

Stormwater Pollution Prevention Plan (SWPPP)

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DRAFT



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I. Introduction

SWWD owns/operates a very small MS4 system. All runoff entering SWWD's MS4 originates in other regulated Municipal MS4 systems. Therefore, all watershed activity affecting stormwater in SWWD's MS4 is subject to Municipal MS4 programs. Reflecting that dynamic, SWWD views its role, with respect to regulated stormwater, as one primarily of support for Municipal MS4 programs.

SWPPP not intended to establish District program, rather it serves to summarize District programs that are relevant to stormwater pollution prevention and fulfill programmatic requirements of the District's MS4 permit.

II. Partnerships

The South Washington Watershed District (SWWD) relies on partnerships to satisfy some requirements its MS4 permit. Those partnerships and requirements are summarized here and described further throughout this document.

SWWD is a founding member of the East Metro Water Resource Education Partnership (EMWREP) upon which it relies to satisfy some requirements under minimum control measures (MCMs) 1, 3, and 6. Formed in 2006, EMWREP currently is a partnership serving 18 local units of government throughout the East Twin Cities metropolitan area. The purpose of the program is to provide education about the impacts of non-point source pollution on local lakes, rivers, streams, wetlands, and groundwater resources and to engage people and communities in projects that will help to protect and improve water quality in the region. EMWREP was recognized as the Minnesota Association of Watershed Districts (MAWD) Program of the Year in 2012. Additional information about EMWREP can be found at www.mnwcd.org/emwrep/. A list of program partners can be found at <http://www.mnwcd.org/emwrep-partners/>.

Consistent with MN Rule 8410, each municipality within SWWD is required to maintain a local water management plan and local controls (i.e. ordinances) that are in conformance with SWWD's Watershed Management Plan and Rules. SWWD relies on this legal partnership to satisfy some requirements of MCMs 4 and 5. All stormwater entering SWWD's MS4 originates from and is delivered by Municipal MS4s.

III. Regulatory Mechanisms

Standards

District Standards are based upon critical studies and plans completed by the District or others which provide a framework for managing the resources in the District. SWWD established District standards in its 2007 Watershed Management Plan (WMP) and routinely amends those standards through the use of guidance documents as described section 6.2 of the WMP. District standards can be found at <http://www.swwdmn.org/about-swwd/watershed-plan/>.

The SWWD Standards Manual is an outgrowth of the WMP and provides additional detail on District expectations. The two primary purposes of the Standards Manual are to (1) address and establish consistency in water quality and quantity modeling approaches, and to (2) provide

guidance on means and methods for achieving District standards. The Standards Manual can be found at <http://www.swwdmn.org/links/information-for-developers/>.

Rules

SWWD has adopted rules as required by Minnesota Statute 103D.341 to accomplish the purposes in Chapter 103D, implement the powers of the managers, and the policies of the District as contained in its WMP. Those purposes include coordinating SWWD activities with other governmental agencies, ensuring that water and natural resources are considered, protected, and preserved within the District, ensuring that future regional water management needs are considered in the development of individual subdivisions, developments, and local water management plans (LWMP), and to protect the public health, safety, and welfare. District Rules can be found at <http://www.swwdmn.org/links/information-for-developers/>.

Permits

Consistent with MN Rule 8410, each municipality within SWWD is required to maintain a local water management plan (LWMP) and local controls (i.e. ordinances) that are in conformance with SWWD's Watershed Management Plan and Rules. It is the policy of SWWD to limit duplication of effort and minimize the expense incurred by SWWD, municipalities, and applicants. Generally, SWWD review and permitting will not be required for projects in Municipalities where a SWWD approved Municipal LWMP is adopted and controls are up to date. In those Municipalities, compliance with SWWD Rules is assured upon issuance of the appropriate Municipal permit. Municipalities are responsible for maintaining all supporting documentation necessary to demonstrate compliance with SWWD Rules.

Projects will be subject to SWWD review and permitting when required under the Municipal LWMP, when the applicant is seeking a variance to LMWP requirements, when a new connection to the District's MS4 is proposed, or when the SWWD Board of Managers deems a permit necessary. SWWD maintains all supporting documentation necessary to demonstrate compliance with SWWD Rules for projects subject to SWWD permitting.

IV. Enforcement Response Procedures

SWWD works together with Municipalities within the District to handle reports of stormwater noncompliance. When a violation is discovered, the District will refer the violation to the appropriate Municipality for enforcement under Municipal permits or, if necessary, City ordinance.

