

## COUNTY OF ANOKA

Public Services Division
HIGHWAY DEPARTMENT

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Assistant County Engineer
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June 28<sup>th</sup>, 2013

Phil Belfiori Rice Creek Watershed District Administrator 4325 Pheasant Ridge Drive, #611 Blaine, MN 55449-4539

Re: Comments to the Rice Creek Watershed District (RCWD) ACD 15 and JD 4 WMD

Dear Mr. Belfiori:

Anoka County Highway Department would like to provide the following comments to the RCWD with regards to ACD 15 and JD 4 WMD. We would like to thank the RCWD for efforts in repairing and maintaining the Ditch system within the RCWD. We would like to officially submit the below comments for consideration and furthermore, applaud the district for the work completed last December 2012 on ACD 15 and JD 4. Should you need any clarifications, we are certainly willing to meet and/or discuss these comments further.

The runoff coefficient (RC) associate with Public Transportation seems excessively high at 94, especially as it relates to county road 54. Only about 25% of our county road right of way (r/w) is comprised of impervious roadway. The remaining portion is encompassed by rural grassland and ditch.

Additionally, the road runoff is handled by roadside ditches. These ditches provide a certain level of pretreatment qualities prior to discharge into JD 4, certainly sediment removal. Whereas much of the private property in the sub-watershed does not have any type of pretreatment and discharge directly into ACD 15 and JD 4. Unlike row crops, highway r/w is established nearly 100% of the time with very little soil susceptible to erosion. Whereas I am unsure if row crop land has similar erosion protection requirements when not planted.

Lastly, when the roads were originally constructed, they met all runoff and drainage standards at the time of construction. Also any future highway projects would be required to meet all RCWD treatment requirements, for both permanent and construction activities.

Cc: File (Subject, C, County Ditch 15)
Jon Olson, Anoka County Public Services Division Manager
Doug Fischer, Anoka County Engineer
Chris Otterness, Rice Creek Watershed District Engineer, Houston Engineering
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For the reasons stated above, we are respectfully requesting that county road 54 and Anoka County highway property be exempt from any costs associated with the repair and maintenance of ACD 15 and JD 4. Or as an alternative, future county road improvements should be exempt for water quality standards.

Again, we would be willing to meet and discuss these items in more detail. Please call me directly with any questions that the district may have at 763.862.4249. Otherwise, we look forward to the continued collaboration with the Rice Creek Watershed District.

Sincerely,

Andrew Witter, PE

Assistant County Engineer