



Title: Edina Local Water Plan Major Amendment

Prepared by: Name: Becky Christopher
Phone: 952-641-4512
bchristopher@minnehahacreek.org

Purpose:

At the October 20, 2022 Policy and Planning Committee Meeting, staff will provide an overview of a proposed major amendment to the City of Edina's Water Resources Management Plan and seek the Board's input on proposed comments to the City. The amendment requires MCWD approval and will be brought forward for Board action at a subsequent meeting.

Background:

On August 30, 2022, the City of Edina submitted a major amendment to its Water Resources Management Plan to the MCWD for review and approval. A local water management plan is a required element of each city's comprehensive land use management plan. MN Statutes § 103B.235 and MN Rules § 8410.0160 grant watershed districts the authority to review and approve local water management plans. The MCWD has 60 days to review the major amendment for consistency with the MCWD's Watershed Management Plan before granting approval or requesting changes.

Summary:

The purpose of the major plan amendment is to incorporate the City's Flood Risk Reduction Strategy which was approved by the City in April 2020. The amendment includes changes to the City's policies and implementation program and incorporates additional detail for priority projects. A summary of the proposed changes (prepared by City staff) is attached, and the full amendment is available in the City's [Water Resources Library](#) (in Plans and Policies >> 2022 DRAFT Major Amendment to Water Resources Management Plan >> For Agency Review folder).

The City of Edina's strategy is to comprehensively reduce the risk of flooding throughout the community. Through this strategy, the City takes action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health, and welfare, and to restore and preserve the natural and beneficial values served by floodplains. The primary goal for the City's flood risk reduction effort is to improve public safety and reduce the exposure of private principal structures to flooding.

The amendment includes detailed modeling and capital improvement options for three study areas within MCWD: Morningside Neighborhood and Weber Park, Concord and West 58th Street, and Halifax Avenue South. The Board is familiar with the Morningside Flood Risk Reduction project that was brought forward for permit consideration in April 2022. This project generated concern regarding potential downstream water quantity and quality impacts, and the District has been working with the City of Edina and Minneapolis Park and Recreation Board under a cooperative agreement to evaluate solutions. The outcome of this assessment will be presented at the October 20, 2022 Board Meeting.

For the other two study areas, the amendment outlines a range of potential capital improvement options, some of which include infrastructure changes that would increase downstream conveyance. These types of incremental changes are not effectively addressed by either the District's regulations or Watershed Management Plan requirements. Through various conversations related to the rule revisions, Morningside project, 2D model, and Climate Action Framework, staff and the Board have discussed concerns regarding the potential cumulative downstream impact of these types of

infrastructure changes. This has been identified as a key area for evaluation and policymaking, in coordination with the District's communities, through the development of the 2D model and climate action planning process over the next few years.

In the meantime, staff is working with the District engineer to review the proposed capital improvement options presented in the amendment to better understand the potential risk. Staff is proposing to provide comments to the City requesting that their plan acknowledge the concern of cumulative downstream impact and provide additional information on how the City will work with the District to evaluate the potential impact of these projects, both on an individual and cumulative basis, and identify solutions.

Supporting documents:

Edina staff report summarizing proposed changes



Date: August 16th, 2022

To: CITY COUNCIL

From: Jessica Wilson, CFM, Water Resources Manager

Subject: Authorize Staff to Submit Draft Major Amendment to Water Resources Management Plan for Agency Review

Information / Background:

In September 2018 City Council adopted the 2018 Comprehensive Water Resources Management Plan. The implementation section of the plan included a Flood Risk Reduction Strategy to outline a plan for working toward reducing flood risk. Based on Council and community feedback, the Morningside neighborhood was selected as the focal geography for the Flood Risk Reduction Strategy.

On April 7, 2020, City Council considered and approved the Flood Risk Reduction Strategy and ordered a major amendment to the Water Resources Management Plan (Plan). The purpose of this report is to summarize the changes in the proposed major amendment and seek the Council's authorization for staff to submit the draft major amendment for agency review.

The Plan describes three core services: flood risk and stormwater runoff management, clean water services, and natural resources restoration and protection. It is informed by a hydrologic and hydraulic model that has undergone several minor and major updates since it was created in 2004. The Plan is a Local Water Plan as defined in MN Rule 8410 and MN Statute 103B.235. It is one of three water plans that serves as the basis for the Water Resources chapter in the Comprehensive Plan.