Violations stemming from active projects permitted directly by SWWD will be addressed through its permit. Should a permittee fail to rectify violations, SWWD will issue a Stop Work Order until permit conditions are met.

V. Storm Sewer System Map and Inventory

SWWD's MS4 is still in development. Once complete, the system will consist of a series of regional infiltration basins and related infrastructure necessary to connect the basins and provide a controlled overflow for large (< 1% return frequency) precipitation events. This system will serve to retain and infiltrate runoff from most of Woodbury and smaller portions of Oakdale,

Lake Elmo, and Cottage Grove. The Districts MS4 does not currently contain any operational outfalls which will be added as the system is completed by 2020. A map and inventory of SWWD's system, both existing and planned, can be found on SWWD's web viewer at <http://map.swwdmn.org/>.

VI. Control Measures

1. Public Education and Outreach

Website

The South Washington Watershed District (SWWD) has created a website that will be used to distribute various educational materials. The educational materials will pertain to the stormwater impacts and methods of runoff prevention. Additionally, the District Rules, Stormwater Pollution Prevention Plan, and Watershed Management Plan (WMP) will always be available for viewing on the website. The website is located at www.swwdmn.org.

EMWREP

SWWD is a founding member of the East Metro Water Resources Education Program (EMWREP). The purpose of the program is to provide education about the impacts of non-point source pollution on local lakes, rivers, streams, wetlands, and groundwater resources and to engage people and communities in projects that will help to protect and improve water quality in the region. The EMWREP Education Specialist serves as the primary point of contact for water resource educational efforts Countywide.

The EMWREP partnership provides SWWD a person dedicated to education in the watershed and County, which the District could not currently support on its own. SWWD relies on EMWREP to meet its public outreach and educational MS4 permit requirements. Not only does EMWREP serve to meet those requirements within the District, but also to gain economy of scale on a broader, countywide, basis. Annual EMWREP work plans and additional information about EMWREP and its efforts can be found at <http://www.mnwcd.org/emwrep/>.

2. Public Participation and Involvement

Annual Meeting

Before the annual report is sent to the Commissioner, the District will solicit public input and opinion in regards to the SWPPP at an annual meeting, held in May of each year. Interested persons will be provided with a reasonable opportunity to make oral statements concerning the SWPPP. The District will request that speakers with similar views select a spokesperson and that no speaker exceeds five minutes. Written input may be submitted at the meeting or to the office of the District. The District will provide proper public notice before the annual meeting that addresses the SWPPP. This will involve the following:

- Providing notice of the meeting 30 days in advance. The notice will be published in the local newspapers (The South Washington Bulletin and the Woodbury Bulletin), and on the [SWWD website](#).
- The notice will provide the date, time, location, and agenda of the meeting
- The notice will also state the location of the SWPPP

Before submitting the annual report, the District will review all relevant and timely oral and written comments from the public. All appropriate revisions to the SWPPP will be made based on the public input.

3. Illicit Discharge Detection and Elimination

Rules

SWWD Rule 11 regulates connections to the SWWD MS4 and prohibits illicit discharges. The Rule also outlines SWWD's enforcement measures available to the District to compel compliance with District Rules—namely, suspension of discharge access to SWWD's MS4. District Rules are available online at <http://www.swwdmn.org/links/information-for-developers/>.

Inspections

SWWD Staff routinely inspects facilities while on site. SWWD's MS4 is designed to serve regional development at full build out. Currently, there is limited need for SWWD's MS4 and use is primarily limited to infiltration of local runoff from parcels adjacent to SWWD's facilities and regional runoff resulting from low frequency precipitation/snowmelt events. Therefore, SWWD facilities are expected to be dry except for select areas during the 48 hours immediately following a precipitation event. With that exception, any standing water within SWWD facilities under current build out conditions would indicate an illicit discharge. Inspections are documented and reported in SWWD's annual MS4 report.

Training

All runoff entering SWWD's MS4 originates from other regulated Municipal MS4s with their own Illicit Discharge Detection and Elimination education requirements. As such, SWWD views its role primarily as support for those Municipal programs. That support is provided through EMWREP which offers a variety of training opportunities for Municipal staff and makes training materials available to Municipal staff to conduct their own training. Specific training goals are established annually as part of the EMWREP work plan. Additional information is available at <http://www.mnwcd.org/emwrep/>.

4. Construction Site Stormwater Runoff Control

Rules

SWWD Rule 1 describes the District's development review applicability, process, and required submittals.

