

Meeting: Board of Managers Meeting date: 8/27/2020 Agenda Item #: 11.3 Request for Board Action

Title: Adoption of the revised MCWD Capital Improvement Plan

Resolution number: 20-065

Prepared by: Name: Michael Hayman

Phone: (952) 641-8226

mhayman@minnehahacreek.org

Reviewed by: Name/Title: Not applicable

Recommended action: Board adoption of the annually revised MCWD Capital Improvement Plan (CIP) for the

2021 budget and implementation cycle.

Schedule: May 2020 – Draft CIP reviewed by Board

June 2020 – Release of draft CIP for 30-day review August 2020 – Revisions and approval of 2021 CIP

Budget considerations: Not applicable

Past Board action: Res # 20-047 Authorization to distribute Capital Improvement Plan for annual

review and comment

Summary:

Each year, as described in the MCWD's Watershed Management Plan (Plan), the Minnehaha Creek Watershed District (MCWD) revises and distributes its 10-year Capital Improvement Plan (CIP) to cities and counties for 30-day review and comment. The purpose of this annual process is to allow the MCWD to adjust its 10-year CIP based on feasibility analysis of projects described in the Plan, identification of new project opportunities through coordination with land use planning, shifts in District priorities, and assessment of staff and financial capacity. As projects are continually being developed, this process also allows the MCWD to provide its stakeholders with a greater level of specificity than was provided in the Plan.

The MCWD adopted its Plan, including its 10-year CIP, on January 11, 2018. Given how recently the Plan was adopted, there have been minimal changes to the CIP. However, it has been updated to provide more refined costs, funding sources, and schedule for projects that are currently in development. The draft CIP was reviewed at the May 28, 2020 Planning and Policy Committee meeting.

At the June 11, 2020 Board Meeting, the Board reviewed the revised draft CIP (attachment 1) and authorized its distribution to the cities and counties. The CIP was accompanied with a cover letter reiterating the District's implementation approach and its desire to coordinate and align its plans and investments with its member communities. Cities, counties, and other partners are encouraged to approach the District with project opportunities that may be incorporated into future revisions of the CIP or considered for other forms of District assistance based on alignment with District goals, timing, and capacity.

Comments on the draft CIP were accepted from June 26, 2020 to July 29, 2020. Staff received responses from Carver County and the cities of Chanhassen, Greenwood, Minneapolis and St. Louis Park. With the exception of a formal letter

from the Greenwood city council, the responses were procedural in nature, requesting minor clarifications about project location, project timing, estimated budgets and partnership opportunities. Each of these clarifying questions was provided by county or city staff via email and was immediately responded to by the appropriate MCWD staff person from the project planning group or policy planning group. Because all staff inquiries are considered procedural in nature, the emails are not included as formal comments, but are available for viewing upon request.

The letter from the city of Greenwood (City), dated July 10, 2020 (attachment 2), requested either 1) extending the comment period deadline or 2) reallocating 10% of its capital budget to AIS programs such as monitoring, control and inspection on Lake Minnetonka. The letter also requested more details on the measured impact of MCWD's work in the Minnehaha Creek Greenway.

On July 24, 2020, President Sherry White issued a response letter on behalf of the MCWD Board of Managers that granted the comment period extension and addressed the key points in the City's letter:

- 1. The significant measurable improvements driven by the work in the Minnehaha Creek Greenway
- 2. MCWD's strategy for improving Lake Minnetonka by addressing the largest pollutant contributors (upstream tributaries) through a collaborative, focused and intentional approach with its partner communities
- 3. MCWD's holistic and data-driven approach to ecological health and the intentional sunset of former AIS pilot programs in favor of projects and programs that maximize effectiveness and overall watershed benefit, while considering the state AIS framework.

On August 5, 2020 the City responded with a letter (attachment 4) thanking MCWD for the information, providing additional comments regarding the MCWD CIP, and requesting the District reallocate \$600,000 of its annual CIP to fund AIS programming on Lake Minnetonka. The MCWD responded on August 17, 2020 (attachment 5) acknowledging receipt of the request and reiterating its willingness to meet and discuss opportunities, as well as to clarify some points of misunderstanding related to the strategy behind MCWD's work, how effectiveness is measured, and how AIS programming has evolved in relation to the MCWD's goal of ecological integrity.

