

**COON CREEK WATERSHED DISTRICT**  
**Request for Board Action**

**MEETING DATE:** October 26, 2026  
**AGENDA NUMBER:** 11  
**ITEM:** MS4 General Permit Reissuance Update

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**AGENDA:** Discussion

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**REQUEST**

Discuss the proposed MS4 General Permit and anticipated District impacts.

**BACKGROUND**

The Minnesota Pollution Control Agency (MPCA) is in the process of reissuing the statewide Municipal Separate Storm Sewer System (MS4) General Permit. CCWD is regulated as a nontraditional MS4 because of its operation of stormwater conveyance and drainage systems.

In November 2020, MPCA issued the current MS4 General Permit which expired November 15, 2025 but remains in effect until the replacement permit is issued.

In early 2026, MPCA circulated an early draft replacement permit for stakeholder review. On February 9, 2026, the Board authorized CCWD to submit comments following review and coordination by District staff, the Technical Advisory Committee, the countywide MS4 taskforce, and MPCA permit staff.

On October 19, 2026, MPCA released the [proposed Municipal Separate Storm Sewer System General Permit](#) for formal public comment through November 19, 2026.

On October 28, 2026, MPCA will host a webinar on the proposed permit. District staff are reviewing the proposed permit and will participate in the webinar.

MPCA is currently targeting summer 2027 for reissuance of the new permit.

**ISSUES/CONCERNS**

**District Comments:** CCWD submitted comments on the early draft permit. Several comments were addressed or clarified in the proposed permit.

**Water Quality Model:** One of the District's comments was to recognize the water quality modeling software Soil and Water Assessment Tool (SWAT), which we used for the districtwide water quality model, as an approved method for estimating pollutant reductions. The proposed permit now expressly identifies SWAT as an approved method. This provides stronger regulatory support for using the modeling work in future TMDL and MS4 compliance activities.

**Unresolved Comments:** Some District comments remain unresolved in the proposed permit, including public education documentation requirements and review of construction contractor self-inspection records.

**District Impacts:** Preliminary review indicates the primary effects on the District will likely involve additional staff time, documentation, inspections, coordination, and compliance administration. Potential areas include public education documentation, illicit discharge inspections, construction inspection and complaint response procedures, PFAS pesticide documentation, TMDL BMP inventories and pollutant reduction documentation, and updates to the District's Stormwater Pollution Prevention Program (SWPPP).

**Implementation:** Existing permittees would be required to submit an updated SWPPP application within 150 days after final permit issuance.

**Public Comment:** The proposed permit remains open for public comment through November 19, 2026. Staff will continue reviewing the permit and participate in MPCA's October 28 webinar before the comment period closes.

## **RECOMMENDATION**

None