June 5, 2016

Dear City Council members,

The Friends of Bass Lake appreciate the efforts made by City Staff to meet with and respond to our input on the Bass Lake Preserve Project. We offer the following assessment of the City Staff June 3rd Executive Summary concerning improvements to the Bass Lake Preserve.

Executive Summary Discussion: Definition of Project

FOBL requests clarifying the definition of the Bass Lake restoration to better reflect the scope of the work required. The current term 'functional restoration' is better replaced with the term 'ecological restoration'. The new term reflects the purpose of restoring the ecology of the lake basin including water quality, contamination, debris removal, vegetation management, and water level. The old term 'functional restoration' conveyed the purpose of restoring stormwater efficiency via dredging and water drainage.

FOBL requests replacement of the term 'Bass Lake Restoration Project' to 'Bass Lake Nature Preserve Project'. The old terminology suggested restoring the lake to historic status. That goal is no longer achievable as demonstrated by the recent DNR reclassification of Bass Lake from lake to wetland status. The term 'Bass Lake Nature Preserve Project' encompasses the idea that Bass Lake is a valued natural wetland recreational asset to be envisioned and re-purposed. The following language is hereby submitted for consideration:

> ***The Bass Lake Nature Preserve Project is an ecological restoration of woodland and wetland acreage for public recreational use with collaboration of local citizens, city departments, county, state, and federal regulatory agencies.***

Outlet Improvements

We are pleased to find agreement with City Staff on the Outlet Structure Project. The acknowledgement of historic water level loss in the basin and a commitment to reestablish those water levels with a permanent new outlet structure is in keeping with our goals.

NE Corner Pond

FOBL withholds support for this funding request without first enlisting private commercial property owners as partners and establishing a 'values' score card.

FOBL believes that commercial property owners that account for most of this watershed should be included in the discussion from the outset. These properties were developed in the mid to late 1980's so existing City easements for trails and stormwater may be applicable. Our contact with Public Storage in February 2016 included conversations about partnering with FOBL on a raingarden project on private property. Our outreach included

conversations with local and regional managers and the national real estate division of Public Storage in Glendale California. The outreach included phone conversations, exchange of emails, conceptual study of the site by our master water stewards, and support of the effort by City Engineering and Forestry departments.

We appreciate that City Staff has agreed to help draft a joint set of 'values' to assess a best management practice (BMP) for stormwater on the public property. The joint set of values is intended as a score card so other land use opportunities such as mature trees, nature paths, and resting/viewing areas are considered in the equation. Once these efforts have been completed we support additional expenditures for stormwater engineering design in the NE corner of the preserve.

Park Glen Drive Improvements

We support this project.

Dredging

Dredging is one of the few stormwater practices used by the city in the past 50 years to manage water flow through the Bass Lake basin. This practice has been repeated on a 25 year cycle due to sediment build up at inlet and outlet pipes. It has now been 23 years since the last dredging. Understandably, City Staff looked at this practice as a solution to the goal of restoring open water in the basin. Until relatively recently it was estimated that 20% of the basin was open water. We believe that loss of water level caused by the deterioration of the outlet structure and encroachment of hybrid cattails has reduced open water to 5%. Comments from the DNR 1993 EAW dredging permit made clear that without serious efforts to address stormwater quality, dredging as a practice would not be considered. Our hope is that commitment to a comprehensive plan of upstream water management practices will allow selective dredging especially at the outlet structure where there has been an estimated 3 acre loss of open water.

Vegetation in Basin

Dredging is not a substitute for vegetation management in the basin. We believe hybrid cattail management is a viable practice requiring experimentation, trial and error. The state legislature made available in 2014 an open permit for management of invasive cattails that doesn't require an Environmental Assessment Worksheet. However, this practice is dependent upon the replacement of the outlet structure and the ability to manage water level in the basin. It's also dependent upon a long term commitment to reduce volume of water and phosphorous flowing to the basin. Vegetation management may be a practice better left to groups invested in a future Park Preserve.

Carpenter Park

The expenditure of $1,025,000 for the Carpenter Park Project constitutes 17% of the entire $6,000,000 multi-year capital improvement budget allocated for the Bass Lake restoration yet represents less than 3% of the drainage acres that flow to the lake basin.

The proposed storage containment of .75 acre-feet of water representing 392,040 gallons is a relatively small volume when compared to the water runoff volume in a 2-year, 24 hour storm event. A 2-year storm event diverts 126 acre-ft. of water to the Bass Lake basin. The proposed storage capacity of Carpenter Park equates to less than **one percent** of water volume flowing to the lake from a 2-year event. The ability to draw-down water in the storage vessel to prepare for the next storm event is achieved by the irrigation of ball fields. This practice is not a cost effective way to reduce water volume. Detailed in the 2012 LRT study are linear street treatment and raingarden practices that draw-down water volume through percolation at the source and are less expensive to construct.

From a cost perspective, since Minnehaha Creek Watershed District will cost share 50% of linear street and raingarden projects it provides immediate financial advantage. There may be further opportunity to enlist churches, schools, and civic organizations in the practice.

The Friends of Bass Lake oppose the Carpenter Park Project until a comprehensive long term plan is developed that cost effectively addresses the reduction of water volume in Bass Lake sub-watershed.

Upland Vegetation Management

We consider the 2015 Great River Greening report to be well founded. Several questions remain about the implementation of the practice and the extent expert recommendations will be followed. The GRG report recommends two forest types; savanna and floodplain. The initial 2015 NW corner project involved clearing invasive vegetation and replanting trees. The savanna forest requires establishment of grasses, sedges, rushes and wildflowers. This type of project is best illustrated by the vegetation planted around the Melrose Center stormwater pond. There has yet to be an effort or explanation into establishing savanna on the NW corner project.

Our support for this practice is cautious until more detail on actual procedures and City Department involvement is provided.

Sincerely,
Scott Carpenter, President Friends of Bass Lake
http://www.friendsofbasslake.com/