It is staff's opinion that opportunities to improve ecological integrity through managing AIS continue to be considered through annual budgeting processes tied to specific initiatives or responsive opportunities, and not as unspecified one-time allocations calculated as a percentage of overall capital budget. Such a shift would disrupt long planned and well-coordinated efforts with our partners, potentially disrupting high impact infrastructure investments set to benefit Lake Minnetonka, Minnehaha Creek, Lake Hiawatha and other critical resources throughout the watershed. As such, staff recommends that the draft CIP be adopted with no further revisions.

Attachments:

- 1. Draft 2021 CIP
- 2. July 10, 2020 letter from Greenwood
- 3. July 24, 2020 response from MCWD
- 4. August 5, 2020 letter from Greenwood
- 5. August 17, 2020 response from MCWD



RESOLUTION

Resolution number: 20-065

Title: Adoption of the revised Minnehaha Creek Watershed District Capital Improvement Plan

WHEREAS Minnehaha Creek Watershed District's (MCWD) 2017 Watershed Management Plan (Plan) included a

proposed 10-year Capital Improvement Plan (CIP);

WHEREAS the Plan requires that MCWD annually release its revised draft CIP for 30 day review and comment to

the counties and municipalities in the District;

WHEREAS on June 11, 2020, the MCWD Board reviewed the draft CIP and authorized its distribution for 30 day

review and comment;

WHEREAS staff distributed the draft CIP for review and comment, and comments were received from Carver

County and the cities of Chanhassen, Greenwood, Minneapolis and St. Louis Park;

WHEREAS responses from Carver County and the cities of Chanhassen, Minneapolis and St. Louis Park were staff

inquiries and procedural in nature, requesting minor clarifications about project location, project timing, estimated budgets and partnership opportunities, and as such, were addressed by the appropriate MCWD staff person and are not included as formal comments to the CIP process, but are available for

viewing upon request;

WHEREAS the city of Greenwood (City) provided a formal comment letter dated July 10, 2020, requesting either 1)

extending the comment period deadline or 2) reallocating 10% of its capital budget to AIS programs such as monitoring, control and inspection on Lake Minnetonka. The letter also requested more details

on the measured impact of MCWD's work in the Minnehaha Creek Greenway;

WHEREAS on July 24, 2020, MCWD issued a response to the City that granted the comment period extension and addressed the key points in the City's letter:

- 1. The significant measurable improvements driven by the work in the Minnehaha Creek Greenway;
- MCWD's strategy for improving Lake Minnetonka by addressing the largest pollutant contributors (upstream tributaries) through a collaborative, focused and intentional approach with its partner communities:
- 3. MCWD's holistic and data-driven approach to ecological health and the intentional sunset of former AIS pilot programs in favor of projects and programs that maximize effectiveness and overall watershed benefit, while considering the state AIS framework;

WHEREAS on August 5, 2020 the City responded with a letter thanking MCWD for the information, providing

additional comments regarding the MCWD CIP, and requesting the District reallocate \$600,000 of its

annual CIP to fund AIS programming on Lake Minnetonka;

WHEREAS; on August 17, 2020 the MCWD responded acknowledging receipt of the request and reiterating its

willingness to meet and discuss opportunities, as well as to clarify some points of misunderstanding related to the strategy behind MCWD's work, how effectiveness is measured, and how AIS programming

has evolved in relation to the MCWD's goal of ecological integrity;

WHEREAS

it is staff's opinion that opportunities to improve ecological integrity through managing AIS continue to be considered through annual budgeting processes tied to specific initiatives or responsive opportunities, and not as unspecified one-time allocations calculated as a percentage of overall capital budget. Such a shift would disrupt long planned and well-coordinated efforts with our partners, potentially disrupting high impact infrastructure investments set to benefit Lake Minnetonka, Minnehaha Creek, Lake Hiawatha and other critical resources throughout the watershed and as such, staff recommends that the draft CIP be adopted with no further revisions;

NOW, THEREFORE, BE IT RESOLVED that the Minnehaha Creek Watershed District Board of Managers hereby adopts the attached 2021 CIP.

