



**COON CREEK**  
WATERSHED DISTRICT

Annual Review of  
SWPPP  
Implementation

June 9, 2025



# SWPPP

## Storm Water Pollution Prevention Program



# Source and History

## Federal Clean Water Act

NPDES = National Pollutant Discharge Elimination System

2002 NPDES Phase II permit begins

February 2003: District notified by EPA via MPCA

because the public ditch system conveys stormwater,

1. CCWD is designated a special MS4 (Municipal Separate Storm Sewer System)

2. must develop and implement a Storm Water Pollution Prevention Program (SWPPP)



# Purpose

1. Reduce storm water discharges to the 'maximum extent practicable'
2. Protect water quality
3. Satisfy the water quality requirements of the Clean Water Act.



# Requirement

Develop 6 Minimum Control Measures  
(MCMs)



# Six Minimum Control Measures

1. Public Education and Outreach on Storm Water Impacts
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Runoff Control
5. Post-construction Storm Water Management
6. Pollution Prevention/Good Housekeeping for Municipal Operations



# MCM 1 Public Education and Outreach

**Requirement:** Implement public education or equivalent outreach activities on impacts of stormwater discharge & steps to reduce pollutants

Method	2022	2023	2024
Brochures and related materials	928	3,910	2,058
Newsletter approx #households via City partners -36 articles published	60,000	62,000	62,000
Direct Contacts at Stormwater-related Community Events	1428	1803	1221
School Projects & Presentations attendees	62	65	77
Swag (pens, rain gauges, stickers, poop bags)	792	878	1785
Education and Outreach Plan	X	X	X



# MCM 2 Public Involvement- Participation

**Requirement:** Comply with public notice requirements when implementing public involvement/participation program.

	2022	2023	2024
Annual Meeting Format	in Person	in person	In person
Attendees	0	0	0



# MCM 3 Illicit Discharge Detection & Elimination (IDDE)

**Requirement:** Develop, implement and enforce a program to detect and eliminate illicit discharges.

	2022	2023	2024
Number of Illicit Discharges	15	16	11
Discovered through	1 by Public complaint	6 by Public complaint	7 by Public complaint
	14 by Staff observation	10 by Staff observation	4 by Staff observation
Enforcement	Verbal warning Notice of Violation	Verbal warning Notice of Violation	Verbal warning Notice of Violation
Provide IDDE Training to Staff	Yes	Yes	Yes
Other requirements fulfilled: Mapping, enforcement manual, BMP Inventory	Yes	Yes	Yes



# MCM 4 Construction Site Runoff Control

**Requirement:** Develop, implement and enforce a program to reduce pollutants in any storm water runoff from construction activities that result in land disturbance greater than or equal to 1 acre.

	2022	2023	2024
Plan reviews conducted	205	159	111
Enforcement actions taken	15	9	38
Active Construction Sites	113	139	102
Number of inspections	499	462	738



# MCM 5 Post-construction Stormwater Management

**Requirement:** Have program to address runoff from > 1 acre development and control WQ impacts

	2022	2023	2024
Do District regulatory mechanisms & Standards meet approved standards	Yes	Yes	Yes
Does District use approved BMPs (Retention, detention, infiltration, MIDs)	Yes	Yes	Yes



# MCM 6 Pollution Prevention/Good Housekeeping for Municipal Operations

**Requirement:** Develop O&M program

	2022	2023	2024
Structural BMPs, outfalls, ponds, within MS4	272	275	278
BMPs, outfalls, ponds Inspected	106	68	97
Own storage and material handling areas	Yes	Yes	Yes
Inspections	Yes	Yes	Yes



# TMDL Compliance

**Requirement:** Report progress on TMDL implementation

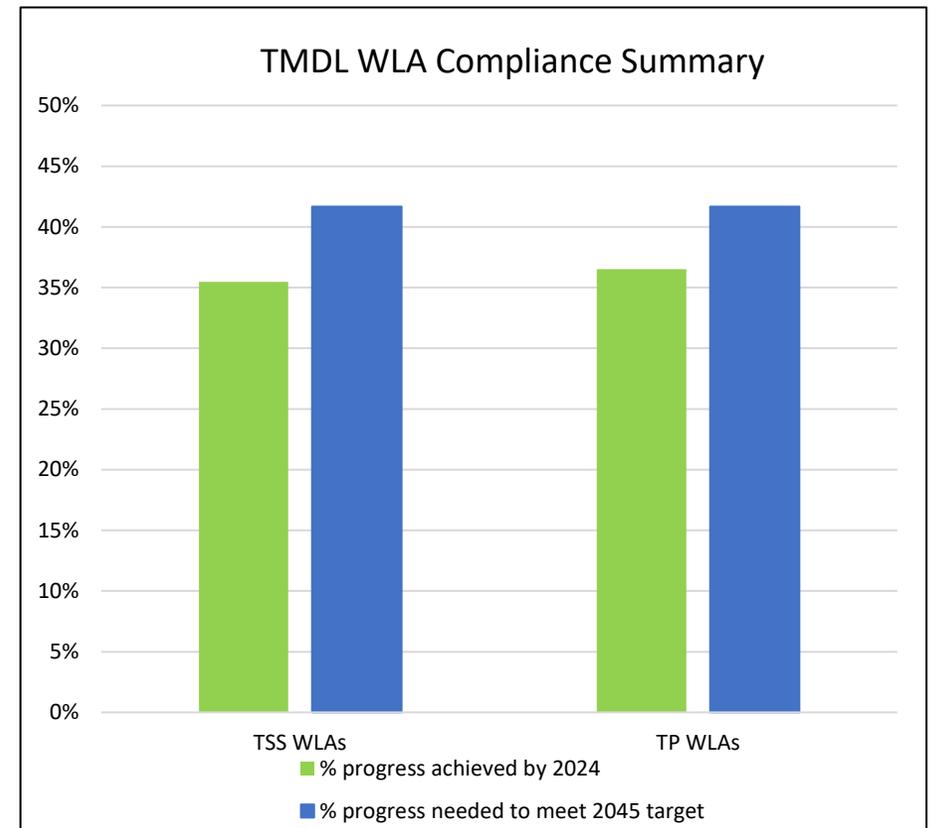
2016: Total Daily Maximum Load (TMDL) study for Aquatic Life and Recreation completed and approved by EPA establishing required Wasteload Allocations (WLAs) for Total Suspended Solids (TSS), Total Phosphorus (TP), and *E. coli*



# TMDL Compliance

**Requirement:** Report progress on TMDL implementation

	2022	2023	2024
TSS WLAs cumulative reductions achieved (tons/yr)	57	57	79
TP WLAs cumulative reductions achieved (lbs/yr)	1564	1606	1606
Does the District have a bacteria source inventory and reduction plan?	Yes		



# RECOMMENDATION

Receive comments from the public.

