate the public concerning urban stormwater, wetlands, and water quality management, how to address it.

• Document Page 39 - 5.6 Overall Policies 1: replace “medium” with “media”; replace “local grade school meetings” with “neighborhood meetings”

• Document Page 39 - 5.6 Overall Policies 3: add, “ and to help implement TMDL goals”

• Document Page 39 - 5.6 Overall Policies 4: add, “translation services”

• Page 9, 5.8, #9: City will implement their goose management plan to reduce TP “and E. coli” loading…

Section 6: Implementation Program

• Page 1, 6.1, 2nd paragraph: Shouldn’t the capital projects focus on TSS and E. coli reductions too instead of strictly phosphorus reductions? Coon Rapids has been assigned categorical WLAs for each of these pollutants

• #61: Very good idea; thank you for including this.

NPDES

• Document Page 18, below Table 3.1: Additional City Ordinances –add ordinance “8-111 Deposit of Materials on City Streets Prohibited” – because this is used on Outreach materials

• Document Page 29, 4.10.1: Corrective Action: Add “staff” to audiences listed

• Document Page 29, 4.10.1: Corrective Action: Add “trainings” to efforts listed

• Document Page 28, 4.7.1 Corrective Action: Add City to notify CCWD of water-related ordinance changes

• Document Page 52 CIP #43 - is this enough for printing costs + signage + possible pet waste disposal stations

CCWD Comp Plan - Issue: AIS

Section 4: Assessment of Issues

• Page 2, 4.2.4: Change “milfoil” to “Eurasian watermilfoil” at first mention; Change “DNR milfoil funds” to ‘a combination of association funds and AIS prevention and management grant dollars”. The DNR AIS management grants have not been available for a couple of years, but CLAA has received grants from the County AIS Prevention Aid funds the past couple of years. The 2016 milfoil treatment was not an “eradication” attempt, but was intended to be part of the long-term Eurasian milfoil management strategy. Perhaps mention how the City has been/will continue to (?) provide cost share dollars towards AIS treatment on Crooked Lake.
• Document Page 28, 4.6.1: – add the CLAA to last paragraph re: collaboration to address AIS in Crooked Lake.

CCWD Comp Plan – Surficial Groundwater trends
Appendix A
• Figure 11 of Surface water/Groundwater interaction is much appreciated.