The Plan is required to:

- Describe physical environment and land use
- Define drainage areas, characteristics, and paths of storm water runoff
- Identify areas and elevations for storm water storage adequate to meet performance standards established in the watershed plan
- Define water quality and water quality protection methods adequate to meet performance standards established in the watershed plan
- Set forth an implementation program to the extent required in the overlying watershed plans.

The Nine Mile Creek Watershed District, Minnehaha Creek Watershed District, and State agencies will review the Plan for consistency with the watershed plans. Staff will make the draft plan available for review and comment by the public during this time also.

Following the 60-day review period, staff will modify the plan as necessary based on comments, and then return to Council to consider plan adoption.

Summary of changes to the Plan

Significant changes have been made to the content and structure of the document. A version with tracked changes is available for review in the [Water Resources Library](#). The gray highlighted text in the 'clean' version of the draft indicates where major changes have been made.

Relatively minor revisions have been incorporated into Section 1.0: Executive Summary and Section 2.0: Introduction and Physical Setting to align with major changes in other sections, incorporate updated terminology and approach per the major changes in other sections, and minor updates with current information since the Plan's adoption in 2018.

Section 3.0: Issues and Implementation program (formerly section 15) has been moved up and has had major revisions (described in more detail below) to incorporate the Flood Risk Reduction Strategy. Note that changes to the clean water elements of the Plan were out of scope for this major amendment and changes reflect only those to incorporate the Flood Risk Reduction Strategy elements currently. The Clean Water Strategy is in progress now.

Section 4.0 Policies for Water Resources Management (formerly section 3) has also undergone major revisions, described more thoroughly below.

The technical pieces which make up the methodology for modeling and major drainage area descriptions and recommendations have been moved to Appendix A (formerly sections 4-14). The wetlands chapter (formerly chapter 16) has been removed to a standalone document. Moving the technical and accessory pieces to the appendix or to standalone documents was intended to keep the primary document to a manageable size and elevate the program and policies for surface water management.

Section 3.0: Issues and Implementation Program (formerly section 15)

This section describes the programs and activities that support each of the core services (flood risk and stormwater runoff management, clean water services, and natural resources restoration and protection) and some of the policy issues around the provision and growth of service. This chapter also discusses resources, financial considerations, and implementation priorities.

Water Resources Network: Stormwater Assets and Natural Resources, Defined

The plan acknowledges the water resources network encompasses its stormwater system of built infrastructure and the system of natural surface and groundwater resources. The stormwater infrastructure assets are described in more of a utility management approach, describing asset procurement, ownership, inventory and inspection, operations and maintenance, renewal and replacement, and new and upgraded public or private assets.

Drivers of Increasing Flood Risk in Edina

Flooding in Edina is not only common, but also increasing. Though there is a desire for solving flood problems outright through transformational change, the physical constraints of a changing climate, aging infrastructure, expensive capital investment needed, and land use decisions of the past continuously push us to a risk management paradigm in which only incremental change is possible.

The factors that are driving increasing flood risk were explored through the development of the Flood Risk Reduction Strategy. The primary and secondary drivers are climate change and aging infrastructure. Well-drained landscapes and imperviousness also matter but are more historical drivers of flood risk.

Flood Risk Reduction Strategy

The City of Edina's strategy is to comprehensively reduce the risk of flooding throughout the community. Through this strategy, the city takes action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health, and welfare, and to restore and preserve the natural and beneficial values served by floodplains. The primary goal for the City's flood risk reduction effort is to improve public safety and reduce the exposure of private principal structures to flooding.

Flood Risk Equation

Flood risk is defined by climate and physical setting, exposure, and vulnerability. According to the Minnesota Department of Natural Resources Climatology Office, Minnesota's climate is already changing rapidly and will continue to do so for the foreseeable future. The region has gotten much wetter and warmer, driven by more frequent heavy precipitation and warmer winters. Principal structure flood exposure can occur through over land flooding, groundwater seepage, and sanitary backflow.

Sectors of Work

The objective of the flood risk reduction strategy is to reduce exposure to flooding, reduce vulnerability to flooding, and provide equitable access to support for readiness, response, and recovery.

Through the following sectors of work, the city will work with the community to comprehensively reduce flood risk.

INFRASTRUCTURE: We renew our infrastructure and operate it to reduce risk. We will plan public streets and parks to accept and convey flood waters to reduce the risk and disruption of related city services.

