

Pamela,

Please accept the attached Mpls Draft Critical Area plan comments from the Mississippi WMO. I apologize for the late submission. I mistakenly had the public hearing date as the comment due date. I will be attending today's meeting. Please call me if you have any questions regarding our comments.

Thanks,

Daniel Kalmon

Program Manager

Mississippi WMO

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Minneapolis Critical Area Plan Comments
Submitted by the Mississippi Watershed Management Organization:

General Comments:

- It is not clear how City's CA follows District boundaries or how City ordinances and regulations vary between the three Critical Area Districts (79-19, C10a).
- Is it the Cities intention to create one CA that provides ordinance overlay zones and regulations for each of the three Critical Area Districts? Or will the City be applying the 79-19 statute requirements on a case by case basing for projects and plans developed within the Critical Area?
- All land use decisions have a direct impact on water quality. The CA plan should be more explicit on how land use policies are going to impact water quality.
- Minneapolis should take primary management responsibility for most of the Critical Area because, the City of Mpls has land use authority. A map of properties where Minneapolis does not have land use authority should be provided in the Critical Area Plan to clarify other land use authorities in the Critical Area.

Specific Comments: Comment notation is as follows: (Reference to Draft CA) comment made (Reference to exe order 79-19)

1. Pg 8:
 - a. (IIA-5) Identify and map major vegetation (C1a1e)
 - b. (IIA-6) Identify and Map location of Wetlands and Drainages(C1a1b&f)
 - c. Needs identification and inventory of soils not suitable for urban development on-site waste disposal. This would also aid the identification of areas not suitable for stormwater infiltration and storage within Critical Area. (C1a1d).
2. Pg 11
 - a. (IIB1-4) Is this a listing of both existing and potential historic sites? Both are required.(C6a7)
3. Pg 12 -16
 - a. Need identification of discharge points(C5b)
4. Pg 21
 - a. (IIIA-1) Identify specific ordinances that meet 79-19 addressing public access (C6d-f & C7c).
5. Pg 24
 - a. (IIIA-5) Plan needs to better clarify land acquisition and public access dedication by developers in all Districts. What ordinance will address this?(C6d,e,&f)
 - b. (IIIA-6) Further develop transportation and utilities mitigation of their impact on the river and public access (C7a,b,c)

6. pg 25 -29
 - a. Need to identify how development site plans will address water quality impacts to river, mitigate adverse environmental effects, provide specific conditions on buffering landscaping and re-vegetation (C1a5 & C2a1,3).
 - b. (IIIB-2&7) Need to be more specific with screening differences (Veg restoration, fences) between Districts and varying land uses (parking lots vs buildings). How screening will be measured. (C2a,b,e&f)
 - c. (IIIB-3) Need recreational & open space list of existing and potential sites(C6a1,3,4,5,6)
 - d. (IIIB-6) Need to be more specific with building height differences between Districts. How minimizing interference with views will be evaluated. (C2b)
 - e. (IIIB-6) What locations along the river has the City identified as suitable for clustering? What will be the opportunity for public input in regard to clustering? Why is the City only allowing clustering in the Central District? (C2c)
7. Pg 29-35
 - a. (IIIC) Add air and water into your definition of natural resources for purposes of the plan. (Water along and within the river)
 - i. "Natural resources for purposes of this plan are taken to mean those vegetative or geological features that occur along the river"
 - b. For stormwater mgmt BMP's recommend planting with MN native species whenever site conditions are suitable.
 - c. (IIIC-1) Need to address stormwater infrastructure setbacks: Recommend 300' from bluffline. Allow a variance only to 150' from bluffline
 - d. (IIIC-8) Provide more detail on management of dredge spoils (regulations in place). Impacts of dredging and storage(C5d&e).
 - e. (IIIC-9) Recommend 90% sediment removal standard within the critical area
 - f. (IIIC-11) Provide list of impacts wetland plans they are meant to prevent. (C1a3)
8. pg 38-44
 - a. (IIIG-3) Trails and trail systems should find ways to infiltrate capture and reuse stormwater. (C6c-b)
 - b. (III G-6) Include in factors which should be studied: Impact on river water quality, habitat, aquatic life.
 - c. (III G - 7) Add Mississippi Watershed Management Organization would like to provide input on regulations for surface water use.
 - d. (III H-3) Add Stormwater capture and reuse to offset increased demands for potable wtr drawn from Mississippi River.
 - e. (III H-4) Consider stormwater capture and reuse to reduce CSO's, and onsite sewer separation and mgmt to limit new flows sewage treatment plant.
 - f. (III I-1) Add Minimize impervious street surfaces city wide and maximize infiltration and water quality practices during street reconstruction.