Resolution Number 20- 065 was moved by Manager	, seconded by Manager	Motion to
adopt the resolution ayes, nays,abstentions.	Date: 8/27/2020	
	Date: August 27, 2020	
Secretary		

DRAFT Minnehaha Creek Watershed District 2018-2027 Capital Improvement Plan

Subwatershed	Capital Projects	Estimated Cost	Potential Funding Sources*	Proposed Implementation Year
Six Mile Creek-Halsted Bay	East Auburn Stormwater Enhancement Project	\$327,500	BWSR grant (\$262,520), City of Victoria (\$64,980)	2018
Minnehaha Creek	Arden Park Stream Restoration and Stormwater Management	\$3,696,322	MCWD levy, City of Edina (\$1,408,920), BWSR grant (\$125,000)	2018-2019
Minnehaha Creek	Minnehaha Creek FEMA Flood Damage Repairs	\$1,200,000	MCWD levy, FEMA grant (\$336,459)	2018-2019
Six Mile Creek-Halsted Bay	Wassermann West External Load Reduction and Landscape Restoration	\$2,204,160	City of Victoria (\$1,941,600), BWSR grant (\$93,879), MCWD levy	2019-2020
Minnehaha Creek	325 Blake Road Regional Stormwater and Greenway	\$3,871,500	MCWD levy, BWSR grants (\$495,000)	2019-2022
Minnehaha Creek	Cottageville Park Phase II Riparian Restoration	\$324,954	MCWD levy, partner contributions	2019-2022
Minnehaha Creek	Meadowbrook Golf Course Ecological Restoration	\$2,006,730	MCWD levy, partner contributions, grants	2021-2022
Minnehaha Creek	Greenway to Cedar Trail Connection and Streambank Restoration	\$510,000	MCWD levy, partner contributions, grants	2021-2022
Minnehaha Creek	Boone-Aquilla Floodplain	\$500,000	MCWD levy, partner contributions, grants	2021-2022
Six Mile Creek-Halsted Bay	Wassermann Internal Load Management		MCWD levy,BWSR grant (\$284,720)	2021-2023
Minnehaha Creek	Minnehaha Parkway Stormwater Management	\$1,400,000	MCWD levy, partner contributions, grants	2021-2023
Painter Creek	Stream Restoration	\$2,990,000	MCWD levy, partner contributions, grants	2021-2025
Painter Creek	Wetland Restoration	\$330,000	MCWD levy, partner contributions, grants	2021-2025
Six Mile Creek-Halsted Bay	Turbid-Lundsten Wetland Restoration	\$3,100,000	MCWD levy, partner contributions, grants	2021-2026
Six Mile Creek-Halsted Bay	Mud Lake Watershed Load Reductions	\$3,090,000	MCWD levy, partner contributions, grants	2021-2027
Six Mile Creek-Halsted Bay	Whole Lake Drawdown	\$770,000	MCWD levy, partner contributions, grants	2021-2027
Minnehaha Creek	West Blake Greenway Enhancement		MCWD levy, partner contributions, grants	2022-2023
Painter Creek	Potato Marsh Restoration	\$870,000	MCWD levy, USACE Section 206, partner contributions, grants	2022-2023
Minnehaha Creek	Meadowbrook Greenway Expansion	\$950,000	MCWD levy, partner contributions, grants	2022-2023
Six Mile Creek-Halsted Bay	East Auburn Wetland Restoration	\$990,000	MCWD levy, partner contributions, grants	2022-2023
Six Mile Creek-Halsted Bay	Pierson Lake Headwaters Restoration	\$320,000	MCWD levy, partner contributions, grants	2022-2023
Painter Creek	South Katrina Marsh Restoration	\$1,270,000	MCWD levy, USACE Section 206, partner contributions, grants	2022-2023
Six Mile Creek-Halsted Bay	Internal Load Management	\$980,000	MCWD levy, partner contributions, grants	2022-2027
Painter Creek	SOBI Marsh Restoration	\$240,000	MCWD levy, USACE Section 206, partner contributions, grants	2023-2024
Minnehaha Creek	Hiawatha Golf Course Restoration	\$1,940,000	MCWD levy, partner contributions, grants	2023-2024
Painter Creek	Upper and Lower Painter Marsh Restoration	\$2,800,000	MCWD levy, USACE Section 206, partner contributions, grants	2023-2024
Six Mile Creek-Halsted Bay	Halsted Bay Watershed Load Management	\$13,050,000	MCWD levy, partner contributions, grants	2023-2026
Lake Minnetonka	Halsted Bay Internal Phosphorus Load Reduction	\$1,400,000	MCWD levy, partner contributions, grants	2025-2027
Christmas Lake	Stormwater Volume and Pollutant Load Reduction	\$200,000	MCWD levy, partner contributions, grants	Opportunity-based
Dutch Lake	Stormwater Volume and Pollutant Load Reduction	\$780,000	MCWD levy, partner contributions, grants	Opportunity-based
Gleason Lake	Stormwater Volume and Pollutant Load Reduction	\$600,000	MCWD levy, partner contributions, grants	Opportunity-based
Lake Minnetonka	Stormwater Volume and Pollutant Load Reduction	\$1,000,000	MCWD levy, partner contributions, grants	Opportunity-based
Lake Virginia	Stormwater Volume and Pollutant Load Reduction	\$650,000	MCWD levy, partner contributions, grants	Opportunity-based
Langdon Lake	Stormwater Volume and Pollutant Load Reduction	\$230,000	MCWD levy, partner contributions, grants	Opportunity-based
Long Lake Creek	Stormwater Volume and Pollutant Load Reduction	\$1,320,000	MCWD levy, partner contributions, grants	Opportunity-based
Minnehaha Creek	Channel/Streambank Restoration	\$3,120,000	MCWD levy, partner contributions, grants	Opportunity-based
Minnehaha Creek	Stormwater Volume and Pollutant Load Reduction	\$2,450,000	MCWD levy, partner contributions, grants	Opportunity-based
Painter Creek	Stormwater Volume and Pollutant Load Reduction	\$980,000	MCWD levy, partner contributions, grants	Opportunity-based
Schutz Lake	Stormwater Volume and Pollutant Load Reduction	\$250,000	MCWD levy, partner contributions, grants	Opportunity-based
Six Mile Creek-Halsted Bay	Stormwater Volume and Pollutant Load Reduction	\$2,000,000	MCWD levy, partner contributions, grants	Opportunity-based
Six Mile Creek-Halsted Bay	Stream Restoration	\$870,000	MCWD levy, partner contributions, grants	Opportunity-based
Six Mile Creek-Halsted Bay	Wetland Restoration	\$3,000,000	MCWD levy, partner contributions, grants	Opportunity-based