SWWD Rule 2 governs Erosion and Sediment Control in the District. The Rule specifically references the current NPDES Phase II General Permit for construction activity as the minimum requirements. Primary enforcement responsibility lies with Municipalities within the District. SWWD Rules can be found at <http://www.swwdmn.org/links/information-for-developers/>.

Inspections

SWWD (Rule 2) and State rules (e.g. Municipal MS4 permits) require Municipalities in the District to enact a sediment and erosion control ordinance and perform inspections as required by State and Federal laws. Because Municipalities in the District are already required to inspect construction sites for erosion and sediment control compliance, SWWD views its role primarily as support for those Municipalities. In such a role, the District generally conducts up to 4 inspections annually at active sites to ensure Municipal activities are adequate. When non-

complaint sites are identified, SWWD documents the violations and works with applicable Municipal staff to address the site. Any complaint or notice of violation received by the District triggers a SWWD inspection.

Education

Inspections and Construction Site Runoff Control is primarily the role of Municipalities within the District which are the primary permitting authorities. Working through EMWREP, SWWD supports Municipal staff by sponsoring workshops through UMN Extension and Minnesota Erosion Control Association or helps to subsidize their attendance at such training events.

5. Post-construction Stormwater Management

Rules

SWWD Rule 7 establishes stormwater management and water quality requirements, including stormwater runoff rate, volume, total phosphorus, and total suspended solids. Additionally, the Rule sets out steps for alternative compliance sequencing on sites where infiltration is not advised. SWWD Rules can be found at <http://www.swwdmn.org/links/information-for-developers/>.

Standards

The SWWD Standards Manual is an outgrowth of the WMP and provides additional detail on District expectations. The two primary purposes of the Standards Manual are to (1) address and establish consistency in water quality and quantity modeling approaches, and to (2) provide guidance on means and methods for achieving District standards, including BMP selection and design guidance. The Standards Manual can be found at <http://www.swwdmn.org/links/information-for-developers/>.

Inspections and Documentation

Primary responsibility for inspections and ongoing compliance post-construction lies with Municipalities within the District. Likewise, responsibility for tracking and documentation also lies with Municipalities in the District. SWWD does maintain a BMP database of projects funded in part by the District. Those BMPs are routinely inspected as part of a cooperative effort of the Washington County Water Consortium and maintained as needed and outlined in cost share agreements.

6. Pollution Prevention/Good Housekeeping

Training

SWWD does not own/operate facilities within the District outside of its MS4 which has limited coverage. Pollution prevention and Good Housekeeping is the responsibility of Municipalities in the District who do own/operate various facilities and maintain property, roadways, and right of way throughout the District. Working through EMWREP, SWWD supports Municipal operations by sponsoring workshops through UMN Extension and Minnesota Erosion Control Association or helps to subsidize their attendance at such training events. Additionally, EMWREP maintains a collection of training materials available to City Staff for internal training. Specific training goals are developed annually as part of the EMWREP work plan available at <http://www.mnwcd.org/emwrep/>.

Cost Share/CCIP

SWWD does not own/operate facilities outside of its limited MS4 which receives runoff from separate Municipal MS4s. Thus, SWWD focuses its efforts on supporting efforts of those Municipal MS4s. SWWD operates both a cost share and a coordinated capital improvement program (CCIP). Using cost share, SWWD encourages and subsidizes the cost of BMP installation throughout the District on both public and private land. Cost share program is performance based and the grant size is scaled based on total phosphorus removal benefit of the planned project. SWWD currently budgets approximately \$80,000 annually for cost share projects.

SWWD's CCIP program subsidizes the cost of maintaining existing BMPs or the construction of new BMPs into Municipal and County capital improvement projects. Examples of projects funded through CCIP to date include, ravine stabilization, pond maintenance, street sweeper, improved de-icing equipment, sand-iron filters, and water re-use systems. SWWD currently budgets \$500,000 annually for CCIP projects.

Restoration

SWWD's MS4 consists of a series of regional infiltration basins and related infrastructure connecting the basins. To improve and maintain the infiltration function of the basins, SWWD continues efforts to restore native prairie. To date, 75 acres has been restored and is now being maintained. An additional 25 acres will be restored by 2020.

VII. TMDLs

SWWD's MS4 does not discharge runoff to any impaired water with an applicable TMDL wasteload allocation.

VIII. Alum or Ferric Chloride Phosphorus Treatment Systems

The SWWD MS4 does not own or operate any Alum or Ferric Chloride Phosphorus Treatment Systems.