COON CREEK WATERSHED DISTRICT
Request for Board Action

MEETING DATE:       June 10, 2013
AGENDA NUMBER:      15
ITEM:               Revisions to the 2012 MS4 Permit

POLICY IMPACT:       Discussion
FISCAL IMPACT:       Budgeted

REQUEST
Receive Report

BACKGROUND
As noted at the last Board meeting, the MPCA Board adopted the 2012 MS4 General Permit on May 21. Revisions to the 2012 MS4

ISSUES/CONCERNS
TMDL Waste Load Allocations:
A. Requirement Removed: Showing individual waste load allocations associated with each TMDL.
B. New Requirement: Show BMPs used in meeting milestones during term of reissued permit.
C. Note: Coon, Sand, Pleasure and Springbrook Creeks are currently impaired for Biota and Bacteria. The District is currently conducting a Watershed Assessment and Restoration Plan for the watershed which will develop a TMDL for these parameters. Load Allocations are currently scheduled to be completed by August, 2014

Enforcement Response Procedures for Implementing MS4 Permit Requirements:
Note: The District already has Policies and procedures on both permit review and enforcement

MCM 1: Public Education & Outreach:
A. Requirement removed: Identifying three high priority issues.
B. New Requirement: Permit now allows the District to select stormwater related issues important to the District.
C. Note: Three initial issues identified in the Comprehensive Plan would be:
   1. Aquatic Invasive Species
   2. Changes in Precipitation
   3. Effects of Changes in groundwater on groundwater dependent resources (or infiltration and water harvesting)
MCM 3: Illicit Discharge Detection and Elimination (IDDE):
   A. Requirement removed: Development of a Standard Operating Procedure (SOP) for illicit discharge inspections, tracking and identifying priority areas has been removed.
   B. Required: Existing requirements for knowing, inspecting and reporting illicit discharges remain.
   C. Note: MPCA asserts that having procedures are necessary for an effective program.

MCM 5: Post Construction Stormwater Management:
   A. New: Flexibility has been added to allow the District to mitigate for discharges of TSS and TP within the watershed (Bank) when the site cannot meet the standard.
   B. Note: The de facto result is that applicants within 1 mile of an impaired water must meet the non-degradation requirements. The in turn means that applicants will need to model the site for water quality pre and post development much as they do for stormwater. Water quality parameters will be phosphorus (TP), suspended solids (TSS) and volume. Once a TMDL is completed, water quality modeling will also need to address loadings.

MCM 6: Pollution Prevention (P2) for Operations that May Impact Source Water Protection Areas:
   A. Note: Not new. The District has conducted a preliminary assessment of this condition and has scheduled a special area management plan for 2014-15 to address these situation specifically (nature of risk – pollutant I.D., Degree of risk to water supplies, BMP options and needs).

MCM 6: Pond Assessment Procedures and Schedule:
   A. Requirement removed: Prescriptive language has been removed.
   B. Required: District can determine how to develop pond assessment procedure and schedule.
   C. Note: District can determine method for determining effectiveness of ponds in treating TP and TSS and the schedule for conducting pond assessments.

MCM 6: Pollution Prevention (P2) for Operations and Maintenance of BMPs:
   A. Requirement removed: Requirement for SOP for BMPs has been removed.
   B. Required: District may continue to determine needs based on inspection findings and criticality of stormwater infrastructure.

Approved TMDLs with Applicable Waste Load Allocations:
   A. Requirement removed: Need to connect all actions and activities with pollutants of concern and BMPs has been removed.
   B. Required: A list of BMPs used for achieving pollutant reductions associated with TMDL Waste Load Allocations.
   C. Note: Waste Load Allocations (or equivalent) and associated BMPs are an outcome of the WRAPP.
### Application Submittal Schedule:

<table>
<thead>
<tr>
<th>City</th>
<th>Group</th>
<th>Date Due</th>
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<tbody>
<tr>
<td>Andover</td>
<td>1</td>
<td>30-Oct</td>
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<tr>
<td>Anoka Ramsey CC</td>
<td>2</td>
<td>29-Nov</td>
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<td>Coon Creek WD</td>
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<td>Anoka County</td>
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<tr>
<td>Spring Lake Park</td>
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### OPTIONS

**RECOMMENDATION**

Review
Discuss
Receive