^{*}Includes specific amounts where funding sources are known.



July 10, 2020

Minnehaha Creek Watershed District Board Attn: Michael Hayman 15320 Minnetonka Blvd Minnetonka, MN 55345 SENT VIA EMAIL mhayman@minnehahacreek.org

Re: Comments Regarding MCWD 10-Year CIP

Dear MCWD Board,

The city of Greenwood received the request for comments regarding the MCWD 10-year CIP.

The city of Greenwood is not aware of any MCWD support for programs to prevent, detect, or control aquatic invasive species other than a common carp control program that is funded by the Lessard-Sams Outdoor Heritage Council. While efforts to monitor and prevent the introduction of invasive species into Lake Minnetonka may not be as visible as the MCWD's capital projects, it is possible that they may do as much or more to protect the natural lake and creek environment. It is quite conceivable that ongoing MCWD support for existing and new programs such as flowering rush control, monitoring for starry stonewort, public launch monitoring and inspections, and milfoil control would take the watershed to new levels and have a dramatic long-term positive affect on lake and creek environments.

City Councilmember Tom Fletcher contacted MCWD Project Planning Manager Michael Hayman on 06.29.20 and asked if the MCWD had any data available on downstream water quality improvements from prior projects. Michael stated that the MCWD did have data available, which he would provide. As of our 07.07.20 city council meeting this data has not been received. Therefore, we respectfully request that the MCWD extend its CIP comment period to 08.06.20 to allow the Greenwood city council to review the requested MCWD data and discuss CIP comments at our next council meeting on 08.05.20 or that MCWD reallocate 10% (\$600,000) from its approximately \$6M annual capital project spending (not including \$2.75M in capital financing) to existing and new aquatic species prevention, detection, and control efforts in the watershed.