REGULATION: We acknowledge competing demands of land use and addressing drainage, groundwater, and surface water issues. We help people solve issues without harming another.

OUTREACH AND ENGAGEMENT: We make flood information available and give people tools for flood resilience.

EMERGENCY SERVICES AND PUBLIC SAFETY: We help people prepare for floods, remove people from harm during floods, and recover after floods.

Implementation and Capital Improvement

Significant updates to the City's stormwater model were done, including incorporating more detailed 2D modeling. The Morningside neighborhood was one of five detailed study areas called out in the 2018 Plan. This major amendment includes study of the other four areas and options for capital improvement.

The five detailed study areas are.

- Morningside Neighborhood and Weber Park
- Concord and West 58th Street
- Halifax Avenue South
- Valley View and Southdale Road Neighborhood
- Southwest Corner of TH 62 and TH 100

The implementation table also incorporates additional items under the emergency services and public safety sector of work to include a review of critical facilities, blue-sky flood preparedness planning, and a substantial damage plan.

Staff previewed the flood risk reduction projects at the City Council's August 3rd work session meeting. Engineering staff and Finance staff are reviewing the Utility Rate Study and populating the 2023-2028 Capital Improvement Plan for Council to consider in the coming months.

Section 4.0: Policies for Water Resources Management (formerly section 3)

This section presents background information, goals, policies, and design standards covering flood risk and stormwater runoff management, clean water services, and natural resources restoration and protection.

Several revisions have been made to provide clarifications, incorporate the new exposure/vulnerability terminology, and incorporate the focus on reducing risk for principal structures to align with the Flood Risk Reduction Strategy.

Notable changes include the following.

- The primary goal of the City's flood risk reduction effort is to improve public safety and reduce the exposure of private principal structures to flooding. Policy statements establish that protection of principal structures is the priority.
- Policies prioritize a No Adverse Impact (NAI) approach, sometimes referred to as the "Good Neighbor Policy". Policies are centered on protecting public health, public safety, public trust, and other concerns.
- Requests for city-coordinated pumping to lower water levels during wet periods will be evaluated based on the health, safety, and welfare of residents. Pumping will only be considered when flooding threatens principal structures. (Resolution No. 2021-22: City's Policy of Prioritizing Flooding Issues, adopted by City Council on February 17, 2021.)
- Site-specific standards for principal structure elevations may allow an alternative path for risk reduction.

Next Steps

Staff is seeking authorization to submit the draft major amendment to the Water Resources Management Plan to Watershed Districts for review and comment. After the 60-day comment period, staff will consider comments, make revisions, and ask Council to consider adopting the major amendment.

Links to past conversations on this topic

Links to past Council consideration of the Water Resource Management Plan, Flood Risk Reduction Task Force, and Morningside Flood Infrastructure Project are provided below:

[August 3, 2022 Council Work Session – Flood Risk Reduction Strategy Report and Clean Water Strategy Report](#)

[September 21, 2021 Council Meeting – MFIP 30% Design Check In](#)

[April 20, 2021 Council Meeting – MFIP Staff Recommendation](#)

[March 16, 2021 Council Work Session – MFIP Preliminary Staff Recommendation](#)

[September 1, 2020 Council Work Session – Morningside Flood Infrastructure Project \(MFIP\) Update](#)

[April 21, 2020 Approve Public Participation Plan for MFIP and Request for Purchase for Engineering and Engagement Services](#)

[Public Participation Plan](#)

[April 7, 2020 Flood Risk Reduction Strategy approval](#)

[March 5, 2019 FRRS Strategy Update](#)

[March 5, 2019 – Work Session – Water Resources Management – Morningside Neighborhood Flood Risk Reduction Strategy, Lake Cornelia Clean Water Strategy, and Chloride Pollution Prevention](#)

[September 5, 2018 – Adoption of 2018 Comprehensive Water Resources Management Plan](#)

[April 3, 2018 – Work Session – Comprehensive Water Resources Management Plan – Implementation Discussion](#)

[January 17, 2018 – Authorize Staff to Submit Draft Comprehensive Water Resources Management Plan for Agency Review](#)

[November 21, 2017 – Work Session – Draft 2018 Comprehensive Water Resources Management Plan Presentation for Review and Comment](#)

[Water Resources Library – Historical Morningside Neighborhood Stormwater Reports](#)