Thank you for providing the city of Greenwood with the opportunity to provide comments regarding the 10-year CIP.

Sincerely,

Debra J. Kind

Mayor, City of Greenwood

on behalf of the Greenwood City Council

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CC: LMCD Board, LMA Board

July 24, 2020

The Honorable Debra Kind Mayor of City of Greenwood 20225 Cottagewood Rd. Deephaven, MN 55331

Re: Comments Regarding MCWD 10-Year CIP

Dear Mayor Kind,

Thank you for your letter regarding the Minnehaha Creek Watershed District's (MCWD) 10-Year capital improvement plan (CIP). MCWD is committed to protecting and improving the health of Lake Minnetonka, one of the state's treasured water resources, which underpins the quality of life of its surrounding communities. We recognize that our work is only possible in close collaboration with our communities, and value our partners' input, including on the annual review of our CIP.

I am writing to respond to the following points and questions raised in your letter:

- 1. Request for data on the effectiveness of MCWD's work in the Minnehaha Creek Greenway
- 2. MCWD's strategy for protecting and improving Lake Minnetonka
- 3. MCWD's work in managing aquatic invasive species for ecological health
- 4. Request for an extension on the comment period deadline for the CIP

Request for data on the effectiveness of MCWD's work in the Minnehaha Creek Greenway

As your letter notes, on June 29, 2020, councilmember Fletcher contacted MCWD Project Planning Manager Michael Hayman seeking data from MCWD's website regarding the Minnehaha Creek Greenway. Mr. Hayman promptly responded that, while raw data wasn't available on the website, he was happy to provide any data that would be useful if Mr. Fletcher could be more specific in his request. While we remain happy to provide any data that the council would find educational on this topic, below is information related to your question regarding the District's sustained effort to restore the most degraded section of Minnehaha Creek.

Minnehaha Creek appears on Minnesota's §303(d) list of impaired waters due to impaired fish and macroinvertebrate communities, low dissolved oxygen, chloride, and fecal coliform bacteria. The downstream receiving water body, Lake Hiawatha, is impaired for excess nutrients. The total maximum daily load (TMDL) study approved by the Environmental Protection Agency (EPA) identifies that the most pronounced increases in total phosphorus come from the stretch of creek between West 34th Street and Excelsior Boulevard in Hopkins and St. Louis Park.

For those reasons MCWD has focused in this geography, now known as the Minnehaha Creek Greenway, to achieve the following goals: (1) improve water quality by building systems to treat urban stormwater from the surrounding region; (2) improve biological communities and stream function by restoring channel geomorphology and habitat; (3) expand, connect and enhance riparian greenspace for the benefit of the Minnehaha Creek system and the surrounding communities.

In aggregate, this work will treat stormwater from 520 acres of the surrounding region and reduce pollutant loading by over 300 pounds per year. When finished, almost 9,000 lineal feet of Minnehaha Creek will have been restored from a ditched condition to a more historic and natural alignment, with the integration of hundreds of habitat features. The restored stream system has been reconnected to its floodplain and 38 acres of restored wetlands, with over 5,000 cubic yards of new floodplain storage created to mitigate flooding. The entire system is connected by more than 66 acres of newly accessible greenspace that includes more than 100,000 new native plantings, and serves to also connect housing, transit, and jobs.

There has been a measurable increase in the quality of Minnehaha Creek and downstream Lake Hiawatha since work began a decade ago. Phosphorus concentrations at sampling sites within the Greenway have significantly improved relative to those directly upstream. In Lake Hiawatha, the downstream receiving water body of Minnehaha Creek, phosphorus concentrations have improved by 19 percent and the average chlorophyll-a concentrations have improved to meet the state standard over the same period. Because there is a predictable lag between management inputs and system response, we anticipate these outcomes will compound in the coming years.

More granular information is available through the Minnesota Pollution Control Agency website, which is the centralized database for water quality monitoring data in the Twin Cities, including data collected by MCWD: https://webapp.pca.state.mn.us/surface-water

These results were made possible by a diverse coalition of public and private partners that provided more than \$7.5 million in outside funding to advance the goals for this restored corridor, which has recently been profiled by the National American Planning Association, the National Stream Restoration Symposium, and others.

Building off of the success and lessons learned in the Minnehaha Creek Greenway, MCWD is excited to be actively working with partners to implement a parallel data-driven strategy to protect and improve Lake Minnetonka.

MCWD's strategy for protecting and improving Lake Minnetonka

As detailed in our 2017 Watershed Management Plan, which received broad support from our communities and partners, our strategy for protecting and improving Lake Minnetonka is two-fold: 1) Focusing on addressing the most significant sources of pollution to achieve long-term measurable results; and 2) Responding to partnership opportunities to integrate clean water benefits into public and private investments in the built environment.

Addressing the most significant sources of pollution

The largest and most focused source of pollution in Lake Minnetonka is not the immediate surrounding landscape that drains into the lake. It is the major tributaries that flow into the lake. As a regional agency, MCWD is uniquely positioned to address these upstream sources of pollution.

The data shows that the three largest outside pollutant sources for Lake Minnetonka are the Six Mile Creek, Long Lake Creek, and Painter Creek systems. These systems bring nearly three times as much nutrient pollution into Lake Minnetonka as the entire direct drainage area of the lake combined. As such, we have focused our Capital Improvement Plan largely around addressing these principal sources. This strategy is consistent with the EPA-approved TMDL for the upper Minnehaha Creek watershed, which identified upstream lakes as a significant source of downstream pollutant loading. To reflect these needs, 60% of the funds in MCWD's 10-year CIP are dedicated to addressing issues in these three systems to directly improve the water quality and ecological health of Lake Minnetonka.

Our first area of sustained focus is in the Six Mile Creek-Halsted Bay subwatershed, a complex system of 14 lakes that represents one of the largest sources of pollutants into Lake Minnetonka, in an area experiencing rapid development and land-use change. Work to date has included restoring 104 acres of wetlands, treating 22 acres of regional stormwater, reducing carp populations by 142,000 pounds, and creating 30 acres of newly-accessible public green space.

By 2021 the work is projected to reduce nutrient loading by 545 pounds per year throughout the system. We're already seeing results: In the past 10 years, nutrient concentrations at the outlet of Six Mile Creek into Lake Minnetonka have improved by 25 percent. The work has been supported by a strong partnership of local communities, Hennepin and Carver counties, Three Rivers Park District, the Lessard Sams Outdoor Heritage Council, and others, and has leveraged more than \$1 million in outside capital for work to date.

Responding to opportunities

In addition to proactively addressing the main drivers of Lake Minnetonka's issues through long-term planning of our capital project spending and program activities, we also recognize that land-use change can happen quickly. Therefore, the District has positioned itself to remain responsive to opportunities to integrate clean water infrastructure into public and private investments in the built landscape. In recent years we have responded to a number of such opportunities within the Lake Minnetonka direct drainage area, on projects and plans to improve water quality, including:

- Integrating stormwater improvements into transportation and development in the City of Wayzata
- The preservation and restoration of Big Island in partnership with the City of Orono
- Collaboration with Hennepin County to enhance the shoreline of the Highway 101 causeway
- Integrating stormwater infrastructure into transit projects and development in the City of Mound
- Implementing numerous shoreline restoration demonstration sites across the Lake
- Working to develop conservation easements that preserve the natural environment
- Collaborating with municipal partners on long-range infrastructure planning

MCWD's work in managing aquatic invasive species for ecological health

In addition to landscape-driven water quality issues, MCWD recognizes aquatic invasive species as one of many factors that influence the ecological health of water resources. In cases where a species is identified as a driver of poor water quality in a system, and science-backed, cost-effective measures exist to manage it with a predictable response, we have pursued these management activities in coordination with, and funding from, our partners.

As you mentioned in your letter, we are in the midst of implementing one of the most comprehensive carp management strategies in the state within the Six Mile Creek-Halsted Bay subwatershed. This program was launched after the EPA-approved TMDL identified carp-driven internal nutrient loading as a major driver of water quality impairment across the system. Using evidence-based management techniques developed at the University of Minnesota, MCWD has invested more than \$1 million to sustainably reduce populations of this invasive fish throughout the system by more than 142,000 pounds, over half of the reduction goal for the subwatershed. This work has enjoyed broad support from Hennepin and Carver Counties, Three Rivers Park District, surrounding communities, and \$567,000 in legislative funding provided by the Lessard Sams Outdoor Heritage Council.

As part of its holistic and data-driven approach to ecological health, MCWD has sunset its former AIS pilot programs for activities such as watercraft inspection grants, rapid response, and applied research. Funding from these programs has been refocused and aligned to more directly address the biggest sources

of pollutants degrading Lake Minnetonka. This shift has been conducted gradually and in close coordination with our partners on the work.

These efforts have judiciously aligned MCWD's resources with organizational capabilities, and have maximized effectiveness and overall watershed benefit, while also thoughtfully responding to the statewide framework that has evolved since we first launched our AIS pilot programs. As MCWD has adjusted its approach, research has since been centralized through the University of Minnesota's Aquatic Invasive Species Research Center, rapid response activities are led and coordinated by the Department of Natural Resources, and grants for prevention and inspection are funded annually by the state legislature and distributed locally through counties.

Request for an extension on the CIP comment period deadline

Your letter requests an extension on the 10-year CIP comment period until <u>August 6, 2020</u>, in order to allow for further council discussion at its next meeting. <u>MCWD will grant that extension</u>.

Please note that most activities listed in your letter are not capital improvement projects, and thus would not be candidates for inclusion in the CIP. As we value open dialog with our communities, we will also be reaching out to pursue a meeting between MCWD and the City of Greenwood.

Lake Minnetonka is a complex system that requires the earnest effort of multiple agencies, institutions, and individuals working together to protect and improve its natural qualities, and we are committed to playing a key role in that stewardship. On behalf of the MCWD Board of Managers, I look forward to continuing our science-driven work in partnership with our communities to enhance this iconic resource.

Sincerely,

Sherry White

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President, Board of Managers

Minnehaha Creek Watershed District

CC: Lake Minnetonka Conservation District

Lake Minnetonka Association



August 5, 2020

Minnehaha Creek Watershed District Board Attn: Michael Hayman 15320 Minnetonka Blvd Minnetonka, MN 55345 SENT VIA EMAIL mhayman@minnehahacreek.org

Re: Comments Regarding MCWD CIP

Dear MCWD Board,

This is a follow up to our 07.10.20 letter requesting an extension of time to prepare comments on the MCWD CIP and the extension until 08.06.20 that Greenwood received in the letter dated 07.24.20 from MCWD Board of Managers President Sherry White. Thank you for the extension and the information provided in her letter and the information provided in District Administrator James Wisker's email of 07.31.20 to Greenwood Councilmember Tom Fletcher.

The Executive Summary of the MCWD 2017 Watershed Management Plan states that Lake Minnetonka with 22 square miles is the 10th largest and one of the most heavily recreated waterbodies in Minnesota. The Plan further indicates that the upper watershed contains 104 square miles and the lower watershed contains 52 square miles for a total of 156 square miles. Thus, Lake Minnetonka occupies roughly 14% of the total watershed area and is the dominant water body in the watershed. With the exception of the Six Mile Creek-Halsted Bay-Jennings Bay area, the MCWD 2017 Management Plan shows that virtually all of Lake Minnetonka's bays are not degraded as their water quality meets or more typically significantly exceeds state standards.

We did not find numerical phosphorus concentration trend data in either the 2019 Annual Activity Report or 2017 Watershed Management Plan, but James Wisker's email did state that Lake Hiawatha's 19% phosphorus reduction from 2010 through 2019 was the greatest reduction of any of the 22 "anchor" lake monitoring substations throughout the watershed. The email did not indicate what portion of the 19% reduction should be attributed to City of Minneapolis Lake Hiawatha area stormwater improvements. According to an October 2013 Tetra Tech report to the MCWD, Lake Hiawatha, which currently occupies 53 acres, was a shallow wetland named Rice Lake before it was acquired by the Minneapolis Park & Recreation Board (MPRB) in 1923. The lake had stands of wild rice that grew in the shallow waters before 1.25 million yards were dredged from the Rice Lake wetland area in 1929 to create the Hiawatha Golf Course.

The MCWD's 2017 Management Plan states that one of the four strategic goals of the District is "Ecological Integrity – To restore, maintain, and improve the health of ecological systems." Greenwood's position is that Aquatic Invasive Species (AIS) such as starry stonewort and hydrilla are a major and constant threats to the health of ecological systems on Lake Minnetonka. Despite these and other threats, Board of Managers President Sherry White's letter states, "MCWD has sunset its former AIS pilot programs for activities such as watercraft inspection grants, rapid response, and applied

research. Funding from these programs has been refocused and aligned to more directly address the biggest sources of pollutants degrading Lake Minnetonka." This is despite the fact that from a dollars standpoint with a \$15,350,000 2020 budget and a levy, which in the case of the City of Greenwood exceeds 10% of the City's levy, the MCWD is the entity that is best positioned to bring financial resources to bear on watershed AIS research, prevention, and response.

MCWD's sole focus on carp and refocusing away from any other AIS prevention, rapid response, and research has left Lake Minnetonka's ecology in a precarious position. As a practical matter, there is not nor will there be funding at the State level (legislative or DNR) as stated in Sherry White's letter to provide appropriate inspection or rapid response activities and the University of Minnesota's AIS Research Center efforts are limited by its current funding. By comparison, other watersheds such as Pelican River and North Fork Crow River have active ongoing AIS programs.

MCWD's refocusing away from AIS makes little sense given the fact that Lake Minnetonka is the dominant waterbody and ecological resource in the watershed. In comparison, Lake Hiawatha that James Wisker cited in his email is a manmade lake with less than .5% of Lake Minnetonka's area. It is further not unreasonable to expect that any invasive species such as starry stonewort or hydrilla that establishes itself in Lake Minnetonka will find its way downstream to Lake Hiawatha and effectively negate any other improvements there as the invasives dominate and crowd out native species.

In a perfect world aquatic invasive species would wait for the MCWD to complete its other projects. However, we do not control AIS any more than we control the Coronavirus and we need to be prepared with prevention and response programs. The heavy recreational use of Lake Minnetonka dramatically increases the risk of AIS introduction into the lake and watershed. Conversely the heavy recreational use also increases the benefits of AIS prevention and remediation. The MCWD is the only party that is in a financial position to support an aggressive AIS prevention and remediation program. The lack of current support for AIS prevention and remediation efforts is a complete abdication of the MCWD's responsibility as stated in its strategic goal to maintain the health of the watershed's ecological systems.

In these times of tight budgets Greenwood also understands the need to control levies. We therefore respectfully request that the MCWD adjust its CIP plan and timetables to shift \$600,000 of the \$6,000,000 annual CIP budget to AIS funding in support of existing projects such as boat inspections, monitoring for AIS in boat launch and other high risk areas, AIS rapid response reserves, AIS control to strengthen native species, and AIS research that is relevant to the watershed. Without this type of commitment, the MCWD will continue to turn its back on the dominant water body in the watershed.

Thank you for your consideration and for listening to us.

Aland

Sincerely.

Debra J. Kind

Mayor, City of Greenwood

on behalf of the Greenwood City Council

CC: LMCD Board, LMA Board

August 17, 2020

The Honorable Debra Kind Mayor of City of Greenwood 20225 Cottagewood Rd. Deephaven, MN 55331

Re: Comments Regarding MCWD 10-Year CIP

Dear Mayor Kind,

Thank you for the thoughtful comments in your letter. It reflects a high level of engagement with our work and a commitment, which we share, to protect and enhance the health of Lake Minnetonka. These comments will be considered when the Board of Managers discusses MCWD's 10-year Capital Improvement Plan at its August 27 meeting.

There does appear to be a continued misunderstanding of the strategy behind our work, its measured effectiveness, and the role of aquatic invasive species programming in our goal of enhancing the ecological health of our water resources.

If it would be helpful, MCWD would be happy to meet and discuss these topics further. Please contact James Wiser at Jwisker@minnehahacreek.org if you would like to find time to connect, and we can align schedules to meet digitally in advance of the August 27 Meeting.

On behalf of the MCWD Board of Managers, I would like to once again thank the council for its engagement and input.

Sincerely,

Sherry White

President, Board of Managers

Sherry Lavis White

Minnehaha Creek Watershed District

CC: Lake Minnetonka Conservation District

Lake Minnetonka Association